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**From:**  
**Sent:** 06 November 2020 13:45  
**To:** Local Development Plan  
**Cc:**  
**Subject:** LDP (LDP2032) Natural Environment  
**Attachments:** The Derry Local Development Plan.docx21.10.20.docx; Trees.docx 30.9.20.docx; LOCAL DEV PLAN MEETING.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

RE Consultation on the Local development Plan (LDP 2032)

For the attention of the Local Development Plan Team

Reference our letter entitled: The Derry Local Development Plan, the Council, The Planners and our precious Natural Environment.

As you will see from the attached letter our concerns are very much about the soundness and effectiveness of the "new" proposed plan, particularly with the section on the Natural Environment (Section 21). It goes without saying that our precious natural environment needs the utmost protection and therefore the LDP protection policies must be properly enshrined in law. We are not convinced at the present time that this is the case. Do give this concern your very serious consideration.

Kind regards

Ps

Also attaching for your info: Trees, Woodland, and Clean air Document plus original LDP questions document.

**The Derry Local Development Plan, the Council, the Planners  
and our  
Precious Natural Environment**

What seems a very long time ago, possibly over three years, we submitted a list of very genuine questions about the new Local Development Plan. In light of the fact that this Plan would cost a massive amount of money to produce, we reckoned that in the knowledge that the previous/current plan had many weaknesses these questions were well and truly justified. The weaknesses contained in the 2011 plan which were flouted by certain beneficiaries and also by planning consultants rendered it massively ineffective and very bad value for money.

We subsequently submitted the list of LDP questions to various people in Council and Planning, but no answers were forthcoming. We also raised questions at LDP info meetings, the few answers that we received at these meetings only confirmed our concerns that the development and production of this new plan would be no better than the previous plan, in other words, an unwarranted waste of many thousands if not millions of pounds of public money. A plan of this expense and importance to the well-being of our community and our environment must be totally sound and water-tight in order to avoid reckless abuse of any possible weaknesses.

As a result of some of our comments that were made at an LDP/PAC meeting in the Derry Guildhall in Jan. 2020 we received a letter from [redacted] which, to us, seemed to indicate that no one in Council had knowledge of our LDP questions document. On receiving this letter [redacted] did a time consuming detailed diary and email search for info relating to the submission of these LDP documents which proved that the questions document was in the possession of a number of council employees. The result of the search was sent to [redacted] and he subsequently sent me a very civil letter indicating that yes our LDP docs did exist. We appreciated this clarification but we still felt somewhat troubled about the amount of time that was spent proving the existence of the said docs. A little apology might have been nice but we know that apologies received from council in the past have been quite meaningless.

In his letter of the 11.6.20 [redacted] refers to the Natural Environment Policies contained in the new LDP. We do realise that special mention is given to the protection of ancient woodland but again there was special mention of this sort of protection in the old plan but these policies were conveniently set aside when we were faced with intrusive development we also even experienced changes being made to the area plan. This is exactly why we are asking for guarantees that the new environmental plan policies and laws will be complied with when destructive development is proposed. The new LDP plan document does contain quite a wordy section on the environment but we do notice caveats that will certainly be taken advantage of by those who have very little regard for the Natural Environment. If laws are too loose or basically flawed then we may as well have no laws.

Unfortunately we are living in a world where totally incomprehensible decisions are being made by our council final decision makers. Evidence of this situation exists in the very recent past where those in council who are completely indifferent to environmental protection have been making decisions that were contrary to the recommendations of our professional planners. How is it that these untrained individuals can or should be able to make decisions that are based on some unknown uneducated poorly informed opinions? Some people will say that this is democracy at work but unfortunately democracy can have a dark side.

If Local Council Decision makers are inclined to oppose the professional planners then there should or must be the involvement of an independent referee to decide who is correct. Should the Council legal team not also have a role to play here? Why employ professional planners if their opinion is not respected?

Why employ a trees and woodlands officer, a climate change officer, a biodiversity officer if they are not involved in decision making regarding planning applications that are detrimental to the natural environment? Is this another council waste of money? According to internationally well respected conservationists, trees are vitally important to our well-being and even small groupings of trees as well as ancient woodlands must be preserved. After all our council is a climate emergency council. One highly respected international conservationist commented that if planning decisions regarding local woodlands were copied and repeated throughout NI, then there is no hope for any of our woodlands.

We know that poor decisions have been made in the past where incorrect practices and procedures were followed resulting in incorrect planning decisions being made and unfairly were never corrected. It is well known that many questions are raised about the planning system. Survey after survey and report after report has been engaged in regarding the workings of the planning system and each one raises scores of questions and issues highlighting the concerns about the ethics and appropriateness of the activities and procedures within the organisation/system. It is very often said (even by planners) that the problems are systemic but who causes systemic problems and who allows the problems to continue. With all that has been said and promised, things never get any better. It would seem that as far as Environmental Protection is concerned the planning system is useless. Derry City and Strabane District Council, some time ago, appointed a Head of Planning Performance and Improvement, this seemed to be a recognition that things needed "tightening up". It was hoped that this person in the role of "Change Master" would make his presence felt regarding the much needed improvements in the planning/council system but so far, nothing seems to have changed. It is unlikely that any worthwhile changes will happen under the present regime. Past experience tells us that the soundly based concerns of those who really care for the environment and the common good of the community will be given no real weight or even cast aside in favour of questionable "Economic Development". Do these people not recognise that the natural environment has an important economic and health based social dimension and that concerned citizens under the Aarhus Agreement must be treated with respect and dignity?

It is very sad that a letter of this sort has to be written but we feel that it is only right that these issues have to be highlighted. We have no wish to be vindictive or unkind to anyone but over the years we have been put through the mill by our council, the planners and others (sound submissions disregarded and information withheld) who should be providing stewardship for the environment and our community. suggests that if we feel aggrieved we should go to the courts. This is not possible for persons of our limited means and if our public representatives were doing their job we would not be put in this situation.

As community volunteers who give our time for the betterment of our City and district. It would be a shame if this well-meaning letter is not given the consideration, weight and respect that it deserves. Our faith in our reps and decision makers is very badly shaken but we can only hope for the real change that is needed to ensure us and others the fair share of natural justice to which we are entitled

## **TREES, WOODLANDS AND CLEAN AIR**

To whom it may concern, and this is everyone in our local and wider community, including our decision makers with responsibility for the current health and future well-being of everyone.

It is thought to be well known that trees play an important part in creating a clean and healthy environment for the well-being of all life on earth. I say "it is thought to be well known" but not everyone especially our decision makers recognises the importance of trees and our general well-being.

It is true that "every tree and every leaf of every tree is important to the health and well-being of everyone in our community".

Trees provide the oxygen of life which they do through the process known as photo syntheses. This in turn removes the many toxins in the atmosphere created by the wide range of pollutants caused by the burning of fossil fuels, fuels that we use every day when we drive our cars, heat our homes, wash our clothes, watch TV and engage in the many other activities of everyday living.

Certain changes are happening with the regard to how cars and machinery etc. are being powered i.e. hybrid and electric cars reducing the amount of diesel being used. These vehicles do not always fulfil the promises as to how beneficial they are in creating a better air quality. A remaining problem here re clean air is the number of homes which are still being heated by different types of oils. Take a walk in any urban area in an Autumn/Winter evening and you will be aware of the foul air created by poor quality heating fuels and the lack of proper servicing of heating boilers. Surely this is an area of fuel use that needs closer monitoring.

There will always be a certain level of pollution in the atmosphere therefore we need to retain and invest in effective ways of combatting pollution and one the most effective means of doing this is to protect our existing trees and woodlands and plant massive numbers of trees in the urban, sub urban and countryside areas.

Trees filter the pollutants and the dirt in the air that is all around us.

Trees create clean air.

Trees have a healing effect.

Trees save lives

Trees combat climate change.

Trees conserve energy.

There is a relationship between trees, the natural environment and good health. (Stress reduction etc.)

Trees create health care savings.

Trees are an important part of our economy.

The closer you are to trees the healthier you are.

Trees help people live longer, healthier, happier lives.

Unfortunately, in Northern Ireland we have the least wooded area in the UK and also one of the least wooded areas in Europe. Overall in NI we only have approximately 6% tree cover and native woodland only represents 2% whilst ancient woodland has been reduced to 0.04%. The worrying situation is that due to certain types of development we are still continuing to lose precious areas of woodland and important environmentally sensitive sites. For some incomprehensible reason our authorities are massively indifferent to the need for tree and woodland protection. There are local and NI wide examples of uncaring unprofessional decisions being made which are detrimental to the required achievement of a healthy environment for the general population. We do have some tree planting programmes but nothing of the sort that is really needed in order to achieve the level of air quality required for a really healthy lifestyle. Whilst tree planting projects are very welcome they do very little to make up for the constant loss of essential tree habitat. In this time of climate change every tree should be protected, even the loss of the smallest groupings of trees can have a global effect.

Many TV programmes and publications are constantly positively commenting upon the health and mental well-being benefits of the great outdoors especially the effects of being immersed in very calming woodland settings. However this message is not getting through to our decision makers especially in our local council area where development is prioritised over the need for environmental protection. One of our Derry newspapers recently reported that one of our top Govt. Ministries was allowing things to go completely in the wrong direction, where current Govt. policy is proving to be destructive to nature and the environment.

We need a more positive attitude from those in power towards the protection of trees and our natural environment, please, please save our trees and allow Mother Earth to provide a healthy clean environment for all our citizens.

Nature's Keepers International

References:

IFL Science

Woodland Trust

Derry Journal

The Atlantic Monthly

Dept. of Agriculture and Rural Affairs

National Library of Medicine

Portland University Stats

The Tree People

Laudato S'i

BBC presenter publications ---

LOCAL DEV PLAN MEETING

St. COLUMBS PARK HOUSE

WHAT IS THE PURPOSE OF THE LOCAL DEVELOPMENT PLAN?

WHO WILL THE PLAN SERVE?

WHO WILL BENEFIT FROM THE PLAN?

WHO WILL PREPARE AND PRODUCE THE PLAN?

WHY IS IT CALLED A DEVELOPMENT PLAN?

WILL THE PLAN BE PRO DEVELOPMENT?

HOW MUCH WILL THE PLAN COST?

WHO WILL PAY FOR THE PLAN?

WILL THE PLAN BE VALUE FOR MONEY?

WILL THE PLAN HAVE LEGAL STATUS?

WILL THE PLAN BE A STATUTORY DOCUMENT WHICH IS ENSHRINED IN LAW?

WILL THERE BE SERIOUS ENVIRONMENTAL PROTECTION MEASURES CONTAINED IN THE PLAN?

WILL IT BE A DOCUMENT WITH REAL TEETH?

CAN THE PLAN BE ALTERED OR CHANGED TO ACCOMMODATE A PARTICULAR DEVELOPMENT?

WHAT HAPPENS IF THE PLAN IS NOT COMPLIED WITH?

WHO ENFORCES THE LAW WITH REGARD TO THE PLAN REQUIREMENTS?

WILL THERE BE REALISTIC PENALTIES FOR THOSE WHO IGNORE THE PLAN REGULATIONS?

WILL IT BE A CRIMINAL OFFENCE TO BREAK THE PLANNING LAWS CONTAINED IN THE PLAN?

WILL THE PLAN BE OPEN TO THE PERSONAL INTERPRETATION OF CERTAIN INDIVIDUALS?