

Derry City & Strabane

Comhairle Chathair Dhoire & Cheantar an tSratha Báin

Derry Cittie & Stràbane Destrick Cooncil

Derry City & Strabane District Council

LOCAL **DEVELOPMENT PLAN** (LDP) 2032

PREFERRED OPTIONS PAPER (POP)

INTERIM REPRESENTATIONS REPORT

NOVEMBER 2017







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1.0 Introduction

1.1 The Local Development Plan (LDP)

The purpose of the Local Development Plan (LDP) is to inform the general public, statutory authorities, developers and other interested parties of the policy framework and land use proposals that will guide development decisions within the District. The LDP is expected to apply regional policies at the appropriate local level and it will set out a clear vision of how the District should look in the future, by indicating what type and scale of development should be encouraged and where it should be located. The Plan's land-use zonings, designations and Planning policies will ensure that lands are sustainably zoned, development is managed and that infrastructure is co-ordinated to develop the District for future generations.

1.2 When adopted, the Council's LDP for the District will replace the current Derry Area Plan 2011 (adopted May 2000) and the Strabane Area Plan 2001 (adopted April 1991), both of which were produced by the Department of the Environment (DOE). The new LDP will also replace most existing regional planning policies. The LDP will comprise of two development plan documents:

- The Plan Strategy (PS); and
- ► The Local Policies Plan (LPP)

Our LDP is being prepared within the context of the Council's Community Plan (the Strategic Growth Plan, SGP) and the wider policy hierarchy and context operating at international, national and regional levels. In addition, there are various other iterative assessments and appraisals that are required to be undertaken. The required adherence to these will be tested at the LDP's future Independent Examinations to ensure 'soundness'.

1.3 Public participation and engagement in formulating the LDP and progress through to adoption is facilitated through a Statement of Community Involvement (SCI) and Timetable (under review), which have been agreed between the Council and the Department for

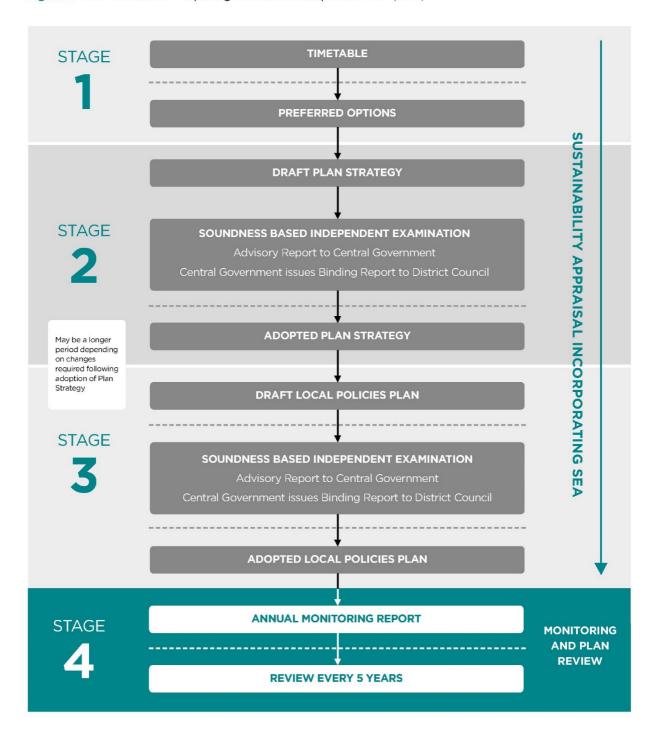


Infrastructure (DfI). See http://www.derrystrabane.com/Subsites/LDP/Local-Development-Plan. Additional engagement was enabled through Council's participation in the EU funded IMPROVE project. Details on this project can be found in Section 4 – paragraph 4.6.

- **1.4** The Plan Strategy will be prepared first and subjected to public consultation and Independent Examination before adoption. After the Plan Strategy has been adopted, the Local Policies Plan will be prepared and also subjected to public consultation and Independent Examination before adoption.
- **1.5** In summary, the LDP for Derry City and Strabane District will fulfil the following functions:
 - provide a 15-year plan framework to support the economic and social needs of the
 District in line with regional strategies and policies, while providing for the delivery of
 sustainable development;
 - facilitate sustainable growth by co-ordinating public and private investment to encourage development where it can be of most benefit to the well-being of the community;
 - allocate sufficient land to meet society's needs;
 - provide an opportunity for all stakeholders, including the public, to have a say about where and how development within their local area should take place;
 - provide a 'plan-led' framework for rational and consistent decision-making by the public, private and community sectors and those affected by development proposals;
 and
 - deliver the spatial aspects of the Council's recent Community Plan the Strategic
 Growth Plan for Derry City and Strabane District (SGP).



Figure 1: The Process for Preparing a Local Development Plan (LDP)





1.6 The Interim Representations Report following publication of the Preferred Options Paper (POP).

1.7 Derry City and Strabane District Council published the Preferred Options Paper (POP) on 31st May 2017 and held a 12 week consultation period over summer 2017. This time scale is in line with Regulation 11(3) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, which states that the consultation period 'must be a period of not less than 8 weeks or more than 12 weeks'. 127 representations were received during the consultation period. The POP was the first formal consultation stage and an important step in the preparation of the Council's LDP for Derry City and Strabane District (see Figure 1). The POP provided the basis for consulting with the public and stakeholders on a series of options for dealing with key issues in the Plan area. It set out the Council's initial proposals and policy direction, aiming to stimulate public comment and help interested parties to become involved in a more meaningful way at this earliest stage of Plan preparation. The POP did not cover every aspect, issue and policy that will be included in the LDP but instead, it sought to identify and address the main Planning issues that will make up the LDP.

1.8 This Representations Report will help to facilitate compliance with Regulation 11(4) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 which requires a council to take account of any representations made on the POP before it prepares the LDP Plan Strategy. This Interim POP Representation Report has been prepared to provide Elected Members, the community and all those who provided representations with a summary of the key issues raised in response to the Council's LDP Preferred Options Paper. Effective community and stakeholder engagement also strengthens the evidence base and enhances the 'soundness' of the LDP.

1.9 In line with our published Statement of Community Involvement, a final public Representations Report will be presented and published in due course (at the time of the Plan Strategy and then at the Local Policies Plan) to advise how the Council has taken the representations into account in the preparation of the Derry City and Strabane District LDP.

Depending upon the issues which need to be considered, the Council will undertake further clarification meetings and engagement with relevant consultation bodies to inform the preparation of its Plan Strategy.

1.10 A number of key documents were produced and published in tandem with the Preferred Options Paper, in particular a Sustainability Appraisal (SA), which incorporates the legislatively required Strategic Environmental Assessment (SEA). A Habitats Regulations Assessment and initial baseline and assessment reports on Equality Impact Assessment (EQIA) and Rural Proofing were also published.







2.0 Purpose of the Report

- **2.1** The purpose of the Interim POP Representation Report is to summarise the key issues arising from the public consultation exercise and is intended to inform both elected Members and the public at an early stage in the process about the comments on the Council's Preferred Options. Key stakeholders will be notified and it will also be sent to neighbouring Council's for information to inform them of any cross boundary issues.
- 2.2 In doing so, the report will assist the Council towards meeting its statutory obligation to take account of all representations made and demonstrate soundness. It will demonstrate that the points raised have been considered (interim or fully), summarised and accounted for and hence that the consultation has been a helpful and worthwhile exercise. Finally, this document will play an important role in supporting the development of subsequent stages of the Plan.







3.0 Consultation Process

3.1 The public consultation ran for 12 weeks from 31st May – 22nd August 2017 in accordance with the Planning (Local Development Plan) Regulations (Northern Ireland) 2015. The POP consultation and engagement took many forms in an effort to reach a wide audience. Methods of consultation included public engagement events, advertisements and web-based consultation. A varied approach to engagement was taken to ensure that the consultation was widely accessible. These are summarised below:

3.2 Consultation Launch Event

The Launch event took place on the 30 May 2017 in The Guildhall, Derry. This launch event was attended by the Mayor of the City and District, the Chair of the Planning Committee, other elected Members, Council Chief Executive, Directors, Head of Planning, statutory consultees, other council officials and representatives from adjoining council areas. This level of attendance demonstrated the widespread commitment to the LDP and the links to the Strategic Growth Plan.

3.3 Public Notice in Local Newspapers

In accordance with the Council's Statement of Community Involvement and the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Preferred Options Paper Consultation was advertised, on 2 consecutive weeks, in the local media namely The Derry Journal, Londonderry Sentinel, Strabane Chronicle, Strabane Weekly News, Tyrone Constitution and Ulster Herald (see appendix for copy of advertisement).

3.4 Website

Derry City and Strabane District Council's (DCSDC) website featured a link to the Preferred Options Paper together with links to all other relevant documents. Screenshots from the Council's website can be found in the Appendix. Contact details for further information were also provided. A link to an online questionnaire was also made available on the Council's website, providing an easy and structured way for views to be submitted. Email and postal



submissions were also welcomed and details of both methods of submission were outlined on the LDP page of the website and within the POP document.

3.5 Social Media

Social media was also used to widely communicate the POP and encourage local people to consider feedback. The social media activity included Facebook, Twitter and Radio Foyle highlighting specific aspects of the POP.

3.6 Display Exhibitions

POP display exhibitions were set up at the Council's two main buildings, 98 Strand Road, Derry and Derry Road, Strabane. These displays made available hard copies of the POP, summary booklets along with all other relevant POP documentation including copies of the POP Evidence base papers, the EQIA document, Rural Proofing Document and the Sustainability Appraisal documents for reference purposes.

3.7 POP Document and Summary Booklets

Hard copies of the POP were also made available in public buildings Council-wide, Libraries, Leisure Centres, other NI Government Offices, Neighbourhood Renewal Organisations, Civic Offices, Cultural Venues, Health Centres, Shops and Restaurants in Derry, Strabane, Newtownstewart, Castlederg, Sion Mills, Claudy and Eglinton. Summary booklets were also designed and published to give a broad overview of the information within the POP in a shorter, simpler and easier to read format. For consistency and recognition, the summary booklets were of a similar branding to the original POP document.



3.8 Public Engagement Events

A series of 16 consultation events (as detailed across) were also held throughout the City and District during June 2017. These meetings were held during daytime and evening to encourage a wide participation, including carers, those with dependents and those in full time employment. Given the overlap of the Strategic Growth Plan there was an opportunity for joint consultation events with consistent and clear

Location	Evening Meeting (LDP and SGP - Strategic Growth Plan)	Daytime Workshop (focussed on LDP, as well as SGP)
Guildhall, Derry	Tuesday 6 th June, 7pm	Weds 7 th June, 2 - 4pm
Alley Theatre, Strabane	Weds 7 th June, 7pm	Friday 9 th June, 2 - 4pm
Magee, Great Hall	Tuesday 13 th June, 7pm	
The Glen Community Centre, Derry		Thurs 15 th June, 3pm - 5pm
Claudy Community Centre	Thurs 15 th June, 7pm	Friday 16 th June, 2 - 4pm
Derg Valley Leisure Centre, Castlederg	Monday 19 th June, 7pm	Tuesday 20 th June, 11.15am - 1pm
Amnity House, Donemana	Tuesday 20 th June, 7pm	Weds 21st June, 2 - 4pm
Skeoge House, Leafair, Derry	Thurs 22 nd June, 7pm	Friday 23 rd June, 2 - 4pm
St. Columbs Park House, Derry	Tuesday 27 th June, 7pm	Wednesday 28 th June 2 - 4pm

messages communicated. A summary of the issues raised is set out in the POP Summary List of Representations Report which accompanies this report.

3.9 Statutory Consultations

It is a statutory requirement under Regulation 9 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, that the Council consults a number of consultation bodies. The Council issued correspondence by email to all Statutory Consultees, as well as identified non-statutory bodies, including:

- Northern Ireland Government Departments
- Adjoining Councils
- Water or Sewerage Undertakers
- The Northern Ireland Housing Executive
- The Civil Aviation Authority
- Electronic Communications Code operators
- Electricity operators
- Gas operators
- Londonderry Port and Harbour Commissioners
- Invest NI
- Translink
- City of Derry Airport
- Belfast International Airport



Loughs Agency

3.10 Section 75

Section 75 of the Northern Ireland Act 1998 requires a public authority, in carrying

out its functions relating to Northern Ireland, to have due regard to the need to

promote equality of opportunity between:

• Persons of different religious belief, political opinion, racial group, age, marital

status or sexual orientation;

• Men and women generally;

• Persons with a disability and persons without; and

• Persons with dependants and persons without.

3.11 In addition, without prejudice to the above obligations, public authorities are

required to have regard to the desirability of promoting good relations between

persons of different religious belief, political opinion or race. The above Section 75

groups are important participants within the planning process and include people

who traditionally have been underrepresented or disadvantaged.

3.12 Section 75 groups were identified through the Council's database in order to

fulfil its statutory obligations and were sent a letter advising them of the Preferred

Options Paper and the importance of their contribution to the POP and how they

could respond. A list of those notified is attached in the Appendix. We will continue

to work with the Section 75 Groups as we begin to form proposals for the Plan

Strategy.

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4.0 Consultation Responses

4.1 Representations

In total there were 127 responses or 'representations' to the POP and these are broken down into the following tables:

Type of Respondee:

Origin of Response	Number of Responses
Statutory and Non Statutory Consultees	22
Elected Representatives	3
Organisations	22
Planning Agents / Individuals	75
Late Responses	5
Total	127

4.2 Nature of Response

Nature of Response	Number
Questionnaire	26
Letter or email	101

4.3 The following responses from Main Statutory and non-Statutory Consultees (Consultation Bodies) were received:

Name/Organisation
Brookfield Renewables
Causeway Coast and Glens Borough Council
City of Derry Airport
Department of Education
Department of Infrastructure



Department of Justice				
Fermanagh and Omagh District Council				
Forestry Service, DAERA				
Gaelectric				
Geological Survey NI/ Minerals, Department for Economy				
Historic Environment Division, Department for Communities				
The Historic Monuments Council – c/o Department for Communities				
Invest NI				
Londonderry Port and Harbour				
Loughs Agency				
Mid Ulster District Council				
Natural Environment Division, DAERA				
NI Water				
NIHE				
North West Development Office, Department for Communities				
Renewable Energy Systems (RES)				
SSE Electricity				

4.4 The following is the full List of the Representations received from Statutory Consultees, Elected Representatives, Planning Agents, Organisations and Members of the Public:

List of the Representations received from Statutory Consultees, Elected Representatives,				
Planning Agents, Organisations and Members of the Public				
ACA Architecture				
Aidan Devine				
Andrew Ryan TLT Solicitors on behalf Mr and Mrs Mullan				
AQB Architecture				
Barbara Curran				
Bart O'Donnell on behalf of Boomhall Estate				
Bond Architects				



Brendan Johns on behalf of Mr G Sayers
Brian O'Connor
Brookfield Renewables
Bryson Energy
Canavan Associates on behalf of R McLaughlin, L McLaughlin, N McKeague & S Morgan
Causeway Coast and Glens Borough Council
City of Derry Airport
Cllr Dan Kelly
Cllr David Ramsey
Colm Cavanagh
Colm Duffy
Connall Sweeney
Cycle Derry
Danny Rafferty
Darren Currie
David Dalzell
David Young
Dept. for Infrastructure
Eamon Caldwell
Eileen Walsh
Enagh Youth Forum
Fermanagh and Omagh District Council
Fintan Hughes
Fleming Mountstephen Planning on behalf of Henderson Group
Forestry Service, DAERA
Foyle Civic Trust
Foyleside Shopping Centre
Friends of the Derry Walls
Futurescape Planning
Gaelectric



Garvan O'Doherty Geological Survey NI/Minerals, Dept. for Economy **Gerald Roarty** Gerard Harkin Glen Development Initiative Glenmornan Community Association Historic Environment Division, Dept. for Communities The Historic Monuments Council – c/o Department for Communities Inaltus on behalf of Kennedy Retail Park, Strabane **Inaltus Planning Inner City Trust** Invest in the West Invest NI James Elliott/Niall McAteer Jane Grant Joe McLaughlin John Duffy John Toland JPE Planning on behalf of BW Homes and Construction Ltd and Braidwater Ltd Kevin McConnell Laura McCausland Lee Kennedy on behalf of McCormick Builders Ltd Lee Kennedy on behalf of Messers McGlinchy, McDuff and McDaid Londonderry YMCA Loughs Agency Maria Bonner Mark Foley Mark H Durkan MLA Mark Houston Design on behalf of Niall Devine, N&R Group Mary Casey



Mary Kerrigan Consulting **MBA Planning** MBA Planning on behalf of Riveridge Recyling Michael Donnelly Michael Savage Mid Ulster District Council MKA Planning on behalf of Kevin Watson MKA Planning on behalf of Mr and Mrs Paddy Cosgrove Myles Donnelly Natural Environment Division, DAERA NI Environmental Link NI Renewables Industry Group NI Water Nigel McGillian NIHE North West Development Office, Dept. for Communities Outer North Neighbourhood Partnership Padraigin Nímhaonaigh Paul McGarvey Paul McGarvey Architect on behalf of Diarmuid Gallagher Paul McGarvey Architect on behalf of James McDermott Paul McGarvey on behalf of several landowners Peninsula Group Peter McCarron **Prehen Historical Society QPANI** (Quarry Producers) Raymond Kee Renewable Energy Systems Retail NI **River Faughan Anglers**



Rock Architecture RSPB Seamus Canavan on behalf of DW Consulting Ltd Shauna Cathcart Slaughtmanus Conservation Group SSE Electricity Strategic Planning on behalf of John Black Strategic Planning on behalf of Londonderry Port and Harbour Commission Strategic Planning on behalf of Mr Black Strategic Planning on behalf of Mr Derek McFeely Strategic Planning on behalf of Mr Gerard Heaney Strategic Planning on behalf of Mr John Killen and Mr Clarke Killen Strategic Planning on behalf of Mr JP McGinnis **TC Town Planning Teresa Donnelly** The Wee Greenway Initiative Thomas McCallion Translink TSA Planning TSA Planning on behalf of Genova NW Ltd Turley Associates on behalf of Mr Gabriel Dolan Turley Associates on behalf of Consortium of Landowners Investors, Developers and Investors Turley Associates on behalf of Dalradian Gold Ltd Turley Associates on behalf of Hartlands Ltd Turley Associates on behalf of Heron Brothers Turley Associates on behalf of Magim Ltd Turley Associates on behalf of Mr Ernie Lusby Turley Associates on behalf of Mr John Burns



Turley Associates on behalf of parties with an interest in Bay Road

Woodland Trust

4.5 The Representations received have each been summarised into issues raised and all entered into a Representations database. A report listing all those summaries by representation has been prepared and will be published on the Council website along with this report. A summary of the issues raised at the LDP POP and Strategic Growth Plan Consultation Events held in June have also been presented with the Representations List report. A key feature of the LDP preparation system is that the consideration is to be 'issue-based' and accordingly, all representations have been sorted into the issues raised, rather than being considered by individual representation. These issues are presented in this Interim Report, sorted into the same structure/topic headings as were set out in the POP document i.e. by Vision and Objectives, then Spatial Strategy, then Economy topics, Social, Environmental etc. Therefore, all representations will be 'taken account of' in the LDP, being considered by Planning officials and elected Members of the Council at this stage, with this Interim report, and then with a Final Representation Consideration Report.



- 4.6 Derry City and Strabane District Council has been actively participating in a new programme of enhanced public consultation and involvement called 'IMPROVE'. This is an EU funded project by the Northern Periphery and Arctic 2014-2020 programme which aims to facilitate the public in helping the Council produce better public services in this District. The benefits apply when public participation is a two-way process where both the public and the Council can learn and gain benefit. Effective public participation allows the public's opinions to be identified and incorporated into decisions that ultimately affect them. As part of this citizen engagement and to make the LDP process more accessible to a wider audience a questionnaire was published on the LDP section of the Council's website. A series of questions about each preferred option was posed and there were comment boxes to provide an answer. This gave the public an opportunity to respond to any specific options of the POP without having to send in an email or letter in an easy and structured way. In total there were 26 responses received and these responses have been summarised in the Representations Summary List that accompanies this report and are incorporated in the issues presented in this paper.
- 4.7 A series of 16 consultation events were held across the City and District during June 2017. A summary of the issues raised will also be published along with the List of Representations Summary Report. These were held during daytime and evening to encourage a wide participation, including carers, those with dependents and those in full time employment. Many of the issues raised were followed up with a more detailed letter or questionnaire response from the participants and the issues raised will be taken into consideration as we go forward towards the Plan Strategy.





5.0 POP Representations, Consideration & Response

This section is laid out in an identical format to that used in the POP document. The issues raised by all the representations have been summarised and a brief consideration and broad approach for the LDP 'going forward' have been provided at the end of each topic. Council's preferred option, as set out in the POP, is shaded within each Topic table:

5.1. LDP VISION AND OBJECTIVES

General Issues Raised:

- While broad support has been shown for the vision and objectives, it is felt that consideration should be given to developing a bespoke LDP vision which draws upon the Community Plan and which is more locally distinct and land-orientated.
- The vision needs to demonstrate how the economic, social and environmental aspects can be integrated to further sustainable development.

Economic Objectives

(a) Creating Jobs and Promoting Prosperity

Issues Raised – Economic Objectives

- Classification of social, economic and environmental objectives are supported but rationale for classification is not always clear.
- The delivery of sections of the A5 and A6 may be inhibited by a number of potential constraints.
- Support for overarching economic objective of creating jobs and promoting prosperity.
- Support for objectives to maximise the economic corridor/A5 linkages and potential benefits for Strabane given its border location.



- The creation of 15,000 jobs is considered too ambitious. Conversely, support is shown for the creation of 18,000 jobs.
- Number of objectives should be reduced and made more concise and easier to monitor.
- Economic objectives must not limit the opportunities for the establishment, growth and expansion of rural businesses based in rural locations.
- Business 'Start-Ups' and 'Homeworking' are crucial in contributing to rural economies and policies need to be suitably tailored to support small-scale enterprise.
- Support for 'Knowledge Based' industries to be located close to the City Centre, Fort George and Ebrington.

Social Development Objectives

(b) Accommodating People and Facilitating Communities

Issues Raised – Social Development Objectives

- Focus needs to be on the City Centre as the Gateway for the North-West.
- Support for a local circular economy with local independents, walkable neighbourhoods, accessible in urban and rural areas as well as home working and selfemployment. Prioritise sustainable modes of transport, upgrade of rail line. Cross border, cross cultural, cross generational community building. Built heritage – unique walled core.
- Social development objectives should include the designation/zoning/provision of lands for housing in Strabane and smaller settlements.
- Mixed housing in accessible locations will assist regeneration plans. Larger housing schemes need to include community facilities such as retail, health shared amenities and leisure.
- The need to protect and consolidate the role of towns and villages is endorsed.
- The provision of local centres and services reduces the need to travel and promotes social engagement, particularly for the ageing members of society.



- Need to ensure that social development objective (iii) does not negatively impact on the Councils Vision for a district which provides 'equality of opportunity for all'.
- Need for physically integrated interconnected residential land.
- The provision of 12,000 new homes is considered too conservative.
- Housing needs to be focused on suitable sites that makes a meaningful contribution.
- The positive impact that transport choices can have upon people's health and wellbeing should be recognised.
- Council needs to develop an ambitious plan for low carbon urban areas which will deliver economic, environmental and health benefits.

Environment Objectives

(c) Enhancing the Environment, Creating Places and Improving Infrastructure

Issues Raised – Environment Objectives

- Broad agreement with points raised but states that where a flexible approach is taken to policy making then this would need to be 'robust' and 'grounded' by evidence.
- Environment should seek to achieve biodiversity, high quality architecture, urban design, conservation and landscape architecture, strengths of existing urban, heritage assets, natural heritage, interconnected physical environment, squares, parks, sustainable power, zero waste, maximisation of transport modes and reduce travel times.
- Built heritage contributes to growth and vitality through sympathetic restoration providing for a range of economic uses such as office / workspace provision.
- LDP needs to recognise that onshore wind energy development can meet climate change obligations under POP environmental objectives. It is a more cost effective and deliverable technology.
- Future development and growth of CODA should be considered in the LDP.
- LDP must recognise economic importance of tourism. Promote NW region as a destination for high quality investment with excellent air connectivity and high quality transport infrastructure.



- A more explicit stance needs to be taken in terms of the responsibilities towards the Sperrins Area of Outstanding Natural Beauty. Environment Objective (viii) fails to explicitly reference the AONB while explicitly referencing Derry City.
- The 'traditional approach' identified and promoted at 4.5 to advance the outlined objectives has failed to protect the district from windfarm blight.
- Perception that car ownership is being prioritised over public transport, cycling and walking.
- The Walled city continues to be dominated by surface car parking and private cars circulating within historic streets for these spaces.
- The commitment to protect and enhance the natural and built environment is supported and the Plan Strategy needs to afford the same level of protection to environmental assets, such as ancient woodland given its scarcity.
- The value of wooded areas needs to recognise the wider benefits and be reflected in future policy.
- There is a lack of community infrastructure at Skeoge green spaces, play parks, pitch development etc. and commercial premises in tandem with the housing developments.
- Concerns that H1 housing lands will be made up of social housing in future.
- Skeoge needs to be more sustainable.
- Concerns about the disadvantage and deprivation of social housing in the future.
- Pedestrianisation of the Walled City should be explored as a transformational tourism/economic initiative for the city and district.
- Failure to include a sufficiently firm commitment to securing modal shift through strengthening and broadening the appeal of public transport, walking and cycling.
 It will therefore fail to secure significant modal shift.

Overall Support for the stated Vision and Objectives. Council will take account of all the issues raised before finalising the draft Plan Strategy (PS). There is also merit in a bespoke LDP Vision, which is more spatial and locally distinctive.



5.2 GROWTH STRATEGY FOR DERRY CITY AND STRABANE DISTRICT

Overall Growth Strategy for Derry City & Strabane District	Option 1 – Current Projections	Option 2 – Planned Growth	Option 3- Potential Optimum as a City Region
Population	149 -152k	155 - 160k	160 - 170k
Jobs	+ 4k	+ 8-15k	+ 16-18k
Homes	+ 6.5k	+ 7-12k	+12-16k

Issues Raised – Growth Strategy

- Brexit will have a negative impact on growth.
- Support for target levels for population growth, additional jobs and new homes.
- Disjoint between para 5.3 (modest pop growth) and later evidence in support of preferred option.
- DFI consider that the growth strategy for the LDP should be more clearly linked with the Draft Strategic Growth Plan.
- The plan evidence does not clearly identify the appropriate evidence to underpin the growth strategy or clearly link this strategy with the planned quantum of housing.
- Spatial Growth Strategy potential to promote environmentally and people friendly environments aligning with PfG targets.
- There's a need to identify suitable homes to attract people back into Council area who have moved to Donegal.
- Need to create economic opportunities to drive growth.
- Proper mitigations need to be inbuilt to ensure consistent growth across the District and not allowing gravitational forces to concentrate growth in the city.
- Achieving many of the social, economic and economic objectives will be dependent on the availability of local and responsibly sourced minerals and aggregates.
- Preferred Option is 'largely' based on 2008 NISRA projections which are outdated.
- Growth scenarios should be subject to SA.



- Adequate protection must be put in place prior to progressing the growth strategy to ensure a balance between the three strands of the Plan.
- Need to invest to grow the circular economy in line with the proposed move towards zero waste for the city and region.
- Development is not inherently sustainable and only becomes so, if it incorporates environmental and social considerations.
- Planned development needs to be subject to SEA and informed by a robust evidence base.
- No references to environmental capacity or commitments to steer clear from sensitive areas.
- The LDP Growth Strategy must give cognisance to eco-system services.
- Difficult to reconcile the sustainable need for growth/numbers of new homes proposed in Option 2 based on supporting data.
- Need for a more restrained growth strategy.
- Major Employment Locations need to be located near to strategic intersections.
- Existing developed employment land must be given strong protection to avoid it being lost to other inappropriate development uses.
- Limits to the growth strategy needs to be removed encourage growth and positive action.
- While strong support shown for Option 3 as the preferred option is considered to be conservative.
- While there is support for a strong and prosperous NW Region, with Derry at its hub, it is difficult to understand how the 'Metropolitan City Region' will work in practice.
- Clarification needed on how this cross-jurisdictional planning concept will work out in practice.
- Develop and strengthen role as the NW City Regional Hub location.
- LDP needs to take a bolder and more ambitious approach by adopting 'The Optimum as a City Region' option with new jobs at 18,000. If the City wants to develop its role as a City Region, its Growth Strategy should and must reflect this.
- Concern at the paucity of a bold and ambitious approach to the Growth Strategy.
- University expansion and student numbers increase will be essential.



While the spectrum of attitudes was not unexpected, there was general support for the Preferred Option. Brexit concerns figure in a number of responses, as do representations seeking higher housing targets. Issues raised on the quality and nature of underpinning data are particularly significant in terms of soundness. Site / settlement specific issues that were submitted will be considered at the Local Policies Plan (LPP) stage. Council will consider all points raised before finalising.



5.3 SPATIAL STRATEGY FOR DERRY CITY AND STRABANE DISTRICT

	Option 1	Option 2	Option 3	
Overall Spatial	Focus on Derry	Proportionate	Balanced Growth –	
Distribution	City as a Regional	Growth across all	focus on Derry City as	
	City, as well as	Settlements and	a Regional City, as	
	Strabane Town as	Countryside	well as Strabane Town	
	a Main Hub as set		as a Main Hub plus	
	out in RDS 2035		other opportunities in	
			the rural settlements	
			and countryside	

Issues Raised – Spatial Distribution

- Options presented are limited and lacking in detail.
- Option 2 does not articulate the need for further opportunities in the Countryside.
- Option 2 would not support the RDS objective to grow population of hubs and hub clusters.
- Support for Option 1 which places a focus on Derry City as the Regional City and Strabane as the main hub.
- Support for balanced growth across the District.
- Proposed growth figures are too restrictive.
- Planning needs to be simplified for countryside.
- Support for Option 3 of Spatial Strategy.
- The Spatial Strategy requires much further consideration during the subsequent plan
- Adherence to RDS and SPPS required.

Consideration in Going Forward

While the spectrum of attitudes was not unexpected, there was general support for the Preferred Option 3, caveated with a desire for additional supporting evidence. Council will consider all points before finalising.



	Option 1	Option 2	Option 3
Specifics of	Existing 49	Rationalise Upper	
Settlement Hierarchy	Settlements	Tiers – Derry,	
	retained	Strabane, Local	
		Towns. Re-	
		designate some	
		Villages and Small	
		Settlements,	
		including some	
		new settlement	
		designations	

Issues Raised – Settlement Hierarchy

- Support for rationalising upper tiers.
- Eglinton should be reclassified as a small town.
- Support for Strabane as a main supporting town.
- There should be detailed consideration of the needs of Drumahoe as a secondary nodal point.
- Support for the spatial strategy where Derry is recognised as the Principal City within the context of a North West Cross Border Region.
- Support for strengthening role of Derry and growing population of hubs in order to counter disproportionate amount of growth in smaller settlements in recent years.
- Support for Strathfoyle remaining as a village settlement.
- Support to reclassify Glenmornan and Cranagh as village settlements.
- Support for Nixon's Corner to be classified as a village settlement.
- Support for Gortnessy to be brought within small settlement designation.
- Craigtown should be considered as a village settlement.
- Sion Mills should be retained as a Village.
- Reclassification of Eglinton will increase the need for more development.
- Support for Claudy remaining as a village.
- Council needs to ensure that the assessment of Claudy supports its designation as a Local Town.



Council welcomes the general support for the preferred option and will further review each settlement against the Settlement Evaluation Framework to determine where is best for settlements to be positioned.

5.4 ECONOMY – ISSUES AND OPTIONS

	Option 1	Option 2	Option 3
A - Economic	Retain existing zonings	Retain existing zonings	Re-evaluate all current
Development	as currently contained	along with additional,	economic zonings and
Land	in DAP & SAP	more sustainably-located,	rezone / zone new
		sites that will cater for our	sustainably-located sites
		assessed future economic	catering for our assessed
		needs	future economic needs

Issues Raised – Economic Development Land

- Support for the re-evaluation of existing economic land and those where there are no extant planning permissions.
- The allocation of economic development lands should be realistic and founded on a robust evidence base.
- Strategic economic development sites close to the new A 5 & A6 or any protected transport corridor should be very carefully considered.
- A need to ensure that economic zonings do not compromise environmental integrity.
- Clarification needed on whether Simplified Planning Zones are to be explored.
- Lack of industrial/employment land take up is due to the zonings being in the wrong location.
- Better policy direction and accompanying guidance needed for new zonings.
- Keen to see re-use of brownfield / derelict sites.
- Fort George should be zoned for regional stadium and associated development.



There was strong support for Preferred Option 3 to re-evaluate all existing zonings caveated with a desire for additional robust, supporting evidence underpinning any re-evaluation exercise. The sustainable interconnection between lands and residential areas needs was a commonly raised issue. Council will take into to account all issues raised before finalising and any site / settlement specific issues that were submitted will be considered at the Local Policies Plan (LPP stage).

	Option 1	Option 2	Option 3
B - City /	Strong focus on	Balance – focus is	Support existing centres but
Town	existing centres whilst	on existing centres	with growth in District
Centres -	constraining District	plus potential	Centres and outer / arterial
generally	Centres and outer /	limited	sites
	arterial sites	development in	
		District Centres	

Issues Raised – City and Town Centres

- SPPS para 6.276 is to retain and consolidate existing District and local centres and ensure their role is complementary to that of the town centre. No further extension in such centres where adverse impact is likely on the town centres.
- Up to date town centre health checks required. Reliance on summarised third party
 10 year old reports (GL Hearn) questioned.
- There is no need to alter the hierarchy of centres as per DAP 2011 and these should be retained.
- A diverse range of uses will be key to the continued success of existing City and Town
 Centres with regular health checks to ensure better responsiveness to reductions in
 footfall and vacancy.
- Flexibility must be applied in the consolidation of all sequentially preferable site and large mixed use schemes should be disaggregated to avoid out of centre locations;



- City and Town Centre sites need to consider redevelopment opportunity site in response to edge-of-town and out-of-town development;
- Focus needs to be on the City Centre as the Gateway for the North-West; Preferred option would be to focus on existing centres, limited development in District Centres and constraint on outer/arterial sites.
- Constraining boundaries of designated Centres with too few development opportunity sites will cause a tension between 'in centre' and 'out of centre' development opportunity site will undermine the ability of the Plan to deliver its growth targets.
- Option 3 scored positively across a range of aspects within the Sustainability appraisal, but scored negatively on the managing of material assets within the Sustainability Appraisal and could potentially lead to a loss of greenfield land. It is therefore not reasonable to score this negatively in this context and option 3 should be promoted over option 2.
- Need a city centre first approach. There should be a masterplan which needs to identify 'anchor' footfall.
- Option 3 is contrary to regional planning policy.
- Key to ensuring town and city centre vitality will be ensuring appropriate balance of uses.

A significant number of responses to this option were received with a spectrum of opinions put forward. While most were broadly supportive of a 'City / Town Centre' first approach, several others argued that such an approach could hinder future development opportunities. Enhancing the vitality and viability of our centres and becoming multi-use locations was also generally supported. The need for robust evidence and up to date baseline data was perceived as essential prior to finalising next steps in the Plan Strategy. A town centre health check will be carried out as part of the recently commissioned LDP Retailing study.



	Option 1	Option 2	Option 3
C - Retailing	Existing amount of	To allow growth of	Monitor retail
Capacity	provision is adequate,	retail supply generally	capacity and plan for
	generally across Derry		sustainable, phased
	and Strabane and retail		growth
	types		

Issues Raised – Retailing Capacity

- Option 2 presents an alternative approach aimed at maximising the investment opportunities and letting market forces determine the amount of retailing across the District.
- An evidence base would have assisted the generation of Options.
- The issue of qualitative as well as quantative need is important including competition and choice and flexibility.
- Ensure preferred Option 3 is consistent with the SPPS.
- Impact of future events i.e. Brexit will impact on preferred option for retail.
- Support for Option 3 but needs 'tight control'.
- The existing District Centres in both the Waterside and Cityside have headroom in respect of unimplemented planning permissions and account would need to be taken of these in respect of future retail growth, capacity and need.
- Commitments at Crescent Link and Rossdowney Road must be taken into account.
- There is an oversupply of convenience floorspace in the City e.g. Lisnagelvin District Centre has an extant permission for redevelopment and Springtown has an unoccupied extension.
- There needs to be more retailing evidence to consider retailing provision.
- Need to monitor retail capacity.
- Consideration should be given to recognising Drumahoe Village as an existing retailing node serving the local catchment and the wider rural area.

Consideration and Going Forward



While a mixture of opinions have been put forward ranging from adopting a 'laissez-faire' approach to recognising Drumahoe as a retailing node, there is broad agreement that further evaluation is required to inform the future direction the LDP will take.

	Option 1	Option 2	Option 3
D - Derry City	Evaluate the existing	Retain the existing	Expand the
Centre	Central Area &	Central Area plus a	overall central
	Commercial Core within	compact Cityside focus	areas within
	Cityside and Waterside,	for commerce	Cityside and
	clarifying / simplifying		Waterside
	their definitions / roles		
	and adjusting their		
	boundaries if necessary		

Issues Raised - Derry City Centre

- Contend that the 'Central Area' and 'Commercial Core' definitions should be replaced and the entire Central Area should be uniformly known as 'City Centre' removing restrictive policies such as Primary Retail Core and Frontages. Whilst these policies seek to strengthen the retail role by concentrating on a location, this can be seen as counterproductive, by restricting other viable uses unnecessarily.
- The terminology used in the new LDP should be consistent with the SPPS. It should refer to 'City Centre' and 'Primary Retail Core'. The option to clarify the meaning of the Central Area and the Commercial Core is welcomed. Focus of development should be on the commercial core, as the traditional shopping core of Derry.
- Concur in principle with the POP in terms of a future review of the 'Central Area' and 'Commercial Core' to create a more rational spatial planning policy in respect of a City Centre City Strategy. Such a review must recognise the significance that those developed areas within the 'Commercial Area' and which are now established as part of the city's commercial infrastructure and form a northern Gateway into the City along the Culmore Road off the New Bridge.
- Clarify definition and role and study appropriateness of these boundaries of the Central Area and City Centre. Rationalise city centre boundary just one needed.



Issues about Derry City that were raised that went beyond the stated option included the following: Promote mixed uses in the centre. City/ town centre living needs to be encouraged – especially affordable accommodation suitable for single households. Vision for Derry City Centre - one that captures the rich heritage of the walled city, culturally vibrant with a balance of footfall, tourism, retailing and increased levels of high quality offering. Moving University into city centre should be considered. Needs to be a masterplan for wider regeneration and improvement and Ebrington needs to be complimentary to the City Centre. Vacant site adjoining bus station at Foyle Street ideal for mixed use development. Other sites would be Foyle Bus Station, Ebrington Site and William Street Car Park. The presence of gambling arcades in the area will only act to compound the issues; Issues around safety. The city centre could be made safer by encouraging more people to live in the city centre above business premises. Would like to see a safe, vibrant, prosperous city centre, easy to access and navigate, with a pleasant stress-free shopping environment with a wide range of shops and businesses and visitor attractions; Local businesses struggle to survive in areas with poor footfall, evidenced also by the proliferation of charity shops, pound shops and also empty premises, even on our most central streets in the city centre.

Consideration and Going Forward

There was broad support for the Preferred Option 1 with the proposed evaluation of both the Central Area and the Commercial Core of Derry City Centre. The need for clarification around the definitions and whether to amend the boundary were the main responses to this option.

The representation responses regarding Derry City Centre also raised issues which went beyond the stated options and these issues will be taken into account in the relevant part of the LDP going forward. Accommodating new appropriate uses, encouraging city centre living and footfall, and ease of accessibility were just some of the issues raised which will be considered going forward.

There will be a Retail Capacity Study and City Centre Health Check Study carried out and the findings of these will inform and underpin any potential boundaries review.

	Option 1	Option 2	Option 3
E - Strabane	Maintain existing	Contract the existing	Expand Town
Town Centre	Strabane Area Plan	Town Centre	Centre boundary
	Town Centre boundary,	boundary to a more	to beyond the
	subject to detailed re-	compact form	Bypass / Camel's
	evaluation of boundaries		Hump area

Issues Raised - Strabane Town Centre

- Preferred Option is ambiguous and evidence base lacking.
- Consolidate Strabane Town centre retail boundaries.
- Consideration needs to be given to cross-border location.
- Support shown for Preferred Option 3.
- Improve connectivity within the town centre.
- Consolidate Strabane Town centre retail boundaries.
- Potential implications arising from Brexit.
- Support for Option 3 to extend boundary beyond the Camel's Hump and By-pass.
- Implications arising from the A5 road. New road line could see trade being diverted away from the town centre.
- Maintaining the existing town boundary is not going to be fit for commercial purpose.
- Lack of riverside strategy.
- Strabane needs to have ambition to deliver retail, consistent with its status as the second largest town.
- Expand Strabane town centre boundary to beyond the by-pass/Camel's hump area.

Consideration and Going Forward

There was support for Option 1 as well as strong support for Option 3. The need for robust evidence and up to date baseline data was perceived as essential prior to finalising next steps in the Plan Strategy. There will be a Retail Capacity Study and Town Centre Health Check Study carried out and the findings of these will inform and underpin any potential boundaries review.



	Option 1	Option 2
F - Local Towns -	Retain the compact Town Centre	Do not define Town Centres
Castlederg,	boundary for Castlederg and define	for Castlederg,
Newtownstewar	compact Town Centres for N'Stewart	Newtownstewart or Claudy
t, Claudy	(existing designated town) & Claudy	
	(proposed new town)	

Issues Raised - Local Towns

- Lack of clarity as to selection of Claudy, Newtownstewart and Castlederg as local towns and omission of Eglinton.
- Council needs to ensure that the assessment of Claudy supports its designation as a Local Town.
- Claudy should remain a village leaving Castlederg and Newtownstewart as the only two local towns within the Council area. The suggestion to change the status of Sion Mills could have a negative impact on Strabane which is only a few miles away.
- Do not see the need for town centres for Claudy or Newtownstewart.
- Support for Option 1
- The important role of the 'Local Towns' needs to be recognised. These settlements already have the necessary services, infrastructure and 'critical mass' to enable them to cater for their catchment populations.

Consideration and Going Forward

While support was shown for Preferred Option 1, the responses were generally limited in relation to the local towns options. That said, the points in relation to Claudy, Castlederg, Eglinton and Newtownstewart will be taken into account as part of the wider review and consideration of issues raised throughout the preparation of the LDP. The Settlement Evaluation Framework will be re-visited and there will also be a Retail Capacity Study and Town Centres Health Check Study carried out and the findings of these will inform any boundaries decisions.



	Option 1	Option 2
G - Transport	Plan to maximise the opportunities	Maintain / accept current
G - Hallsport		·
	for sustainable development	transport links and plan for
	arising from the A5 / A6 upgrades	commensurate level of
	and other orbital / cross border	sustainable growth. Also promote
	links. Also promote Active Travel	Active Travel and accessibility
	opportunities and accessibility and	within our main urban
	connectivity within our main urban	settlements
	settlements	

Issues Raised - Transport

- POP should draw out clearly the links between the plan objectives and transport and identify a number of realistic strategic options
- DFI considers these options do not fully represent an integrated approach to land-use and transport.
- Options do not acknowledge or discuss the most effective ways of achieving a modal shift to more sustainable forms of transport.
- DFI reiterates need for LDP & Local Transport Plan processes to be integrated and to influence each other.
- DFI draws Council attention to SSPS para 6.301which outlines strategic policy to be taken into account in the preparation of the LDPs.
- If Derry is to grow, it must be able to accommodate greater numbers of people who must be able to move around the City. There needs to be a greater focus on identifying locations that are accessible by walking, cycling and public transport and ensuring that development in these locations are a suitably high density.
- POP has not made sufficient reference to or taken cognisance of the existing Ulsterbus Foyle bus network.
- More emphasis needed on the role of the Derry hub as a key public transport node linking the city to other key hubs and gateways.
- A5/A6 Council should capitalise on the potential strategic car and Goldline journey time savings.



- Transport A2, A5 & A6 vital. A5 & A6 Reminder re SPPS & PPS3 AMP3 affording protection to key transport corridors in terms of creating new accesses onto them.
- Comments on potential impacts from unauthorised development on A6 & A5.
- The dualling of the N14 (Strabane-Letterkenny) needs to be explicitly referenced.
- Comment on the feasibility study undertaken by DFI to end the A5 around the west of Derry City. The company agrees this would provide infrastructure improvements to enhance the circulation around the city and provide strong cross board connection.
- Park and ride schemes need to identified.
- Connections Plan, highlighting safe pedestrian access, a car parking strategy and a public transport plan.
- Transport welcome any supporting transport assessment particularly in light of Council plans to re-evaluate all current economic zonings. This would be in line with RDS (RG1).
- POP is light on trains, port and airport.
- Rail improvements across the District would expand peoples transport options and new sustainable housing areas alongside.
- City/Town Centres. To make them vibrant there needs to be accessibility by public transport.
- Any development that is likely to generate 'significant movement' in the rural area and cannot be served by public transport should be refused;
- Significant level of comments in relation to cycling, walking and moving away from the car. These are summarised and considered under Section 9H

This topic generated a significant amount of correspondence. There is support in terms of the strategic importance of the A2, A5, A6 and N14. However there is some caution in relation to the option to maximise the opportunities arising from such routes as it was highlighted that such routes have a strict regional protected routes policy applied to them.

The broader theme that comes from the responses is it that the POP does not fully reflect the importance of transport on planning and land use. There is support for exploration of



alternative modes of transport and a move away from the car. There is a suggestion that as a minimum that the POP should reflect the regional strategic objectives for Transport as set out in the SPPS.

Noting the level of representation at POP stage on this topic, we will review and consider the views put forward and re-assess how we address this issue at Plan Strategy. We also reengage with key consultees such as Dfl, Sustrans and Translink to order to further consider the comments raised. We will also be commissioning further transport studies and car park studies, which will inform the best way forward for transport in the LDP.

	Option 1	Option 2	Option 3
Н-	Identify flagship Tourism	Plan for further	Focus on the
Tourism	sites / areas along with	opportunities that	protection of our
	opportunities for	emerge, to expand	Tourism assets and
	dedicated sustainable	current offer	constrain Tourism
	attractions and associated	generally	development
	accommodation. Focus on		potential
	improved accessibility,		
	place-making and legibility		
	of tourism offer		

Issues Raised - Tourism

- Need a revised objective to promote tourism development more generally throughout the district, including rural areas. SSPS requires a Tourism Strategy. Policy Option 3 does not take account of regional strategic policy which is to facilitate sustainable tourism development.
- The LDP is critical to the achievement of the Draft Tourism Strategy.
- City/town areas as tourist destinations as whole. Promoting tourism in the heart of the City Centre.



- Specific reference to the need for the conservation and sustainability should be included in any option. To be sustainable 'flagship' sites and associated development must fully respect their local environments. Need to ensure protection of tourism assets and settings due to degradation from tourism growth.
- All new major visitor attractions need to have a mobility plan developed in tandem with appropriate input from Translink. Linking a city cycle network with tourism huge opportunities to explore in this area. Pedestrianisation of the walled city should be explored as a transformational tourism/economic initiative for the city and district.
- Plan needs to provide for a sufficient range of hotel and bed space accommodation with future hotel developments being located close to transport hubs.
- Strabane is a tourism gateway. Need to make proper provision for the Sperrins

 Heritage Sperrin Centre what should be done with it?
- The facilities for tourism in the LDP area are inadequate in number and quality to attract and retain visitors in the area especially in the rural area. Growing caravan/motor home and 'glamping' sector should be actively encouraged.
- The vision of the LPD should not be limited to flagship sites or tourism zones.
- Promoting high end tourism, making a significant contribution to the visitor economy.
- POP disregards tourism potential of the rural areas particularly Foyle system and its water based tourism products. Evidence supplied 3 activity tourism operators, many angling guides as well as specialist accommodation providers.
- Preferred option needs to clarify that it will protect / safeguard tourism assets.

There is support for the preferred option. Given the support for Option 2, it is proposed that we review, alongside key consultees how Council's Tourism Strategy will maximise the tourism potential in our District and how this integrates with the LDP. It is recognised that Derry City, Strabane and the rural areas, including our AONB are important tourism destinations, gateways and facilities. It was noted that tourism accommodation & related facilities (particularly in rural areas) were considered areas of concern. The LDP can seek to shape the physical environment to improve accessibility, such as ensuring key tourism and leisure attractions are accessible by a range of transport options, including walking and

cycling. Ongoing liaison with all relevant stakeholders will be undertaken as these issues are considered as part of the Plan Strategy preparation.

	Option 1	Option 2	Option 3
I -Minerals	Planning Strategy for	Retain Existing –	Stronger protection for
Development	Rural NI (PSRNI)	substantially unchanged	Minerals Safeguarding areas and also stronger
			Minerals Constraint areas / policies

Issues Raised – Minerals Development

- Need for policy for high value minerals, highlight importance of sand and gravel production within our District and overall, stresses the positive contribution to the economy, growth, health and well-being of this District from sustainable mineral development.
- Opposition to areas of mineral constraint.
- Council is reminded that options should be set within the regional policy context established by the RDS / SPPS. DFI welcomes further studies as proposed by Council and these will assist Council to further develop and refine evidence base for Minerals.
- Mineral policies of the PSRNI to be carried forward should be subject to SA.
- Support for mineral policy which will seek to minimise / eliminate potential risk to environmental health.
- Identify Mineral Safeguarding (Reserve) Areas around existing operational sites to prevent inappropriate development that would sterilise future construction aggregate reserves and impact on the day to day operation of existing sites.
- Inadequate minerals policy has been a major problem for many decades failing to protect designated sites including the River Faughan SAC.
- POP has not acknowledged the policy failure and the review of planning policies section suggests that the planning authority is presently unaware of the true extent of the problem facing the Council in regard to this issue.



- The subject policy needs to be set in the context which ensures that levels of extraction do not exceed environmental limits or undermine the integrity of wider eco-systems.
- Development should be steered away from protected sites and policy wording should provide sufficient protection to the natural environment.
- Carrying forward a failed Minerals Policy into the LDP is a mistake and an inadequate approach if sustainable planning is to be achieved.
- Minerals no fracking at any time.

There have differing views on best to deliver new minerals policy for the LDP. Some of the views include the concern that carrying forward the existing policy in PSRNI does not take into account the regional strategy in SPPS. Other views include preference for specific aspects of the SPPS, such as opposition to 'Areas of Mineral Constraint' as proposed by SPPS.

There is also support for a balanced policy that gives account to environmental issues. Other responses view the current policy approach as not appropriate and believe that it shouldn't be carried forward. As this is a complex issue, we will continue to engage with key stakeholders in order to formulate a policy approach for minerals.

	Option 1	Option 2	Option 3
J - Rural	To focus rural	Balanced, opportunities in the	Rural development /
Economy	economic	rural settlements for	businesses promoted
	development	appropriate-scale	generally across the
	proposals in the	development / employment	District, wherever it
	Local Towns and	plus opportunities for	emerges spatially and
	Villages, to drive	appropriate business starts	with only minimal
	the rural economy	and small businesses in the	restrictions
		countryside, to promote a	
		vibrant rural economy	



Issues – Rural Economy

- Business 'Start-Ups' and 'Homeworking' are crucial in contributing to rural economies
 and polices need to be suitably tailored to support small scale enterprise; Proposed
 new policies for enhanced opportunities in the countryside welcomed so as to sustain
 vibrant rural areas and their communities.
- Some further definition of the kinds of business which would be considered 'appropriate' in the countryside is needed in a controlled manner to help sustain the rural economy.
- Focusing rural economic development in towns and villages is far more sustainable as
 a whole. Pro sequential test for rural economic development. Development should
 primarily be located within settlement limits.
- Concern for the possible sustainability implications of the preferred approach –
 especially new business starts and small businesses in the countryside. RDS SFG11
 aims to promote economic development opportunities at the hubs and only in the
 rural area with exceptions.
- LDP policy should seek to apply regional strategic policy at a local level. Any departure from SPPS policy must be supported by a robust evidential context.
- Any development that is likely to generate 'significant movement' in the rural area and cannot be served by public transport should be refused.
- DCSDC must ensure that the implementation of any definition for "appropriate scale development" does not become a barrier to promotion of vibrant rural communities.

 Accommodation must be made for non-farming rural business opportunities.

Consideration and Going Forward

The key issue raised in the representations was how the LDP will strike a balance between sustaining rural communities while protecting the environment from inappropriate development. As well as promoting rural business and employment opportunities in the countryside, there is clearly a need, in terms of Independent Examination 'soundness' to apply regional strategic policy at a local level. Council must ensure that there is a robust evidential context to underpin any proposed departure from stated SPPS rural economy policy.



5.5 SOCIAL DEVELOPMENT - OPTIONS

	Option 1	Option 2	Option 3
A - Strategic	Dispersed – across	Concentrated –	Balanced – moderate
Housing	the Settlement	emphasis on urban,	focus on Derry city as a
Distribution	Hierarchy, including	central, sustainably	Regional City, as well as
	countryside in	accessible locations	Strabane town as a Main
	proportion to		Hub plus housing
	settlement tier		opportunities across the
			settlement tiers at
			appropriate scale /
			densities and in the
			countryside

Issues Raised - Strategic Housing Distribution

- The focus should be on directing growth to Derry and Strabane to ensure they maintain their status in the settlement hierarchy to accord with the RDS.
- The preferred option should be amended to state a primary focus on Derry and Strabane but with other opportunities across the settlement tiers.
- -LDP should limit growth of dispersed, single dwellings in the countryside.
- As the second largest settlement tier at 14.4%, DCSDC must make proper accommodation in the LDP for countryside development including non-farming development.
- There should be opportunities across the settlement tiers.
- -Support for option 3 with a strong emphasis on the Local Towns.
- -More detail in relation to the options would aid understanding of the implications of each.
- -Evidence base is required to establish in more detail the quantum and distribution of housing allocation. Robust evidence base required if departing from policy context.

Consideration and Going Forward

There was support shown for all 3 options within the responses received.

The views included those advocating a "dispersed" pattern of development, which would allow development at all tiers and locations. There was also support for the "concentrated"



approach, as this was seen as the most sustainable. The "balanced" approach was also supported with some wording changed. This would merit further consideration.

Going forward, it is still considered that the "balanced" approach provides the most appropriate solution for our District, possibly with a modified wording, however it is acknowledged that the chosen option must be supported by a robust evidence base.

	Option 1	Option 2	Option 3
B - Housing	Current Housing	Balanced, Planned	Previous Housing
Allocation	Growth Indicator	Growth of	Growth Indicator (HGI)
Quantum	(HGI) as per RDS	12,000 dwellings	as per RDS 16,000
	6,500 dwellings		dwellings

Issues Raised - Housing Allocation Quantum

- -Support for the balanced planned growth as set out in option 2.
- -DFI stress HGI is for guidance and not a cap or target to be achieved. Also policy neutral and makes no allowance for the RDS objective of developing a strong NW centred on Derry.
- -Evidence is not clear to support required new homes. Council should adopt a consistent approach to the use of current data / evidence.
- -The plan evidence needs to clearly identify the appropriate evidence to underpin the growth strategy and clearly link this strategy with the planned quantum of housing.
- -Noted that preferred option on housing allocation quantum is silent on the proportion of social housing required to meet assessed need.

Consideration and Going Forward

Specific preferences for each of the options were not raised in any significant quantity in the POP responses. However there is a clear message in the responses in relation to Housing Quantum in respect of the use of evidence. There are a number of responses that refer to the importance of the use of current data/evidence to underpin the preferred Option 2.

Moving forward on this topic it is clear that Council must ensure that the preferred option is underpinned by verifiable evidence. Given the critical importance of this matter to the overall



plan, it is proposed that we undertake a specific study on housing growth as part of our evidence to ensure it supports the preferred option.

	Option 1	Option 2	Option 3
C - Location	Rely on existing	Retain committed and	Re-evaluate all existing
and	zonings and	zoned housing land for	zoned land on the basis
allocation	settlement	residential, re-evaluate	of sustainability. Only
of housing	development limits	un-committed sites and	carry forward zonings
land		allocate any further	deemed sustainable.
		required land in	Allocate all land based
		accordance with	on sequential test in
		sequential test in SPPS,	SPPS
		and deliverability	

Issues Raised - Location and Allocation of Housing Land

- -DFI acknowledges Council will undertake an exercise to evaluate these lands to determine their current status and any constraints to their development. Further discussion helpful in understanding options and why they were not selected.
- -Understand Council's preference for option 2 but while 3 would undoubtedly be less straightforward it would eventually have a better outcome. Plan in haste, repent at leisure.
- -Support option 3 rather than option 2. Need to assess unimplemented zonings as well as new housing designations to see if they are suitable, available and viable for residential housing.
- -Option 2: Retain. DCSDC should make provision (as compensatory allocation) within those settlements/areas for land which was previously zoned for housing but which is now mapped as flood zone in the updated flood risk maps.
- Existing zoned land for which planning has not been sought should be re-evaluated on the basis of sustainability.
- The tying up of land which is unlikely to be forthcoming for development needs to be addressed. This will afford the opportunity for other lands to be brought into the zoning allocation and stimulate economic activity.
- -Committed sites should be retained in addition to new land.
- Location and allocation of housing land there should be a review of housing zonings and unzone some housing lands.



There was significant support for Option 3 and it was presented that this approach was the most desirable in terms of sustainability. However there was also notable recognition that Option 2 took into account the legacy of the previously zoned housing land and in particular the commitment in the form of planning approvals.

Given the support for Option 3, we will further consider the viability and implications of this option before settling on a final option.

	Option 1	Option 2
D – Social /	Incorporate the principle of including	More research needed by DfI,
Affordable	social, private and affordable	DfC, NIHE and Council on this
Housing and	housing & cross community.	area. The need is not proven for
Balanced	Consider policy and mechanisms to	policy response, so do not include
Communities	deliver balanced communities and	in the Plan. Possible future
	meet all housing need / demand.	subject plan or supplementary
	More research needed by Dfl, DfC,	guidance
	NIHE and Council	

Issues Raised - Social / Affordable Housing and Balanced Communities

- -Noted that preferred option on housing allocation quantum is silent on the proportion of social housing required to meet assessed need.
- Section 2 fails to examine social housing projections for the whole plan period and clearly there is an underestimation of social housing need for the new local development plan.
- Like to see an affordable housing policy promote social housing development in mixed tenure developments.
- -Agree identifying mechanism to achieve not easy developer contribution?
- A social housing requirement can adversely impact on development going forward e.g. if no need exists, what are other mechanisms for addressing this requirement? Option 2 is preferable.



- Agrees with the aims but requests that the social development objectives are extended to include the designated zoning/provision of lands within the settlement limit to accommodate the overwhelming social housing need of the city.
- -Social housing but protection from speculative developers wanting social housing on unzoned land.
- Consider the provision of rural social housing.
- -Should have a minimum requirement for social housing of bungalows and lifetime homes.

We have received comments in relation to the level of Social Housing needed for the plan period. We will continue to work closely with NIHE to ensure that we have the most accurate and up-to-date figures for social housing need. This will take into account the amount and location of housing needed.

Whilst there is a tentative welcome from some quarters for the preferred Option, there have been queries on how this would be best delivered. Deliverability will be one of the aspects that will be researched with the named partners. Some responses from the housing industry have added a note of caution in relation to the preferred Option and are worried that a policy that it is too rigid may impede development. Again, the wording and the application of any policy will form part of the research as suggested in Option 1.

	Option 1	Option 2	Option 3
E - Open	Protect the existing	Re-evaluate our current	
Space /	and zoned OSR	OSR provision in terms	
Recreation	provision as set out	of role and function and	
(OSR)	in DAP and SAP	identify and protect any	
, ,		existing land and	
		additional land required	
		for open space, sport	
		and recreation	



Issues Raised - Open Space / Recreation

- -DfI refers to SPPS para 6.205 general policy presumption against loss of open space and references Council admission with position paper that they are unclear as to what exactly the existing OS provisions is.
- Housing Executive strongly supports Option 2 to identify and protect Open Space and the selective redevelopment of portions of open space.
- -Agree that some informal open space is underutilised ... but how is that measured? Does lack of 'use' render an open as surplus to requirements and mean that it is not viewed as a resource with value to neighbouring residents and others? Alternatively, some open spaces cause heartaches for residents and this should be considered on an application by application basis.
- -Careful consideration needs to be given to open space in 70/80's housing developments is it causing anti-social problems. Supports more recreational space.
- -RSPB do not accept DCSDCs proposal to only protect suitable and necessary OSR land this is a significant departure from PPS8 and SPPS;
- -Note re-evaluation and concerned at term "underutilised" infers all open space must be used by people.
- -The LDP should contain proposals for the development of integrated green and blue infrastructure network of green spaces and water features, providing access to amenities for recreation, walking, cycling and wildlife.
- -Create parks shared by surrounding neighbourhoods.
- -Council should consider the potential use of open space to resolve flooding issues, create more open amenity space and promote health and well-being through the introduction of SuDS
- -Need to re-evaluate the current Open Space Requirement position in terms of role and function and identify and protect an existing land. The example of formal sporting activities such as the provision for GAA was noted on a number of responses.
- -Support the Council's preferred option to undertake a re-evaluation of lands that were zoned for OSR to ensure proper account is taken of the accessibility of individual locations by all modes and how that might change with committed changes to existing transport networks.



Two divergent views are represented in the comments received on this topic. On the one hand there is a view that the current approach should be taken, which affords protection to all open space regardless of role and function. On the other hand there is an acknowledgement that there are certain open spaces, which create anti-social issues and hold no real value in terms of ecology and visual amenity, which may be best used for other uses.

Planning, and other officials within Council, will undertake a re-evaluation of both our formal and informal open space. This will inform the amount of OSR land required for the plan period and will also inform the protection afforded to OSR land in the LDP policy.

	Option 1	Option 2	Option 3
F - Community	Identify/Zone/Protect	Existing provision of	Identify/Zone/Protect a
Infrastructure	Committed sites	Health, Education, etc is considered adequate	long-term reserve of potential sites

Issues Raised - Community Infrastructure

- -Council has not established at this stage a baseline evidence position that would enable it to generate more specific options. More sharing of evidence from statutory consultees is required to build the evidence base to inform the LDP.
- -Housing Executive agrees option 1 should be preferred option re community infrastructure, reasoning included. Also like to see HIA undertaken for major developments to promote active travel and use of OS.
- -Required for the entire plan period should be identified in the plan and considered as part of furthering sustainable development alongside housing and jobs.
- The bringing forward of committed sites only will ensure no land is unnecessarily tied up and will also help inform the wider LDP Strategy.
- -Wording should be included that will give favourable consideration for health and education proposals on other lands and to also allow alternative uses to come forward on the zoned



lands should the relevant authority confirm they don't intend to bring forward for the identified purpose and/or they are surplus to requirement.

- Community Infrastructure. Do not favour any of the three options. Instead integrate community infrastructure into existing neighbourhoods within high street typology.

Consideration and Going Forward

There is broad support for the proposed Option 1, however it has been highlighted that we need sound baseline evidence on the intentions of the various statutory consultees in relation to their estates. We will continue to engage with our key consultees to ensure that their interests are considered in the LDP.

	Option 1	Option 2	Option 3
G - Waste	Existing Infrastructure & committed Capital Proposals identified & protected	Identify/Protect a long-term reserve of potential projects / sites	

Issues Raised - Waste

- -Council must assess the likely extent of future waste management facilities for the District and identify specific sites for the development of waste management facilities in the LDP. Council must also engage with local authorities in the RoI to promote a co-ordinated regional approach.
- -DCSDC need to make allowances for those identified new sites within this LDP which were not identified as part of the previous two LDP's.
- -could/should these two options not be incorporated into a single option?
- need to invest to grow the circular economy in line with the proposed move towards zero waste for the city and region.
- Known illegal landfill site within District-how should be dealt with and what future use should land be put to?
- The North West region has a recognised shortfall in provision for landfill, especially for inert waste.



- -Housing Executive supports waste policy approach.
- -A number of private operators have proposed their land for waste disposal

The LDP will take on board the comments made in relation to waste. The way forward for the LDP will involve further consideration of the key issues raised such as zero waste, circular economy and illegal dumping. This will involve further working with other Council officials and engaging with key stakeholders in this area and there will be further consultation with statutory bodies where necessary.

5.6 ENVIRONMENT - OPTIONS

	Option 1	Option 2	Option 3
A - Natural	Existing designated	In addition to Option 1,	Protect only those
Environmental	sites / protected	designate additional	currently designated
	species are identified /	local designations and	sites / protected
	protected, with Policies	preclude inappropriate	species and
	as per SPPS. Other	development likely to	accommodate
	habitats, species or	have significant	development in all
	features of natural	adverse impacts on	other locations
	heritage importance	such sites	
	will also be protected in		
	line with the SPPS		

Issues Raised - Natural Environment

- DFI request justification for selection of Option 1 over Option 2.
- -Recommends that richness and diversity of the heritage (natural, historic & built) should be fully acknowledged across POP e.g. River Foyle, valley & catchment.
- Recommend an integrated management approach to heritage assets natural & cultural heritage as intertwined.
- -Disagree with chosen preferred option for Nat Environment & Built environment / Heritage.
- -Welcome protection of sensitive locations within AONB's from renewables.
- -Clarity of environmental objectives and need to include Green Infrastructure.



- -Suggest an additional environmental objective to encourage all aspects e.g. of classification, management and monitoring in relation to plan area landscapes.
- -Environment Objectives C (i) welcomes promotion of health and well-being and enhancement of natural environment to achieve biodiversity.
- DCSDC must take a more explicit stance in terms of its responsibilities towards the Sperrins Area of Outstanding Natural Beauty.
- -Existing policies have failed/failing designated sites.
- -Option 2 would be more desirable but understandably would need extra resources.
- -The River Faughan benefits from designations such as Area of High Scenic Value. The River Valley beyond Goshaden/the Oaks is a highly attractive landscape and the AoHSV should be extended along the Faughan Valley in a south easterly direction to connect with the Claudy Country Park in recognition of this.
- Appropriate development has the potential to enhance the natural environment through active investment in restoration and management, without which the designated site could become unmaintained and degraded. Each proposal should be on its merits
- Having a local designation has worked well in English Local Plans, allowing the protection of sites important at a District scale and identifying sites that could be enhanced as a result of any planning gain or biodiversity/carbon off-setting required.
- -Consider option 2 rather than option 1 should be the preferred option. LLPA's likely to be required and surveys undertaken to deliver these designations.

Recognition that SPPS approach as per Option 1 takes account of international, national, protected species and local designations. However there is a feeling that that such designations are not enough on their own and that they should be supported through appropriate policy and policy application.

There is also notable support for Option 2, in terms of identifying additional local designations. This option will be explored in conjunction with the Council's wider Biodiversity Action Plan and we will also take into account the suggested areas raised through this consultation exercise.



	Option 1	Option 2	Option 3
В -	Informed by the	Informed by LDP	Accommodate growth
Landscape	existing NI /	Development Pressure	/ development
Character	Regional Landscape	Analysis and relevant	wherever possible,
	Character Area	Landscape Character	utilising the minimal
	Assessments and	Assessments, identify	number of protected
	their associated	those areas of our	landscape
	Sensitivity	landscape with higher	designations in the
	considerations,	sensitivity or 'at capacity'	LDP
	permit further	and identify	
	sustainable	development that may	
	development	be inappropriate in these	
	accordingly on a	areas	
	case by case basis		

Issues Raised – Landscape Character

- -Landscape Character expand Option 2 and undertake up to date LCA for the plan area. List all plan area landscape designations.
- -References dated studies and seeks clarification on whether Council has carried out its own assessment. Consider relationship between preferred option and renewable energy preferred option
- -The 2010 Landscape Character Assessments are significantly out of date and provides no protection to the Sperrin Area of Outstanding Natural Beauty. The 2008 West Tyrone Landscape Assessment commissioned by the then DOE concluded W. Tyrone had at that time reached "saturation point" in terms of wind turbine density.
- Landscape Character. The Sperrins AONB is a valuable resource that should be afforded protection form inappropriate development. Applications for development should be accompanied by a suitable Landscape analysis to demonstrate that they do not do harm.
- -Work together on minerals / renewable energy on AONB and other sensitive landscapes;
- -Particularly supportive of sensitive Landscape Zones being protected from Renewables projects;



- Do not want area-defined prohibitions or restrictions on high structures within AONBs or other landscape designations.
- Spatial restrictions require elaboration. Council reminded that in addition to landscape sensitivity, the location of renewable energy development requires consideration of a range of factors.
- Council should embrace its existing renewable energy industry with the view to increasing productivity where appropriate, especially where these features are now established in the landscape. It may prove worthwhile that all existing renewable sites could be identified as preference sites where appropriate renewable energy developments are proposed while still protecting sensitive landscape locations.
- Make reference to whole landscape of the District being important for the people who live there approach of the European Landscape Convention (2000) and DOE (2000) & DAERA (2016).
- -Option 2 fails to identify what landscape capacity is how will this assessment be made? Ambiguous nature of Option 2 calls into question soundness of policy proposal
- Mineral and aggregates extraction has the potential to negatively impact on landscapes but with modern standards possible impacts can be significantly mitigated.
- -In supporting option 2, Translink would argue that certain infrastructure works e.g. park and ride sites, by necessity have to be located outside development limits or off-site which may well impact on areas of significant landscape character but still can be accommodated by sympathetic designs.
- The remediation and reuse of Mobuoy Road site needs to be addressed as an integral part of the LDP and should include some form of designation to protect the important riverine landscape
- -The River Faughan benefits from designations such as Area of High Scenic Value. The River Valley beyond Goshaden/the Oaks is a highly attractive landscape and the AoHSV should be extended along the Faughan Valley in a south easterly direction to connect with the Claudy Country Park in recognition of this.



The responses have highlighted that the existing Landscape Character Areas for the District are dated and need reviewed. The Sperrins AONB has been identified as a key landscape and there were comments supporting the protection of this landscape from high structures such as wind farms. However the renewable industry have a different view and believe that a blanket designation could be counterproductive to the wider renewable strategy.

Going forward, there will be a requirement to have to up-to-date Landscape Character Area assessments and a review of the Landscape Pressure Analysis. We will also have to consider in more detail the comments from the renewable energy industry to understand the implications for the wider renewables strategy.

	Option 1	Option 2	Option 3
C - Coastal	Accommodate		
Development	appropriate coastal		
	development as per		
	current UK Marine		
	Policy and forthcoming		
	Marine Plan for NI		

Issues Raised - Coastal Development

- -Suggest Council consider SSPS policy is relevant and appropriate to local circumstances for Coastal development, economic development, natural environment etc
- Given our maritime location, it is important that DCSDC also reference Irish Maritime Policy.
- The forthcoming Marine Plan for NI should recognise the alignment of NIRs network and given its role in sea defence and Translink's requirement to undertake maintenance and civil engineering works.
- -Coastal development ensure highest design and sustainability standards are achieved.

Consideration and Going Forward

The above comments have been noted and will be considered in the accommodation of current Marine Policy into the LDP.



	Option 1	Option 2	Option 3
D - Built	Existing designated	In addition to Option1,	Protect only those
Environment /	areas / buildings of	designate new areas /	designated areas /
Heritage	historic environment	buildings of historic	buildings and
	importance will	environment	accommodate
	continue to be	importance as part of	appropriate
	protected and	LDP preparation and	development where
	development	preclude all	possible
	facilitated with	development likely to	
	policies in line with	adversely impact on	
	the SPPS	such sites / buildings or	
		their setting	

Issues Raised - Built Environment / Heritage

- -HMC welcomes proactive approach to the protection of natural and historic environment but somewhat disappointed that preferred option for built environment / heritage is only in line with current PPS / SPPS. Disappointed that Council has (with its deserved reputation for holding historic environment in high regard) chosen not to take on task of identifying and considering locally significant built heritage, at odds with other proactive approach for preferred options.
- -Built environment/heritage. In addition to option 1, designate new areas/buildings of historic importance and preclude all development likely to adversely impact on such sites/buildings on their settings. Protect collective unlisted built heritage (including boundary wall) through local listing processes now available to council especially in inner city/town areas.
- -Preferred option should not preclude the protection of additional built heritage assets through the LDP process.
- -The main tourism assets of the District are based on the natural environment and the historic built environment specific reference to the need for their conservation and sustainability should be included in any option. To be sustainable 'flagship' sites and associated development must fully respect their local environments.
- -Option 2 would be more desirable but understandably would need extra resources. Emphasis on Place-making and design will result in a quality built environment;



-Built environment/heritage. In addition to option 1, designate new areas/buildings of historic importance and preclude all development likely to adversely impact on such sites/buildings on their settings. Protect collective unlisted built heritage (including boundary wall) through local listing processes now available to council – especially in inner city/town areas.

-Boomhall should be given a degree of recognition and protection in the new LDP

Consideration and Going Forward

The main issue here is whether the LDP should identify locally significant buildings/areas above and beyond those afforded protection as Listed Buildings and/or Conservation Areas. Any requests for additional heritage protection will be fully considered.

	Option 1	Option 2	Option 3
E - Urban	Existing design	A comprehensive drive	Minimal design
		· ·	· ·
Design /	standards are	for Place-Shaping,	standards accepted
Places	accepted –	including high quality	with focus on
	reasonable design	design of both buildings	development and
	sought on a site-by-	and key focal areas, in	investment paramount
	site basis	both urban and rural	
		areas	

Issues Raised

- -LDP should designate specific Design Areas. This would meet the policy requirements of good design within the SPPS.
- -Welcome option 2 and recommend high quality design includes green infrastructure (GI). Prefer high design levels across all development rather than restricted to designated design areas. Such design could include ecological networks.
- -Dfl happy with this approach. Support for high quality architecture, urban design, conservation and landscape architecture, strengths of existing urban, heritage assets, natural heritage, interconnected physical environment, squares, and parks. Sustainable power, zero waste, maximise modes of transport, reduce travel times.



Urban Design/Places. Prefer preferred option. Include high quality design of spaces: street, squares, parks, riverside walkways and their enclosing buildings.

- -Include inner town/city and 'walled city' surrounding contexts among the places needing regeneration as well as major regeneration sites. Needs to be pro-active proposing urban design led master plans where necessary.
- -Strongly supportive of a place making approach. Relevant urban guidance / supplementary planning policies / DCANS to be included and promotion of Lifetime Neighbourhoods principles.
- -RSPB does not agree with preferred option-Urban biodiversity is declining; POP fails to recognise that good design can promote biodiversity and encourage wildlife
- -No regard given to the importance of quality design in delivering and furthering sustainable development, including biodiversity;
- -Little evidence on how LDP purposes to use urban design to mitigate and adapt for climate change;

LDP should aim to deliver zero carbon buildings. Attention drawn to Kingsbrook development in England and project objectives around wildlife/biodiversity;

Consideration and Going Forward

Broad support for the preferred Option and most of the responses have been positive. Recognition that urban design goes beyond designing buildings and architecture and that it involves how our city, town and countryside works. There were some contributions that highlighted that urban design/places should take into account climate change and impacts on biodiversity. This will be taken into account.

	Option 1	Option 2	Option 3
F - Renewables –	Maximise the wind and	Identify the most sensitive	
Wind & Solar	solar resource of the	Landscape Zones remaining,	
	District	for protection, permitting	
		appropriate wind & solar	
		development elsewhere in line	
		with SPPS	



Issues Raised - Renewables - Wind and Solar

- -Reminded Options should be set within regional policy. Clarity required why policy options only refer to wind and solar energy.
- Encouragement for Council to reflect the wider climate agenda and drive decarbonisation in its LDP and be proactive in reducing reliance on non-renewable energy. Concerned that Council are under-planning for future energy consumption. Draft PFG & Paris Agreement point to a future direction that seeks to promote further growth of a renewable energy sector.
- Council should focus on economic benefits investment, generating jobs, strengthening grid and reducing harmful emissions and over-reliance on imported fossil fuels.
- -POP's economic objective jars with proposed renewable policies at Section 9. Correlation between District energy needs up to 2032 and energy supply ought to be fully considered prior to imposition of suggestive restrictive renewable energy policies.
- Encourages Council to plan for powering the anticipated growth of the District through promotion of renewable energy infrastructure and make provision for energy storage infrastructure.
- The prohibitive nature of the POP options could result in in a reduction wind energy applications which could impact on the ability to meet renewable energy targets and also impact on local economic growth and less diverse rural economies.
- -Support for sensitive Landscape Zones being protected from Renewables projects-AONBs and SPAs mentioned.
- -Strategic spatial approach to renewable energy development bring proposed by Mid Ulster is welcomed by RSPB. However, this should be done at a regional level in order to be effective. This is set out in attached submission as part of call of evidence by DOE in regard to SPPS for Renewable Energy Development
- Cumulative impact of single turbines will require further attention
- References dated studies and seeks clarification on whether Council has carried out its own assessment.
- -That important contribution of a renewable energy supply is absent from POP baseline consideration of energy infrastructure.
- -Onshore wind energy is acknowledged by UK Government as offering the cheapest form of energy.



- -LDP should make provision to ensure adequate power supply is accessible across NI.
- Council needs to develop an ambitious plan for low carbon urban areas which will deliver economic, environmental and health benefits.
- Housing Executive supports option 2 but keen to see this as part of a more holistic approach to developing energy policies. They are keen on Energy efficient development and would strongly support a minimum BREEAM or EPC/SAP rating for new buildings.
- -Consider impacts of turbines on CODA radar.
- -Passive homes should be encouraged.

This section attracted a considerable amount of comments. In particular the issue of protecting sensitive landscape zones raised differing views. On the one hand there was support for the protection of areas such as the Sperrins AONB, however there was also those who advocated the view that such a spatial policy/strategy would be unduly restrictive and detrimental in term of meeting the overall renewable objectives. It is important that we take into consideration all material considerations and make a balanced decision on this matter.

A further theme coming through in the responses is that the POP does not adequately reflect the wider "Climate Change" agenda and how all types of renewables/strategies can contribute to that. This is an area that will require further consideration to ensure that the LDP properly reflects our approach to climate change.

Some of the submissions have raised comments about a lack of evidence, out dated evidence or the need for further study. This will be taken on board.

	Option 1	Option 2	Option 3
G - Flooding	Avoid all further	Precautionary approach –	
	development in flood prone	only allow suitable types of	
	areas, or those forms of	development in flood prone	
	development which	areas in line with SPPS / PPS	
	exacerbate flooding	and with appropriate	
	elsewhere	mitigation	



Issues Raised - Flooding

-A number of representations supported Option 1, which would be to avoid all further

development in flood prone areas, or those forms of development which exacerbate flooding

elsewhere. This is seen as the "true" precautionary approach.

-DFI prefer no tweaking to technically complex flooding policies, which are broadly aligned to

Option 2 above. DFI stresses SPPS para 6.129 "no sites or zone lands that may be susceptible

to flooding now or in the future."

- Housing Executive keen to see comprehensive policy in PS to deal with all aspects of flooding

- prevention and mitigation. Promote SuDs.

-Flooding policy should be aware that woodland has the ability to "slow the flow" and

alleviate downstream impacts. Research indicates 47, 915ha of potentially high priority land

for the creation of woodland to assist in flood risk mitigation.

-Council should consider the potential use of open space to resolve flooding issues, create

more open amenity space and promote health and well-being through the introduction of

SuDS.

Consideration and Going Forward

There is support for each of the 2 options. Option 2 is in line with current planning policy,

whilst Option 1 would remove the ability to identify exceptional circumstances as set out in

current policy. Given the support for Option 1, it is proposed that we review, alongside key

consultees, what scope there is to remove the exceptions that are set out in current policy.

We have also received suggestions for flood alleviation such as forestation, open space and

SUDs. These will all be considered further in conjunction with key consultees. Since the

flooding event of 22 August 2017, there is certainly now a greater awareness and sensitivity

about flooding, and its direct link to land-use Planning.

Derry City & Strabane
District Council
Combate
Chathair Dhoire &
Cheartar on Clerithe Báin
Derry Citité & Strábane
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	Option 1	Option 2	Option 3
H - Transport -	Identify / encourage /		
Environmentally	require pedestrian		
and people-	accesses / footways,		
friendly	cyclepaths /		
	bridlepaths and other		
	green / blue proposals		

Issues Raised - Transport - Environmentally and people-friendly

- -POP should draw out clearly the links between the plan objectives and transport and identify a number of realistic strategic options
- -DFI considers these options do not fully represent an integrated approach to land-use and transport.
- -Options do not acknowledge or discuss the most effective ways of achieving a modal shift to more sustainable forms of transport.
- -DFI reiterates need for LDP & Local Transport Plan processes to be integrated and to influence each other.
- -DFI draws Council attention to SSPS para 6.301which outlines strategic policy to be taken into account in the preparation of the LDPs.
- -There should be a clear recognition within the LDP of the need for a comprehensive network of segregated road-side routes on the city's main arterial routes. White paint on the side of the road is not enough. A2 needs designed to take account of pedestrians and cyclists. Feels that POP does not seek to make cycling a genuine transport option through safe and segregated infrastructure.
- Council should introduce a Sustainable Transport score for areas across the District according to their current provision of public transport and active travel infrastructure
- -Supportive of active travel & improving connectivity between settlements.
- -Developers should contribute more in terms of cycle paths / walkways.
- -Welcome GI encouragement into development. Will require strong policy wording. Consider that transport and GI should be considered as two separate issues (para 9.48).
- -Any new revised policy must consider regional strategic objectives under para 6.297 of SPPS



Spatial Growth Strategy & use of Accessibility Analysis offer potential to promote environmentally and people friendly environments and work towards draft PFG outcomes.

- -If city of Derry is to grow, it must be able to accommodate greater numbers of people who must be able to move around the City. There needs to be a greater focus on identifying locations that are accessible by walking, cycling and public transport and ensuring that development in these locations are a suitably high density.
- -Walking and cycling accessibility should be a key and early consideration in site selection.
- -It is unclear from the wording whether the commitment to Active Travel is solely for main urban settlements or across the District.
- -The LDP continues to be passive, prioritising private car over public transport, cycling and walking. The Walled city continues to be dominated by surface car parking and private cars circulating within historic streets for these spaces.
- -If the car remains the focus of regional development and the number one transport option, then it may be difficult for Derry to be a 'sustainable city'.
- The development of pedestrian/cycle networks will be fundamental to the future success of proposed major capital projects such as the NW multi- nodal Hub, new P&R sites etc.
- -A strategic approach to developing sustainable transport networks is required as opposed to a piecemeal approach through developers and individual applications.
- -Supports the broad vision however the lack of a genuine focus on sustainable transport within the plan results in it failing to deliver against 2 of those 3 themes (environmental and social)

Environmental – fails to include a sufficiently clear or firm commitment to securing modal shift through strengthening and broadening the appeal of public transport, walking and cycling.

- -Social the plan fails to acknowledge the positive impact that transport choices can have upon people's health and wellbeing. The LDP fails to meet its own stated aim of delivering equality of opportunity for all. There should be a clear commitment to making Derry a cycling city.
- -Linking a city cycle network with tourism
- -A Connections Plan, highlighting safe pedestrian access, a car parking strategy and a public transport plan



This topic, along with the 'Transport' option contained within Section 4, generated a significant amount of correspondence. The broad theme that comes through, from both statutory bodies and the public, is that whilst the POP acknowledges transport and active travel, it does not set them at the heart of the LDP. There is strong support for using the LDP as a catalyst for a modal shift which would reduce the need for the car. It is highlighted that this is line with the wider regional policies as set out in the SPPS and it also meets broader plan objectives in relation to the environment and health and well-being.

Given the level of representation at POP stage on this topic we will review and consider the views put forward and re-assess how we address this issue at Plan Strategy.

5.7 REVIEW OF PLANNING POLICIES - LPD APPROACH AND OPTIONS

General	Formerly in PPS 1,	Retain Existing –	Include Principles of Place-
Development	see SPPS	substantially	making and good development
Principles		unchanged	– on noise, odour, dust,
			neighbourliness, good design,
			landscaping, energy efficiency,
			etc

Issues Raised - General Development Principles

- -Clarification sought on whether the LDP would set out the Council's view on public vs. private interests in planning
- -A number of comments indicating that options within POP don't marry up with the SPPS definition of "furthering sustainable development"
- A number of comments indicating that options within POP don't marry up with the SPPS definition of "mitigating and adapting to Climate Change"
- A number of comments indicating that options within POP don't marry up with the SPPS definition of "improving health and well-being" i.e. promotion of car over other modes of transport



The principles of planning as set out in the SPPS set the tone for the preferred regional policy direction. This approach to planning intends to extend beyond land use to integrate policies for the development and use of land with other key policies and programmes which influence the nature of places and how they function. We have noted that some of the comments above indicate that we need to more mindful of this approach to planning and going forward we need to mindful of other key policies and programmes in order to get the most out of the LDP.

Natural	PPS 2	Retain Existing –	Retain Existing – substantially
Environment		substantially	unchanged, with stronger policy
		unchanged	on high structures / cumulative
			impact in AONB

Issues Raised - Natural Environment

Neighbouring Councils should cooperate on Sperrin AONB policy development.

-Clarification on various relevant points of policy and guidance i.e.

Paragraph 10.3 states that existing policy will be retained, substantially unchanged. This differs from paragraph 10.6 which states that policies in SPPS replicated in PP2 could be dropped, the remaining ones carried forward and policy NH6 (AONB) replaced. Clarification needed if LDP is to be quiet on nature conservation policy.

- -As per PPS2 NH5 Council through policy / guidelines should not permit development on ancient or long established woodland sites.
- -Prefer current planning policy SPPS / PPS18 / PPS2 rather than LDP imposing area wide prohibitions.
- -Policy on natural heritage should include restoration and enhancement
- -Designations Buffer zones around designated sites should be considered for inclusion and the current provisions of PPPS 2 carried across in full into the LDP;
- -The LDP must afford protection to local designations such as SLNCIs and the current provisions of PPPS 2 should be carried across in full into the LDP;
- -Other Habitats, Species or Features of Natural Heritage Importance Existing PPS 2 should be adopted in full as it provides an important 'catch all'.



- -Level of detail with regards to changes to policy wording is insufficient to make insufficient comment/assessment with regards the options chosen for each of the policy areas.
- -Broad agreement with points raised but states that where a flexible approach is taken to policy making then this would need to be 'robust' and 'grounded' by evidence.

Responses on PPS 2 highlighted the differing views on having a specific spatial policy/high structures policy for the AONB. This is an issue that has been raised across several areas such Natural Environment, Landscape Character and Renewables and therefore will need further consideration.

The remainder of the responses are advocating that elements of the existing policy should be brought forward, this would be largely in line with the preferred approach.

Roads	PPS 3	Retain Existing –	Clarify on Protected
		substantially unchanged	Routes Policy, esp. in
			regard to new A5 and A6

Issues Raised - Roads

- -Reminder re SPPS & PPS3 AMP3 affording protection to key transport corridors.
- -DFI draws Council attention to SSPS para 6.301which outlines strategic policy to be taken into account in the preparation of the LDPs
- -It is not clear what clarification is required in relation to Protected Routes Policy-The proposal to carry forward policies of PPS 3 is welcomed subject to clarification from the Council on what 'minor changes' are proposed.
- -Level of detail with regards to changes to policy wording is insufficient to make insufficient comment/assessment with regards the options chosen for each of the policy areas. RSPB reserve the right make comment when further detail is available;
- -Section 1 PPS 3 to favour the creation of street typology routes as opposed to roads

Consideration and going forward



Responses did not raise objections to the proposed approach. Responses generally emphasise existing policies and have reserved judgement on any "minor changes" that we propose.

Economic	PPS 4	Retain Existing –	Retain Existing – substantially
Development		substantially	unchanged but slight relaxation
		unchanged	for rural and urban small
			businesses / start-ups. Also
			review the criteria for protection
			/ release of existing ED land (PED
			7)

Issues Raised – Economic Development

- -LDP policy should seek to apply regional strategic policy at a local level. Any departure from SPPS policy must be supported by a robust evidential context. Concern at the possible sustainability implications of the preferred approach especially new business starts and small businesses in the countryside.
- -Background evidence papers do not provide evidence in relation to the existing economic development uses in the countryside or the identified business needs of the rural area. No supporting evidence presented regarding a pressing need or a lack of opportunity.
- -Support compatibility with nearby uses when considering location of employment land. Requires strong policy protection akin to PPS 4 PED 8 to ensure other uses do not adversely impact or inhibit economic development.
- -Notes 18, 21, 4 & 16 requiring fundamental review and keen to see all policies replicated and retained and given adequate weight in the LDP to drive the plan led system.
- -Accommodation must be made for non-farming rural business opportunities.
- -Some further definition of the kinds of business which would be considered 'appropriate' in the countryside is needed.
- Policy PPS4 should be reviewed and look at the develop agreement which may assist in the delivery of an economic development site.
- -While PPS4 is unduly restrictive to rural enterprise, it would be useful to review evidence which supports this concern
- -Level of detail with regards to changes to policy wording is insufficient to make insufficient comment/assessment with regards the options chosen for each of the policy areas.



-The lack of demand or desire to develop industrial/employment land is due to the zonings being in the wrong locations and/or the zonings lacking any policy direction in terms of appropriate or acceptable uses

Consideration and Going Forward

There is support in the responses for a review of elements of PPS 4 and in particular economic development in the countryside. However there is also concern that such an approach is not sustainable and there does not appear to be any evidence presented to support a move away from regional policy. This is an issue that requires further research and consideration.

We have also noted comments in relation to the compatibility of economic uses and lack of policy direction on zonings. Further consideration will be given to these in the preparation of the plan strategy.

Retailing	Formerly in PPS 5, see SPPS	Rely on Existing principles in SPPS –
		substantially unchanged

Issues Raised - Retailing

- -Retail Hierarchy needs re-assessed.
- -There should be less focus on out-of-town developments.
- -Comparison goods and retail warehousing has been detrimental to the vitality of the city.
- -Retail capacity study is important in forming an opinion on retail policy.
- -Retail hierarchy and retail capacity are matters that are of a strategic nature that should be considered at this point in the process.
- -There should be positive policies for local shops of a scale appropriate to the sector and will help to deliver the RDS commitments and is consistent with the five sore principles of the SPPS.
- -There would be reservations in respect of the release of any employment lands for any other uses and specifically for retailing or mixed use development outside of any designated centres;



-A full 'Glossary of Terms' needs to be included as part of the Local Plan Policies providing a tool for defining and interpreting new forms of retailing and retail centres over the plan

period;

-SPPS is silent on petrol filling stations;

-Is there a fundamental need for Council to review the policies or formulate its own policies

in the same way Mid-Ulster has done in their POP?

-City and Town Centre sites need to consider redevelopment opportunity site in response to

edge-of-town and out-of-town development;

-Removing restrictive policies such as Primary Retail Core and Frontages. Whilst these policies

seek to strengthen the retail role by concentrating on a location, this can be seen as

counterproductive, by restricting other viable uses unnecessarily. There should be equality

of opportunity throughout the city centre.

-The LDP needs a planning framework which is supportive of modern, Local Convenience,

locally accessible shopping and should be encouraged in the LDP.

-Planning decision have resulted in a city dominated by cars and have failed to encourage

sustainability and connectedness when it comes to the location of commercial facilities e.g.

Culmore and Crescent Link.

Consideration and Going Forward

There are some comments in relation to town centre vs. out of town retailing. There have

also been suggestions on what the retail hierarchy should look like and where centres should

be placed on that hierarchy. Given that Council will be carrying out a retail capacity

assessment in advance of the next stage of the LDP, it is view that our approach will remain

as set in the POP subject to further consideration of the study.

We will consider the need for other policies such as retail frontages, petrol stations etc. and

in doing so will take into consideration the comments received.

Derry Citty & Strabane Dissist Council Conshale Chathair Deoire & Cheartar an Eiratha Báin Derry Cittle & Strabane Destric Cooses!

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Built Heritage	PPS 6 plus Addendum	Retain Existing – substantially
		unchanged.

Issues Raised – Built Heritage

- -Policy Built Heritage: While generally supportive of retention of current operation policy, HED highlight certain policies gaps which additional policy / wording to SPPS / PPS 6 policies could help address. Significant input / suggested rewording is provided to PPS 6 / SPPS and DAP policies
- HED considers any policy framework for the development and regeneration of settlements through place making and design vision should have the contribution of the historic environment at its core.
- -Interim Rural Proofing concern that perceived relaxing of rural policy could impact negatively on historic environment assets.
- -Interim Rural Proofing HED welcome the reuse of vacant or underused historic buildings in the countryside which they consider would benefit community cohesion, vitality and tourism in the area.
- EQIA HED advise that altering a Listed Building for people with a disability in line with DDA may require dispensation to protect historic fabric of the building.
- -Retain policy BH5 in light of current state of discussion about possibility of seeking World Heritage status for Derry-Londonderry
- -Para 10.3 & 10.12 conflict. Clarity required.
- -LLPA's policy required consistent with SSPS para 6.29/30
- -Application of existing policy too strict. Protection of built heritage is important but it should not be a barrier to sensible and sensitive proposals to support economic development.
- -Planning Policies are adequate need stricter enforcement of conditions.
- -Level of detail with regards to changes to policy wording is insufficient to make insufficient. comment/assessment with regards the options chosen for each of the policy areas.

Consideration and Going Forward

More clarity is required in relation to the wording of this policy and we will engage with NIEA on this matter. No major objection to the policy approach in the responses received, however



there was some comment on how it should be applied in practice. There was also a request to retain BH5. As this would be a departure from our preferred approach, it will require further consideration and consultation with key stakeholders.

Quality Housing	PPS 7 plus	Retain Existing –	Retain Existing –
	Addendums	substantially unchanged	substantially unchanged,
	on residential		but greater emphasis on
	character		density standards –
	and		appropriate to the type of
	extensions		settlement and location in
			the settlement.
			Amalgamate the
			Addendums with the
			policy

Issues Raised - Quality Housing

- -Strongly supportive of a place making approach. Relevant urban guidance / supplementary planning policies / DCANS to be included and promotion of Lifetime Neighbourhoods principles
- -Supportive of high standards of design and housing future proofing. Keen to see guidance with LDP on minimum space standards, open space, active travel and providing safe and secure neighbourhoods. Landscape proposals should be required for all housing developments where communal open space is required.
- -Secured by Design should be included in LDP.
- -LDP policy as a minimum needs to replicate the wording of SPPS, PPS21 and addendum to PPS7;
- Like to see a policy in the PS which caters for all those with specialist needs supporting evidence included.
- Like to see a policy in the PS ensuring an appropriate mix of housing.
- -Like to see a policy in the PS for Supported Housing (SH Individuals who cannot live independently in their own home) supporting evidence included.
- -Should have a minimum requirement for social housing of bungalows and lifetime homes.



Include high quality design of spaces: street, squares, parks, riverside walkways and their enclosing buildings.

Consideration and Going Forward

Responses received have been broadly in support of the preferred approach to this policy. Some additional issues have been raised that will require further consideration and these will be taken into account when finalising this policy.

Recreation	PPS 8	Retain Existing –	
Open Space		substantially unchanged	

Issues Raised - Recreation Open Space

- -Section 10 Policy PPS 8 recreation OS para 10.3 conflicts with para 10.16 concern over stated review of these policies to allow greater flexibility in terms of potential adverse impacts.
- -DfI refers to SPPS para 6.205 general policy presumption against loss of open space and references Council admission with position paper that they are unclear as to what exactly the existing OS provisions is.
- -Housing Executive strongly support the selective redevelopment of portions of open space. LDP to provide an exception clause limited to development that provides a 'substantial community benefit' Affordable Housing (social and intermediate housing) to be defined within policy as a "substantial community benefit"
- -Careful consideration needs to be given to open space in 70/80's housing developments is it causing anti-social problems. Supports more recreational space.
- -Indoor and intensive outdoor sports facilities should following the existing policy approach of SPPS and PPS8;
- -Do not accept DCSDCs proposal to only protect suitable and necessary OSR land –this is a significant departure from PPS8 and SPPS;
- -Note re-evaluation and concerned at term 'underutilised' infers all open space must be used by people.



Some concern expressed in relation to the preferred option of re-evaluating open space and the implications this would have for the OSR policy. As such we will give this option more consideration, engage with consultees and provide clarity where necessary. We also received suggested amendments that would vary from PPS 8, these will also require further deliberation.

Some responses have raised that we have not carried out a re-evaluation of open space and this is exercise that needs completed. This is noted and we will carry this out in advance of the plan strategy stage.

Enforcement	PPS 9	Retain Existing – substantially unchanged
	(cancelled by	
	SPPS)	

Issues Raised - Enforcement

- -Planning Policies are adequate need stricter enforcement of conditions.
- -The LDP must be enforced if it is to have relevance.

Consideration and Going Forward

Whilst we received no comments in relation to enforcement policy we note the above comments which highlight the importance of enforcement as a tool for implementing the LDP.

1	Waste	PPS 11	Retain Existing – substantially unchanged

Issues Raised - Waste

- -Support for waste policy approach.
- -Should look at infrastructure within new developments to include communal recycling facilities and promote circular economy and move towards zero-waste.



- -Need to invest to grow the circular economy in line with the proposed move towards zero waste for the city and region.
- -A sustainable approach to waste management by reducing the amount of waste being sent to landfill while ensuring there are no environmental risks associated with waste management, disposal or treatment;
- -Council should apply a precautionary approach to all waste management proposals
- -Disposal of inert waste should be steered clear of sensitive site;
- -DCSDC need to make allowances for those identified new sites within the LDP which were not identified as part of the previous two LDPs.
- -Suitably worded policy should permit necessary infrastructure to come forward on alternative sites, if required and zoned lands to be disposed of for other uses if no longer being brought forward by the relevant authority.

Whilst there is some support for the waste policy approach, there is also a view that the policy approach does not give enough emphasis on a desired move towards to circular economy and zero waste. There comments will be taken into account and any formulation of policy for waste will also consider wider regional policies and strategies as well as any local waste management plan.

Housing in	PPS 12	Retain Existing –	Retain Existing –
Settlements		substantially unchanged	substantially unchanged,
			but emphasise the need
			for Balanced Communities
			/ mix of housing tenures
			and types, plus mixed
			communities

Issues Raised - Housing in Settlements

- -Travellers needs to be adequately catered for retain HS3 / PPS12 or SPPS policy.
- -Section 1 PPS 3 to favour the creation of street typology routes as opposed to roads. Amend PPS12. PPS12 allow for other uses within residential developments live/work units, business workshops



- -Welcome for the commitment in Section 7.12 of the POP to place an emphasis on sustainability and the exploration of brownfield sites.
- -There should be an emphasis on brownfield land as per 60% set down in RDS. POP lacks ambition in this regard.
- -DFI question the suggestion the discrepancy between the HGI and the extant housing zonings may influence the density of housing development. This, they state, should be addressed through the LDP process. An overprovision of zoned land should not in itself be a justification for the increase in HGI figures, or be the driver for reductions in site densities, both or which individually and combined could prejudice sustainable forms of development as land is a finite resource which needs to be used sustainably;
- -If city of Derry is to grow, it must be able to accommodate greater numbers of people who must be able to move around the City. There needs to be a greater focus on identifying locations that are accessible by walking, cycling and public transport and ensuring that development in these locations are a suitably high density.
- -Definition of 'Sustainable Development' should be included in LDP.
- -The fundamental principle of sustainable development is that it integrates economic, social and environmental objectives but the LDP does not achieve the requisite level of integration to further sustainable development as the detail beneath each objective, remains primarily within its own pillar silo.
- -The need for affordable and social housing is recognised and the tension between delivering housing and safeguarding the environment
- -Disappointed that Council appears to have almost given up on the site re-evaluation exercise before it has even started the process on account that of the fact that the vast majority of such lands have planning permission;
- -While DCSDC advocates the use of the sequential approach to land search and identification of sites within two of its options, it is unclear from the POP it is unclear from the POP how it intends to implement such an approach in identification of location and allocation of housing land;
- New homes mixed tenure, distinctive, connected communities. Housing repair, remake, create terraced residential street. Community facilities in high streets including living over shops.



-Clarification is sought by POP text on 'more research is required by DFI, DFC, NIHE & Council' in relation Social and Affordable Housing and balanced communities.

-Social and affordable housing and balanced communities. This clear segregation is hard wiring social division into our city. The LDP should acknowledge this phenomena and include policies to oppose it.

-Social/Affordable Housing and Balanced Communities. A social housing requirement can adversely impact on development going forward e.g. of no need exists, what are other mechanisms for addressing this requirement? Too robust a policy will skew balance of any controversial discussions in favour of Housing Association as a 'ransom' for permission.

-Like to see an affordable housing policy promote social housing development in mixed tenure developments – reasoning included.

-Affordable housing definition (social rented housing & intermediate housing) needs to be set out as per SPPS.

-Like to see an affordable housing policy promote social housing development in mixed tenure developments – reasoning included.

Consideration and Going Forward

Responses support the main principles and policies of PPS 12 such as increasing housing density without town cramming, promoting sustainable forms of development and examining the possibility of balanced communities.

There is some concern in relation to a view that the POP is indicating that the overprovision of zoned land could be a driver for reductions in site densities and that this approach would be contrary to regional sustainability policies. This is an area needs to be reviewed.

Clarification is sought on the proposed research on social and affordable housing. We are seeking to advance this research with the key partners as outlined in our option. We will also take into account comments received as part of the research process.



Transportation	PPS 13	Retain Existing –	
& Land Use		substantially unchanged.	
		General principle of	
		integrating with land uses	
		and accessibility	

Issues Raised - Transportation and Land Use

- -Support shown for the principles of PPS 13.
- -Multiple comments received indicating that a preference for more emphasis on the following issues; reliance on private car, cycling, walking, public transport, review of car parking, rural connectivity, climate change agenda, making the city more sustainable and park and rides.
- Options do not fully represent an integrated approach to land-use and transport.
- -Need for LDP & Local Transport Plan processes to be integrated and to influence each other.
- Attention is drawn to SSPS para 6.301, which outlines strategic policy for Transport to be taken into account in the preparation of the LDPs.

Consideration and Going Forward

Transportation and land use is an area that attracted a lot of comments. Overall there is a view that these issues need to take a more prominent role in the LDP. Our preferred approach is to take forward the principles as set out in PPS 13 and we also need to consider these alongside the Transport objectives as set out in the SPPS. In doing so we will also need to consider what prominence we give to our overall transport strategy in the LDP.

Flooding	PPS 15	Retain Existing –	Retain Existing, but clarify
		substantially unchanged	Reservoir Flooding policy -
			emerging

Issues Raised - Flooding

- -LDP should address flood risk from all sources.
- -DFI prefer no tweaking to technically complex PPS15 policies.
- -More clarification required on reservoirs.



- -Some preference for stricter flooding policy which would not allow any exceptions within flood plain.
- -PPS 15 extra clarification needed reservoirs FLD 5.
- SUDS SUDS should be promoted within new developments along with retrofits. Revised Draft Consultation on PPS15 attached for information.
- -Woodland has the ability to "slow the flow" and alleviate downstream impacts. Research indicates 47, 915ha of potentially high priority land for the creation of woodland to assist in flood risk mitigation.
- -Policy should include the promotion of SUDs

Given the technical aspect of flooding, we will review, alongside key consultees, what scope there is changes in current policy.

We have also received suggestions for flood alleviation such as forestation, open space, SUDs. These will all be considered further in conjunction with key consultees.

Tourism	PPS 16	Retain Existing –	Retain Existing –
		substantially unchanged	substantially unchanged
			but some more scope for
			rural tourism attractions
			and accommodation

Issues Raised - Tourism

- -Exploit flexibilities afforded within PPS16.
- -Policies contained within PPS16 have generally worked well.
- -The facilities for tourism in the LDP area are inadequate in number and quality to attract and retain visitors in the area especially in the rural area.
- -There is no mention in the POP of the growing caravan/motor home and 'glamping' sector which should be actively encouraged. The vision of the LPD should not be limited to flagship sites or tourism zones.
- -Positive policies that encourage a wide range of tourism schemes as contained in PPS16, especially the caravan motor home and camping sector which is under represented in the LDP area should be carried through and expanded.



- -Ensure protection of tourism assets and settings due to degradation from tourism growth.
- -Considers revised objective to promote tourism development more generally throughout the district, including rural areas.
- -SSPS requires a Tourism Strategy
- -Development should be steered clear from sensitive areas;

Comments have been broadly supportive of the preferred approach. A reminder that policy will need to reflect the agreed local tourism strategy, this is noted.

Advertisements	PPS 17	Retain Existing – substantially unchanged. Stronger
		on design and materials generally

Issues Raised - Advertisements

PPS17 – should demonstrate awareness of and make provision for new technology – LED signage

Consideration and Going Forward

Comments on PPS 17 noted and will be taken into account.

Renewable	PPS 18	Retain Existing –	Policy for Wind Sensitivity
Energy		substantially unchanged	Zones, Solar Zones, others
			Renewables - need to be
			flexible for the 'next
			technology'?

Issues Raised – Renewable Energy

- -PPS 18 review is ongoing and it is to be completed, including any necessary amendments to the SPPS by the end of 2018.
- -PPS 18 and PPS 21 require fundamental reform to reflect the local circumstances in the Tyrone part of DCSDC. The 2010 Landscape Character Assessments are significantly out of date and provides no protection to the Sperrin Area of Outstanding Natural Beauty



- -Prefer current planning policy SPPS / PPS18 / PPS2 rather than LDP imposing area wide prohibitions.
- Urge Council to have regard to all relevant material considerations supplied before finalising LDP renewable energy policies.
- Urge the Council to insert specific renewable energy targets which will enable the plan to facilitate the development of clean technologies and renewable energy generation in a planned and integrated fashion suitable for all Council area.
- Policy on renewable energy should address the issue of hydroelectric proposals in greater detail.

The outcome of the review of PPS 18 is critical in terms of formulating our renewable policy for the LDP. On a local level there have arguments for and against the imposition of area wide prohibition of wind farms. It is important that we take into consideration all material considerations and make a balanced decision on this matter.

Rural	PPS 21	Retain Existing –	Based upon the SPPS criteria
Development		substantially unchanged	but some clarification and
			additional opportunities for
			rural houses – re CTY2a
			clustering, ribbon-infill, farm
			clustering, 6-year & 10
			year criteria and
			conversions – all within
			the parameters of SA,
			SPPS and our HGI Housing
			Allocation strategy

Issues Raised – Rural Development

- PPS 21 review is ongoing and it is to be completed, including any necessary amendments to the SPPS.



- PPS 21 require fundamental reform to reflect the local circumstances in the Tyrone part of DCSDC. The 2010 Landscape Character Assessments are significantly out of date and provides no protection to the Sperrin Area of Outstanding Natural Beauty
- -Concern at the possible sustainability implications of the preferred approach especially new business starts and small businesses in the countryside.
- -LDP policy should seek to apply regional strategic policy at a local level. Any departure from SPPS policy must be supported by a robust evidential context. Background evidence papers do not provide evidence in relation to the existing economic development uses in the countryside or the identified business needs of the rural area. No supporting evidence presented regarding a pressing need or a lack of opportunity.
- -LDP should limit growth of dispersed, single dwellings in the countryside.
- -Concern about the change in policy relating to proposed farm dwellings in 2014 the policy was changed to not permit land owners who let their farm land not have planning permission for a family dwelling. Concern that young families will not be able to establish themselves in the Countryside and this will have a major impact on the rural population.
- -Preferred Option 2 does not articulate the need for further opportunities in the Countryside or the proposed departure from the SPPS policy approach.
- -It is difficult to justify how PPS21 can be considered to represent 'sustainable development in the countryside' given the pressure on resources and services. In particular, concerns arising due to the increased numbers of septic tanks and the impact to the water quality of waterways due to increased phosphorous levels
- -LDP policy as a minimum needs to replicate the wording of SPPS, PPS21 & addendum to PPS7 -Planning needs to be simplified particularly for small part time farmers revert back to PPS21
- CTY 10. Allow farms let on Conacre to obtain dwellings.
- -PPS21 retain largely unchanged. Proposed amendments e.g. CTY2a clustering, farm clustering and dilution of the 6 and 10 year criteria seem to widen the door to suburbia in the countryside a dilution of a natural asset.
- -Concerns over potential for enhanced opportunities in relation to new dwellings in countryside.



Welcome the commitment from DCSDC to balanced growth across the District, especially given that after city dwellers, countryside dwellers make up the largest population grouping at 14.4%.

- -As the second largest settlement tier at 14.4%, DCSDC must make proper accommodation in the LDP for countryside development including non-farming development.
- -PPS 21 precludes any rural development beyond farming and farm diversification. This needs substantive amendment in the new LDP.
- PPS21 6 year criteria should be looked at for those who had emigrated and returned to farm. Work of DAERA on number of farm IDS
- -Like to see planned development through strategic policy / LPP allocation for affordable housing in rural area. Those instances of rising and unforeseen need to be catered for by exception policies (similar to CTY5 PPS21)
- -Like to see retention of CTY5 Protocol (DOE/NIHE2010)
- -Welcome potential for continued economic development opportunities in the countryside. Limited local growth will allow them to reach a stage of financial capability to make a move affordable in due course.
- -Rural Economy some further definition of the kinds of business which would be considered 'appropriate' in the countryside is needed.
- -Balance needs to be struck between providing appropriate development and protecting the countryside with reuse of buildings promoted;
- -Would not be prudent to focus zoned land in Derry and Strabane would go against economic development and entrepreneurial opportunities for the countryside.
- -Support the preferred option to encourage appropriate rural businesses to develop in a controlled manner to help sustain the rural economy.
- -Development in countryside needs tightly controlled.

Consideration and Going Forward

As expected, this policy attracted a substantial number of comments. In the main, there are three views; those in favour of relaxing PPS 21, those in favour of retaining PPS 21 as it is and those in favour of stricter rural policy. Like PPS 18, regional rural planning policy is subject to a current review and it is critical that we await the outcome of that before deciding a local



policy direction. Whilst it is likely that many of the comments received will be same or similar to those under consideration under the PPS 21/SPPS review, we must ensure that we carefully consider all the issues received, as well as taking into account any changes to regional policy.

Affordable	PPS 22 (Draft,	Incorporate the principle of	More research needed by DfI,
Housing	2014)	affordable housing.	DfC, NIHE and Council on this
		Consider a policy and	area. The need is not proven
		mechanisms to deliver	for a policy response, so do
		affordable housing. More	not include in the Plan.
		research needed by DfI,	Possible future subject plan
		DfC, NIHE and Council on	or Supplementary Planning
		this area.	Guidance

ssues Raised - Affordable Housing

- -Social / Affordable Housing & Balanced Communities: Clarification is sought by POP text on 'more research is required by DFI, DFC, NIHE & Council'.
- -City/ town centre living needs to be encouraged especially affordable accommodation suitable for single households.
- -Affordable housing definition (social rented housing & intermediate housing) needs to be set out as per SPPS.
- -Like to see an affordable housing policy promote social housing development in mixed tenure developments reasoning included.
- -Development management approach to the provision of affordable housing in the plan strategy.
- -Support for a developer contributions for affordable housing development and happy to discuss form and implementation of a suitable policy with Council.
- -Like to see planned development through strategic policy / LPP allocation for affordable housing in rural area. Those instances of rising and unforeseen need to be catered for by exception policies (similar to CTY5 PPS21).
- -Social and Affordable Housing and balanced communities. Agree identifying mechanism to achieve not easy developer contribution?



- -DCSDC need to include provision in the LDP for social/affordable housing in 'countryside' locations (as part of the extended settlement hierarchy) which cannot be accommodated by NIHE/Housing Associations to date because planning policy does make provision for it as an option outside of a settlement.
- -Social/affordable housing this is a complex and sensitive issues appropriate research and academic research should be carried out and a suitable mechanism for local circumstances should be identified
- -Social and affordable housing and balanced communities. This clear segregation is hard wiring social division into our city. The LDP should acknowledge this phenomena and include policies to oppose it.
- -A social housing requirement can adversely impact on development going forward e.g. of no need exists, what are other mechanisms for addressing this requirement? Too robust a policy will skew balance of any controversial discussions in favour of Housing Association as a 'ransom' for permission.
- -Social affordable housing and balanced communities. Can't agree to option 1 without further research in this area. Opposed to any key site requirements of site specific obligations as this could sterilise land or may not actually result in the delivery of social housing. Whilst a general policy for the plan to consider the need/demand on an application by application basis may be acceptable there is insufficient research to qualify at this stage.
- -The need for demographic projections of need include demographic projections of need, supporting a growing economy, meeting the need for affordable

Affordable housing needs to be considered in the context of the objectives for economic growth.

Consideration and Going Forward

There is broad welcome for a policy for affordable housing, however there is no consensus on a mechanism to deliver this. Therefore we will continue our engagement with DfI, DfC, NIHE and Council on this area.

Enabling	PPS 23	Retain Existing – substantially unchanged
Development		



Issues Raised - Enabling Development

No issues raised

Consideration and Going Forward

Continue with our preferred approach.

Minerals	Planning	Retain Existing –	Stronger protection for
Development	Strategy for	substantially unchanged	Minerals Safeguarding
	Rural NI		areas and also stronger
	(PSRNI)		Minerals Constraint areas
			/ policies

Issues Raised - Minerals Development

- -Need for policy for high value minerals, highlight importance of sand and gravel production within our District and overall, stresses the positive contribution to the economy, growth, health and well-being of this District from sustainable mineral development.
- -Opposition to areas of mineral constraint.
- Council is reminded that options should be set within the regional policy context established by the RDS / SPPS. DFI welcomes further studies as proposed by Council and these will assist Council to further develop and refine evidence base for Minerals.
- -Mineral policies of the PSRNI to be carried forward should be subject to SA.
- Support for mineral policy which will seek to minimise / eliminate potential risk to environmental health;
- -Identify Mineral Safeguarding (Reserve) Areas around existing operational sites to prevent inappropriate development that would sterilise future construction aggregate reserves and impact on the day to day operation of existing sites.
- -Inadequate minerals policy has been a major problem for many decades failing to protect designated sites including the River Faughan SAC.
- -POP has not acknowledged the policy failure and the review of planning policies section suggests that the planning authority is presently unaware of the true extent of the problem facing the Council in regard to this issue.



- The subject policy needs to be set in the context which ensures that levels of extraction do not exceed environmental limits or undermine the integrity of wider eco-systems.
- -Development should be steered away from protected sites and policy wording should provide sufficient protection to the natural environment.
- -Carrying forward a failed Minerals Policy into the LDP is a mistake and an inadequate approach if sustainable planning is to be achieved.
- -Minerals no fracking at any time.

There have been differing views on how to best deliver new minerals policy for the LDP. Some of the views include the concern that carrying forward the existing policy in PSRNI does not take into account the regional strategy in SPPS. There is some opposition to 'Areas of Mineral Constraint' as proposed by SPPS.

There is also support for a balanced policy that gives account to environmental issues. Other responses view the current policy approach as not appropriate and believe that it shouldn't be carried forward. As this is a complex issue, we will continue to engage with key stakeholders in order to formulate a policy approach for minerals.

Planning
Agreements
and Community
Benefits

The Council intends to further research requirements / mechanisms and to utilise both tools to positively and pro-actively secure legitimate development contributions, for the benefit and proper planning of this District, via the LDP

Issues Raised - Planning Agreements and Community Benefits

- -Planning Agreements caution against developer contributions for public sector developments where wider societal benefits are the driving force rather than profit.
- -Agree with economic growth and seek social clause in planning agreements.
- -Useful tools in other areas. Benefits should be significant and sustainable. Look at community benefits derived from Wind Energy applications in Scotland.



-LDP needs to recognise that onshore wind can support social objectives of the POP through community benefit funds.

Consideration and Going Forward

Some constructive comments were received in relation to how to best utilise planning agreements and community benefits. These will be taken into account when formulating our approach to this matter.

Hazardous	The LDP will include appropriate measures so as to meet best-
Substances	practice in relation to preventing major accidents and dangerous
	substances.

Issues Raised - Hazardous Substances

No issues raised

Consideration and Going Forward

Continue with our preferred approach.

5.8 SETTLEMENTS- PLACE-MAKING AND DESIGN VISION

	LDP Approach	LDP Approach	Comments
	Continue current	Strategic leadership	Strategic Regeneration
CITY	'market-led'	and intervention.	Framework to take
Ciri	development. Do	Incorporate a strong	account of
Derry	not intervene	Vision in the LDP for	opportunity/regeneration
	strategically in	the city's	sites such as Ebrington,
	leading the city's	regeneration.	Fort George, Riverside,
	regeneration.	Commitment to	Harbour Square and
		future detailed	Council-controlled assets.
		Regeneration	
		Framework and / or	
		Supplementary	
		Planning Guidance	



MAIN TOWN Strabane	Continue current 'market-led' development. Do not intervene strategically in leading the town's regeneration.	Strategic leadership and intervention. Incorporate a strong Vision in the LDP for the town's regeneration. Commitment to future detailed Regeneration Framework and / or Supplementary Planning Guidance	Strategic Regeneration Framework to take account of opportunity/regeneration sites such as the Canal Basin, Smith's Mill, Railway St and traditional town centre area.
LOCAL TOWNS Castlederg, Newtownstewart, Claudy	Continue current 'market-led' development. Do not intervene strategically in leading the towns' regeneration.	Strategic leadership and intervention. Incorporate a strong Vision in the LDP for the towns' regeneration. Commitment to include a Design / Place-making Vision Statement in the LDP for each town.	Build upon and sustain existing strengths and assets of these towns.
Sion Mills	Continue current 'market-led' development. Do not intervene strategically in leading the settlement's regeneration.	Strategic leadership and intervention. Incorporate a strong Vision in the LDP for its regeneration. Commitment to include a Design / Place-making Vision Statement in the LDP.	Recognise the specific heritage qualities of the settlement and acknowledge other heritage initiatives carried out by the Council.
Villages	Continue current 'market-led' development. LDP Commitment	Strategic leadership and intervention. Incorporate a strong Vision in the LDP for	Be aware of the context, character and setting of our villages and encourage a good



	to include a	the villages'	standard of design that
	Design / Place-	regeneration.	acknowledges all of these
	making Vision	Commitment to	
	Statement in the	future detailed	
	LDP – for Villages	Regeneration	
	tier.	Framework and / or	
		Supplementary	
		Planning guidance.	
Small Settlements	Continue current	Strategic leadership	Be aware of the context,
Sman Sectionients	'market-led'	and intervention.	character and setting of
	development.	Incorporate a strong	our small settlements
	LDP Commitment	Vision in the LDP for	and encourage a good
	to include a	the settlements'	standard of design that
	Design / Place-	regeneration.	acknowledges all of these
	making Vision	Commitment to	admire wiedges an or these
	Statement in the	future detailed	
	LDP – for this tier.	Regeneration	
		Framework and / or	
		Supplementary	
		Planning guidance.	
		33	
Open Countryside	N/A		Good design standards,
			as set out in 'Building on
			Tradition'

Issues Raised - Settlements Place Making and Design Vision

- Would prefer to see more than a Vision for each area perhaps more detailed guidance / principals
- The regeneration along the banks of the Foyle and expansion of Magee will revitalize the City. Plan needs to encourage active redevelopment of Ebrington, Fort George and Harbour Square.
- -The LDP should set out an ambitious spatial plan which; Identifies key development sites; A 21st Century Riverside such as those created in Bristol, Aker Brygge (Oslo), Shad Thames/Butler's Wharf (London) and Dublin; a City Wide public realm plan; a heritage-led



development of the Walled City; a connections Plan, highlighting safe pedestrian access, a car parking strategy and a public transport plan.

- -Include inner town/city and 'walled city' surrounding contexts among the places needing regeneration as well as major regeneration sites. Needs to be pro-active proposing urban design led master plans where necessary.
- -Welcome this and visions should include protection and enhancement of distinctive landscape character, views and setting.
- Rural villages/settlements are losing their purpose and character under current planning policy. As a result they end up being nothing more than dormitory settlements with a population base simply supporting larger urban settlements.
- -DCSDCs development control role will be fundamental to better design and place making in the life of the LDP.
- -Emphasis on Place-making and design will result in a quality built environment;
- -Strategic leadership and intervention must involve a working partnership bringing together the public, private and community sectors. This will aid the process of developing a vision which is investment-led within the framework of an agreed LDP.
- -Relevant urban guidance / supplementary planning policies / DCANS to be included and promotion of Lifetime Neighbourhoods principles.
- -Council should instead show leadership and seek to implement a substantial positive step change in how people can and do travel into and around the city. Council should introduce a Sustainable Transport score for areas across the District according to their current provision of public transport and active travel infrastructure. If there is a desire to expand in areas with a low sustainable transport score then that should be done with a parallel improvement in sustainable transport in those areas.
- -Supportive of high standards of design and housing future proofing. Keen to see guidance with LDP on minimum space standards, open space, active travel and providing safe and secure neighbourhoods. Landscape proposals should be required for all housing developments where communal open space is required.
- -It is already too late for some of our settlements, nevertheless, damage can be mitigated by introducing good quality design at this late stage.



-Little evidence on how LDP purposes to use urban design to mitigate and adapt for climate

change;

-Urban Design/Places. Prefer preferred option. Include high quality design of spaces: street,

squares, parks, riverside walkways and their enclosing buildings.

Consideration and Going Forward

The approach taken was broadly welcomed, however a number of responses believed that

the vision should not be limited to certain areas and that we should instead apply standards

of good design and place-making across all areas of our City and District.

There was also a message coming through that an approach to design and place-making

should go beyond a vision and Council should consider guidance and policy. It was also

suggested that we critically examine previous approaches and where necessary decide a

better approach in the future.

Derry City & Strebane Oxidete Cownell Constatie Chatthair Dhoire & Cheantar an tizentha Bál Derry Cittle & Strábane Derlyrick Coencil





6.0 Conclusion

6.1 This Interim POP Representation Report has outlined how public consultation in relation to the Council's Preferred Options Paper (POP) complies with Regulation 11(4) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015. It also provided clarification in relation to the processes involved in publicising and promoting the consultation for the Preferred Options Paper both in terms of public consultation and liaising with statutory and non-statutory consultation bodies.

6.2 From a presentational viewpoint, Council's POP document was well received in terms of its readability, layout and clarity. The clear and legislatively required relationship with the Strategic Growth Plan was positively commented on. This feedback is one that Planning officials can proactively build on in preparing the layout and content of the draft Plan Strategy document.

6.3 In terms of issues raised, respondents were broadly supportive of the thrust, sustainability approach and main text of the POP document and its supporting documents. The task in hand going forward will be for Council to agree and prioritise these issues raised and to facilitate those that best serve our needs in terms of our LDP, District Vision and Strategic Growth Plan. The preparation of the LDP is key to furthering sustainable development, implementing the Strategic Planning Policy Statement (SPPS) and realising our vision and aspirations as articulated through the Strategic Growth Plan.

6.4 It has been noted that Planning extends beyond land-use to integrate policies for the development and use of land with other key policies and programmes which influence the nature of places and how they function. It is therefore incumbent on Council, as part of the LDP preparation, to undertake all necessary engagement and discussion with relevant Government Departments, consultees, agencies and other interested parties to ensure that a robust and current evidence base is gathered and a fully rounded and transparent consideration of all issues and viewpoints takes place.



6.5 The broad nature of responses to the Options as presented in the POP can be categorised as follows; either:

- Supportive of the preferred option (with / without supplying supporting evidence);
- Not supportive of the preferred option and a preference for another Option (with / without supplying supporting evidence);
- Or seeking additional, robust baseline evidence / further studies to underpin future decision making.

6.6 The following Key Topic areas received a greater amount of interest and will require a much greater level of additional consideration, namely:

Economic – Economic Development Lands, City / Town Centres, Transport, Rural Economy, Minerals;

Social – Strategic Housing Distribution, Location & Allocation of Housing Land; Sociable / Affordable Housing & Balanced Communities;

Environment – Natural / Historic Environment, Landscape, Urban Design, Renewables, Transport – People & Environmentally Friendly, Settlements – Place Making & Design Vision.

These Topics dovetail into the key findings emanating from the Strategic Growth Plan in terms of those key areas seen as drivers to the economic regeneration and social improvements required to enable this District to fully deliver its 'North West City Region' role and fully maximise its potential to the benefit of its citizens.

6.7 All of the suite of Planning Policy Statements were opened up for representations to be made during the consultation period. The broad nature of responses can be categorized as follows; either:

- Retain the policy in each PPS as is;
- Relax the contained policy within each PPS;
- Stricter policy controls required over and above that already contained in the PPS;
- A general desire to see Council more rigorously enforce the application of policy.



The following Planning Policy Statements received a particular level of interest namely,

PPS13 – Transportation & Land Use

PPS 18 – Renewable Energy

PPS 21 – Sustainable Development in the Countryside. PPS 21 attracted the greatest level of response with issues raised divided into requests to have the future LDP rural planning policy either, retained as per PPS21, relaxed or alternatively made stricter.

6.8 The POP and SA (EQIA and Rural Proofing) consultation with statutory bodies and the public has demonstrated that there is a wide range of different views being expressed regarding the Council's Preferred Options. Overall, while there was much support for Council's Preferred Options for the proposed LDP, certain topic areas attracted significant comment and raised issues that will require further consideration, additional studies or analysis of supplied supporting baseline data. Any actions / agreement arising out of these issues raised will need to be factored against the various Soundness tests, against which the LDP will be scrutinised at the Independent Examination (IE). In particular, any LDP actions emanating out of the issues consideration that could be perceived to be contrary to current regional planning policy must be underpinned by a sound and robust evidence base to justify their inclusion in the Plan Strategy.





Appendix - Information about POP Launch & Consultation

Consultation Launch Event on 30th May 2017.



From back left to right: Cllr Kieran Maguire, Cllr Thomas Kerrigan, John Kelpie (Chief Executive, Derry City and Strabane District Council), Cllr Gus Hastings, Maura Fox (Head of Planning). From front left to right: Karen Philips (Director of Environment and Regeneration, Mayor Hilary McClintock, Cllr John Boyle (Chair of Planning Committee).



Launch of LDP Preferred Options Paper 2017, 30 May 2017. From Left to right – Maura Fox (Head of Planning), John Kelpie (Chief Executive, Derry City and Strabane District Council),



Mayor Hillary McClintock, Cllr John Boyle (Chair of Planning Committee), Karen Philips (Director of Environment and Regeneration).

Information Leaflet:

Public Consultation Workshops on Strategic Growth Plan (Community Plan)



& LDP Preferred Options Paper (POP)

for Derry City & Strabane District

The Strategic Growth Partnership for Derry City & Strabane District, together with Derry City and Strabane District Council have jointly launched two important documents designed to improve the social, economic and environmental wellbeing of our City and District.

The draft, Inclusive Strategic Growth Plan is open for consultation until **Friday 15th September 2017.** The details can be accessed at Council Offices and at **www.derrystrabane.com/communityplanning**A series of public consultation events will be held across the City and District during June 2017, to engage local stakeholders on the proposals within both documents, as follows:

www.derrystrabane.com/ldp

Location	Evening Meeting (LDP & SGP - Strategic Growth Plan)	Daytime Workshop (focussed on LDP, as well as SGP)
Guildhall, Derry	Tues 6th June @ 7pm	Wed 7th June, 2pm - 4pm
Alley Theatre, Strabane	Wed 7th June @ 7pm	Fri 9th June, 2pm - 4pm
Ulster University @ Magee, Great Hall	Tues 13th June @ 7pm	
The Glen Community Centre, Derry		Thurs 15th June, 3pm - 5pm
Claudy Community Centre	Thurs 15th June @ 7pm	Fri 16th June, 2pm - 4pm
Derg Valley Leisure Centre, Castlederg	Mon 19th June @ 7pm	Tues 20th June, 11.15am - 1pm
Amnity House Donemana	Tues 20th June @ 7pm	Wed 21st June, 2pm - 4pm
Skeoge House, Leafair, Derry	Thurs 22nd June @ 7pm	Fri 23rd June, 2pm - 4pm
St. Columb's Park House, Derry	Tues 27th June @ 7pm	Wed 28th June, 2pm - 4pm
		making it
Everyone is welcome to attend these For further information please visit w		nappen 6 derrystrabane.com





Photos of Banners and Display Table at Reception, Derry City and Strabane District Council



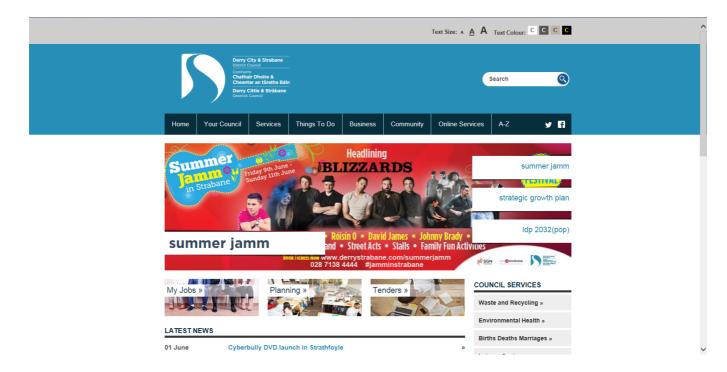


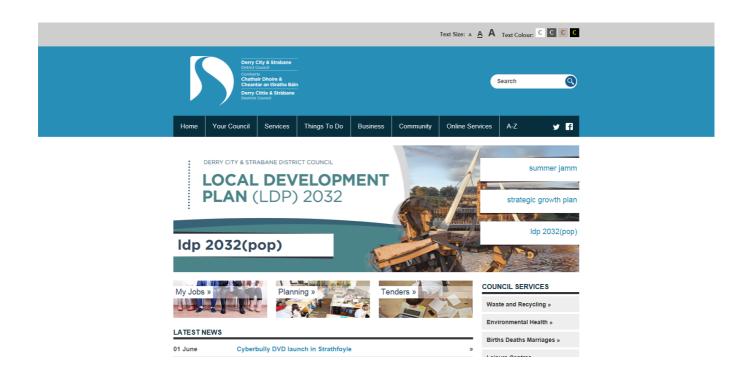
Copy of the Advertisement in the Local Press published for two consecutive weeks.

1.	Derry Journal	30.05.2017, 2 week placement
2.	Londonderry Sentinel	31.05.2017 2 week placement
3.	Strabane Chronicle	01.06.2017 2 week placement
4.	Strabane Weekly News	01.06.2017 2 week placement
5.	Tyrone Constitution	01.06.2017 2 week placement
6.	Ulster Herald	01.06.2017 2 week placement

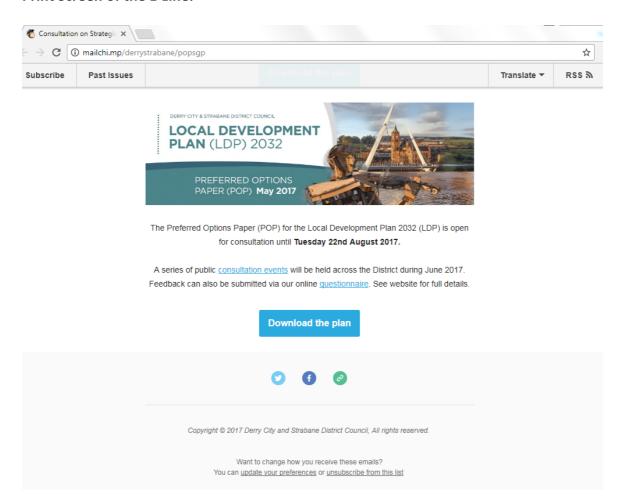


Print Screens (1st June 15.34) below of Derry City and Strabane District Councils Main Home Page with the LDP POP link displayed on the right hand side. The two front screens were on timed rotation.





Print Screen of the E-zine:





List of Section 75 Organisations

List of Sec	tion 75 Organisations
Action on Hearing Loss	Eglinton Community Association
Active Citizens Engaged	EGSA
African Caribbean Group	First Housing Aid and Support Services (FHASS)
Age Friendly (Derry and Strabane)	Foyle Cruse Bereavement Care
C/o Derry Health Cities	
Ailsa Bratton	Foyle Deaf Centre
All Saints Caring Association	Foyle Downs Syndrome Trust
Ancient Order of Hibernians	Foyle Family Heritage Centre
Apprentice Boys of Derry	Foyle Haven
Baha' I Faith	Foyle New Horizons
Ballymacgroarty and Hazelbank	Foyle Trust for Integrated Education
Community Partnership	
Ballymagroarty Community	Foyle U3A
Assoc/Youth Assoc.	
Bond Street Community Association	Foyle Women's Aid
Bridge Accessible Transport	Foyle Women's Information Network
CALMS	Gael Phobal
Carnhill Community Centre	Galliagh Community Development Group
Carnhill Resource Centre	Gasyard Development Trust
Caw Nelson Drive Action Group	Gingerbread (NI)
Cheshire House	Greater Shantallow Area Partnership
Church of Ireland	Habinteg Housing Association
Citizens Advice Bureau	Hands That Talk
City of Londonderry Grand Orange	Holywell Trust
Lodge	
Claudy Rural Development Group	Hungarian-Irish Network
Clooney Family Centre	HURT



Community Development Learning	Ilex URC	
Initiative		
Community Restorative Justice (NW	Inner City Trust	
Region)		
Council for the Homeless (NI)	Irish Street Community Association	
Creggan Enterprises Ltd	Law Centre NI	
Creggan Neighbourhood Partnership	Leafair Community Association	
Creggan Pre-School and Training	Learmount Community Development Group	
Trust (CPTT)		
Cultúrlann Uí Chanáin	Lettershandoney and District Development	
	Group	
Cumann Gaelach Chnoc na Ros Doire	Lilliput Theatre	
CUNAMH	Londonderry Methodist City Mission	
Currynieran Community House	Londonderry YMCA	
Derry Northside Development Trust	Long Tower Youth and Community Centre	
Derry Travellers Support Group	MENCAP	
Derry Well Women	Mens Action Network	
Derry Youth and Community	Methodist Church in Ireland	
Workshop		
Destined	Methodist City Mission	
Destined (Feeny)	Monreagh Ulster Scots Heritage Centre	
Disability Action	Mrs Sue Divin	
Disability Equality NI	Multiple Sclerosis Society (Foyle Branch)	
Disability Equality NI	National Autistic Society	
Newbuildings Community and	Sion Swifts F. C.	
Environmental Assoc.		
NEXUS Institute	Sollus Centre	
NI Association for Mental Health	St Columb's Park House Peace & Reconciliation	
	Centre	



NI Chest, Heart and Stroke	STEER	
Association (Local)		
NIACRO	Strabane Athletic F.C.	
NIPPA	Strabane Ethnic Community Association	
NIPSA	Strabane Volunteer Centre	
NIPSA Branch 536	Strand Foyer	
North West Housing Ltd	Stroke Organisation	
North West Migrants Forum	Talking Newspaper	
North West Volunteer Centre	The Cedar Foundation	
Northern Ireland Chest Heart and	The Junction	
Stroke		
Northern Ireland NEWPIN	The Women's Centre	
Northlands Centre	Traveller Development Officer	
NSPCC	Triax Neighbourhood Partnership Board	
NW Community Network	Ulster Scots Communtiy Network	
NW Forum of People with	UNITE	
Disabilities		
Off The Streets	USEL	
Older People North West	Verbal Arts Centre	
Outer North Neighbourhood	Victim Support Northern Ireland	
Partnership		
Outer West Neighbourhood	VOYPIC	
Partnership		
Partnership Care West	Waterside Area Partnership	
Pat Finucane Centre	Waterside Women's Centre	
Peace and Reconciliation Group	West Bank Initiative	
Praxis	Women's Institute	
Presbytery of Derry and Donegal		
Probation Board for Northern		
Ireland		



R.E.A.L. Network
Rainbow Project
Residents Committee Park West
Riversdale Otters A.S.C,
RNIB Resource Centre
Rosemount Resource Centre
Rural Area Partnership in Derry
Rural North West Community
Support
SALT Community Association
SDLP Local Office
Sensory Support Service
Shamrock Hurling Club
Sigersons Ladies GAA Club
Sikh Cultural Centre
Sikh Cultural Centre
Simon Community

