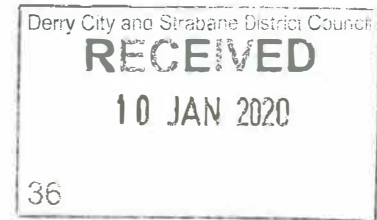


Chloe Duddy

From: Dawn McIntyre
Sent: 10 January 2020 10:03
To: Chloe Duddy
Subject: FW: EYF Response to Draft LDP
Attachments: DCSDCLDPEYFResponse .docx

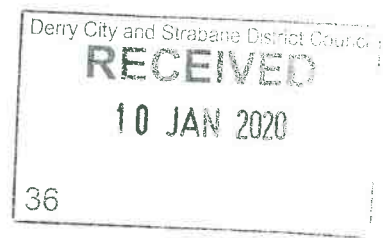


From: Paul Hughes [mailto:info@enaghyouthforum.com]
Sent: 20 December 2019 12:06
To: Local Development Plan <LocalDevelopment.Plan@Derrystrabane.com>
Cc: [REDACTED]; Theresa.Kearney@daera-ni.gov.uk; Maura Fox <Maura.Fox@derrystrabane.com>; John Kelpie <John.Kelpie@derrystrabane.com>
Subject: EYF Response to Draft LDP

Please find EYF response attached.
Please acknowledge receipt of this correspondence.

Kind Regards,

Paul Hughes
Youth & Community Development Worker
Enagh Youth Forum
Tel: 02871860751



20/12/19

DERRY CITY & STRABANE DISTRICT COUNCIL - LOCAL DEVELOPMENT PLAN 2032

ENAGH YOUTH FORUM RESPONSE TO DRAFT LDP 2032

Enagh Youth Forum is a grassroots youth and community organisation based in Strathfoyle but working across the rural Faughan DEA. We are also a registered charity with the NI Charity Commission.

Our work is guided by three core principles of:

- Promoting Environmental Well-Being through campaigning for zero waste solutions, improved environmental and wildlife protection, including the local areas of Enagh Lough and The River Faughan
- Promoting Economic Well-Being through the provision of a wide range of training and employment programmes and accredited courses
- Promoting Social Well-Being

EYF's comments are largely restricted to our area of interest; namely, the River Faughan:

In particular the LDP fails to adequately highlight/address the issue of Mobuoy Dump. This needs to be looked at again. In particular we suggest that LDP staff make **URGENT** contact with Dr Theresa Kearney from the NIEA & the newly established 'Mobuoy Committee' set up by Derry City and Strabane District Council' during November 2019. (See Full Council Minutes November 2019) The impact of Mobuoy on the A6 also needs to be noted within the LDP in much more detail and Mobuoy dump must be referenced directly within the LDP.

The River Faughan is a designated Special Area of Conservation (SAC) and Area of Special Scientific Interest (ASSI).

Despite being afforded the highest level of environmental protection in Europe, historically, poor planning has meant our river faces a permanent legacy of threat from environmental harm namely due to the governments inaction over Mobuoy Dump. The River Faughan, another Area of Special Scientific Interest and Special Area for Conservation, has been the unfortunate location of Europe's biggest illegal landfill site. Mobuoy has had over one million tonnes of domestic and construction waste dumped in a huge organised crime scandal, stemming from failure to investigate illegal quarrying.

Concerns were raised as far back as 2003 but the waste remained undiscovered by inspectors, and the Mills Report was not published until 2013, highlighting the frightening scale of waste crime in the area. Even though the waste run-off constitutes a risk to public health with the potential to contaminate Derry's drinking water supply and a call for a public inquiry received cross-party support in 2014, little concrete action has been taken. Contracts were awarded by the DUP's Michelle McIlveen with an implementation plan to be in place by spring 2017, but squabbles among different governmental departments have

meant that any plans may need to wait on the appointment of a new minister IF Stormont is to get back up and functioning again in Northern Ireland.

General comment:

The planning function is undertaken in the public interest (SPPS, 2015: 10). Those public servants charged with the delivery of planning are required to act in the public interest (RTPI, 2016; IPI, 2012 – Professional Codes).

It would therefore be prudent for the Local Development Plan (LDP) to articulate from the outset a clear definition of what constitutes the public interest in planning.

Section 4 – LDP Vision and Objectives

Economic objectives

Objective (vi) places strong emphasis on the importance of the delivery of the flagship highway schemes of the A5 and A6. However, the delivery of the A6 (Drumahoe to Maydown section) is currently stymied by the Mobuoy Road illegal waste disposal site and has been removed from the current 2017 – 2021 budget for infrastructure provision. No proposals for the super-dump's remediation have yet been made public, but given the scale of the problem and the likelihood for it to impact on the council area for years to come, the remediation and reuse of the Mobuoy Road site (the size of 66 football pitches) **should & MUST be addressed as an integral part of the LDP**. This should include some form of designation to protect the important riverine landscape.

Waste

It is somewhat odd that a council area with an illegal landfill site containing an estimated 1.7 million tonnes of waste adjacent to Derry's main water supply is silent about how this should be dealt with and what future use the land will be put to. Clean Up Mobuoy Dump Now! We need justice for Mobuoy and we need an independent environmental protection agency.