

Appendix 4 - Summary Table of Consultation Responses on Sustainability Appraisal Interim Report for LDP Preferred Options Paper

Statutory Consultee	Summary
Department for Infrastructure (DfI)	<p>[ANNEX 1: DfI Planning response - para 4.0 to 4.3]</p> <ul style="list-style-type: none"> • Concern that the Council has not demonstrated how Preferred Option has been informed by the SA and potentially impacting on 'soundness' of plan <p>[ANNEX 1: DfI Planning response - para 18.4]</p> <ul style="list-style-type: none"> • 'Carried Forward Policies' should also be tested through SA, and evidence of this is required. <p>[ANNEX 2: DfI Non-Planning business area response – Water and Drainage Policy Division (p.15)]</p> <ul style="list-style-type: none"> • <i>Sustainable Water – A Long Term Water Strategy 2015-2040</i> should be included in the Glossary and Appendix 2
Derry City and Strabane District Council	<ul style="list-style-type: none"> • Notes contents of LDP POP Sustainability Appraisal Interim Report
Department for Communities - Historic Environment Division (HED)	<p>[Comments have been added directly to a version of the Sustainability Appraisal Interim Report - Appendix A: Assessment Matrices]</p> <ul style="list-style-type: none"> • In response to '<i>Figure 4: Significant Effects of LDP POP, objective 14</i>'. Disputes that -ve effects of development relate to greenfield land or settlement edges and as 'Areas of Archaeological Potential' relate to urban centres and historic cores • Comment in relation to '<i>Section 4. Strategic Cumulative Effects</i>'. Suggest inclusion of "...and conservation..." to end of "...the LDP policies will include policies supporting their protection..." • Comment at '<i>Section 5. Mitigation and Monitoring</i>'. Requests clarification on meaning of "...the impacts of new digital infrastructure on the historic environment could be considered more fully" • Comment at '<i>Main Issue 2: Housing Allocation objective 14</i>'. "Should look toward regeneration and usage of non-designated heritage assets and industrial heritage" • Comment at '<i>Main Issue 6: Economic Development - Addressing Deprivation / Regeneration in the Rural Area objective 14</i>'. "Possible to introduce policies favouring use of non-designated heritage assets/industrial heritage" • Comment at '<i>Main Issue 8: Overarching Policy for Renewable Energy Development objective 14</i>'. Low carbon energy can have serious -ve impacts on below ground remains and setting of key sites and historic

	<p>landscapes. Query if visual impact is being considered separately.</p> <ul style="list-style-type: none"> • Comment at <i>'Main Issue 9: Integrated Renewable Energy and Passive Solar Design objective 14'</i>. Query the assessment that there is no direct relationship between the policy options and the historic environment particularly listed structures/works in conservation areas. • Comment at <i>'Main Issue 12: Lakes and Waterways objective 14'</i>. "Could also impact on historic waterside infrastructure associated with heritage assets/freshwater archaeological remains/shipwrecks" • Comment at <i>'Main Issue 12: Lakes and Waterways 'Comments and Mitigation''</i>. The focus should not solely be mitigation but also evaluative work may be required during the planning process to inform decision making. <p>Key: -ve = negative +ve = positive</p>
<p>Department of Agriculture, Environment and Rural Affairs (DAERA)</p>	<ul style="list-style-type: none"> • General – preference for more detail on environmental issues to understand assessment matrices. Expect further detail on mitigation needed where significant -ve effects. Level of detail may not be acceptable at a later stage. <p>[Comments on Sustainability Appraisal Interim Report - Appendix A: Assessment Matrices]</p> <ul style="list-style-type: none"> • Comment on <i>'Main Issue 1: Spatial Growth Options objective 12, option 3'</i>. Should be recognised that this option could impact on biodiversity as it promotes growth within the countryside and therefore has a greater potential to impact on species and habitat, and subsequent to impact on water and air quality. • Comment on <i>'Main Issue 2: Housing Allocations objective 8, 11 and 15, option 2'</i>. Should be a -ve impact on air quality as dispersal increases car use. Could negatively impact on climate change. • Comment on <i>'Main Issue 2: Housing Allocations objective 12, option 3'</i>. More likely to have a -ve impact on species and habitats and mitigation would be required. It should be recognised that brownfield/previously developed land should consider biodiversity as some rarer invertebrates and plants rely on disturbed sites, and some sites may be priority habitats under the 'Open Mosaic Habitats on Previously Developed Land'. Appropriate survey are required prior to development or zoning. • Comment on <i>'Main Issue 2: Housing Allocations objective 13, option 2 & 3'</i>. Option 2 should have significant -ve effects and Option 3 -ve effects due to increase development in the wider countryside • Comment on <i>'Main Issue 2: Housing Allocations objective 17, option 1 & 3'</i>. There should be a difference between these options and as Option 3 will result in some Greenfield development which would be less sustainable. • Comment on <i>'Main Issue 2: Housing Allocations objective 22, option 2 & 3'</i>. Should not be +ve. No evidence of discussion between various options. • Comment on <i>'Main Issue 4: Sustaining Rural Communities objective 12, option 2'</i>. This will increase

	<p>development in the Rural Protection Areas (RPAs) although Natural Heritage (NH) sites would be excluded. Development can indirectly affect sites from disturbance (e.g. impact on water quality from septic tanks). Functional buffers around sites and streams flowing into sites should be established.</p> <ul style="list-style-type: none"> • Comment on <i>'Main Issue 5 & 6: Economic Development: Addressing Deprivation/Regeneration in Urban Areas objective 12, option 1 & 2'</i>. Reuse of buildings in the countryside has potential to impact on breeding birds and bats. As such, mitigation should be highlighted in final policy of option 1. Option 2 has potential to negatively impact on biodiversity with greater development promoted in the countryside. • Comment on <i>'Main Issue 5 & 6: Economic Development: Addressing Deprivation/Regeneration in Urban Areas objective 13, option 1'</i>. Potential +ve effects as it would reduce dereliction and combined with sensitive retention and reuse of older buildings. • Comment on <i>'Main Issue 8: Overarching Policy for Renewable Energy objective 10'</i>. Needs to be recognised that renewable energy development has the potential to impact on water quality when on peat due to peat slide events. Option 2 reduces this impact as lots of peatland areas are also highly valuable landscapes. • Comment on <i>'Main Issue 8: Overarching Policy for Renewable Energy objective 12, option 1'</i>. Additional -ve risk if biodiversity information is not included as there would be presumption for renewable development which may impact on biodiversity if not sensitively located. • Comment on <i>'Main Issue 12: Lakes and Waterways'</i>. Consider option 1 would have lesser effects on biodiversity and landscape as it concentrates impacts on specific agreed sites. <p>Further comments highlight climate change information (mitigation and adaption) for future reference and should be included in subsequent LDP Environmental Reports.</p> <p>Key: -ve = negative +ve = positive</p>
<p>Gaelectric Developments Ltd (GDL)</p>	<p><i>Comments on Sustainability Appraisal Interim Report - Appendix A: Assessment Matrices</i> <i>Main Issue 8: Overarching Policy for Renewable Energy Development.</i></p> <ul style="list-style-type: none"> • <i>Obj 17</i> – concerned with use of the phrase ‘imposing visual presence’ when describing wind farms as subjective and highly negative. Also, consider limit evidence of wind turbine development having a -ve impact on land quality and soil due to below ground work. Foundations are limited (less than 3.0m) and which benefit to land drainage. • General - Disagrees with the phrase taken from the SA interim report <i>“There is potential for negative effects in relation to unconventional oil and gas as well as mineral extraction whilst further mitigation measures will safeguard important landscapes from large scale wind farms”</i> (found at p6 and p18) and as considers it is unfair to include wind farms in this context and as they generate clean electricity and with minimal impact on

	surrounding environment in the construction and operation phases.
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Public Representation	Summary
<p>LDP 0177 Dalradian Gold Limited</p>	<p>Overall Summary:</p> <ul style="list-style-type: none"> • Areas of procedural or technical non-compliance with the EAPP Regulations; and/or the DP SA/SEA Practice note. • Failure of the SA to fully capture benefits of current and proposed future extraction activities (including gold reserves at Curraghinalt) <p>The suggested effective remedy to these shortcomings is:</p> <ul style="list-style-type: none"> • Identification of safeguarded land for mineral development • Reappraise the <i>reasonable alternatives</i> with the area of safeguarded land clearly identified • Re-consultation of a revised POP and Interim SA <p>Detailed comments:</p> <p><u>SA/SEA Scoping Report</u></p> <p>Failure to consult prior to the publication of the LDP POP contrary to DP Practice Note 4 (figure 1), including consultation on the <i>Baseline Information</i> and structure of the document. Failure to follow 'best practice' to allow wider stakeholders such as members of the public to comment.</p> <p>Considers that the baseline data does not accurately reflect the scale or potential benefit the minerals industry has on the local community (<i>Material Asset Baseline</i>).</p> <p><i>Section 5 of SA Scoping Report – Sustainability Issues.</i> 'Economy and Employment' section should recognise contribution that could result from responsible extraction of gold reserves and 'Material Assets' does not mention the substantial gold reserves.</p> <p><i>Section 6 of SA Scoping Report – Developing the SA Framework.</i> Objective 15 should be amended 'To minimise the production of waste and adopt a sustainable approach to the use of non-renewable materials'. Request an additional objective relating to gold and mineral reserves as follows: 'To utilise the substantial mineral assets of the district in a sustainable manner'.</p>

SA of the POP

Consultation and Transboundary consultations. No evidence of Transboundary consultation as per the EAPP2004 and as advised by Development Practice Note 4. This therefore removes an opportunity for interested parties to influence.

The development and assessment of reasonable alternatives. For main issue 7 (Minerals Development) - Option 3. This is not sufficiently distinctive from option 2 to be a 'realistic alternative' and therefore is contrary to Regulation 11 of the EAPP NI 2004.

Comments on Sustainability Appraisal Interim Report - Appendix A: Assessment Matrices Main Issue 7: Minerals Development –

Overall: - considers that the assessment fails to recognise the long-term socio-economic benefits arising from the construction and operation of a gold mine. This would increase +ve contributions for SA objectives 1, 2, 7, 18, 19, 20, 21.

Specific comments noted (and only where in disagreement with the Council's assessment):

- *Obj 1* – promotes that mineral extraction will have a greater than negligible impact on reducing poverty and social exclusion. Therefore Option 2 and 3 should be regarded as having a +ve impact.
- *Obj 2* - promotes that as mineral extraction will have a +ve impact on employment and wealth and therefore a correlating improvement on health and wellbeing. Therefore Option 2 and 3 should be regarded as having a +ve impact.
- *Obj 3* –greater benefit than recorded should be noted, and given commitments of mineral/gold mining sector to improving skills and training
- *Obj 4* – the substantial economic benefit associated with mineral/gold mining sector would have a +ve impact on home ownership and maintenance
- *Obj 7* – considers that option 2 and 3 should have a +ve impact as improved increased spending would generate the need for more services (such as shops)
- *Obj 12, 13 & 14* - not possible to accurately assess option 3 prior to identifying broad locations of safeguarded land.
- *Obj 16* – disagrees with the -ve impact of minimal extraction. In particular gold (once extracted) enters a circular economy and is thus recycled. This is different to hydrocarbon mineral extraction which are consumed.
- *Obj 18* – a greater +ve impact should be recorded given the substantial economic benefits associated with mineral extraction
- *Obj 19* – should be a +ve and as a large number of highly skilled and technical jobs with be created.

	<ul style="list-style-type: none"> • <i>Obj 20</i> – option 2 and 3 should be recorded as +ve given the positive contribution through economic and social benefits would contribute towards sustainable economic regeneration • <i>Obj 21</i> – strongly disagrees as there is the potential for significant investment should planning permission be granted to begin mineral extraction. <p>Key: -ve = negative +ve = positive</p>
<p>Quarry Products Association Northern Ireland (QPANI)</p>	<p><i>Comments on Sustainability Appraisal Interim Report - Appendix A: Assessment Matrices Main Issue 7: Minerals Development.</i></p> <p>Specific comments noted (and only where in disagreement with the Council’s assessment):</p> <ul style="list-style-type: none"> • <i>Obj 1</i> – should be a +ve. Given level of employment of aggregate and minerals industry in FODC. • <i>Obj 4</i> - should be a +ve. Supply of local construction materials keeps construction costs lower improving affordability at the local level. • <i>Obj 6</i> – should be more +ve. Given the role of the Aggregates and Minerals industry in supporting local communities and school. • <i>Obj 12</i> – should be a +ve. Highlights the overall positive contributions to biodiversity the Aggregates and Minerals industry (for example, habitat creation). • <i>Obj 14</i> – should be neutral (not –ve). Given the industry past record and commitment to mitigate the impact of development on historic environment and cultural assets including the commitment for pre-application investigations for archaeological remains • <i>Obj 16</i> - should be neutral (not –ve). Given difficulties in sourcing alternative materials. • <i>Obj 17</i> - should be neutral (not –ve). Given the reuse of overlying soils and clays, including as noise bunds/landscaping during extraction and as part of future restoration schemes. • <i>Obj 19</i> – should be a +ve. Given the extent of employment (including secondary employment) supported by the Aggregates and Minerals Industry coupled with training, apprenticeships etc. • <i>Obj 20</i> – request clarification. If ‘promote sustainable regeneration’ is specific to regeneration of the local area and community or local quarrying and minerals industry. • <i>Obj 22</i> – should be a +ve. <p><i>Main Findings (p.89)</i> – given the above it is considered that the overall effect of mineral extraction is changed to a +VE.</p> <p><i>Comments and Mitigation (p.89)</i> - strongly contests this statement and given the track-record (at local, national and European level) of the quarrying industry has and will continue to offer and deliver on conserving and enhancing biodiversity, making a minimal impact on soil quality, landscape and protecting and enhancing archaeological</p>

	heritage. Key: -ve = negative +ve = positive
LDP 0814	The SA Interim Report - Seems quite weak. Many of the decisions appear difficult to sustain.
LDP 0838 Bryson Energy	Would like to see inclusion and emphasis of energy efficiency alongside that of renewable energy.