



Derry City & Strabane
District Council
Comhairle
Chathair Dhoire &
Cheantar an tSraitha B ain
Derry Citty & Str abane
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Ms Hilda Clements
Principal Planning Officer
Fermanagh & Omagh District Council
Planning Department
Strule House
16 High Street
Omagh
BT78 1BQ



14th December 2018

Dear Hilda,

Consultation on Fermanagh & Omagh District Council's Local Development Plan (LDP) draft Plan Strategy (PS) and Associated Documents

Derry City and Strabane District Council welcomes the opportunity to respond to the above-mentioned LDP PS process. Our Planning officers have read the draft PS and the supporting evidence base and other iterative documents that underpin it and congratulate their Fermanagh & Omagh District Council counterparts on the publication of this key stage in your LDP process. Both Council areas have commonality in terms of key planning issues and we welcome the opportunity to input at this important juncture and subsequent future stages as both Councils progress cohesive LDP's for our respective Districts.

Having reviewed the relevant documents, Derry City and Strabane District Council would comment on the following key areas of mutual interest in the F&O draft PS which sets out how the area will change and grow over the period up to 2030:

Part 1 - Chapter 5: LDP Vision & Strategic Objectives

It is noted that the LDP Vision reflects the desire for the Council to be an active place with strong communities and which recognises that the rural area is a home to many people. We also note the eighteen Plan Strategy objectives which have taken account of the F&O Community Plan's themes and outcomes to ensure the LDP and the Community Plan effectively embed an integrated place-shaping approach across the District. Sustainable Development is to be the core principle underpinning your District's future Planning.

Part 1 - Chapter 6: Spatial Growth Strategy

It is noted that the Spatial Growth Strategy is based on the RDS approach and seeks to deliver:

- Managed growth, based on sustainable patterns of development across the Council area;

- Focus major population and economic growth within the two main hubs of Enniskillen and Omagh and strengthen their roles within the District;
- Sustain the five small towns across the District, as important local service centres for their rural hinterlands;
- Sustain the role of the villages as small local service centres, providing opportunities in keeping with their scale and character;
- Sustain small settlements which act as focal points for the rural community;
- Support and sustain vibrant, rural communities by accommodating appropriate development;
- Promote a balanced approach to transport infrastructure and encourage public and private transportation provision;
- Facilitate the protection of vulnerable landscapes and conservation interests, promoting open space and the provision of green and blue infrastructure.

We also note that you are according with the 2030-adjusted HGI figure of 5,190 dwellings and propose to locate approximately half of the HGI figure into the Main Towns of Enniskillen and Omagh, approximately a quarter into the Countryside and the remaining third to the Villages, Local Towns and Small Settlements. The proposed Phased approach to manage housing supply is similarly noted.

Derry City and Strabane District Council notes your stated need for 90 hectares of Industry and Business land to accommodate a predicted 4,875 new jobs in this sector by 2030 and your consideration that the majority of this can be located on existing zoned land.

We note that your PS is supported by a DFI-produced Local Transport Strategy which will seek to ensure that the transport network and transport needs of the Council area are taken into account in planning for its future development. DfI is also in the process of preparing a North-West Transport Strategy for this District and wider region, so hopefully this will link well and co-ordinate with your documents.

Part 2 – Development & Design

We note your Council's commitment to high quality design, in both urban and rural settings and we particularly note the specific policy to support a range of types of development in the countryside (outside of Special Countryside Areas) with the aim of sustaining rural communities while protecting and improving the environment.

Part 3 - People & Places

This Council also notes the various other proposed policies to deliver sustainable housing to meet the needs of your District, within the settlements and also to provide opportunities for appropriate and sustainable houses in the countryside.

Part 4 – Economy

Derry City and Strabane District Council notes your Industry / Business policies, Retail / Town Centres Strategy (with Primary Retail Cores) and the Tourism Strategy – with its aim to sustain and increase the number of visitors to the area and to capitalise upon and further develop the area’s tourism assets, facilities and infrastructure in a sustainable manner without adversely impacting upon the landscape, historic environment and built environment e.g. the unspoilt upland areas of the Sperrin AONB.

We note the proposed Area of Constraint on Mineral Development (ACMD) to apply across your section of the AONB. We also note the specifics of Policy MIN 01 and the criteria to be met to enable appropriate mineral developments in the ACMD.

Given the proximity and the many similarities between the rural parts of our two Districts, it is particularly important that we and the other Sperrin AONB Councils continue to actively engage together and strive for designations / policy that will be co-ordinated across the entire AONB for these and other relevant Planning issues.

Part 5 – Environment

Derry City and Strabane District Council would be supportive of Policy L01 (Development within the AONB) and Policy LO2 (Special Countryside Areas, SCAs), particularly as the latter has facilitated an SCA designation adjacent to the Glenelly Valley. The landscape of the unspoilt Sperrin AONB and the Glenelly Valley and its surrounding margins are significant assets for both Councils and their sensitive protection is to be welcomed. We would reiterate the importance of specific engagement by the other relevant Councils as part of LDP progression when considering such areas of mutual overlap and importance.

Part 6 – Infrastructure

We note your Flood Risk Management context and associated policies. We also note your approach to Renewables and your commissioned Landscape Wind Capacity Study to assess the overall capacity of your varying landscapes to support further windfarm developments and identify areas where there is potentially no longer capacity. Cumulative landscape and visual Renewable effects are of mutual interest between our respective Councils and the issues of capacity and windfarm ‘repowering’ should be subject of ongoing Planning liaison. Our own Landscape Character Area (LCA) Review is considering similar issues, so our respective designations / policies can take account of each other’s where relevant.

Derry City and Strabane District Council also notes your support for transportation proposals which improve travel times, alleviate congestion and improve safety as well as providing more sustainable modes of transport, including buses, walking and cycling.

Sustainability Appraisal – Interim Report

Derry City and Strabane District Council notes the content of your Sustainability Appraisal Report (SAR) which summarises the Sustainability Assessment (SA), incorporating the Strategic Environmental Assessment (SEA) of the LDP draft PS. We are content with the extent of the 'Scoping', the assessment of the emerging policies against the SA Framework and new strategic options considered and developed.

We would concur with your overall SAR conclusion that there are no anticipated significant negative effects of the policies or the proposals of the LDP draft PS either with regards to any individual policy or proposal or when considered cumulatively. We recognise and acknowledge your stated limitations in both the baseline data and how some effects can be measured, resulting in some still unknown effects.

Conclusion:

The Derry City and Strabane District Council's Planning officers look forward to future liaison and consultation with their Fermanagh & Omagh District Council Planning counterparts as our LDP progresses towards our draft LDP Plan Strategy publication. Such consultation can take place at the legislative key stages as well as through input provided via our ongoing 'Stakeholder' meetings and the Sperrins Forum.

Yours sincerely


Maura Fox
PP Head of Planning