

[LDP@Derrystrabane.com](mailto:LDP@Derrystrabane.com)

Date: 27<sup>th</sup> January 2020

Tel: 028 7034 7137

Dear Ms Fox,

**Re: Derry City & Strabane District Council Local Development Plan: Draft Plan Strategy – Public Consultation.**

I write on behalf of Causeway Coast and Glens Borough Council and in response to your correspondence dated 29<sup>th</sup> November 2019, relating to the publication of your Local Development Plan (LDP) Draft Plan Strategy and associated documents. I wish to make the following comments:

**Part B: Overall Growth Strategy Evidence Base Paper EVB5: Growth Strategy**

Section 2 outlines the rationale behind the growth strategy. It appears that there is no consideration of whether the additional population, dwellings and jobs may impact on the Causeway Coast and Glens Borough (CC&G), particularly as other parts of the document refer to the influence of Derry City on parts of CC&G.

It is considered that some of the pathway to growth factors set out in paragraph 2.4 may not deliver the anticipated growth. As examples, the continued development of the City of Derry Airport, the significant student expansion of the Magee University campus, and the significant growth in technology industries. It is noted that a cash injection of £60 million as part of the monies for the Stormont deal was announced on Thursday 16<sup>th</sup> January 2020, and that a Department of Health report indicated NI needed at least 100 new medical students per year, and the new medical school would help meet that demand.

**Community Plan Capital Expenditure Forecasting and Analysis Report**

As stated on page 5 of the Community Plan Capital Expenditure Forecasting and Analysis report prepared by the UUEPC, the Ambitious Scale – Outputs of Analysis – equates the rate of growth for employment in the Council to be close to 25%, or that achieved by Dublin in the period 200-2015. The sectors for the concentration of employment growth are ICT, Education, Arts and Entertainment and Other Services.

The Skills section on page 14 highlights that the skills set of the Council's employed population is not well matched to the additional employment opportunities, and that this is a significant risk to the overall plan. 17% of the source of jobs will come from migrants at 2025 and 16% from commuters (page 13).

The Summary on pages 33 and 34 highlight that there are a number of significant risks to the delivery of the economic aspirations of the Community Plan and, by association, the Draft Plan Strategy.

**Comments on Housing Growth Indicators 2016 Based – Publication by NISRA, October 2019, Senior Economist, DC&SDC**

Page 7 refers to previous work from UUEPC which has shown the Functional Economic Market area extends well beyond the DCSDC area to encompass parts of Donegal, Limavady and Omagh. However, there appears to be no consideration of the potential impact of the Draft Plan Strategy on the Limavady area. Even if it were felt there would be no impact, it would be helpful if the plan strategy demonstrated this conclusion.

As examples of the justification for the additional dwellings, the university expansion is to 9,400 students (from approximately 5,400 students). The proposed Medical School was due to open in 2019. It proposes a 4 year programme with an annual intake initially of 60 students, rising to 120 students, indicating a total of 480 students. 83 weeks of this course will be spent in clinical placement. It cannot be assumed that the increase in student numbers will directly correlate with a need for new dwellings, as factors such as contact teaching hours, purpose built student accommodation and privately rented HMOs are relevant.

Figure 8: Primary 1 Hour Drive time Catchment of Derry in North West Region. This figure suggests that the 1 hour am peak car drive time to the Guildhall includes Coleraine, Portstewart, Portrush, Ballymoney and the Bann corridor. However, given the bottle neck that occurs in Ballykelly during am peak hour and the congestion around the Caw Road roundabout, it is likely that this figure is inaccurate. Another influence on the city's catchment is the draw of Belfast and Ballymena in CC&GBC, and their proximity by road and rail. This may have a bearing on the City's ability to deliver its proposed 8-15,000 jobs if these parts of CC&G are considered as part of this planned growth.

**Designation SCA 1** – Sperrins SCA (page 64) – it is noted that only a limited range of development will be allowed under Policy NE6.

**Designation AHLI 1** – Areas of High Landscape Importance (page 65) – noted that these cover key coastal, river valley and settlement settings and that proposals that would adversely affect or change either the quality or character of the landscape will not normally be permitted under Policy NE 7.

**Designation GB1** – Green Belts (page 65) – it is noted that development will be strictly managed and apart from a limited number uses, there will be a clear presumption against any new use of land that might create a demand for more buildings.

**Designation DPA 1** – Development Pressure Areas (page 66) – noted that these are focused on areas of existing pressure or the potential for localised development pressure in the countryside (with the same policy tests as the Greenbelt).

**Designation WECA1** – Wind Energy Capacity Areas (WECAs) (page 67) – acknowledge these are localised areas that have experienced significant pressure

from wind farms and single turbines so need careful consideration of any further such proposals to prevent unacceptable further development (Policy in chapter 24: Renewable Energy.)

It is noted that the Strategy includes Land Use Policy Areas in Villages and Small Settlements and that these are areas of land identified for specific uses.

### **Economic Development**

It is noted that the strategy appears to have taken the approach to retain existing uncommitted Economic Development zonings.

City of Derry Airport (page 115) – noted that growth to be managed through the LDP, with land for aircraft servicing businesses, freight, logistics and other air transport related economic development uses.

Acknowledge that UU – Magee and Altnagelvin campus are seen as a key role in economic development in research and development hub, with scope for B1(a) and (c) development in association with the main medical and educational uses.

Policy ED 2: Office Development (page 119), limits office development in villages and small settlements to a central location with a floorspace of any individual unit of no more than 200 sq.m. Net or gross is not clarified. Paragraph 9.20 (page 119 and 102) appears to relate to the city and towns only, and there is no justification in relation to villages and small settlements.

Policy ED 3 (page 120) requires Economic Development in Villages and Small Settlements to be on identified LUPAs and to be centrally located. Paragraph 9.24 states that criteria 2 and 3 re central location and compatibility with other uses is an interim approach until the LPP is adopted.

Policy ED4: Small Scale Economic Development in the Countryside (page 124) does not include reference to a firm proposal as per PPS 4. Criterion a) refers to the development of a small rural community enterprise/centre outside of a village or small settlement where the use will be associated with the settlement. Where practicable, an edge of settlement location will be favoured. Unclear how this policy sits with Policy ED3: Economic Development in Settlements in relation to Villages and Small Settlements that have a LUPA. Would this allow for development outside a settlement even if there is an undeveloped LUPA identified within it? Does this policy apply only to settlements without a LUPA, or is the intention that the community enterprise/centre will provide something different to economic development uses – if so, is this under the wrong policy?

Criterion b) relates to small scale B2,3 or 4 uses adjacent to the main dwelling of the business owner. Criterion d) refers to homeworking, which would appear to be contrary to the Annex to the PPS which suggests homeworking does not require permission (see paragraphs 9.37 and 38). In Green Belts, criterion b) development will only be acceptable where an existing or redundant building is proposed to be reused or replaced and the use is not significantly intensified or the building footprint significantly increased. Supporting paragraph 9.35 to criterion b) reads like a policy.

## **Transport and Movement**

Page 150, Figure 12 – Overview of Transport Strategy for the District. This refers to the DfI draft Local Transport Study. The figure shows Potential Park and Ride Sites in Limavady and Coleraine? Paragraph 11.19 states the 60 minute Derry City catchment to the north east almost spans to Limavady. This does not reflect Figure 8 on page 51.

Paragraph 11.22 states that consideration will be given at the LPP stage as to whether there is a requirement for specific policies/key site requirements to assist in any planned growth of the airport and port over the plan period and beyond. Given the proximity of the airport to the Borough's boundary, this may be of particular relevance to CC&GBC. Paragraph 11.23 refers to a rail halt to integrate modern rail and airport infrastructure. Paragraph 11.29 is also relevant to the above points.

## **Tourism/AONB**

The Council notes the Sperrin AONB Policy set out in NE5.

## **Collaborative Working**

The Council will seek to continue to work collaboratively in relation to common issues arising as we progress through our LDP preparation.

Please do not hesitate to contact me should you wish to discuss further.

Yours faithfully,



Denise Dickson  
Head of Planning