



Derry City & Strabane
District Council
Comhairle
Chathair Dhoire &
Cheantar an tSratha Báin
Derry Citty & Strábane
Destríck Council

Mr Paul Christy
Central Planning Unit
Donegal County Council

- by email

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Dear Paul,

Comments from Derry City & Strabane District Council relating to Consultations regarding the Proposed Variation to the Donegal County Development Plan re. Wind Energy Policy Framework and regarding the new Donegal County Development Plan 2024-2030

I refer to the letters and consultation documents from Donegal County Council to this Council, dated 29th April 2022 and 8th April & 12th May 2022 respectively regarding the above-mentioned matter. I am writing to you with comments, following the approval of a Paper at the recent meeting of the Council's Planning Committee on 18th May (Should there be any change from this situation following the Full Council ratification thereafter, I shall advise you immediately.) Comments are as follows:

Preliminary Comments

Derry City & Strabane District and Donegal County, together form the North-West Region, which is considered to be a functional economic and spatial region and the two respective Councils work closely together, co-operating to develop and market the region jointly for the benefit of both districts. Both Governments and the Councils have been mutually supportive of the principles of co-operation and co-ordination of relevant and beneficial aspects, including environmental considerations and strategic Planning policies. In recent times, the Councils have co-operated on inputs to the North West Regional Spatial & Economic Strategy (RSES), Metropolitan City Region Spatial Planning and a NW Energy Strategy.

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Consultation a) on County Donegal Development Plan (CDDP) Proposed Variation re. Wind Energy Policy

It is acknowledged that an information-sharing meeting took place between Planning officers of the respective Councils in September 2021, in advance of the formal consultation on the Environmental Screening reports in December 2021. We recognise the requirements of the RoI Planning and Development Act, 2000 (as amended) that the Council 'shall have regard to the development plans of adjoining planning authorities and shall co-ordinate the objectives in the development plan with the objectives in the plans of those authorities...' Accordingly, our officers have exchanged information and have a good understanding of our respective existing and proposed Planning policies for Wind Energy. Both Councils are positive on facilitating renewable energy, to combat climate change and help meet national targets, balanced with the need to protect our environmentally sensitive locations and people's amenity, recognising that both areas already deliver a relatively high proportion of the national wind energy outputs.

Specifically, please see this Council's recent Local Development Plan draft Plan Strategy (LDP dPS) documents which reference our regional focus, emerging wind energy policies and environmental designations: https://www.derrystrabane.com/getmedia/f0dfee6f-7ba0-4422-8a29-6163562286e2/DC-SDC_Local-Development-Plan-final-online_1.pdf In particular, see Paras. 2.2 – 2.5, 2.24 – 2.30, 2.50 - 2.57, Chapter 24 (Renewable & Low Carbon Energy Development), Chapter 6 (Spatial Strategy) Paras 6.28-29 and Chapter 21 (Natural Environment). Further detail is also available in the related Evidence Base Papers especially EVB 24, 6C & 21. [https://www.derrystrabane.com/Subsites/LDP/LDP-draft-Plan-Strategy-\(dPS\)/LDP-Plan-Documents](https://www.derrystrabane.com/Subsites/LDP/LDP-draft-Plan-Strategy-(dPS)/LDP-Plan-Documents)

This Consultation relates to a Proposed Variation to the County Donegal Development Plan for a revised Wind Energy Policy Framework. The Variation document is accompanied by a SEA Environmental Report and an AA Natura Impact Report.

The Variation document itself sets out the proposed amended map and text for the changes from the existing County Development Plan. Specifically, it:

- Identifies and acknowledges the current National policy context
- Sets out how the Council considers that the Wind Energy Variation aligns with the requirements of the national guidance, namely, the Draft Revised Wind Energy Development Guidelines (Dec. 2019)
- Inserts an amended policy text and a new Map 8.2.1. In summary, the Proposed Variation still includes a requirement for 10-times separation distance between turbines and residential properties. The new map divides County Donegal into 3 categories: 'Not Normally Permissible' (Red), which covers most of the County including the most sensitive designated areas and population centres; 'Open to Consideration' (Amber), which covers a relatively small part of the County including most of the east-north of the County that is close to Derry City & Strabane District. Notably, the 'Lifford-Stranorlar Municipal District Areas at Risk of Landslides and Associated Environmental and Ecological Concerns' (close to the Castlederg area) is included in the Red zone, as is the landslide event area at the nearby Meenbog

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windfarm site. There is a third category 'Acceptable in Principle' (White) but the new map shows little or no land visible in this category.

Derry City & Strabane District Council notes the proposed new Wind Energy Policy and key map for the current County Donegal Development Plan. The potential environmental impacts of the new policy are assessed in the accompanying environmental reports. The SEA Environmental Report has been prepared in accordance with the statutory requirements and relevant SEA guidance. This Council agrees with the need to consider all the potential environmental impacts identified and listed. There is obviously a close proximity and visual / environmental relationship along the whole boundary areas between the two districts (by land connections, across our rivers and also Lough Foyle), so it is critical to consider the implications of any Wind Energy zones and proposals on the other area. The Report has considered the whole range of environmental effects, with various mapping layers - including a buffer from CODA, our Special Protection Areas and Scenic Amenity Areas, as well as considering amenity / landscape impacts, noise, flicker, air quality, water / hydrology, land stability, etc. It concludes that the new Wind Energy policy would have no or insignificant effects across the potential impacts and that as mitigation, individual proposals would be subject to normal consultations and site-specific assessment.

The AA Natura Impact Report is prepared in accordance with the Planning and Development Act 2000 (as amended) and relevant European and National AA Guidance. The report identifies and classifies the implications of the Proposed Variation on relevant European Sites (e.g. Natura 2000 Sites such as Special Areas of Conservation and Special Protection Areas) in view of the conservation objectives of the sites. The DC&SD has been considered in this Report, including the listing of key sites in / near the District. While the Report concludes no adverse effects on the integrity of European sites even in the absence of mitigation, it does recommend 4 additional protections are added to the policy to ensure that individual proposals for wind energy development will be fully assessed at the project / application level.

This Council's Planning officers have reviewed the consultation documents and are broadly in agreement and accept the findings of the respective documents. In summary, the new policy / map for Donegal is noted, but it is very difficult to predict what impacts it will have on new wind energy proposals or whether there will be any impacts on this District – strategically or site-specifically. It will be important that any potential impacts will continue to be considered and appropriate consultations carried out (including with this Council), at individual Planning application stage.

Consultation b) on Preparation of a new County Donegal Development Plan (CDDP)

Derry City & Strabane District Council notes the various 'Key Issues & Trends' set out in the Issues & Options Paper for the new CDDP. This Council also notes the SEA Scoping Issues Paper – which sets out the SEA process, identifies the key environmental issues and then the scope / scale of environmental information required for the Environmental Report. As stated above, this Council acknowledges the close proximity and visual / environmental relationship

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along the whole boundary areas between the two districts so we agree with the need to consider all the potential environmental impacts. Moreover, the two Councils have been very supportive of each other's Development Plans and indeed continue to work together under the auspices of planning and developing the North West City Region in particular.

This is an early stage in the preparation of the new CDDP and DC&SDC Planning officers look forward to continuing to liaise with those of Donegal CC in a positive manner, to share information on our respective Plans, common issues and areas for co-operation / co-ordination. Therefore, we would suggest that a meeting of our senior Planning officers be arranged over the coming period to discuss those matters. The Council itself will then look forward to inputting and formal consultations later in the process, as appropriate.

I trust that these comments from this Council are useful and assist you in progressing the Proposed Variation, and then the new CDDP. Overall, this Council is very positive and supportive of the drive to achieve sustainability and high environmental standards, as we continue to work together to develop a mutually-beneficial, strong and attractive North West Region.

If you do require any further clarification, and to arrange the CDDP meeting referenced above, please do not hesitate to contact Head of Planning, Maura Fox or Proinsias McCaughey, Principal Planning Officer in Local Development Planning.

Yours sincerely

Philip McKinney

Planning Committee Chair