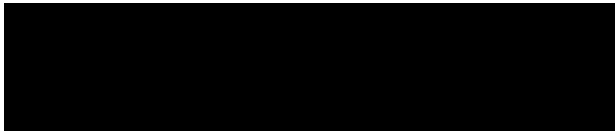




Derry City & Strabane
District Council
Comhairle
Chathair Dhoire &
Cheantar an tSratha Báin
Derry Cittyie & Strábane
Destrict Council

Mr Alistair Beggs
Strategic Planning,
Dept. for Infrastructure (NI),
Belfast

- by email



Date: 26th March 2021

Dear Alistair,

Comments from Derry City & Strabane District Council regarding Transboundary Consultation regarding the Proposed Variation to the Donegal County Development Plan re. TEN-T Roads Improvements Project

I refer to the e-mailed letters and consultation documents from Donegal County Council to this Council, dated 19th February and 8th March 2021 regarding the above-mentioned matter. In those letters, it was requested that this Council provides our formal consultation comments via DfI; hence I am writing to you with those comments, following the approval of the attached Paper at the recent meeting of the Council's Planning Committee on 24th March. Comments are as follows:

Preliminary Comments

This Consultation relates to a Proposed Variation to the County Donegal Development Plan 2018-2024. The Variation document is accompanied by an Environmental Report, Natura Impact Report and a Strategic Flood Risk Assessment Report.

The project itself relates to 3 road sections, namely:

- 1) the N15 to by-pass to the north of Ballybofey-Stranorlar
- 2) the N13 to the south of Letterkenny, to improve its access towards Derry, Strabane and to Sligo
- 3) the N14 from near Letterkenny to SW of Lifford, towards the Strabane / A5 Link

Derry
C/o Council Offices
98 Strand Road
Derry
BT48 7NN

Strabane
C/o Council Offices
47 Derry Road
Strabane
BT82 8DY

t: +44 (0) 2871 253 253
e: info@derrycityandstrabanedistrict.com

 Derry City & Strabane District Council

 @dcsdcouncil

www.derrycityandstrabanedistrict.com

Derry City and 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 suite of longstanding major roads proposals on both sides of the border which have been considered to be complementary and important infrastructure for the whole region, including the new A6, new A5, A2 Upgrade and these 3 road sections. Together, they will significantly improve journey times between these key settlements within this region and provide external connectivity to / from the region to Belfast, Dublin and Sligo / the 'Atlantic Corridor'.

The NW Region and its proposals to address the infrastructural deficit, including the 3 roads in question, have been consistent with many government, regional and Council documents in recent years, including the RoI National Planning Framework, the NW Regional Spatial & Economic Strategy, Co Donegal Development Plan, the NI Regional Development Strategy 2035 and indeed this Council's recent Local Development Plan draft Plan Strategy (LDP dPS). Derry and Letterkenny are identified as a 'Linked Gateway' in the RDS and, together with Strabane, the 3 settlements are being considered as a 'cross-border Metropolitan City Region' in the NPF and RSES. Therefore, Derry City & Strabane District Council (DC&SDC) is very aware of and supportive of these 3 major and strategic roads improvements.

Specifically, please see the recent LDP dPS documents which reference these roads: <https://www.derrystrabane.com/getmedia/f0dfee6f-7ba0-4422-8a29-6163562286e2/DC-SDC-Local-Development-Plan-final-online-1.pdf> In particular, see Paras. 2.3, 2.32, 2.34, 2.50-2.57 and Chapter 11 especially Para 11.20. Cross-border connectivity including these road proposals were also referenced in the LDP Transport Evidence Base Paper EVB 11 – Paras 3.70 & 5.5 (as well as 11A NW West Transport Study). [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)

Road No 1, to bypass Ballybofey-Stranorlar will be very beneficial as it links Derry – Letterkenny (N13) and Strabane (N15) to Sligo, Galway and the 'Atlantic Corridor'. (This Council welcomes the new bypass alignment to the NW of the towns, as the previous route to the SE would have involved the closing-off of the Daisy Hill road – which is used by a lot of residents of this District, who had therefore opposed the closure.)

Road No 2, near Letterkenny, will also be very beneficial as it will significantly improve the link between Derry and Letterkenny themselves (N13), their links to the 'Atlantic Corridor' and also the link from Letterkenny to Strabane and onwards to Dublin. A key theme in the NW Transport Plan, the LDP and in the Donegal CDP is to encourage modal change, away from the private car towards public transport and to aspire to provide Park and Ride / Share facilities at key locations near and beyond Derry (and Letterkenny) – see LDP Para. 11.29. Therefore, it would be important to have adequate land and to design these (bus and P&R/S) facilities into this particular scheme – of major road junctions at the edge of

Derry
C/o Council Offices
98 Strand Road
Derry
BT48 7NN

Strabane
C/o Council Offices
47 Derry Road
Strabane
BT82 8DY

t: +44 (0) 2871 253 253
e: info@derrycityandstrabanedistrict.com

 Derry City & Strabane District Council

 @dcsdcouncil

www.derrycityandstrabanedistrict.com

Letterkenny. (It may be useful for NTA / designers to liaise with DfI regarding complementary proposals for P&Rs at Buncrana Rd, Derry and at Strabane.)

Whilst all 3 roads projects will be beneficial for the whole Region, only Road No 3 will have a direct interface with Derry City & Strabane District i.e. this N14 from near Letterkenny to Lifford / Strabane will involve a new road bridge over the River Finn and linking to the new A5 WTC just off the Urney Road at Castletown, at the SW edge of Strabane. The map shows that the Preferred Option corridor to the south of the N15 does not actually extend down to the River Finn; therefore, it is difficult to establish exactly where this bridge would be located or how it would address the river. It is understood that there was an earlier permission from An Bord Pleanála for a bridge and approach; presumably, this has been co-ordinated with the plans for the A5 WTC, Junction 7, as shown on p21 of the 2019 ES Addendum-NTS, at <https://www.a5wtc.com/CoreDocuments>

a) Comments regarding the CDP Variation Documents

The Proposed Variation documents are quite clear in explaining the process and also set out the proposed amended maps and text for the changes from the existing County Development Plan. Specifically, it:

- Identifies and protects the new preferred route corridors by inserting new maps and amending policies and objectives and also removes the corresponding historic route corridors.
- Provides Strategic Support for the TEN-T PRIPD by inserting new, and amending transport-related text, policies and objectives, especially in Chapter 5: Infrastructure.
- Makes the Plan compatible with the project by amending / inserting policies, objectives and zoning objectives e.g. objectives and policies related to zonings for housing, employment, open space, amenity, former railway corridors, built heritage and archaeological heritage, to ensure compatibility between the Plan and the project.

None of the proposals are of any direct concern for this Council as having negative impacts on Derry City and Strabane District. However, the points previously raised, repeated above, still remain to be addressed at the later, detailed design stage of the Ten-T Roads; firstly, the opportunity to provide Park and Ride / Share facilities at the new roads as an aid to sustainable transport in our County / District, and secondly the uncertainty surrounding the interface of Road 3 as it crosses the River Finn to link with the new A5 west of Strabane. It should also be noted that there is reference in this Council's LDP (p 147) to a potential future feasibility study regarding the potential for re-opening of the railway lines to Strabane and to Donegal; this Council is supportive of an extended rail network in the region so it is requested that this potential should be borne in mind in the detailed design of the Ten-T roads where they could impact on the former railway lines.

Derry
C/o Council Offices
98 Strand Road
Derry
BT48 7NN

Strabane
C/o Council Offices
47 Derry Road
Strabane
BT82 8DY

t: +44 (0) 2871 253 253
e: info@derrycityandstrabanedistrict.com

 Derry City & Strabane District Council

 @dcscouncil

www.derrycityandstrabanedistrict.com

b) Comments regarding Environmental Report

We have read the Environmental Report and it seems to be reasonable, in that it identifies, describes and evaluates the likely significant effects on the Environment of implementing the Proposed Variation. The preparation of the Report involved scoping consultation with adjoining Planning authorities including DC&SDC; the previous comments from DC&SDC have been reported and considered on page 7 of this Report, as well as the listing of key designated sites and Landscape Character Areas in the District and NW Region considerations on page 15. Overall, the Report describes the current state of the environment, identifies relevant Environmental Protection Objectives, assesses the impact of each element of the proposed variation on wide range of environmental criteria, describes how such impacts will be mitigated, evaluates the alternatives to the proposed variation and details environmental monitoring measures.

These comments are subject to the points raised above, about the need for further detail and ongoing project-level assessment of the environmental impacts, especially regarding the approach / crossing of the River Finn, west of Strabane-Lifford.

c) Comments regarding the Natura Impact Report

Following on from the HRA Appropriate Assessment Screening Report, this Natura impact Report also seems to be reasonable, having covered all the main potential impacts on the Natura 2000 European sites. The Report includes an assessment of the potential impact of the Proposed Variation on specific Natura 2000 sites (both individually and in combination with other plans and projects) and outlines possible measures to mitigate any potential impacts. The report concludes beyond reasonable scientific doubt that Proposed Variation will not adversely affect the integrity of any Natura 2000 site having regard to the mitigation measures outlined in the report. The DC&SD appears to have been considered in this Report, including the LDP summary at p 23 and the listing of key sites in the District.

Again, these comments are subject to the points raised above, about the need for further detail and ongoing project-level assessment of the environmental impacts, especially regarding the Route 3 approach / crossing of the River Finn SAC and the River Foyle & Tributaries SAC.

d) Comments regarding the Strategic Flood Risk Assessment Report

The Strategic Flood Risk Assessment Report has been prepared in accordance with the relevant guidelines. It includes: a detailed analysis of the flood risks related to the Preferred Route Corridors (e.g. fluvial, pluvial and coastal), an assessment of the variation vis-à-vis the sequential approach outlined in said guidelines including the application of the justification test and the identification of potential measures to manage residual flood risk. The report concludes that it is appropriate to designate the associated Preferred Route Corridors for development as detailed in the Variation. In particular, the Report considers the impacts / potential for flooding of the Finn, Mourne and Foyle (p5) and maps such as that at page 24,

Derry
C/o Council Offices
98 Strand Road
Derry
BT48 7NN

Strabane
C/o Council Offices
47 Derry Road
Strabane
BT82 8DY

t: +44 (0) 2871 253 253
e: info@derrycityandstrabanedistrict.com

 Derry City & Strabane District Council

 @dcscouncil

www.derrycityandstrabanedistrict.com

but it does not appear to be concerned about flooding impacts on the Derry City and Strabane District.

I trust that these comments from this Council are useful and assist you in forwarding a formal response to this Consultation from Donegal County Council. Overall, this Council is very positive and supportive of the proposed Ten-T Road improvements in Donegal, as we continue to work together to develop a mutually-beneficial, strong and well-connected North West City Region.

If you do require any further clarification, please do not hesitate to contact Head of Planning, Maura Fox or Proinsias McCaughey, Principal Planning Officer in Local Development Planning.

Yours sincerely

Christopher Jackson

Planning Committee Chair

Derry
C/o Council Offices
98 Strand Road
Derry
BT48 7NN

Strabane
C/o Council Offices
47 Derry Road
Strabane
BT82 8DY

t: +44 (0) 2871 253 253
e: info@derrycityandstrabanedistrict.com

 Derry City & Strabane District Council

 @dcsdcouncil

www.derrycityandstrabanedistrict.com