



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

Paul Christy
Senior Executive Planner
Donegal County Council
- by email

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Date: 4th November 2020

Dear Mr Christy,

SEA & HRA Scoping Consultation for Co Donegal Dev Plan Variation re.TEN-T Roads Improvements Project

I refer to your e-mailed letter and consultation documents to this Council dated 13th October 2020 regarding the above-mentioned matter. Thank you for the consultation and opportunity to input to the process. The matter has been considered at the recent meeting of the Planning Committee and comments are as follows:

Preliminary Comments

This project relates to 3 road sections, namely:

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

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 roads. 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'.

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The NW Region and its infrastructure, 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'.

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 design these (bus and P&R/S) facilities into this particular scheme – of major road junctions at the edge of Letterkenny. (It may be useful for NTA / designers to liaise with DfI regarding complementary proposals for P&Rs at Bunrana 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 supplied does not show clearly the location / extent of the Preferred Option corridor to the south of the N15 down to the River Finn; therefore, it is difficult to establish exactly where this bridge would be located. Presumably, this has been co-ordinated with the plans for the A5 WTC, Junction 7, as shown on p21 of <https://www.a5wtc.com/Documents/7756/Download>

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a) Comments regarding Strategic Environmental Appraisal (SEA)

We have read the SEA Screening Report and it seems to be reasonable, having covered all the main potential environmental impacts and concluding that 'the proposed variation would be likely to have significant effects on the environment' and hence that it is necessary to undertake a full Strategic Environmental Appraisal Report for the project. It is noted that one of the reasons for requiring SEA is *'The fact that the variation has the potential to give rise to transboundary effects including: impacts on Natura 2000 sites, air pollution, noise pollution and landscape impacts.'*

Based upon the Screening Report, observations in relation to the scope / content of the SEA Report includes:

- It may be useful to name the Local Development Plan (LDP 2032) for Derry City and Strabane District, as 'another plan' that is influenced by the project – see background above.
- It may be useful to consider the above-mentioned Park and Ride / Share facilities at key locations, on each of the 3 Road Sections (particularly section 2), as a means of reducing car usage in both districts, and mitigating negative impacts – see background above.
- It would be important to clarify on the nature and extent of this road project No 3 (and bridge?), so that the project / impacts may be assessed – see background above.
- Section 3 and Section 1 corridors have correctly been identified as being upstream, with potential impacts on this District, particularly the River Finn SAC, the River Foyle & Tributaries SAC (and Moneygal Bog SAC & Owenkillew SAC and the Sperrin AONB – though their links are likely to be much less) – which can be further assessed.

b) Comments regarding Appropriate Assessment – Natura 2000 Habitats Regulations Assessment

We have also read the HRA Appropriate Assessment Screening Report and it too seems to be reasonable, having covered all the main potential impacts on the Natura 2000 European sites, and concluding that a full Appropriate Assessment is necessary 'as it cannot be excluded, on the basis of objective information, that the proposed variation, either individually or in combination with other plans and projects, will have a significant effect on a European Site.

Based upon the AA Screening Report, observations in relation to the scope / content of the AA Report includes:

- It would be important to clarify on the nature and extent of this road project No 3 (and bridge?), so that the project / impacts may be assessed – see background above.
- Section 3 and Section 1 corridors have correctly been identified as being upstream, with potential impacts on this District, particularly the River Finn SAC, the River Foyle & Tributaries SAC (the Moneygal Bog SAC & Owenkillew SAC have been effectively screened out, as impacts are 'unlikely') – which can be further assessed.

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I trust that these comments from this Council are useful and assist you in progressing with the respective SEA and AA procedures. Whilst this consultation appears to have been issued to 'each Environmental Authority and Adjoining Planning Authority', it is not clear if it the formal environmental consultation body in Northern Ireland has been consulted; if not, please consult DAERA SEA Team on: SEATeam@daera-ni.gov.uk and DAERA CDP Team at CDP@daera-ni.gov.uk

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

Planning Committee Chair

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