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Date: 27<sup>th</sup> June 2019

Tel: 028 7034 7244

Dear Ms Clements.

Re: FODC Local Development Plan: Draft Plan Strategy – Counter Representations.

I write on behalf of Causeway Coast and Glens Borough Council and in response to the publication of your LDP: Draft Plan Strategy Representations for public comment on Thursday 2<sup>nd</sup> May 2019.

Whilst FODC is not an 'adjoining council' for the purposes of formal consultation, the Sperrin AONB traverses both of our administrative boundaries (as well as those of Derry City and Strabane and Mid Ulster District Council areas). As such, it is important that the Council is aware of, and makes comment (if deemed necessary) on the draft policies that relate to this particular AONB.

The Council is also aware that, due to the cross boundary nature of the Sperrin AONB designation, two key tests of 'soundness' (as set out at Appendix 3 of the Planning Appeals Commission guidance 'Procedures for Independent Examination of Local Development Plans') are as follows:

## Consistency tests

C4: Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

## Coherence and effectiveness tests

CE1: The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils.

## **Cross Boundary Sperrins Forum**

The Sperrins Forum, convened in April 2017, consists of both elected representatives and professional planning officers from the following councils:

- Causeway Coast and Glens Borough;
- Derry City and Strabane District;

- Mid Ulster District; and
- Fermanagh and Omagh District.

The Forum was primarily set up to ensure a high level of co-operation and communication among neighbouring councils as we prepare our Local Development Plans (LDPs). It addresses the following common issues:

- Protection of landscapes and environmental assets through appropriate environmental designations;
- · Management of Minerals Development;
- Improvement of road linkages and infrastructure;
- Sustainable tourism development; and
- Meeting peoples' needs.

The relevant councils will continue to work together throughout their respective LDP preparations to facilitate collaborative working and to ensure that the tests of 'soundness' are met.

## **Representations Received**

Representations received to the FODC Draft Plan Strategy which may impact on cross boundary issues (Sperrins AONB) are noted.

The Council does not at this stage wish to add a site specific policy or alter or delete any site specific policy in the development plan document. The issues raised will be considered by the Council in the preparation of its LDP.

We looking forward to the continuation of our collaborative work on issues affecting the Sperrin AONB as we progress our respective Plan preparations.

Yours faithfully,

S. Mulhern

Denise Dickson Head of Planning