

# Supporting Statement

Coastal Defence Works,  
Lough Foyle,  
Eglinton.



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## 1.0 Background

1.1 This Supporting Statement (SS) has been prepared in respect of an application for full planning permission for the development of sea defences to the railway line between Castlerock and Coleraine. It deals primarily with the design and layout of the development proposed.

1.2 This application represents a development necessary to protect the railway line and corresponding infrastructure from flood risk and erosion.

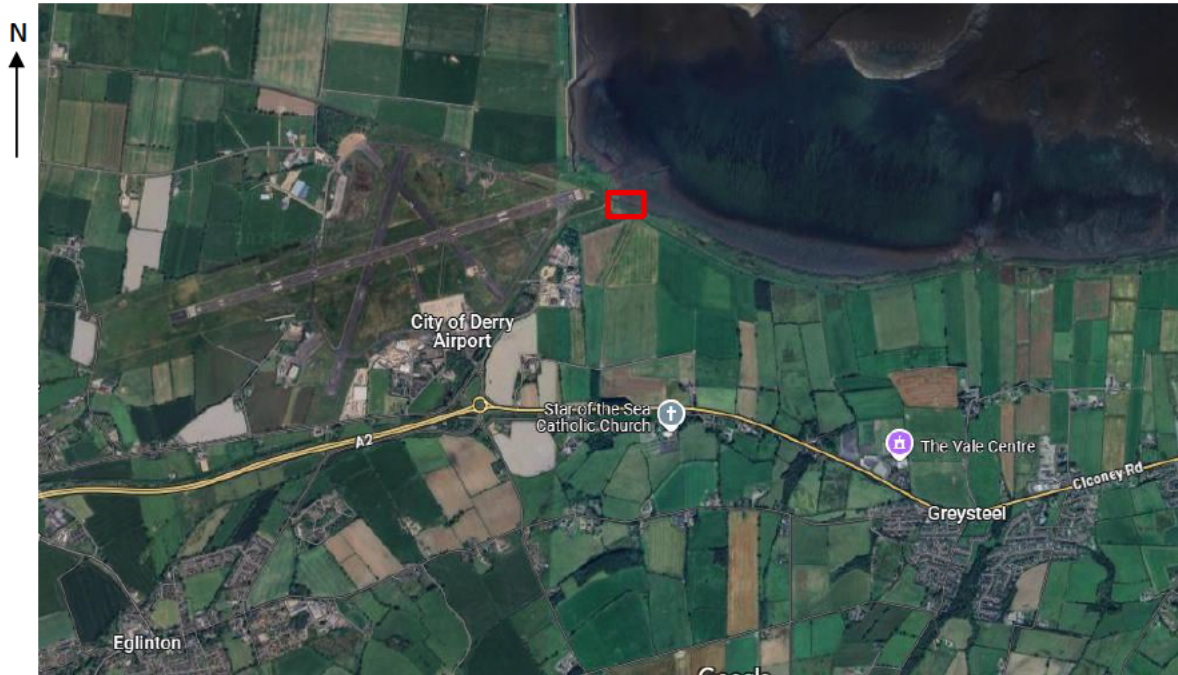
## 2.0 Site and Surrounding Area

2.1 The application site measures c. 0.16ha and is located on lands approximately 300m north east of Longfield Industrial Estate. The northern boundary of the site forms part of the bank to Lough Foyle (Fig. 1, 2 and 3). The City of Derry Airport is located to the west of the site. The end of the runway lies approximately 140m west of the site. The site is host to the Derry – Belfast railway line. Land to the south consists of farmland, beyond which lies the Longfield Industrial Estate. The Clooney Road (A2) runs from the south west to the south east of the site.

2.2 At present, the site does not benefit from any formal flood defence. The grass embankment is subject to coastal erosion and is at risk of further erosion.



*Figure 1 – Site location*



*Figure 2 – Site location*



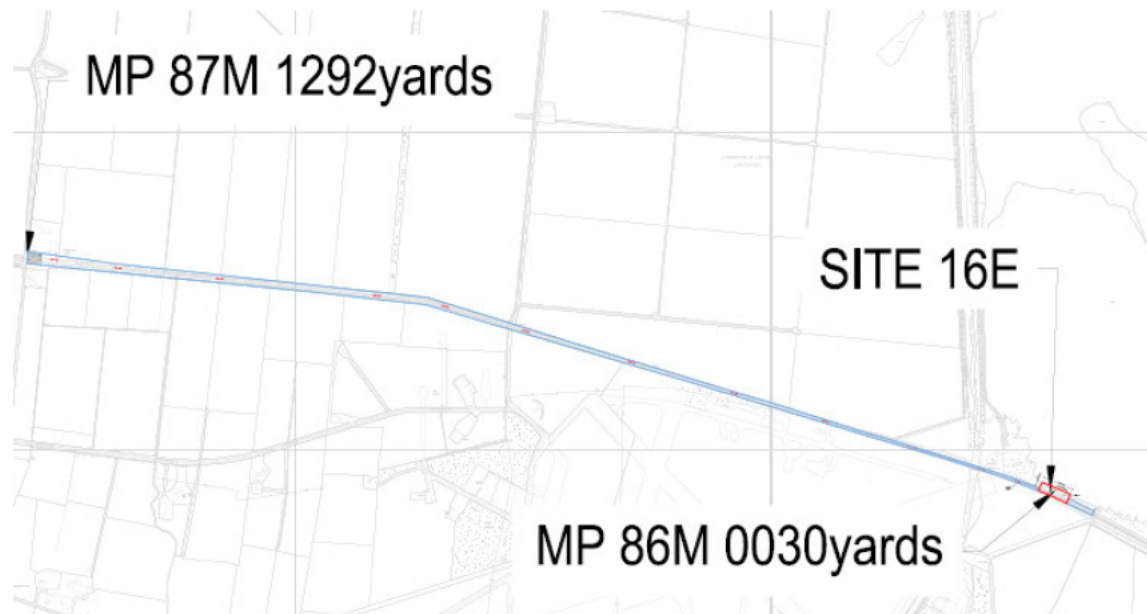
*Figure 3 – Site location*

### 3.0 Planning History

- 3.1 A desktop planning history search identified no recent planning history on the application site or in the wider area.

#### 4.0 The Proposed Development

- 4.1 The proposed development is for full planning permission for the provision of sea defences alongside the railway line, to include the formulation of a new rock armour revetment. The area directly behind the new revetment will be filled with existing smaller sized rock to meet the existing embankment level.

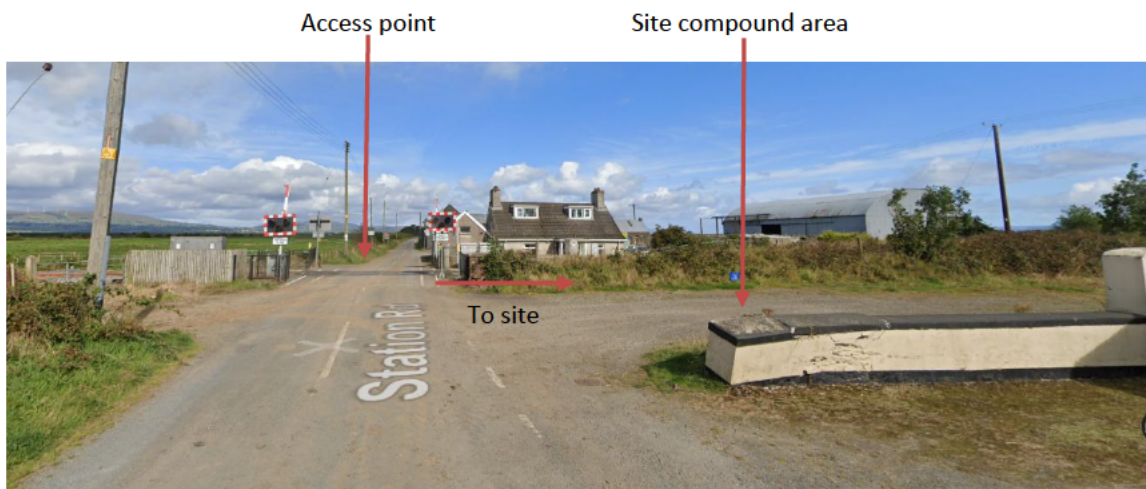


*Figure 4 – Excerpt from proposed site plan.*

- 4.2 The proposed design and layout of the proposed development is required to promote the protection of the railway line from coastal flooding and erosion in the location specified. The proposed development will support transport infrastructure and ensure the longevity of a sustainable mode of public transport in the area. The site layout plan (Fig. 4) demonstrates the scale and location of the proposed scheme in relation to the railway line and Lough Foyle.
- 4.3 The site includes a temporary works compound located at the nearest access point approximately 2.8km to the west of the site on the Station Road where the former Eglinton Station is located (Fig's 4, 5 and 6). This access point to the railway line, will allow materials/plant to be transported via road to the temporary works compound and then transferred onto rail stock from which works to the embankment can take place. The work area itself is proposed to be accessed via the railway or from the foreshore of Lough Foyle. Land used to form the temporary works compound will be restored to its original state following completion of the works (Fig 6). The temporary compound would benefit from Permitted Development under the Permitted Development Order Part 5 'Temporary Buildings and Uses' and therefore does not form part of the planning application.



**Figure 5 – Access Plan**



**Figure 6 – Image of site access**

- 4.4 The proposed works at Asset 16E will comprise of a new rock armour revetment formed in a double interlocking primary rock armour layer (1-3t) with a geotextile beneath the rock armour (Fig. 7 and 8). The area directly behind the new revetment will be filled with existing smaller sized rock to meet the existing embankment level. The revetment is to be installed between Chainages 1700-1713 (254726E, 422262N to 254713E, 422269N) and tie into the existing grass embankment at both ends.



4.6 The section drawing below (Fig. 8), visually demonstrates the intricacies of the construction process outlined above.

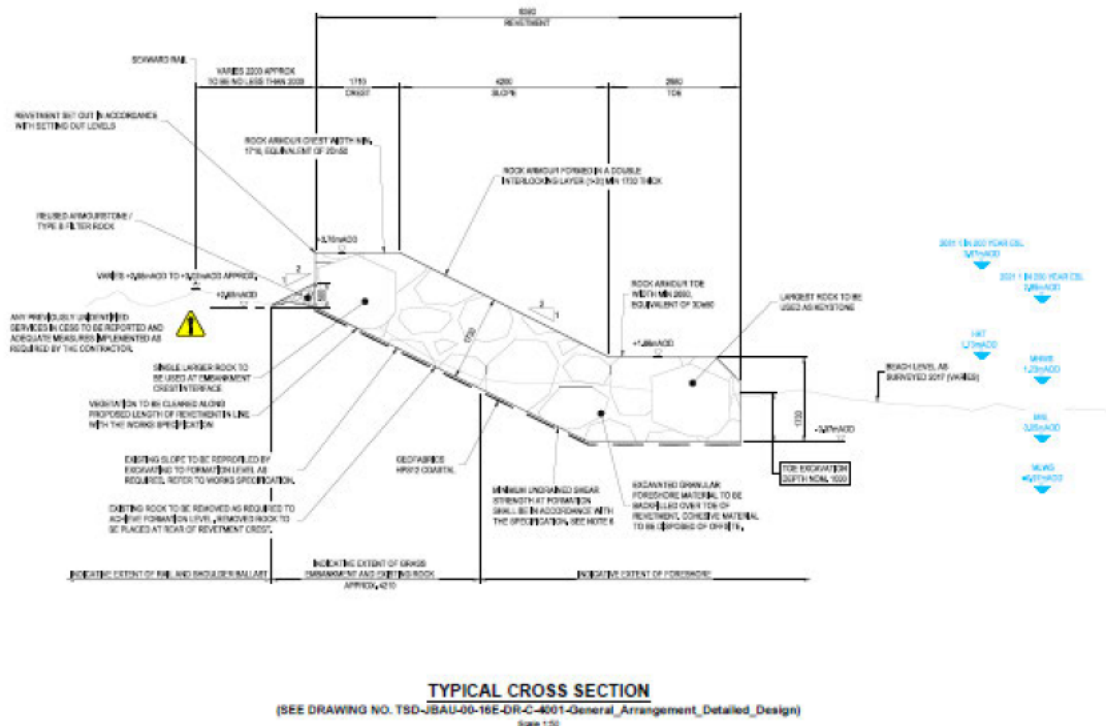


Figure 8 – Section

4.7 The design of the current proposal has considered the natural topography of the site and, the natural and archaeological heritage of the site.

4.8 Further detail on the proposed development are addressed and outlined in more detail in response to the relevant planning policies outlined further below.

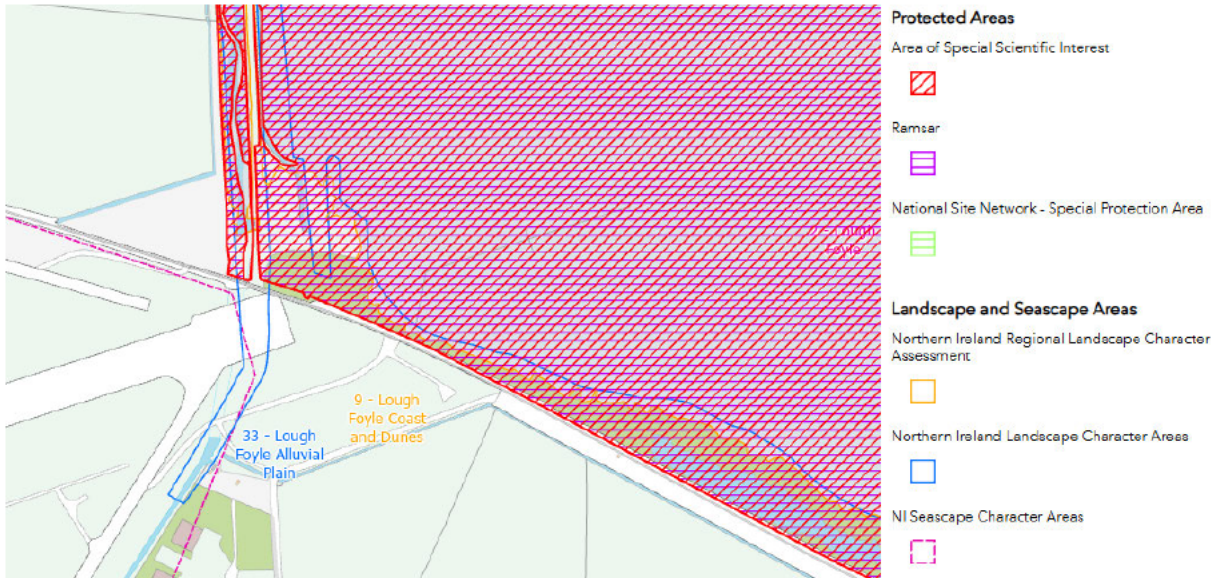
## 5.0 Local Development Plan Context

5.1 Section 45 (1) of the Planning Act (Northern Ireland) 2011 requires that the planning authority, when dealing with an application, has regard to the local development plan so far as it is material to the application, and to any other material considerations.

5.2 Section 6(4) of the Planning Act (NI) 2011 also states that determinations must be made in accordance with the local development plan unless material considerations indicate otherwise. The extant local development plan is the Northern Area Plan 2016.

5.3 Within the relevant area plan (Northern Area Plan 2016), the subject site is located within an area of environmental sensitivity, designations are as follows:

- Lough Foyle Area of Special Scientific Interest (ASSI)
- Lough Foyle RAMSAR
- Lough Foyle Special Protection Area (SPA)



**Figure 9 – NIEA Natural Environment Map**

## 6.0 Regional Policy Context and Assessment

### Regional Development Strategy (2035)

6.1 The Regional Development Strategy (RDS) encourages development that will promote transport which balances the needs of our environment, society and economy. Objective (SPG-TRAN 1) highlights the importance to upgrading of public transport services.

### Strategic Planning Policy Statement (SPPS)

6.2 The SPPS was published by the Department of the Environment in September 2015. The provisions of the SPPS apply to the whole of Northern Ireland and are material to all decisions on individual planning applications and appeals. The SPPS promotes good design which it states is an important material consideration in the assessment of all proposals.

6.3 The SPPS encourages design that will respond sympathetically to the characteristics of the site namely, archaeological heritage; the form of the land, its contours and views to and from the site; and the existing natural heritage and protect or create appropriate conditions for flora and fauna to thrive.

### Planning Policy Statements (Retained Policy)

6.4 The following PPPs are also relevant to the proposal:

- PPS 2: Natural Heritage;
- PPS 15: Planning and Flood Risk (Revised).

6.5 The proposed development is considered against these regional policies in the sections below.

**PPS 2: Natural Heritage**

- 6.6 PPS 2 sets out the Departments planning policies for the conservation, protection and enhancement of our natural heritage. It contains policies relating to European and Ramsar sites (policy NH 1), species protected by law (policy NH2), sites of nature conservation importance (policy NH 3), habitats, species or features of natural heritage importance (NH5) and Areas of Outstanding Natural Beauty (NH6).
- 6.7 Lough Foyle Ramsar site is situated on the north coast of Northern Ireland in County Londonderry, extending north east of the city of Derry. This includes the whole of the Lough Foyle Area of Special Scientific Interest. The site is comprised of a large shallow sea lough which includes the estuaries of the rivers Foyle, Faughan and Roe and contains extensive intertidal mudflats and sandflats, and associated brackish ditches
- 6.8 A Biodiversity Checklist and Preliminary Ecological Assessment have been prepared to support the application, as the proposed development has the potential to affect features of natural conservation interest. The assessment confirms that there are no protected sites within the application area and no protected or priority flora recorded, with no evidence of protected fauna observed; while birds and common terrestrial mammals, a fox and a domestic cat were noted, the protective provisions of Policy NH2 of PPS2 are not engaged. To ensure any potential impacts are avoided or minimised, the development will be implemented in accordance with best environmental practice and relevant Pollution Prevention Guidelines, including PPG 1 - *Understanding your environmental responsibilities - good environmental practices*-, GPP 5 *Works and maintenance in or near water* and PPG6 *Working at Construction and Demolition Sites*. The site's drainage will be designed in line with Sustainable Drainage Systems (SuDS) principles during site clearance, construction and operation to reduce the risk of polluted runoff or sediment entering adjacent watercourses.
- 6.9 The above proposed mitigation measures will ensure that the proposal complies with the relevant policies of PPS2. Given the findings from the Preliminary Ecological Appraisal, the conclusions against the policy requirements are as follows:
- Policy NH 1 - The proposal is not likely to have a significant impact on the Special Protected Area or Lough Foyle Ramsar.
  - Policy NH 2 - The proposal is not likely to harm any European protected species.
  - Policy NH 3 – The proposal is not likely to have an adverse effect on the integrity, including the value of the site to the habitat network, or special interest of the Area of Special Scientific Interest.
  - Policy NH 5 - The proposal will not result in an unacceptable adverse impact on priority habitats or species.
  - Policy NH 6 – The proposal is subservient in its size and scale and sensitive in its design to the immediate surrounding area and wider area of outstanding natural beauty.

In conclusion, the proposal fully complies with all relevant policy requirements of PPS2.

### ***PPS15 Planning and Flood Risk (Revised)***

- 6.10 PPS15 (Revised) sets out the Department’s planning policies to minimise and manage flood risk to people, property and the environment. Figure 10 shows that the site is located within the coastal flood plain. Policy FLD 1 prohibits development within the 1 in 100 year fluvial flood plain or the 1 in 200 year coastal flood plain unless the proposed development qualifies for one of the exceptions listed. Given that an element of the proposed development is for the construction of new sea defences in an undefended area to protect transport infrastructure, it is concluded that the application is subject to the exemption put forward in part D of FLD 1. In conclusion, the proposed development is in accordance with the requirements of Policy FLD 1.



**Figure 10 – Flood map**

**Key:**

Blue: Present day – floodplain rivers (1 in 100 year)

Green: Present day – floodplain sea (1 in 200 year)

## **7.0 Conclusions**

- 7.1 This supporting statement demonstrates how the proposal has developed to take account of the site assets and constraints. It has been developed cognisant of the prevailing planning policy framework to ensure that the proposal is designed in an appropriate manner to take account of the site, its setting and, local heritage context both natural and archaeological, in order to provide a suitable flood defence scheme.
- 7.2 The planning application is also accompanied by a suite of drawings and a number of technical reports to address all the relevant design and technical matters required as part of the planning application submission.
- 7.3 Overall, it is submitted that the proposed development satisfies all the planning considerations to include policy, design and technical matters and should be granted planning approval.