

06 November 2020

Delivered by email and post

Local Development Plan Team  
Derry City & Strabane District Council  
Council Offices  
98 Strand Road  
Londonderry  
BT48 7NN



Dear Sir / Madam

## REPRESENTATION TO DERRY CITY & STRABANE DISTRICT COUNCIL'S LOCAL DEVELOPMENT PLAN - DRAFT PLAN STRATEGY

### GRANSHA PARK, CLOONEY ROAD, DERRY (INCLUDING ZONING H32)

This representation is submitted on behalf of the Department of Health (DoH) and the Western Health and Social Care Trust (WHST) in relation to their lands at Gransha, Derry~Londonderry in response to a consultation on the Derry City and Strabane District Council (DCSDC) draft Plan Strategy (dPS).

The DoH / WHST did not submit a representation to the original consultation period of the dPS in December 2019 / January 2020. This consultation provides the DoH / WHST with the opportunity to confirm their intentions for the future redevelopment of their lands at Gransha.

### SUBJECT SITE

The extent of the lands (known as Gransha Park), under the ownership of the DoH / WHST, are located within the settlement limit of the extant Area Plan for the area (Derry Area Plan (DAP) 2011), see map extract at **Appendix 1**. The land extends to circa 70 hectares with the main existing use of the land being for the provision of various health, support services and associated office uses including:

- Waterside Hospital;
- Grangewood Mental Health In-patient Unit;
- Lakeview Hospital;
- Little Orchids Children's Centre; and
- Voluntary organisations including U3A Foyle.

The existing buildings are set in maintained gardens and served by an internal road network and associated car parking.

Hamilton House  
3 Joy Street  
Belfast  
BT2 8LE

T 028 9072 3900 [turley.co.uk](http://turley.co.uk)

A large portion to the north east of the site comprises of Residential Zoning H32, as designated within the DAP 2011. The overall area of this zoning is approximately 31.5 hectares and the undeveloped portion, of approximately 28.5 hectares, has a potential yield in the region of 428 no. dwellings. Access to the site is from Gransha Roundabout which is located on the A2 dual carriageway.

## **FUTURE DEVELOPMENT AT GRANSHA**

Whilst there has been no development activity on Residential Zoning H32 since the publication of the DAP 2011 in May 2000, the Department of Health (DoH) has confirmed that the land has been deemed to be surplus to the Departments requirements and has been identified as part of the 'Public Land for Housing' project. A sequence of steps is currently being followed to demonstrate the sites suitability for disposal and to allow the site to be brought forward for social / affordable housing. DfC has communicated to DoH that it supports retention of the housing zoning and its suitability for the Public Land for Housing project. – see copy attached.

The capital receipt received from the disposal of the land will be reinvested into the health budget to provide healthcare facilities.

Outline planning permission (Ref: LA11/2016/0422/O) was granted in 2019 on lands to the south east of Gransha Park for a *“new residential neighbourhood, with small convenience retail and professional services, provision of formal and informal open/play spaces, new signalised junction (at Gransha) and associated landscaping and access works”*. This permission relates to Residential Zoning H30 (lands at Ballyoan) and establishes a programme for the delivery of road upgrades to Gransha Roundabout and Caw Roundabout which are to be delivered as part of the proposed development.

Further to this we understand that a secondary access, which will be used for blue light emergency vehicles, linking the Stradreagh Junction of the A6 dual carriageway to Gransha Park East will form part of the A6 Londonderry to Dungiven Dualling (Stage 3) project and that actions relating to the design of this junction and vesting of land have taken place.

This extant permission and road upgrade works provides assurance that the necessary road infrastructure in the immediate vicinity to the subject site will be suitable to serve the future development on Residential Zoning H32.

An existing greenway (to Waterfoot Park) and a proposed greenway extension project are in close proximity to the Gransha Park lands and complement other green infrastructure in the locality. The opportunity to realise a truly sustainable neighbourhood is already significantly underway and serves to enhance the attractiveness of this area for families and city commuters alike.

As the site will be brought forward for residential development imminently, we respectfully request that the Council retains Residential Zoning H32 in their upcoming Local Development Plan.

In addition to this the WHSCT will be considering a number of potential future developments on the balance of the lands at Gransha, including;

- Development of a challenging behaviour unit for older people;
- Development of facilities for dementia services along the lines of a “village” model;
- Development of additional Supported Living accommodation for Mental Health & Learning Disability, including additional capacity for Short Links;

- Step up Step down facility to help with flow out of Acute MH hospital & support re integration into the community (step down) as well as supporting patients in the community in crisis to reduce admissions (Step up);
- Development of a low secure facility to support higher risk patients that have been detained under Mental Health Act & who may pose serious risk to public safety;
- Relocation of staff / services from other Trust locations, staff training facility;
- Admin facilities for Trust community teams;
- Residential accommodation for medical students;
- New ambulance hub (in partnership with the Northern Ireland Ambulance Service);
- Centralised community aids and appliance store;
- Transport compound;
- Maintenance workshops;
- New area board HQ; and
- Developments to accommodate the ever growing demand for health services.

Whilst some of the uses proposed do not provide health services directly to the public they will provide essential staff accommodation / maintenance facilities that will enable the continued operation of other health services in the district. For this reason we would request that the Council retains the site as whiteland within the settlement limit of Derry~Londonderry. This zoning will allow the DoH / WHSCT a adequate flexibility to deliver their Masterplan for the site.

## **SOUNDNESS OF THE PLAN**

The keystone of the local development plan system is the principle of 'soundness'. Section 10(6) of the 2011 Act provides that the purpose of the Independent Examination (IE) is to determine, in respect of the development plan document:

- a) whether it satisfies the requirements of sections 7 and 8 or, as the case may be, sections 7 and 9, and any regulations under section 22 relating to the preparation of development plan documents; and
- b) whether it is **sound**.

The Planning Act (Northern Ireland) 2011 does not define the meaning of 'soundness'. However, Development Plan Practice Note 6 – Soundness (DPPN 6), dated May 2017, suggests that it may be considered in the context of its ordinary meaning of '*showing good judgement*' and '*able to be trusted*'.

Furthermore, DPPN 6 states that the tests of soundness are based upon three categories. These three categories relate to:

- how the development plan document (DPD) has been produced;
- the alignment of the DPD with central government regional plans, policy and guidance; and

- the coherence, consistency and effectiveness of the content of the DPD.

Our review on behalf of the DoH & WHSCT has taken into account the tests of soundness when determining if the strategy and policies proposed within the dPS are sound.

## **DERRY CITY AND STRABANE DISTRICT COUNCIL DRAFT PLAN STRATEGY (DPS)**

### **The Council's Proposed LDP Vision and Growth / Spatial Strategies**

The Council's overall Vision for the District is;

*"To make Derry City and Strabane District a thriving, prosperous and sustainable area – Planning for balanced and appropriate high-quality development, whilst protecting our environment, and also promoting wellbeing with equality of opportunity for all".*

Spatial & Cross-Cutting Objective A (ii) is;

*"To develop and reinforce Derry City as the core settlement, regional gateway and principal city of the North West – providing employment, administration, commerce, specialised services, cultural amenities and tourism / visitor facilities as well as shopping health, education and leisure services, particularly for the cross-border population within the one-hour drive time across the North West Region".*

The dPS sets out a summary of the Growth Targets for the district for the period 2017 to 2032 which underpin its Growth Strategy. These are listed below:

- 9,000 new homes;
- 10,000 more people; and
- 15,000 more jobs.

The LDP's spatial strategy and the settlement hierarchy, in accordance with guidance in the RDS and the SPPS, sets Derry as the principal City of an expanding North West cross-border city region, to be the prime focus of development, to achieve a 'critical mass' of size and limiting other nearby settlements that would compete / detract from it. The remainder of the settlement hierarchy includes Strabane as a main town, Castlederg, Claudy and Newtownstewart as local towns and a further 23 villages and 19 small settlements.

The DoH / WHSCT agree with DCSDC's spatial strategy and settlement hierarchy proposed within the dPS. It is considered a sound approach to identify Derry City as the prime focus of development and as the main provider of housing, economic uses and health services.

The DoH / WHSCT also support the identification of the A2 road at Gransha as being an 'Arrival Point' and a 'Main Housing Location' in this part of the city (Page 69, Figure 10: Strategic Development of Derry-Londonderry City). Both of these designations reinforce the spatial importance of the subject site for the future development of this gateway into the north east of the city.

### **Chapter 16 - Housing in Settlements and the Countryside**

The LDP Strategy for the strategic allocation of Housing Land is to have a supply of housing Land to meet the anticipated requirements of the District and with the main housing allocation to Derry City as the Regional City for the North West. Table 8: Indicative Allocation of Housing in DC&SDC by Settlement Tier 2017-32 indicates that the Council are allocating an indicative number of 4,950 - 5,850 dwellings to be located within the settlement of Derry City. This represents 55 – 65% of the overall provision for the district.

Paragraph 16.17 states that;

*“the LDP will carry forward most of the Housing zonings / designations from the Derry Area Plan 2011 and the Strabane Area Plan 2001, namely the (substantially) unimplemented Housing zonings, Flats Policy Zone (formerly the DAP designated Flat Zone FL 1) and the associated Flat Prevention Areas (formerly the DAP Flat Exemption Areas)”.*

The DoH / WHSCT strongly agrees with the strategy of retaining most of the existing housing zones and would reiterate that the lands at Zoning H32 are in the process of being brought forward for residential development through the ‘Public land for Housing’ programme, providing certainty that these lands will be developed to deliver much needed housing in the city.

### **HOU 1 Strategic Allocation and Management of Housing Land - Zoned Housing Land and LUPAs**

Policy HOU1 adopts a sequential approach to managing the release of land for new housing. LDP Phase 1 Zonings – Phase 1 housing land will be zoned on sites (of 0.2 hectares or 10 or more dwelling units in the following circumstances:

- Existing commitments i.e. sites with live residential planning permission;
- Selected Urban Capacity Sites (City and Main Town) and Whiteland Sites (Local Towns) identified at LPP;

The strategy identifies that Phase 2 housing lands are held in reserve and include the following:

- Derry Area Plan (DAP) and Strabane Area Plan (SAP) housing zonings without current residential planning permission; and
- Other Urban Capacity Sites (City and Main Town) and Whiteland Sites (Local Towns).

If, during the LDP period there is a need for Phase 2 housing zonings earlier than anticipated, the following will apply:

- Phase 2 can be re-zoned as Phase 1 as a consequence of an LDP amendment following a Plan review and the re-appraisal of future housing requirements;
- Phase 2 land can be approved through a planning application from a registered housing association for social/ affordable housing where there is a localised housing stress / need. Such a need should be supported by NIHE.

Whilst we understand the rationale of Councils approach to Phase 1 / Phase 2 housing lands we are concerned that this is an unsound approach to the delivery of residential development in Derry City. Paragraph 16.20 states that:

*“a criteria-based approach to selecting sites for each phase will be undertaken in the Local Policies Plan (LPP). The selection criteria will take account of a number of factors including: Housing Monitor; Urban Capacity; Windfall and Housing Needs Assessment (HNA)”.*

The Council has published a summary of its Housing Monitor Report 2018–2019 however this does not identify individual sites. Without viewing this information we are unable to fully appreciate how the Council has concluded that there is an area of 426.8 hectares remaining for residential development.

As written, the policy will mean that Phase 2 zoned residential lands will be frozen, relying on other Phase 1 developments coming forward before they can be developed. Policy HOU 1 relies on existing committed zonings, which in many cases are large complex zonings where there is a limited prospect of them being developed for



housing during the plan period. Council must recognise the difficulty of limiting the deliverability of a cohort of zones sites and where existing commitments have failed to be implemented in the previous plan period.

Whilst the policy does make provision for bringing Phase 2 lands forward for development earlier than anticipated, where there is an identified need, the procedure and circumstances of this mechanism is not fully explained in the dPS. Paragraph 16.24 states that;

*“As an exception to the Phased approach, the Council has identified that there **may** be a very specific shortage of housing land, matched with a very high social housing need, in certain local areas. In these circumstances, if no alternatives can be identified after a sequential consideration, it **may** be necessary to exceptionally permit some additional housing lands” (our emphasis)*

This mechanism is vaguely described and does not specifically outline the policy test for early implementation of a Phase 2 zoning. The text advises that if no alternatives can be identified after a sequential consideration however it does not state what this entails – whether this is a citywide or localised site search?

We consider that there is no guarantee that current Phase 1 developments will progress to deliver residential development in the short to medium term and the Council is unnecessarily restricting development on residential zoned lands in the extant Area Plan. This approach is overly restrictive and could delay the delivery of residential development on suitably zoned sites.

The DoH / WHSCT lands at Gransha are in a position to be brought forward for residential development in the short term and the current wording of Policy HOU1 of the dPS would provide further policy restrictions on the site which could delay / jeopardise the development of the land and result in the loss of a public owned residential site suitable to contribute towards the current and pressing social housing need in the city.

#### ***HOU7 Accessible Housing (Lifetime Homes and Wheelchair Standards)***

HOU 7 requires all residential developments to comply with the Lifetime Homes standards as set out in the Department for Communities, Housing Association Guide. For proposals over 5 units, the policy has a further requirement that proposals must demonstrate how they propose to address wheelchair standards for 10% of the units.

Para. 16.66 states that *“the quality of our homes has a significant influence on our health, happiness, confidence, social life, relationships with our families and general well-being”*. From a public health perspective, the DoH / WHSCT strongly support the aim of this policy in helping to deliver better, accessible living environments for everyone.

## **CHAPTER 18 – COMMUNITY INFRASTRUCTURE**

The Councils LDP Strategy for Community Infrastructure, in accordance with the SPPS, aims to promote new community infrastructure developments within our local communities and to protect existing facilities and services within the District Policy CI 1 Community Infrastructure.

### **Policy CI 1 Community Infrastructure**

Policy CI 1 Community Infrastructure states that;

*“Proposals for new facilities, extended facilities or re-development of community infrastructure will be permitted provided that they meet the principles of sustainable development (see Section 7) and comply with all of the following criteria:*

- *They demonstrate a clear community need;*

- *The community they seek to serve can access the facility via a number of different forms of transport including walking, cycling and, where available, public transport;*
- *They are appropriate in terms of scale and are in character within their locality; and*
- *They meet the principles as set out in GDP 1."*

Paragraph 18.9 goes on to state that *"the Council aims to protect the existing amenity of current community facilities, such as cemeteries, hospitals, schools etc. from incompatible uses that would impact on their role, function and character"*.

The DoH / WHSCT welcome the Councils acknowledgement of the importance of protecting existing community infrastructure facilities and also for encouraging the extension of these facilities where a clear community need is demonstrated.

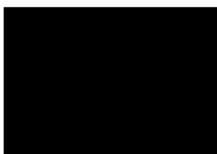
As previously outlined the DoH / WHSCT have significant plans for the future development of their lands at Gransha, providing a range of healthcare facilities for the city in the form of direct services / accommodation as well as ancillary developments required to operate health services i.e. transport compound and maintenance facilities.

On this basis the DoH / WHSCT consider that retention of the existing lands under their control at Gransha within the settlement limit as unzoned whiteland is essential to achieve the Councils community infrastructure strategy in Derry~Londonderry.

The lands at Gransha are unique in that they are a public sector owned residential zoning within Derry City. We would request that Zoning H32 is brought forward as a Phase 1 residential zoning, ensuring the lands can be brought forward for social / affordable housing and contribute towards addressing the existing housing need in the city.

If you require any further information in relation to this representation please contact our office.

Yours sincerely

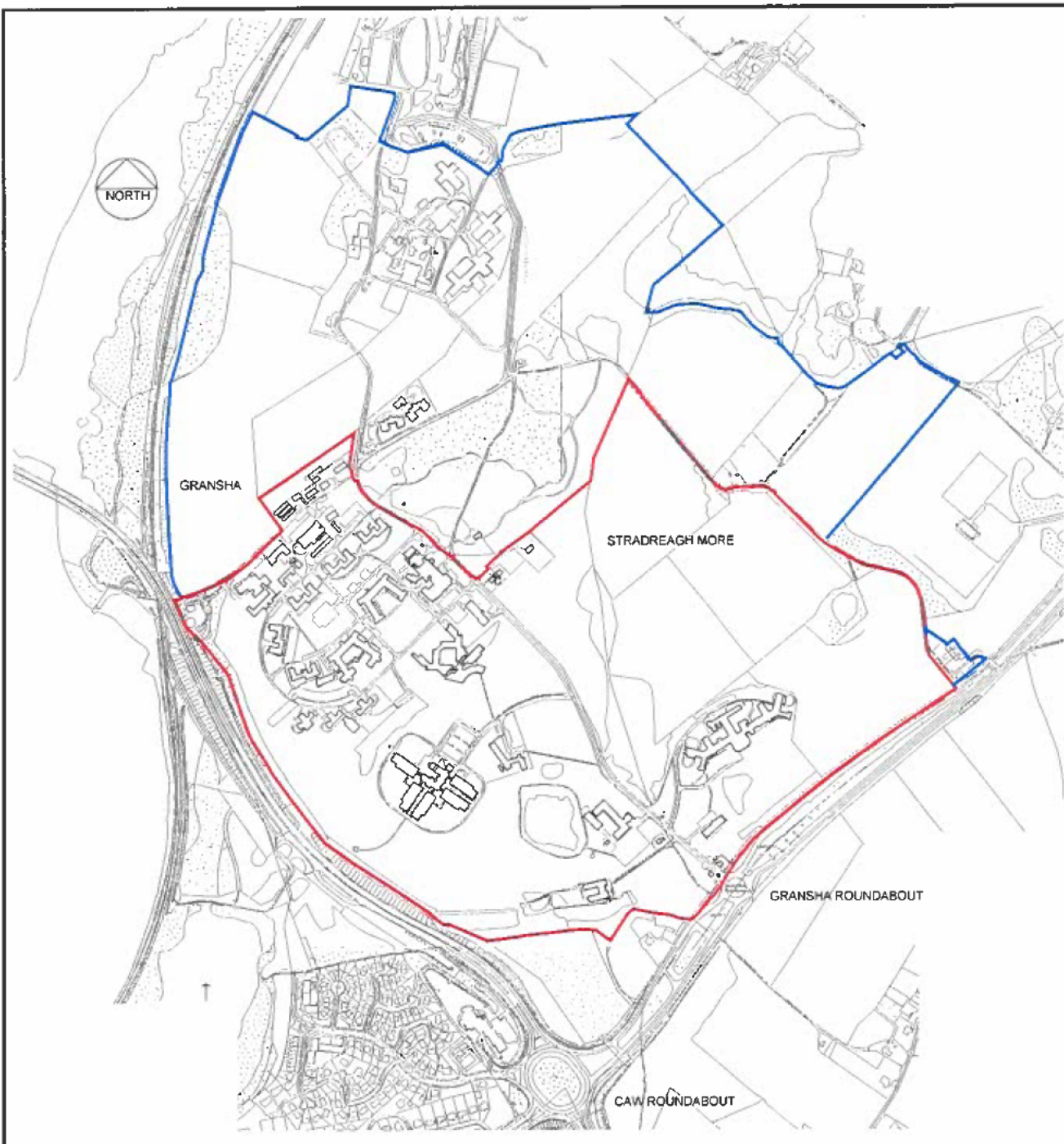


**Director**





## Appendix 1: Site Location





**LEGEND**

- DEPARTMENT OF HEALTH LAND AND WHSCT LAND WITHIN SETTLEMENT LIMIT
- DEPARTMENT OF HEALTH LAND AND WHSCT LAND OUTSIDE SETTLEMENT LIMIT

											
<b>Construction Division</b> <small>Clare House          303 Aspin Road West          Sch. West BE3 9E0</small>  <span style="float: right;"><small>Tel: 028 90 816200</small></span>											
<b>Client</b> Assets and Estate Management Branch Department of Health											
<b>Job</b> Gransha/Stradreagh More Estate											
<b>Drawing</b> WHSCT Land and DoH Land											
<b>Scale</b> 1:5000 @ A2											
<b>Branch</b> CPD Health Projects											
<b>Branch Manager</b> David Porter											
<b>Drawn by:</b> G.B.	<b>Date:</b> 15 October 2020										
<b>Verified by:</b>	<b>Date:</b>										
<b>Drawing No.</b> <div style="text-align: right; font-size: 1.2em;">16 / 13</div>											
<b>Amendment</b> <table border="1" style="width: 100%; height: 20px; border-collapse: collapse;"> <tr> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> </tr> </table>											





Level 9  
Causeway Exchange  
1-7 Bedford Street  
Belfast  
BT2 7EG

[REDACTED]  
Our ref:  
Date: 27 October 2020

[REDACTED]  
Property Management Branch & Management Services Unit  
Investment Directorate  
Department of Health  
Annex 4  
Castle Buildings  
Stormont Estate  
BELFAST  
BT4 3SQ

Dear [REDACTED],

**Local Development Plan (LDP 2032): Draft Plan Strategy – LDP Stakeholder,  
Notification of Re-Consultation**

The Department for Communities is currently taking forward the Public Land for Housing (PLfH) Project which aims to identify unused or under-utilised public sector land that has the potential to be reused for housing as a way of helping to increase housing supply in NI across all tenures.

At a recent Project Board meeting, you had made the Board aware that proposals in the Draft Plan Strategy could potentially impact upon the objectives of the PLfH project in the Derry City and Strabane District Council area. There is a concern that the Draft Plan Strategy, in examining housing need in the area, could potentially de-zone green field lands which are currently zoned for housing.

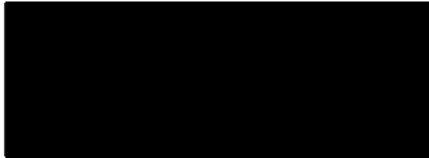
The PLfH Project has been engaged with your office for some time working towards having some of its land at the Gransha Health Estate, which is currently zoned for 315 housing units, released for housing purposes. We would therefore very much

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support the Department for Health position to have the housing zoning on these lands in particular retained.

Increasing housing supply, particularly in areas of high social need, is a key Ministerial priority within the Department for Communities and I would ask that this is taken into consideration before any decisions are taken to reduce or de-zone land for housing in the Derry City and Strabane District Council area.

Yours sincerely



**Housing, Urban Regeneration & Local Government  
Department for Communities**



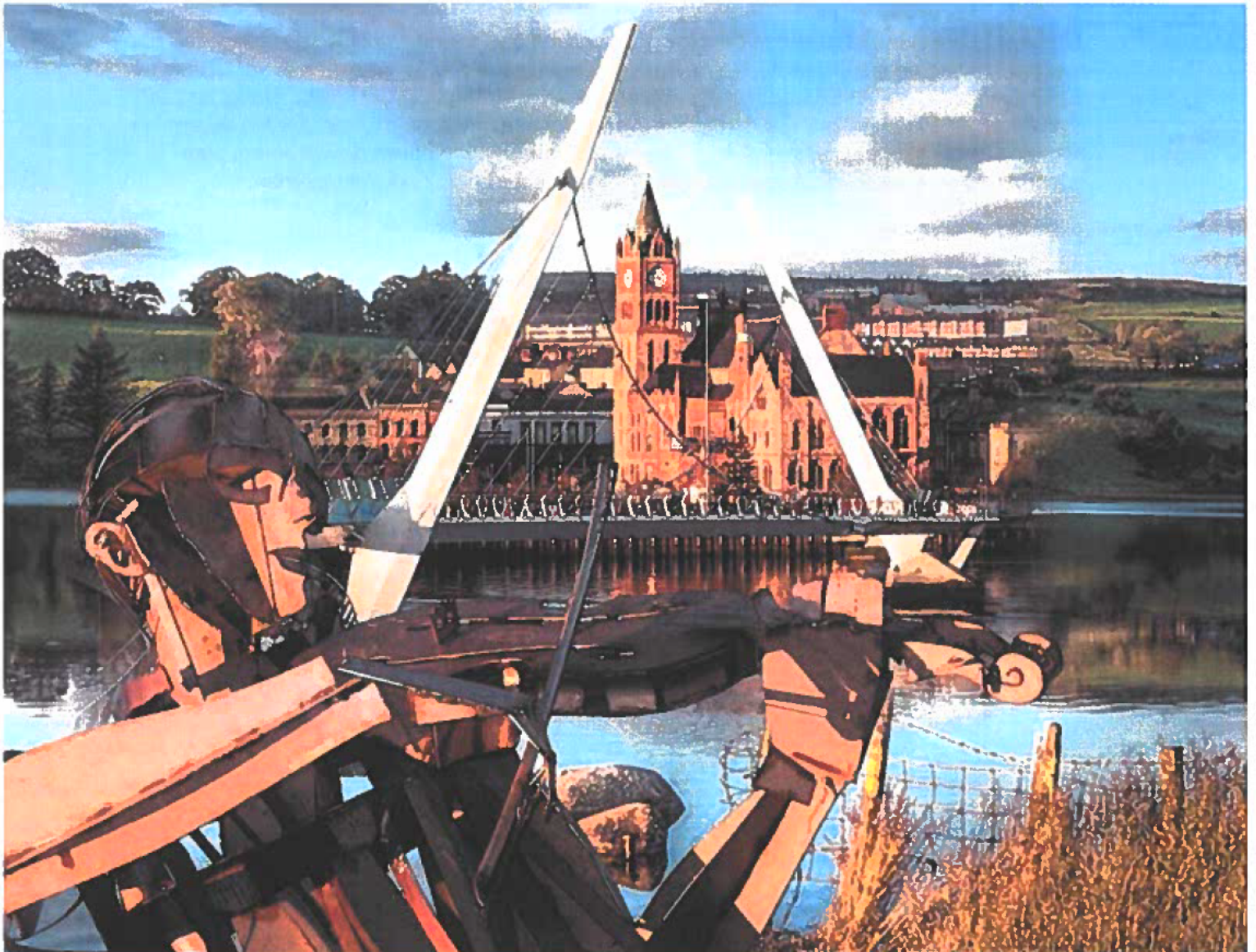


Derry City & Strabane District Council

# Local Development Plan

(LDP) 2032

Representations Form for the Re-Consultation of the LDP  
Draft Plan Strategy & Associated Appraisal / Assessments



September 2020

<http://www.derrystrabane.com/Subsites/LDP/Local-Development-Plan>

## Re-Consultation on LDP Draft Plan Strategy

The Council's LDP draft Plan Strategy was already published in December 2019, followed by a consultation period which ended in January 2020. However, a procedural error has been identified so this further consultation period is now being undertaken. Any additional or revised representations may now be submitted during this re-consultation period.

If you did not make a Representation to the draft Plan Strategy during the previous consultation period and now wish to do so, please use this form to make your Representation. Similarly, you can use this form to provide any additional or revised information to a previously made Representation or to indicate that you do not wish to add any further information to your previously submitted Representation.

## What is the Local Development Plan (LDP)?

The new LDP will guide land-use development and set out Planning policies and proposals for the use, development and protection of our settlements and countryside across our District to 2032. Crucially, it will help to deliver the outcomes in the Strategic Growth Plan. Once the LDP is adopted, its Planning policies, zonings and development proposals will be used to determine planning applications across the District. The LDP will comprise of two development plan documents: this LDP Plan Strategy and, in due course, the LDP Local Policies Plan.

## What is the LDP Plan Strategy (PS)?

This LDP draft Plan Strategy sets out the Council's strategic Planning objectives, designations and policies for the District in line with regional strategies and policies, but tailored to the local needs of this City and District.

The preparation of the PS has been informed by the Council's LDP Preferred Options Paper (POP – May 2017) which provided the basis for consulting with the public and stakeholders on a series of options for dealing with key issues in the Plan area. It set out the Council's initial proposals and policy direction, therefore aiming to stimulate public comment and help interested parties to become involved in a more meaningful way at the earliest stage of Plan preparation. The published draft LDP PS fully reflects a consideration of all the representations made during the POP consultation period and all engagement with stakeholders, consultees and elected Members of the Council.

## How We Are Consulting

Complete this draft Plan Strategy Representations Form and either return by email to [LDP@DerryStrabane.com](mailto:LDP@DerryStrabane.com) or download a copy and post to:

Local Development Plan Team,  
Council Offices,  
98 Strand Road,  
Derry,  
BT48 7NN

Hard copies of the form will be available at the above address and our other main office at 47 Derry Road, Strabane, Tyrone, BT82 8DY. Please note that if you are making a representation in any other format, it must include the requested information set out in this form and address the Tests of Soundness.

The draft Plan Strategy is published for formal public consultation for a period of eight weeks beginning on 11th September 2020 and closing on 6th November 2020. Please note that in order for comments to be considered valid, you must include your contact details. We will use these details to confirm receipt of comments and to seek clarification or request further information. Anonymous comments or comments which do not directly relate to the draft Plan Strategy will not be considered as part of the consultation process.

## Availability of Documents

The LDP draft Plan Strategy and supporting documents, including the Sustainability Appraisal Report (incorporating the Strategic Environmental Assessment), the Habitats Regulation Assessment, Rural Needs Impact Assessment and the Equality Impact Assessment, are all available to view online [www.derrystrabane.com/ldp](http://www.derrystrabane.com/ldp)

From Friday 11th September to 6th November 2020, between the hours of 9am-5pm (Monday to Friday), all documents will also be available for inspection, by appointment only, at the Council's offices at 98 Strand Rd, Derry BT48 7NN, or at 47 Derry Rd, Strabane BT82 8DU. In order to arrange an appointment to view the documents, or if you have any queries on accessing the documentation, the Planning Office can be contacted on 028 71 253 253 or [ldp@derrystrabane.com](mailto:ldp@derrystrabane.com)

The dPS document will also be available at the Council Leisure Centres and Public Libraries that are open in the District, due to COVID 19 restrictions, from 11th September 2020.

Please note that, due to the current COVID 19 circumstances, there will be no further public meetings or drop-in sessions with this re-consultation. Instead, during the re-consultation period, an appointment may be made to speak to or meet / virtual meeting with a Planning Officer by contacting us at the email / telephone number above, where you can ask questions in the same manner as you would at a public meeting or drop-in.



## Section A: Data Protection

### Local Development Plan Privacy Notice

Derry City and Strabane District Council is a registered data controller (ZA119397) with the Information Commissioner's Office and we process your information in accordance with the General Data Protection Regulation and Data Protection Act 2018 (GDPR).

Derry City and Strabane District Council only collects and processes personal information about you in order to fulfil our statutory obligations, to provide you and service users with services and to improve those services. Your personal information will be used to populate the LDP Representations Database.

If you wish to find out more about how the Council processes personal data and protects your privacy, our Corporate Privacy Notice is available at:  
<https://www.derrystrabane.com/Footer/Privacy-Policy>

It contains the standards you can expect when we ask for, or hold, your personal information and an explanation of our Information Management Security Policy. All representations received will be published on our website and made available at our Local Planning Office, 98 Strand Road, Derry BT48 7NN, for public inspection and will be forwarded to the Department for Infrastructure (DfI) and hence to the Independent Examiner / PAC.

### Why are we processing your personal information?

- To enable the preparation of the Council's Local Development Plan;
- To consult your opinion on the Local Development Plan through the public consultation process;
- To ensure compliance with applicable legislation;
- To update you and/or notify you about changes; and
- To answer your questions.

If you wish to find out more information on how your personal information is being processed, you can contact the Council's Data Protection Officer:

**Data Protection Officer**  
47 Derry Road  
Strabane  
BT82 8DY  
Telephone: 028 71 253 253  
Email: [data.protection@derrystrabane.com](mailto:data.protection@derrystrabane.com)

## Section B: Your Details

**Q1. Are you responding as an individual, as an organisation or as an agent acting on behalf of individual, group or organisation? (Required)**

Please only tick one

- Individual (Please fill in Question 2, then proceed to Section C.)
- Organisation (Please fill in the remaining questions in the section, then proceed to Section D.)
- Agent (Please fill in the remaining questions in the section, then proceed to Section E.)

**Q2. What is your name?**

Title

FirstName (Required)

Last Name (Required)

Email

**Q3. Did you respond to the previous LDP Preferred Options Paper?**

- Yes
- No
- Unsure

**Q4. Tick whichever is applicable:**

- I /we wish to carry forward my previously submitted representation without adding anything further (Insert Rep Number if known)
- I /we do wish to provide additional / revised information to my /our previously submitted Representation (insert Rep Number if known)
- I / we did not submit a representation during the previous consultation period (December 2019 – January 2020) and now wish to submit a Representation during this Re-Consultation period.

## Section C: Individuals

Address (Required)

Town (Required)

Post code (Required)

On completion, please proceed to Section F.

## Section D: Organisation

If you have selected that you are responding as an organisation, there are a number of details that we are legally required to obtain from you. If you are responding on behalf of a group or organisation, please complete this section, then proceed to Section F.

Organisation / Group Name (Required)

Your Job Title / Position (Required)

Organisation / Group Address (if different from above)

Address (Required)

Town (Required)

Postcode (Required)

On completion, please proceed to Section F

## Section E: Agents

If you have selected that you are responding on behalf of another individual, organisation or group there are a number of details that we are legally required to obtain from you. Please provide details of the individual, organisation or group that you are representing.

### Client Contact Details

Title / First Name (Required) [REDACTED]

Last Name (Required) [REDACTED]

Organisation / Group Address - Department of Health

Address (Required) Property Management Branch & Management Services Unit

Investment Directorate, Department of Health, Annex 4, Castle Buildings, Stormont Estate

Town (Required) Belfast

Postcode (Required) BT4 3SQ

Email address (Required) [REDACTED]

On completion, please proceed to Section F

### Agent Contact Details

Title / First Name (Required) [REDACTED]

Last Name (Required) [REDACTED]

Organisation / Group Address

Address (Required) Turley

37 Clarendon Street

Town (Required) Londonderry

Postcode (Required) BT48 7EG

Email address (Required) [REDACTED]

On completion, please proceed to Section F

**Q4. Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP? Please only select one**

Agent     Client     Both

## Section F: Soundness

The LDP draft Plan Strategy will be examined at Independent Examination (IE) in regard to its 'soundness'. Accordingly, your responses should be based on soundness and directed at specific strategic policies or proposals that you consider to be unsound, along with your reasons. The tests of soundness are set out below in Section J.

Those wishing to make representations seeking to change the draft Plan Strategy should clearly state why they consider the document to be unsound having regard to the soundness tests in Section J. It is very important that when you are submitting your representation that your response reflects the most appropriate soundness test(s) which you believe the draft Plan Strategy fails to meet. There will be no further opportunity to submit information once the consultation period has closed unless the Independent Examiner requests it.

Those who make a representation seeking to change the LDP draft Plan Strategy should also state below whether they wish to be heard orally at the Independent Examination (Please see [www.pacni.gov.uk](http://www.pacni.gov.uk) for further details on the IE procedures.)

## Section G: Type of Procedure

**Q5. Please indicate if you would like your representation to be dealt with by:** (Required)

Please select one item only

- Written (Choose this procedure to have your representation considered in written form only)
- Oral Hearing (Choose this procedure to present your representation orally at the public hearing)

Unless you specifically request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only.

Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

## Section H: Is the draft Plan Strategy Sound?

Your comments should be set out in full. This will assist the Independent Examiner to understand the issues you raise. You will only be able to submit further additional information if the Independent Examiner invites you to do so.

### Sound

If you consider the Plan Strategy to be Sound and wish to support the LDP Plan Strategy, please set out your comments below.

N/A

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

## Section I: Unsound

In this section, we will be asking you to specify which part(s) of the draft Plan Strategy you consider to be unsound.

Note: If you wish to inform us that more than one part of the draft Plan Strategy is unsound each part should be listed separately, and Sections J and K filled out for each separate part of the draft Plan Strategy. (i.e. if you believe that multiple parts of the draft Plan Strategy are unsound, please fill out multiple copies of Sections J & K.).

**Q6. If you consider that the LDP draft Plan Strategy is unsound and does not meet one or more of the tests of soundness below, you must indicate which test(s) you consider it does not meet, having regard to Development Plan Practice Note 6 available at:**

[https://www.planningni.gov.uk/index/news/dfi\\_planning\\_news/news\\_releases\\_2015\\_onwards/development\\_plan\\_practice\\_note\\_06\\_soundness\\_\\_version\\_2\\_\\_may\\_2017\\_.pdf](https://www.planningni.gov.uk/index/news/dfi_planning_news/news_releases_2015_onwards/development_plan_practice_note_06_soundness__version_2__may_2017_.pdf)

Please note that if you do not identify a test(s), your comments may not be considered by the Independent Examiner. Continued on next page.



## Section J: Tests of Soundness (Required)

State which Chapter / Policy / Paragraph / Map that this Section refers to:

Ch5 Spatial Strategy, Ch6 Growth Strategy, Ch 16 Housing & Ch 18 Community Infrastructure - see attached letter submitted on behalf of the Department of Health and Western Health & Social Care Trust and letter from the Department for Communities.

This should relate to only one section, paragraph or policy of the LDP draft Plan Strategy. If you wish to inform us that you consider more than one part of the LDP draft Plan Strategy is unsound, you can submit further representations by completing and submitting additional copies of this section.

### Procedural tests

- P1. Has the plan been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
- P2. Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- P3. Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?
- P4. Did the Council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?

### Consistency tests

- C1. Did the Council take account of the Regional Development Strategy?
- C2. Did the Council take account of its Community Plan?
- C3. Did the Council take account of policy and guidance issued by the Department

### Coherence and effectiveness tests

- CE1. The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant, is it in conflict with the plans of neighbouring Councils.
- CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
- CE3. There are clear mechanisms for implementation and monitoring.
- CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.

## Section K: Which part(s) of the draft Plan Strategy are you commenting on?

This should relate to only one section, paragraph or policy of the LDP draft Plan Strategy. If you wish to inform us that you consider more than one part of the LDP draft Plan Strategy is unsound, you can submit further representations by completing and submitting additional copies of this section.

**Relevant Chapter number(s)**

See enclosed letter

**(and/ or) Relevant Policy number(s)**

See enclosed letter

**(and/or) Relevant Paragraph number(s)**

See enclosed letter

**(and/or) District Proposals Map**

See enclosed letter

Please give full details of why you consider this part of the LDP draft Plan Strategy to be unsound, having regard to the tests(s) you have identified above. Please be as clear and concise as possible.

See enclosed letter

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

If you consider the LDP draft Plan Strategy to be unsound, please provide details of what changes(s) you consider necessary to make the LDP draft Plan Strategy sound.

See enclosed letter

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

## Section L: Sustainability Appraisal

If you wish to submit an 'expression of opinion' in relation to the Sustainability Appraisal (SA) of the LDP draft Plan Strategy (incorporating the Strategic Environmental Assessment (SEA)) please state them below or by email to [LDP@DerryStrabane.com](mailto:LDP@DerryStrabane.com). If sending by email, please clearly state that your comments are in relation to the SA.

N/A

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

## Section M: Draft Habitats Regulation Assessment (HRA or AA)

If you have any comments or opinions in relation to the Draft Habitats Regulation Assessment (HRA) report of the LDP draft Plan Strategy, please submit them below or by email to [LDP@DerryStrabane.com](mailto:LDP@DerryStrabane.com). If sending by email, please clearly state that your comments are in relation to the HRA.

N/A

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

## Section N: Draft Equality Impact Assessment (EQIA)

If you have any comments or opinions in relation to the Draft Equality Impact Assessment (EQIA) report of the LDP draft Plan Strategy, please submit them below or by email to [LDP@DerryStrabane.com](mailto:LDP@DerryStrabane.com). If sending by email, please clearly state that your comments are in relation to the EQIA.

N/A

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

## Section O: Draft Rural Needs Impact Assessment (RNIA)

If you have any comments or opinions in relation to the Draft Rural Needs Impact Assessment (RNIA) report of the LDP draft Plan Strategy, please submit them below or by email to [LDP@DerryStrabane.com](mailto:LDP@DerryStrabane.com). If sending by email, please clearly state that your comments are in relation to the RNIA.

N/A

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.