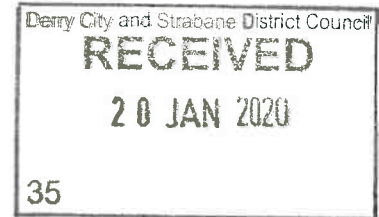




17 January 2020

Local Development Plan Team
Derry City and Strabane District Council
98 Strand Road
Derry
BT48 7NN



Dear Team Leader

Submission on the Draft Plan Strategy for the Local Development Plan 2032

I have read the Draft Plan Strategy and would comment as follows.

To assist your consideration of my submission I will use the headings as they appear in the Draft Plan Strategy.

Overall Settlement Hierarchy

The Draft Plan Strategy proposes 3 Local Towns to service the rural areas of the District. These are: Castledearg, Claudy and Newtownstewart.

Castledearg, given its location, large rural hinterland, level of service provision and population, is a more sustainable location than either Newtownstewart or Claudy. It should not therefore be placed on the same settlement tier as Newtownstewart and Claudy. Newtownstewart and Claudy do not provide the same level of services as Castledearg. In addition, while Castledearg had a population of 3,000 in 2011, Newtownstewart and Claudy were much smaller. In 2011 Newtownstewart had a population of only 1,551 with Claudy having even less at 1,340. These figures are highly material to your consideration of the status which should be awarded to Castledearg.

Given its size, level of service provision, population, potential for growth and ability to serve a wide area, Castledearg should be designated a 'Town' and given its own tier in the settlement hierarchy which should be extended to 6 levels as follows:

1. Derry: the principal City,
2. Strabane: the main Town,

3. Castledearg: Town,
4. Claudy and Newtownstewart: Local Towns,
5. Villages, and
6. Small settlements.

Table 8: Indicative Allocation of Housing in DC&SDC by Settlement Tier 2017-32 and Appendix 5 – Housing Allocation Tables

The Draft Plan Strategy should adopt the highest 'Indicative Number of Dwellings' (column 5: Table 8) which is 10,000 units.

In recognition of Castledearg's ability to perform a greater function than that anticipated in the Draft Plan Strategy its 'Share of District Housing' in column 8 in Table 2 (Appendix 5) should be increased beyond the highest figure which is 227 units.

Castledearg's 'Approximate Current Housing Capacity' in column 9 of Table 2 (Appendix 5) is based upon planning approvals, land zoned in the Strabane Area Plan, Urban Capacity sites, Whiteland and Windfall Allocation. The capacity is estimated as 784 units. This figure is unrealistic since many of the housing zonings in the Strabane Area Plan have never even been the subject of a planning application since they were first proposed in 1987, 32 years ago. The reasons for this remain, and will be present over the next plan period. As a consequence the estimated output of 784 units is unrealistic and amounts to an over estimate.

A new HOU Policy is required

The Draft Plan Strategy recognises that not all new housing will be provided on 'brownfield' sites. Yet it seems to assume that no new housing sites need be identified in the City, Main Town and other Towns. This assumption seems to be based on the 'Approximate Current Housing Capacity' figures contained in the Draft Plan Strategy.

These figures should not be relied on for the Towns below Strabane in the settlement hierarchy because, at this level, land release is often dependent on unusual local factors such as farmers being willing to sell their land. This being the case Policy HOU 1 should recognise that new housing sites will be required in the Towns below Strabane in the hierarchy. Policy HOU1 should therefore be expanded (or a new HOU Policy included) to give preference to new sites which make use of existing services and are already well enclosed by development. The additional text added to Policy HOU 1 (or the new Policy) should read as follows:

The following tests will be applied when identifying new housing sites in the Local Policies Plan:

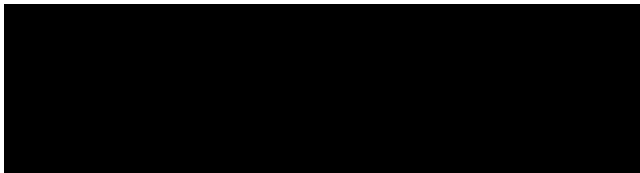
- ***The site should be serviced in terms of access, storm and foul drainage and be connected to the settlement's footway and street lighting network, and***
- ***Preference will be given to sites already enclosed by development on at least 3 sides.***

Phasing of housing land

Outside of Derry City and Strabane the release of land zoned for housing should not be phased. As already mentioned land release in settlements below tier 2 in the hierarchy is often dependent on unusual local factors and this dictates that phasing the release of zoned land would be an inflexible mechanism. This inflexibility would result in the need for a costly and time consuming review of the land zoned in settlements soon after the adoption of the final Local Policies Plan.

I hope that you find this submission helpful and I look forward to the next stage in the preparation of the Local Development Plan 2032.

Yours sincerely

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Shauna Cathcart