

Response ID ANON-ZKXW-M37Z-5

Submitted to Local Development Plan 2032 - Representations form for the LDP draft Plan Strategy and Associated Appraisal / Assessments
Submitted on 2020-01-27 11:46:59

Local Development Plan Privacy Notice

Your Details

Name

Name:

Peter Carr, for Belfast Metropolitan Residents Group

Email Address

Email:

Are you responding as an individual, as an organisation or as an agent acting on behalf of individual, group or organisation?

Organisation

Did you respond to the previous LDP Preferred Options Paper?

Yes

Organisations

Organisation / Group Name

Your Name

Your Name:

Peter Carr

Email Address:

Your Job Title

Your Job Title:

Chair, Belfast Metropolitan Residents Group

Organisation/Group Address

Address Line 1:

Address Line 2:

Town/City:

Postcode:

Soundness

Type of Procedure

Please indicate if you would like your representation to be dealt with by:

Oral Hearing

Is the draft Plan Strategy Sound?

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

Sound Strategy Comments:

Is the draft Plan Strategy Unsound?

Tests of SoundnessThis 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.

C1. Did the Council take account of the Regional Development Strategy?, C3. Did the Council take account of policy and guidance issued by the Department?

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.

Which part(s) of the draft Plan Strategy are you commenting on?

Relevant Chapter Numbers

Relevant Chapter Number(s):

4,5,6, 16,17,18, 26, 27, 40

Relevant Policy number(s):

As per above chapters

Relevant Paragraph number(s) :

District Proposals Map :

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.

details of why you consider this part of the LDP draft Plan Strategy to be unsound:

See additional documentation

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.

Details of what changes(s) you consider necessary to make the LDP draft Plan Strategy sound.:

See additional documentation

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. If sending by email, please clearly state that your comments are in relation to the SA.

Sustainability Appraisal :

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. If sending by email, please clearly state that your comments are in relation to the HRA.

Draft Habitats Regulation Assessment (HRA or AA):

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. If sending by email, please clearly state that your comments are in relation to the EQIA.

Draft Equality Impact Assessment (EQIA):

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. If sending by email, please clearly state that your comments are in relation to the RNIA.

Draft Rural Needs Impact Assessment (RNIA):

Chloe Duddy

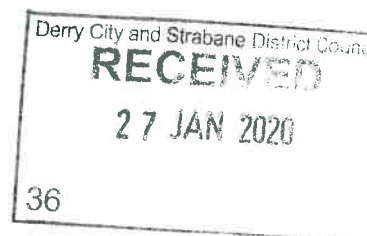
From: peter carr [REDACTED]
Sent: 27 January 2020 17:52
To: Local Development Plan
Subject: Response ANON-ZKXW-M37Z-5
Attachments: BMRG Derry-Londonderry draft strategy submission.docx

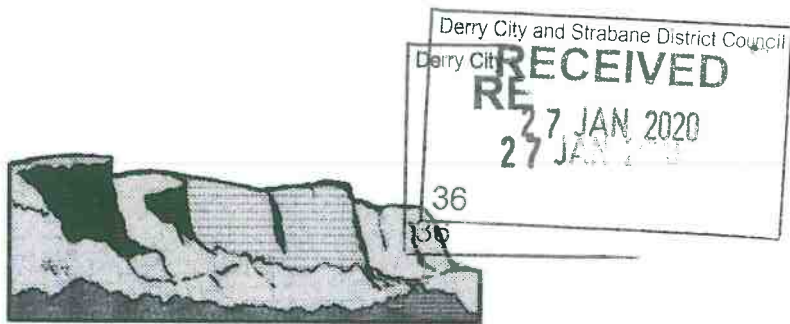
Dear Sirs,

please find enclosed additional documentation relating to the above response to the Draft Plan Strategy from the Belfast Metropolitan Residents Group (BMRG).

I would be grateful if you would acknowledge receipt,

with thanks,
yours,
Peter Carr
for Belfast Metropolitan Residents Group





BELFAST METROPOLITAN RESIDENTS GROUP

Observations on the Derry City & Strabane District Council Draft Plan Strategy

1. The Housing Growth Indicator (HGI) suggests a housing need of c.4,100 dwellings over the plan period (2017-2032). The Draft Plan Strategy (the plan) is constructed around a figure of c.9,000 dwellings¹ (and a rise in population from c.150,000 to 160,000).

No convincing rationale is provided for the scale of the plan's departure from the HGI either in the plan (5.6-5.15, p.52-54) or the attendant documentation. For example, ensuring Derry remains 'strong and vibrant' is important to both RDS 2001 and 2010, which seeks to 'Develop a strong North West' and to 'Strengthen the role of Londonderry as the principal city for the North West'. The RDS similarly stresses the importance of realising 'the potential of the... Londonderry – Letterkenny Gateway', and the city's role as a regional centre for 'much of the western part of Northern Ireland and... a substantial part of County Donegal.' These long standing features of policy are presented as innovations and grounds for departure from the HGI. (Economist Comments, p.3)

2. As the plan states (HOU 1, p.225; 16.10, p.221; Table 9, p.223, etc), there is a huge site resource available within the Council area. The plan does not, however, contain mechanisms which will allow it to proactively manage this to deliver housing sustainably.
3. This is tacitly admitted in the plan when it broaches the subject of the Northern Ireland 60% brownfield target. Percentage figures are not explicitly stated, but it is clear that the target will be missed by a significant margin. For Northern Ireland's second largest urban area to fall so short of this key target indicates a lack of robustness in the plan and a need for fundamental alteration.

¹ Both figures are at variance with the current building rate of 446 dpa, which would give a plan period build of 6,690. (2014-17 figures from EVB 16, Housing in Settlements, tables 7 & 8. 2014-17 build total: $1338 \div 3 = 446 \times 15 = 6.690$)

We were unable to find current Housing Monitor data on the Council website, but find the use of the old, four-column style Housing Monitor in the Housing in Settlements Report (Tables 5 & 6, p.19) is concerning in that it is of no diagnostic value in determining progress in relation to achievement of the 60% brownfield target. This could be seen as implying that progressing towards the target is not a current policy goal.

4. The target will be missed primarily because the plan does not properly come to grips with the problem of the district's greenfield inheritance. Equating zoning with 'ambition' and 'growth', the Derry Area Plan 2011 met a need estimated at 8,500 dwellings by zoning 11,500 sites. 'Opportunity sites' added another 1,500 giving a total of 13,000. Of the 595 hectares of housing land zoned in 2000, 370 hectares remain unbuilt on in 2019.
5. Derry has a housing need of c.5,200 dwellings and c.12,600 sites (Appendix 5, table 2, p.504). Less than a quarter of these sites (3,100) are classified as Urban Capacity or Windfall (Table 9, p.223). Three-quarters are in low social value, peripheral, greenfield locations, the development of which will be at best a mixed blessing and could actually be detrimental to the city.
6. This ratio is not conducive to maximising the city's brownfield build levels as the 'tension' generally recognised as being necessary to incentivise brownfield building does not exist. The plan recognises this, noting the correlation between increased greenfield approvals and reduced windfall approvals (Capacity Study, table 6, p.20). However, rather than taking action to maximise build on what the SPPS calls Step 1 land, it passively accepts that build on Step 1 will give way to build on qualitatively inferior Step 2 sites, and makes no qualitative or operational difference between the two.

This is not satisfactory. The SPPS Search Sequence (SPPS, p.72) requires plan makers to prioritise Step 1 sites. A mechanism for doing so must be introduced into the plan. Were the relatively modest Derry City and Strabane Town 2017-19 windfall approval rates to be extended over the plan period, a figure of 2,610 could be expected.² The figure factored in to plan is 675.³ This is effectively an admission that the plan is not maximising sustainable development as it is required to by policy (SPPS 6.137, bullet point 2, etc.)⁴ SPPS 6.139 bullet point 5 states that, 'in line with the objectives of the RDS it is necessary to make a full allowance for this when deciding the number of sites to identify in the plan to prevent excessive allocation of

² This extrapolation is conservative. Were the 2014-19 average to be extrapolated over the plan period a figure of 3225 could be expected. (Source EVB 16a, Urban Capacity Study, table 6, Historic Trends, p.20)

³ 600 Derry, 75 Strabane, total 675. (Ibid.)

⁴ EVB 16, Housing in Settlements, para 3.32, states that, 'It is assumed that windfall over the LDP period will be 10% of our total dwelling capacity'. However the figure of 985 quoted in table 10 is just circa. 5% of capacity.

housing land.’ An additional potential impact is noted in Housing in Settlements 3.25, which notes that ‘there may be limited opportunities for the plan to deliver a supply of affordable housing.’

7. This is particularly disappointing as Derry has a record of underperformance in this area. The table below shows brownfield availability in twenty-one regional towns and cities in 2004 and 2014. Derry-Londonderry is the only settlement not to record an increase. Derry also exhibits the least favourable ratio of greenfield to brownfield sites of all the settlements listed bar one (a ratio of 3:1, 2014 figures). On the face of it, it would seem to present an almost classic case of excessive greenfield zonings inhibiting brownfield site flow.

Size of brownfield site pool

Town /city	2004⁵	2014⁶
Antrim	310	1212
Armagh	380	724
Ballymena	1290	1918
Ballymoney	786	1628
Banbridge	391	851
Coalisland	117	193
Cookstown	547	879
Coleraine	745	2787
Craigavon UA	5914	7596
Derry	2551	2453
Downpatrick	508	636
Dromore	382	556
Dungannon	672	1605
Enniskillen	664	1648
Larne	579	1347
Magherafelt	225	691
Newry	896	1678
Newtownards	564	1451
Omagh	433	2326
Portrush	312	809
Strabane	161	351

8. We welcome the plan’s intended use of phasing and the assignment of certain zoned lands to Phase 2. However given that the need figure is less than the availability figure contained in Phase 1 alone (c.300 hectares of the available 370 are committed and

⁵ Northern Ireland Housing Land Availability Summary Report 2004.

⁶ Ibid 2013 (updated July 2014); i.e. the figures come from the earliest and last Housing Monitors available from the DfI.

will fall into Phase 1), in the interests of delivering housing sustainably, there is a need for the plan to qualitatively assess the Phase 1 sites with a view to discouraging building on those sites whose development will be least advantageous to the city.

9. The idea that the plan should ‘provide an additional five years land supply... establishing the requirement for approximately 12,000 dwellings’ (16.5-16.7, p.219-220), does not seem to us to accurately reflect 6.140 of the SPPS, which is about taking a ‘plan, monitor and manage’ approach to provision, and looking at the plan’s continuing capacity to meet need through the monitoring process as opposed to, at this point, settling on a 12,000 figure.
10. We welcome the proposed creation of a Derry-Londonderry Green Belt as offering a robust policy basis for the management of development pressures in the vicinity of the city. There is a case for establishing a similar Green Belt around Strabane.