

Submitted to Local Development Plan 2032 - Representations form for the LDP draft Plan Strategy and Associated Appraisal / Assessments
Submitted on 2020-01-22 18:03:02

Local Development Plan Privacy Notice

Your Details

Name

Name:

Mr. Adrian Brown

Email Address

Email:

[Redacted]

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

Agent

Did you respond to the previous LDP Preferred Options Paper?

No

Agents

Client Contact Details

Name:

Mr. Clarke Killen

Email Address:

[Redacted]

Address Line 1:

[Redacted]

Address Line 2:

[Redacted]

Town/City:

[Redacted]

Postcode:

[Redacted]

Agent Contact Details

Name:

Mr. Adrian Brown

Address Line 1:

[Redacted]

Address Line 2:

[Redacted]

Town/City:

[Redacted]

Postcode:

[Redacted]

Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP?

Both

Soundness

Type of Procedure

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

Written

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:

The Plan Strategy is not Sound based on coherence and effectiveness tests CE2 and CE4.

Is the draft Plan Strategy Unsound?

Tests of Soundness 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.

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?

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?

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., CE3. There are clear mechanisms for implementation and monitoring.

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

Relevant Chapter Numbers

Relevant Chapter Number(s):

Chapters 6 and 16

Relevant Policy number(s):

Designation SETT 1, HOU 1 and HOU 2

Relevant Paragraph number(s) :

Paragraphs 6.3, 6.4, 6.6, 16.4, 16.8, 16.14, 16.29

District Proposals Map :

Proposals Map 1: Settlement

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:

There is a lack of flexibility in the LDP regarding provision of housing. Reliance on existing zoned land, approved and brownfield sites is too rigid. Provision of greenfield sites should be included in relation to settlements outside Derry City & Strabane Town.

The publication of the LDP was premature and should have awaited the outcome of Brexit. The LDP has not assessed the impact of the UK leaving the EU and the likely economic benefits for NI and the border regions given that NI will remain under EU rules which are not available to the rest of the UK. Furthermore, Air Passenger Duty is likely to be removed in the March budget. Both these factors should be assessed as the Council area is strategically placed with good port and airport links to the rest of the UK and Ireland. In this scenario, the LDP is too conservative in the amount of housing provision. With Brexit, although the future is unknown, there is great economic growth potential thus a corresponding increase in population than that envisaged in the LDP. The LDP should at least be more flexible regarding housing provision and allow additional housing outside of Derry City. In this respect a figure of 12,000 units is too conservative, given the likely economic benefit of Brexit.

The LDP Review Period is too long at 5 years given that Brexit will be completed by the end of 2020.

The LDP ignores the desire of people to live outside Derry City as evidenced by the expansion of the dormitory settlements, such as Eglinton, Claudy, Newbuildings, Campsey etc. The Plan provides no scope for these settlements to expand further, thus forcing people into Derry City were clearly they do not wish to go, evidenced by the sluggish development of existing brownfield sites and zoned land within Derry City. The Settlement Hierachy places too much focus on Derry City and Strabane Town at the expense of the other settlements.

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.:

I agree that Derry City should not expand further. However consideration should be given to upgrading the status of Campsey Small Settlement to a Village and the development limit expanded. A reasoned case for the expansion of Campsey (submission dated 22/08/17), was made at POP stage by the consultancy firm, Strategic Planning, 1 Pavilions Office Park, Kinnegar Drive, Holywood, BT18 9JQ. Their comments remain valid, although they have had no input into this submission. The reasons Campsey should be considered as a Village is its strategic location near to Foyle Port, City of Derry Airport, the nearby industrial estates and main transport corridor. In addition, all existing land within the settlement has been developed and more is required. This is evidenced by the demand for a recently completed housing development that was fully occupied within a matter of weeks.

To recap, the LDP draft Plan Strategy can be made sound by increasing the housing quotas beyond 12000 units to 16000 units. The additional housing allocations should be increased wholly within the Villages and Small Settlements and the Plan review period in the first instance reduced from 5 years to 1 year to allow assessment of Brexit implications given that the UK will leave at the end of 2020 and it is not known if a trade deal can be agreed with the EU within that timeframe.

Campsey Small Settlement to be upgraded to Village Status or at the very least the development limits expanded.

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 :

No Comment

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):

No comment

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):

No comment

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):

No comment