
From:
Sent: 29 October 2020 12:05
To: Local Development Plan
Cc:
Subject: Representation Enclosed for Re-Consultation on LDP Draft Plan Strategy
Attachments: LDP Submissions Form Straidarran.pdf; Straidarran LDP Submission Final Report October .pdf; Appendix 1 Table 2 LDP.PDF; Appendix 2 Derry District 2018-2019 Housing Monitor.pdf

Follow Up Flag: Follow up
Flag Status: Completed

To whom it may concern,

Please find an attached representation (consisting of 4 documents) to be taken into consideration in the most recent consultation period from 11th September to 6th November 2020 on the LDP Draft Plan Strategy. The 4 documents are as follows:

- Completed draft Plan Strategy Representations Form
- Accompanying Explanatory Report
- Appendix 1: Table 2 of Appendix 5 of draft Local Development Plan
- Appendix 2: Housing Monitor Sites Derry District as of April 1st 2019

Please take into consideration all documents enclosed.

Many thanks,

27th October 2020

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

Dear Sir/Madam,

RE: SUBMISSION TO THE DERRY CITY AND STRABANE DISTRICT COUNCIL LOCAL DEVELOPMENT PLAN TEAM.

PROPOSAL TO HAVE APPLICANT'S LANDS AT KILCUL ROAD INCLUDED WITHIN THE PROPOSED DEVELOPMENT LIMITS FOR STRAIDARRAN SETTLEMENT IN THE NEW LOCAL DEVELOPMENT PLAN 2032.

We have been instructed by my client, _____ to make a formal submission to Derry City & Strabane District Council, Local Development Plan Team on their Draft Plan Strategy (DPS).

Our client welcomes the publication of the Derry City and Strabane District Council's Local Development Plan (LDP) – Draft Plan Strategy - and the progress the Council is making toward a Local Development Plan for the District but consider the statutory requirements of 'soundness' have not met the Procedural Tests, Consistency Tests and the Coherence & Effectiveness Tests. As some of the draft plan strategies are not 'sound', we therefore call for them to be amended.

We have also indicated lands at Kicul Road, Straidarran and request Council include all, or any part of the subject site, as identified in red on the aerial photograph included below, within the small settlement development limits of Straidarran.

1.0 SUMMARY

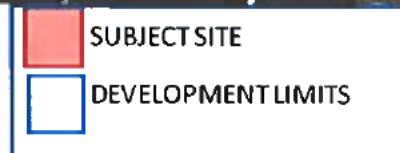
- 1.1 This representation seeks to provide a detailed commentary on the overall soundness of the DPS and suggested amendments that should be made to a number of flagged policies.
- 1.2 Specific comments are included with respect to the soundness failings of Designation SETT 1, Designation SETT 2, Policy HOU 1, Policy HOU 2 and Policy HOU 5.
- 1.3 Detailed coverage of relevant planning policy guidance, in relation to Straidarran, have been explored.
- 1.4 We also provide specific comments with respect to the need for new housing land, specifically due to current zonings having been built out to capacity, in Straidarran and the appropriateness of our client's lands.
- 1.5 Finally, we identify our client's lands as a rational rounding off for the settlement limit of Straidarran that will facilitate the delivery of much needed residential/community infrastructure and therefore recommend the extension of Straidarran settlement limits to include the subject lands.

2.0 SITE DESCRIPTION

2.1 The subject site, as illustrated in red in Figure 1, measures approximately 5.7HA and is situated off the Claudy to Feeny commuter route, approximately 2.5miles from Claudy and 2.8miles from Feeny. The subject site has existing roadside frontage to, and is easily accessible by, the Kilcul Road. This existing roadside frontage extends to approximately 150metres. The Kilcul Road is located on the eastern boundary of the subject site, whilst the Glenshane Road (B74), a minor transportation link between Claudy and Dungiven via Feeny, is located immediately south of the site.

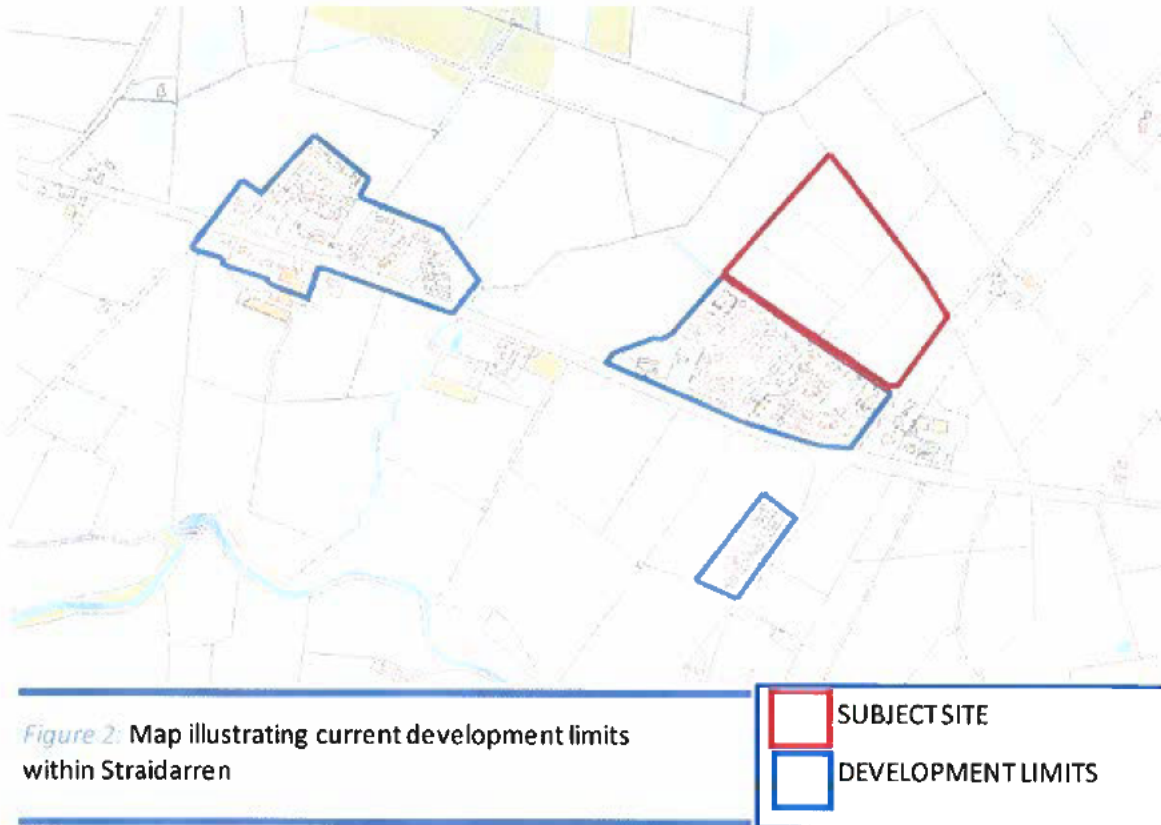


Figure 1. Aerial photograph of subject site



3.0 SETTLEMENT CONTEXT

- 3.1 Straidarran is located approximately 19km from the core settlement of Derry-Londonderry, the principle city of the North-West. It is important to emphasise that Straidarran is a rural settlement, as defined by the Inter-Departmental Urban-Rural Definition Group. The official definition classifies those settlements, with fewer than 5,000 residents together within the open countryside, as rural. Rural areas differ from urban areas due to their greater geographical isolation, population dispersal, longer distances from key services like health, education or leisure facilities, and limited employment opportunities.
- 3.2 The small settlement of Straidarran is linear in nature and extends approximately 1km along the B74 whilst also extending, in part, along the minor Clagan Road. It comprises of 3 separate parts with the subject site being located directly adjacent to one of these parts. Figure 2 clearly illustrates the three sections of current development limits (outlined in blue) and the closeness in proximity of the specified site (outlined in red) to these development limits. The subject site shares frontage with one of the current zoned development limits, in which lies an established residential area. This frontage extends along approximately 300metres of the subject site's boundary.
- 3.3 Statistics for Straidarran (sourced from the LDP 2017-2032) illustrate that the settlement has an approximate total of 169 households with a resident population of 423. Approximate current housing capacity is a total of 9 no. housing units whilst the housing requirement is 25 no. housing units.
- 3.4 Claudy, located 16km south-east of Derry-Londonderry, is defined as a local town. It has a population of 1,340 and an approximate total of 531 households. Approximate current housing capacity is a total of 348 no. housing units whilst the housing requirement is 78 no. housing units.



4.0 JUSTIFICATION:

4.1 DC&SDC LOCAL DEVELOPMENT PLAN 2017- 2032.

4.2 The LDP retains Straidarren designation as a small settlement, as outlined in the Derry Area Plan 2011, and has identified a housing allocation of 25 no. units to be delivered up until 2032.

4.3 Para 2.16 of the LDP elaborates upon the District’s ‘housing need’. NIHE figures for March 2019 indicated that there were 4, 510 applicants on the social housing waiting list for Derry City and Strabane, with 3,401 of those applicants in housing stress. Its further stated that the total number of applicants in housing stress has consistently increased year upon year from a figure of 1,031 in 2002, to 3,401 as of March 2019.

4.4 NIHE Derry and Strabane Housing and Investment Plan 2019-2023 indicates that the social housing need for Derry City and Strabane District is 2,744 units over a five-year timeframe (2018-2023) with other settlements requiring 132 units and with Claudy, the nearest town, having a need of 20 new units over this period. This reiterates the current and projected

need to ensure the delivery of suitable small-unit housing not only for families and single occupant households, but also for the ageing population and those with disability.

5.0 LDP EVIDENCE BASE 16: HOUSING IN SETTLEMENTS AND THE COUNTRYSIDE, DECEMBER 2019.

5.1 Upon reviewing LDP Evidence Base 16: Housing in settlements and the countryside, it was stated that the NIHE sought the retention of CTY5: Social & Affordable Housing (PPS 21) to allow for the exceptional development of a group of no more than 14 dwellings adjacent to or near a small settlement to provide social and affordable housing where it can be clearly evidenced that no suitable sites are available within the settlement limits. They considered it was important to have this specific policy flexibility within the LDP for such scenarios where a demonstrable need has been identified to ensure the LDP can react to and deliver for such need across the LDP period.

5.2 A further response from NIHE suggested that in some settlements, such as Eglinton and Claudy, there may be a specific zoning or Key Site Requirements for an adequate amount of social housing to meet need over the plan period. Some rural areas that are particularly popular among social housing applicants are along the main A2, A5 and A6 arterial routes where relatively good transport links to the main urban centres are enjoyed. These housing areas include Sion Mills, Eglinton and Claudy. For this reason, demand for rural housing generally exceeds supply.

5.3 The principle of ‘soundness’ is the cornerstone of policy formation with regards to the local development plan.

5.4 Section 10(6) of the 2011 Act states that the purpose of the Independent Examination is to determine, with regards to the development plan document, whether:

- (a) 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 relation to the preparation of development plan documents.
- (b) It is sound.

5.5 The NI Planning Act 2011 does not define the meaning of ‘soundness’ however, Development Plan Practice Note (DPPN) 6 – Soundness 2017, suggests that the term may be interpreted in the context of its ordinary meaning of ‘illustrating good judgement’ and ‘able to be trusted’.

5.6 DPPN 6 goes on to state that the tests of soundness are based upon three categories that relate to the following:

- How the development plan document has been produced.

- The alignment of the development plan document with central government regional plans, policy, and guidance.
 - The coherence, consistency, and effectiveness of the development plan document.
- 5.7 DPPN 6 advises that the principle of ‘soundness’ involves testing the principles, content and preparation processes involved in the formation of the development plan document against a key list of criteria. Namely:
- Procedural Tests
 - Consistency Tests
 - Coherence and Effectiveness Tests
- 5.8 Whilst the test of soundness is based on the above 3 categories, there is a degree of overlap of the criteria specifications to be met in each test. The purpose of the Independent Examiner is to determine how the development plan document meets each test and whether the document is sound as a whole.
- 5.9 With regards to making representations to Council in relation to the draft plan document, DPPN 7 states that *‘representations should provide evidence to demonstrate why the draft PS is unsound and/or how any proposed changes make the draft PS more sound’*.
- 6.0 Designation SETT 1 – Settlement Hierarchy
- 6.1 The Draft LDP Plan Strategy comprises of 47 settlements including Derry City, Strabane Town, 3 Local Towns, 23 Villages and 19 Small Settlements as indicated on the Table below:

Designation SETT 1: Settlement Hierarchy for DC&SD, LDP 2032

City	Derry
Main Town	Strabane
Local Towns (3 No.)	Castlederg, Claudy, Newtownstewart
Villages (23 No.)	
Ardstraw	Killen
Artigarvan	Killeter
Ballymagorry	Lettershendoney
Clady	Magheramason
Cranagh	Newbuildings
Culmore	Park
Donemana	Plumbridge
Eglinton	Sion Mills
Erganagh	Spamount
Glebe	Strathfoyle
Glenmorman	Victoria Bridge
Killea (part – rest is in Rol)	
Small Settlements (19 No.)	
Aghabrack	Drumlegagh
Aghyaran	Garvetagh
Ardmore	Goshaden
Ballyrory	Killaloo
Bready	Maydown
Campsey	Nixon's Corner
Cloghcor	Straidarran
Craigbane	Tamnaherin
Donagheady	Tullintrain
Douglas Bridge	

- 6.2 As indicated above, Straidarran has retained its status as a small settlement in the new DPS under the fifth tier of the settlement hierarchy.
- 6.3 Straidarran was first designated as a village in the settlement hierarchy of the DAP 2011.
- 6.4 A small settlement, as defined by the Local Draft Plan 2032 is as follows:
- *“The fifth settlement tier is ‘Small Settlements’. These are normally characterised by a concentration of buildings displaying an obvious sense of cohesion and with one or more community facility”.*

- 6.5 Straidarran is a community with restricted facilities that is unable to meet the needs of both the existing and future population. It is our professional opinion that Straidarran has been built out to capacity and the remaining land within the current development limits is not sufficient to deliver the share of housing requirement (25 housing units) or community facilities. The LDP states that the approximate current housing capacity for Straidarran is a total of 9 housing units but there is an absence of data as to how this figure was arrived at.
- 6.6 Between 1999 and 2015, approximately 80% of all housing units built across the former Derry District were built in Derry City itself. The remaining 20% accounts for the remaining local towns, villages and small settlements indicating a disproportionate growth across the district. This evidenced disproportionate growth places further emphasis on the importance to achieve a complementary urban/rural balance to meet the need for housing particularly for those residents of smaller settlements, such as Straidarran.
- 6.7 We consider that the LDP provides the opportunity to sustainably grow Straidarran and deliver the community infrastructure that is currently lacking in the settlement. To achieve this, we believe that an appropriate quantum of new housing is required to support the development of new/enhanced community facilities such as those flagged within the Claudy/Killaloo Cluster Village Plan.
- 6.8 Additionally, Housing Monitor Sites should be considered outdated. Housing Growth Allocation for Derry is a total of 12,700 units; this is not sufficient. Derry, as the principle city of the North-West, requires greater allocation. As aforementioned, the city and its district are already subject to ongoing housing problems/restricted access to housing.
- 6.9 Statistics for Straidarran (*sourced from the LDP 2017-2032*) illustrate that the settlement has an approximate total of **169 households** with a **resident population of 423 persons**.

Table 7: Settlement Hierarchy-Related Infrastructure

Infrastructure	Principal City (Derry)	Main Town (Strabane)	Local Towns	Villages/Small Settlements
Skills	University	Further Education, Special Schools	Library, post-Primary	Nursery, Primary School
Health	Acute Hospital, A& E, Maternity	A&E Hospital, Children's Home, Minor Injuries, Outpatients	Pharmacy, Health Centres, Social Services, Day Care Centres	Doctor, Ambulance, Outreach Services
Social	Museums/ Galleries, Conference/ Concert Arena	Leisure Centre (pool) Visitor Centre, Advice Centres, Arts & Culture Centre	Community Centre, Sports Facility, Welfare Services	Local Hall, Play Areas
Environment	Power Generation, AONB/ASSI	Water & Sewage Treatment Plants, Waste-landfill, Waste-recycle	Recycling, Renewables, Water & Sewers Supply	Access to clean water, sewage disposal
Commercial	Department Stores, Specialist Shops, Arts & Cultural Facilities	Shopping Centres, Retail Warehousing, Range of Restaurants	Supermarket, Restaurants, Mix of Retail Facilities	Shop, Pub, Post Office, Petrol Station
Justice	Police HQ, High Court, Prison Forensic Science	Police District, County Court, Probation Service	Police Station	Neighbourhood Watch
Productive	Tourism Signature Projects, Science Centre, Major Industrial parks, Strategic Development Zones	Industrial Park, Tourism Office	Enterprise Centre, Information Office	Workshop/ Business unit
Networks	Ports & Airports, Key Transport Nodes, Energy Generation Interconnector	Major Roads, Bus/Rail, Park N' Ride, Cycle Network	Link Corridors/ Trunk Roads, Bus/Rail to larger centres	Local Roads, Broadband, Urban Street Lighting, Local Bus, Cycle

Source: Adapted From the Hierarchy of Settlements and Related Infrastructure Wheel, Page 24 of RDS 2032

- 6.10 Straidarran, as a small settlement, has an 0.32 percentage share of all households in the DAP 2032. Of the 19 small settlements, its ranked number 2 with only Maydown being superior with 0.34 percentage share of all households.
- 6.11 The settlement offers restricted community facilities with only a community playgroup and a Chiropractor Clinic. The settlement should be provided with sufficient land so the community can have the opportunity to increase the facilities offered in the new LDP 2032.

- 6.12 No justifiable, coherent, or robust evidence has been provided for reasoning as to not offer lands for additional or community facilities for Straidarran.
- 7.0 DESIGNATION SETT 2 – Development within Settlement Development Limits.
- 7.1 Designation SETT 2 provides each indicated settlement, in the settlement hierarchy, a settlement development limit, beyond which there will be presumption against further urban development (subject to development in accordance with the other relevant policies).
- 7.2 The current development limits in the DAP 2011 and SAP 2001 remain in place and continue to guide development until they are reviewed and adopted in the LPP.
- 7.3 We would suggest that Designation SETT2 fails soundness tests with regards to CE2 and CE4.
- 7.4 It is not founded on a robust evidence base that illustrates the rationale employed nor is it flexible enough to accommodate changing circumstances over the LDP lifespan.
- 7.5 Within the settlement limits of Straidarran, all housing lands have been built out to capacity with no windfall or brownfield development opportunities available. Therefore, a current assessment of the existing lands of the settlement, covering the duration of the plan period to 2032, need to be reviewed to identify new lands for the provision of new dwelling units as outlined in Appendix 5 of the LDP.
- 7.6 Paragraph 16.13 states *“In addition to the significant number of existing housing commitments, land has been identified for housing on ‘urban capacity’ and ‘whiteland’ sites, plus an allowance for ‘windfall’ dwellings within our District’s settlements. These figures are rounded and summarised in Table 2 below. It is clear that there is ample ‘housing land’ available within the District’s settlements, when compared to the number of houses required over the LDP lifetime”.*

- 7.7 See Table 9 below which provides a summary of land for delivery of housing in the district's settlements at 2017:

Table 9: Summary of Land for Delivery of Housing, in District's Settlements, at 2017³³

Settlement Tier (47 No.)	Commitments on Zoned Housing Land		Other Commitments (outside Zonings)		Approx. Urban Capacity & Whiteland ³⁴		Additional Windfall Potential ³⁵	Total Dwellings Capacity
	Units	Ha.	Units	Ha.	Units	Ha.	Units	Units
City	8,000	400	1,500	44	2,500	125	600	12,600
Main Town	300	20	200	9	1,000	33	75	1,600
Local Towns	700	40	400	24	400	16	75	1,575
Villages	160	9	2,200	130	1,400	93	190	3,760
Small Settlements	-	-	330	30	600	40	45	930
Settlements Total	9,160	469	4,630	237	5,900	307	985	20,500*

Source: DC&SDC Housing Monitor, Urban Capacity Study & Windfall Study. *Rounded figures

- 7.8 The draft LDP states that it will seek to manage the District housing by:
- Zoning (by defining and refining) the committed housing land and prioritising sites, using phasing to focus on early delivery, in the city and towns;
 - Not zoning additional land for housing generally;**
 - Identifying additional housing land on brownfield sites and otherwise in sustainable, accessible and central locations;
 - Zoning additional housing lands only in an exceptional circumstance, where a specifically identified local need, and lack of alternative lands, is robustly evidenced. These sites should also be sustainable, accessible and central locations as far as possible;**
 - Within villages and small settlements, identify and manage the priority housing areas for early delivery, at appropriate density levels;
 - Managing the amount, type and location of dwellings outside of settlements through Policies HOU 18 to HOU 26; and
 - By actively monitoring the amount, type and location of all dwellings being
- 7.9 Council are encouraged to review the following restrictive policies in order to accommodate the growth and housing need for the District over the plan period:

- Criterion (b) *Not zoning additional land for housing generally; &*
- Criterion (d) *Zoning additional housing lands only in an exceptional circumstance, where a specifically identified local need, and lack of alternative lands, is robustly evidenced. These sites should also be sustainable, accessible, and central locations as far as possible.*

7.10 These policies are overly restrictive and damage the overall housing growth of the District in the long term by focusing growth mostly in the larger towns and cities which is detrimental and disproportionate to smaller towns, settlements, and villages.

7.11 In order to deliver the realistic housing lands within the Council area we would suggest that they revisit the housing allocations and settlement development limits so that housing lands can be identified within villages and small settlements.

8.0 Housing Allocations Provision & Available Lands:

- **HOU 1 Strategic Allocation and Management of Housing Land – Zoned Housing Land and LUPAs Part (b) Villages and Small Settlements.**

8.1 This policy states that exceptions will be made for social housing, in relation to land located outside Land Use Policy Areas (LUPAs), where a Housing Association demonstrates a need within a settlement that cannot be met inside a LUPA.

8.2 Housing provision in the District’s settlements will be reflective of the LDPs overall Strategic Growth Plan, Spatial Growth Plan and Settlement Hierarchy. The Council will strategically allocate and manage housing for 9,000 new homes for the LDP period.

8.3 Council confirm that in many of our settlements, the number of existing commitments is sufficient to meet the housing requirement up to 2032 and even beyond. It will only be after these commitments are delivered that a requirement will emerge for the phased release of selected sites for housing.

Table 8: Indicative Allocation of Housing in DC&SDC by Settlement Tier 2017-32

Settlement Tier	% Share of District's Households	% Share of District's Population	Proposed Indicative % Share of Requirement	Proposed Indicative Number of Dwellings
City	57.9%	55.3%	55 – 65%	4,950 - 5,850
Main Town	9.2%	8.8%	8 – 10%	720 - 900
Local Towns	4.2%	3.9%	3.5 – 4.5%	315 - 405
Villages	13.7%	14.1%	12 – 14%	1,080 - 1,260
Small Settlements	1.8%	1.8%	1.5 – 2%	135 - 180
Countryside	13.1%	16.2%	12 – 16%	1,080 - 1,440
				c. 8,300 – 10,000 c. 9,000 average

- 8.4 We would suggest that Policy HOU 1 is to be considered unsound as it fails to meet the requirements of Test CE2 and Test CE4.
- 8.5 As part of the LDP Evidence Base, Settlement Appraisals have been undertaken, based upon the RDS evaluation framework which takes account of the following six tests:
1. Resource Test,
 2. Environmental Capacity Test,
 3. Transport Test,
 4. Economic Development Test,
 5. Urban/Rural Character Test, and
 6. Community Services Test.
- 8.6 These test figures for each village/settlement are not made available by Council for viewing but Table 2 of Appendix 5 (*copy attached as Appendix LKP 1*) uses this settlement evaluation information, plus the LDP Spatial Strategy, in order to produce an indicative allocation of houses for that settlement over the LDP period.
- 8.7 In nearly all settlements, there is 'ample' housing land capacity, so the LDP is confident that the indicative numbers of dwellings can be delivered. We would contend that the majority of existing housing land capacity, as listed within existing settlement, is not available for housing or has historical problems attached, rendering them unavailable to meet the future housing need in the area.
- 8.8 The LDP Plan Strategy and Local Policies Plan seek to manage the settlements' housing land supply.
- 8.9 Table 9, below, indicates a total of 9160 new homes for the Council District over the plan period. The figures as set out on Table 9 would advise that taking account of existing housing commitment inside and outside of development sites, urban capacity and windfall potential sites, the district has the capacity to 20,500 new homes; over twice the required figures.

Table 9: Summary of Land for Delivery of Housing, in District's Settlements, at 2017³³

Settlement Tier (47 No.)	Commitments on Zoned Housing Land		Other Commitments (outside Zonings)		Approx. Urban Capacity & Whiteland ³⁴		Additional Windfall Potential ³⁵	Total Dwellings Capacity
	Units	Ha.	Units	Ha.	Units	Ha.	Units	Units
City	8,000	400	1,500	44	2,500	125	600	12,600
Main Town	300	20	200	9	1,000	33	75	1,600
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Villages	160	9	2,200	130	1,400	93	190	3,760
Small Settlements	-	-	330	30	600	40	45	930
Settlements Total	9,160	469	4,630	237	5,900	307	985	20,500*

Source: DC&SDC Housing Monitor, Urban Capacity Study & Windfall Study *Rounded figures

- 8.10 The figures, above, express that the District has sufficient lands availability for a potential of 13,960 housing units on 706HA of committed housing sites to address the housing need for the District over the plan period.
- 8.11 The Urban Capacity Sites and Windfall Sites are very speculative and most likely not available for housing; therefore, they should be omitted from the figures as they can't be relied on for the delivery of housing over this plan period. The Urban Capacity Sites account for 6885 housing units or 33.58% of the total dwelling capacity.
- 8.12 Appendix 5 – Housing Allocation Table indicates that Straidarran has 169 households, 423 resident population and its share of the housing allocation by households is 29 minus the councils housing capacity figure of 9 units. This requires housing lands for 20 new homes over the plan period, which is 12 years, and totally unacceptable for a settlement of this scale and nature with well-known historical problems for housing land and home delivery.
- 8.13 Council housing allocation on 'planned growth' scenario is too restrictive and should be done on the 'potential growth' scenario which would provide sufficient lands to accommodate and facilitate the potential of between 11,000 – 15,000 new homes and the creation of between 16,000 – 18,000 jobs with services and infrastructure to accommodate up to 170,000 people.
- 8.14 These figures would redistribute growth to settlements, including the villages and small settlements, by up to 14% - increasing the housing provision for Straidarran by 4 units taking the total from 29 units (share of household population) to 33 housing units.
- 8.15 Council's Housing Monitor Sites in the Derry District, as of 1st April 2019, (Appendix LKP2) indicate Straidarran has 121 units completed with remaining potential of 0 units; Not 9 units

as indicated in Table 2 of Appendix 5 of the LDP. **I note no map has been provided of the Capacity Sites for assessment.**

- 8.16 We have carried out an indicative assessment of remaining capacity sites in the settlement and none are available; the settlement has been at full capacity for some time. Straidarran is in urgent need of additional community and housing as some of the local population are being displaced to other towns and villages due to the lack of housing.
- 8.17 Taking potential growth on potential figures would estimate a potential for 33 housing units requiring suitable housing lands over the plan period. In addition, a full appraisal and a percent of total should be included for social and affordable housing.
- 8.18 For the reasons set out above, we request Council include the lands, highlighted on the aerial photograph in Figure 1, into the settlement development limits of Straidarran to accommodate the overwhelming housing need of the small settlement.
- 8.19 This proposed development falls under the **exception to the phased approach** as outlined in Para. 16.24 whereby the Council has acknowledged that there may be an evident shortfall between the District's very high social housing need versus a very specific shortage of housing land. We would like to highlight that Straidarran is indeed one of these areas whereby it is necessary to permit additional housing lands, outside of settlement development limits.
- 8.20 We would also question Policy HOU1 as the amount of housing allocation is realistically insufficient to deliver the housing requirement in the plan timeframe of up to 2032 considering the build rate throughout the course of the DAP 2011 and global recession .

- **HOU 2 Strategic Allocation of Housing in Settlements – Other than Zoned Housing Land and LUPAs**

- 9.0 This policy states that it is the intent of the LDP that all new housing development will be delivered on previously committed sites or within the existing development limits. The policy promotes the development of new housing on appropriate vacant and underutilised land in order to contribute to the regional target for 60% of new housing to be located in appropriate 'brownfield' sites.
- 9.1 A brownfield site, as defined within the LDP, is a site within a settlement limit which is or was occupied by a permanent structure. We wish to draw attention that this settlement has no suitable 'brownfield' sites to accommodate housing need. The settlement consists mainly of housing with restricted community facilities.

- 9.2 The LDP states that all new housing development within the LDP area will be delivered on previously committed sites (Policy HOU1) or within the settlement limit.
- 9.3 We object to this policy due to the current relevance of designation of settlement development limits of Straidarran as set out in DAP 2011. Again, this is due to the date and timeframe for which the development limits were established and the fact that their relevance be rendered obsolete. Also, as aforementioned, we would consider that lands within the current development limit have already been built out to capacity.
- 9.4 We would deem Policy HOU 2 unsound as it does not meet the requirements of soundness tests CE2 and CE4 in relation to being based on a robust evidence base and as having the flexibility to accommodate for changing circumstances in the LDP lifespan.

- **HOU 5 Affordable Housing in Settlements**

- 10.0 This policy or including, 10 or more residential units; or on a site of 0.5 Ha or more, where a minimum of 10% of units are provided as affordable housing.
- 10.1 We would deem Policy HOU 5 unsound as it does not meet the requirements of soundness Test CE2 and Test CE4. It is not based on a robust evidence base nor is it reasonably flexible to deal with changing circumstances.
- 10.2 Affordable housing is defined within the LDP in Para. 16.53, and relates to social rented housing and intermediate housing. Social rented housing is relevant to our proposal, the following definition is therefore relevant; "Social Rented Housing is housing provided at an affordable rent by a Registered Housing Association; that is, one which is registered and regulated by the Department for Communities as a social housing provider."
- 10.3 It is our view that each settlement should be allocated an additional percentage of housing land to accommodate any future social housing need. It is common throughout the district that, in some areas, social housing providers cannot accommodate land. The proposed site and the landowner are amenable to the provision of more affordable housing in the pursuit of strong and balanced communities.
- 10.4 The LDP acknowledges that there is a significant demand for social housing within the District and that the total new-build social housing need for the period 2017-2032 is 4,750 units. The LDP states that approximately 4,400 units of the required Social Housing Need will be delivered through existing housing sites or via remaining housing zonings however, this leaves a residual of 350 units for which suitable land needs to be sourced. We would therefore put forward our proposed site as a suitable location to deliver and address the

much-needed social housing requirement for the nearby settlement town of Claudy which are both interlinked.

10.5 Straidarran formed part of a Cluster Village Plan for Claudy and Killaloo (2017-2022) which was produced as part of the Village Renewal Scheme under the NI Rural Development Programme 2014-2020. This plan provides a vision for how the local area can continue to improve and sustainably develop. This plan aligns with the strategies outlined in the Faughan Local Growth Plan. The following were key findings for Claudy and its surrounding area are:

- Lack of facilities, particularly for young people
- Need for increased sport and leisure facilities
- Need for a Community Building/Hall
- Need for additional shops/business units
- Increased need for Social Housing
- Need for tailored units for retirees, disabled and ageing population who want to downsize and live rurally.

10.6 2016 population projections produced by NISRA indicate an increasingly ageing population of the district. By 2032, over 65s are expected to represent more than 20% of the population highlighting that the provision of appropriate accommodation for the ageing population a highly recommendable pursuit (LDP, 2032:18).

11.0 SUMMARY

11.1 The current development limits within Straidarran were allocated in the Derry Area Plan (DAP) 2011 and will continue to guide development until they are reviewed and adopted in the updated Local Policies Plan (LPP). Their allocation was deemed appropriate as they would not contribute to the elongation of the lineage of the settlement but would instead encourage the in-depth expansion of the settlement. The addition of the subject site to Straidarran’s development limits is therefore in keeping with the desired objectives of the DAP as it borders an existing zone of development limit and its infill would result in the in-depth expansion of the settlement rather than elongation of its lineage.

11.2 There is an apparent additional housing need in Straidarran. Appendix 5 of the Local Development Plan (LDP) 2032 identifies a need for 25 new dwellings in Straidarran over the plan period. However, there is no capacity for any additional new dwellings within the current development limits of Straidarran, highlighting a lack of sufficient land. Considering this, Derry City and Strabane District Council will be required to extend the development limits of Straidarran to accommodate the inclusion of new land that will provide the capacity to deliver sufficient housing.

- 11.3 Further housing infrastructure is required to service the local population. Due to the shortage of housing options in Straidarran, residents are being involuntarily displaced from the locality. The inclusion of the subject site within Straidarran's development limits will proactively address this housing shortage.
- 11.4 The most recently published Preferred Options Paper (POP) calls for the sustainable re-evaluation of uncommitted zoned or other land. The subject site is a suitable location, that follows the traditional pattern of growth, with the ability to accommodate a sustainable and appropriate form of development that will meet the need for housing in the delivery of a cohesive, vibrant, rural community.
- 11.5 Therefore, our client, would like to take this opportunity to inform the council that their lands (as identified in Figures 1 and 2) are available, suitable and deliverable, and should be given immediate consideration for inclusion within the development limits of Straidarran small settlement in order to deliver the housing units required or for commercial/community use.

Therefore, for the reasons set out above, I request that Council, in the preparation of its new Local Development Plan (LDP) 2032, include these subject lands in whole, or any part of, into the small settlement limits of Straidarran and zone for housing/commercial/community use.

Please feel free to contact me if you wish to discuss in more detail.

Yours Faithfully,

Settlement	Approx. No. of Households	% Share of all Households	Population (150,497)	% Share of Population	Share of Housing Requirement (9,000) by % Households	Share of Housing Requirement (9,000) by % Population	Approximate Current Housing Capacity
Ardrav	87	0.2%	218	0.1%	13	13	148
Artigarvan	310	0.6%	730	0.5%	46	44	300
Ballymagory	274	0.5%	608	0.4%	41	36	247
Clady	242	0.5%	538	0.4%	35	32	185
Cranagh	32	0.1%	80	0.1%	5	5	98
Culmore	1,161	2.2%	3,465	2.3%	170	207	256
Donemana	271	0.5%	586	0.4%	40	35	271
Eglinton	1,365	2.6%	3,679	2.4%	201	220	187
Erganagh	206	0.4%	515	0.3%	31	31	45
Glebe	273	0.5%	734	0.5%	41	44	147
Glenmoran	63	0.1%	158	0.1%	9	9	85
Killea (part in NI)	53	0.1%	133	0.09%	8	8	2
Killer	115	0.2%	288	0.2%	17	17	143
Killeter	46	0.1%	115	0.1%	7	7	45
Lettershendoney	186	0.3%	510	0.3%	27	31	67
Magheramason	215	0.4%	538	0.4%	32	32	192
Newbuildings	1,109	2.1%	2,611	1.7%	163	156	324
Park	184	0.3%	460	0.3%	27	28	40
Plumbidge	124	0.2%	310	0.2%	18	19	148
Son Mills	871	1.6%	1,907	1.3%	128	114	174
Spamount	98	0.2%	245	0.2%	14	14	321
Strathfoyle	988	1.9%	2,419	1.6%	145	145	104
Victoria Bridge	152	0.3%	360	0.3%	23	23	445

Villages



Derry City and Strabane District Council HOUSING MONITOR

HOUSING COMPLETIONS ON MONITORABLE SITES IN
DERRY DISTRICT AS OF 1 APRIL 2019

Settlement	Units Complete	Remaining Potential	Area Developed	Area Remaining
ARDMORE	68	60	3.4	2.1
CAMPSEY	1	3	0.1	0.1
CARNANREAGH	3	0	0.8	0.0
CLAUDY	262	215	15.1	11.9
CRAIGBANE	1	1	0.9	0.9
CULMORE	841	160	40.1	10.4
DERRY	13085	10372	544.8	426.8
EGLINTON	667	71	38.1	3.5
KILLALOO	1	17	0.1	0.5
KILLEA	54	2	2.6	0.1
LETTERSHENDOWNEY	39	91	1.7	4.3
MAYDOWN	86	4	3.7	0.1
NEWBUILDINGS	479	211	23.7	9.5
NIXON'S CORNER	30	0	1.4	0.0
PARK	98	29	6.8	1.7
STRAIDARRAN	121	0	5.1	0.0
STRATHFOYLE	437	44	21.4	4.0
TAMNAHERIN	10	7	0.7	0.3

Site survey findings/completions have been informed by data obtained from Land and Property Services. (LPS)

02 October 2020

Page 1 of 2

TULLINTRAIN	2	1	0.3	0.4
District Totals	16285	11288	711.0	476.7

Site survey findings/completions have been informed by data obtained from Land and Property Services. (LPS)

02 October 2020

Page 2 of 2



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** 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

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

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**

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

First Name (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)

Last Name (Required)

Organisation / Group Address (if different from above)

Address (Required)

Town (Required)

Postcode (Required)

Email address (Required)

On completion, please proceed to Section F

Agent Contact Details

Title / First Name (Required)

Last Name (Required)

Organisation / Group Address (if different from above)

Address (Required)

Town (Required)

Postcode (Required)

Email address (Required)

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 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.

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

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:

Designation SETT 1: Settlement Hierarchy for DC&SD

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)

Chapter 6 Spatial Strategy for the Derry City and Strabane District

(and/ or) Relevant Policy number(s)

Designation SETT 1: Settlement Hierarchy for DC&SD

(and/or) Relevant Paragraph number(s)

(and/or) 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.

Please see enclosed report.

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.

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

Section J: **Tests of Soundness** (Required)

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

Designation SETT 2: Development within Settlement Development Limits

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)

Chapter 6 Spatial Strategy for the Derry City and Strabane District

(and/ or) Relevant Policy number(s)

Designation SETT 2: Development within Settlement Development Limits

(and/or) Relevant Paragraph number(s)

Para. 6.16 to Para. 6.19

(and/or) 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.

Please see enclosed report.

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.

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

Section J: **Tests of Soundness** (Required)

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

Chapter 16: Housing in Settlements and the Countryside

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.
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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)

Chapter 16: Housing in Settlements and the Countryside

(and/ or) Relevant Policy number(s)

Policy HOU 1: Strategic Allocation and Management of Housing Land

(and/or) Relevant Paragraph number(s)

Para. 16.19 to Para. 16.29

(and/or) 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.

Please see enclosed report.

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.

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

Section J: **Tests of Soundness** (Required)

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

Chapter 16: Housing in Settlements and the Countryside

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Procedural tests

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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)

Chapter 16: Housing in Settlements and the Countryside

(and/ or) Relevant Policy number(s)

Policy HOU 2: Strategic Allocation of Housing in Settlements

(and/or) Relevant Paragraph number(s)

Para. 16.30 to Para. 16.33

(and/or) 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.

Please see enclosed report.

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.

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

Section J: **Tests of Soundness** (Required)

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

Chapter 16: Housing in Settlements and the Countryside

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?**
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- P3. Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?**
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- C1. Did the Council take account of the Regional Development Strategy?**
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Section K: Which part(s) of the draft Plan Strategy are you commenting on?

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Relevant Chapter number(s)

Chapter 16: Housing in Settlements and the Countryside

(and/ or) Relevant Policy number(s)

Policy HOU 5: Affordable Housing in Settlements

(and/or) Relevant Paragraph number(s)

Para 16.45 to Para 16.60

(and/or) 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.

Please see enclosed report.

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.

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

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

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

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

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