

From: Brian Kelly <brian.kelly@turley.co.uk>
Sent: 03 February 2022 17:41
To: Local Development Plan
Subject: Consultation on draft LDP Plan Strategy (Schedule of changes)
Attachments: 220203 CL DCSDC LDP (various).pdf; 220203 CL DCSDC LDP (Apex Housing Association).pdf

Consultation on draft LDP Plan Strategy (Schedule of changes)

Dear Plan Team

Please find the attached representations. Grateful if you could confirm receipt.

Kind regards

Brian Kelly

Director

Turley

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3 February 2022
Delivered by email

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

Dear Sir/Madam

LDP DRAFT PLAN STRATEGY - DPS SCHEDULE OF PROPOSED CHANGES

REPRESENTATION REFERENCES: LDP-PS-REP-47; LDP-PS-REP-48; LDP-PS-REP-54; LDP-PS-REP-55; LDP-PS-REP-56; LDP-PS-REP-57; LDP-PS-REP-58; LDP-PS-REP-59

Further to the Council's publication of proposed changes to the LDP draft Plan Strategy, this response is made on behalf of our respective clients – the relevant references are identified above. This consultation on proposed revisions to the draft Plan Strategy is welcomed where it demonstrates the Council is responding to the previously submitted representations.

These comments should be read alongside the original representations to the Derry City & Strabane Draft Plan Strategy, references: LDP-PS-REP-47; LDP-PS-REP-48; LDP-PS-REP-54; LDP-PS-REP-55; LDP-PS-REP-56; LDP-PS-REP-57; LDP-PS-REP-58; LDP-PS-REP-59.

The following are some further comments to highlight specific issues that are likely to affect the soundness of the LDP Plan Strategy

Evidence Base

As per previous requests, and to meaningfully engage with the process of preparing the draft Plan Strategy, it is critical that the evidence base used by the Council is made available as part of the consultation, including the Urban Capacity Study. It is respectfully requested that the complete evidence base for the plan is made available at the earliest opportunity.

Plan Period

The preparation of the draft Plan Strategy is significantly delayed. Taking a pro rata approach with the plan timetable, it would be reasonable to assume that the Local Plan Policies will be adopted in 2026, meaning the life of the plan is reduced to only 6 years. It is imperative that the LDP delivers upon the objectives of the Strategic Growth Plan, but with only 6 years remaining, you should reconsider revising the plan period.

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Growth Strategy & Housing Policies

We disagree with the revised strategy and policies. The proposed changes do not address the previous weaknesses identified by Turley or the soundness issues with LDP Plan Strategy. As mentioned above, there is an absence of evidence to support the proposed changes.

In addition to the foregoing our clients maintain their objections to the respective policies as articulated in their original representations.

Yours sincerely

Brian Kelly 
Director

brian.kelly@turley.co.uk