

06 November 2020  
Delivered by email and post

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



Dear Sir / Madam

**REPRESENTATION TO DERRY CITY & STRABANE DISTRICT COUNCIL'S LOCAL DEVELOPMENT PLAN - DRAFT PLAN STRATEGY**

**GRANSHA PARK, CLOONEY ROAD, DERRY (INCLUDING ZONING H32)**

This representation is submitted on behalf of the Department of Health (DoH) and the Western Health and Social Care Trust (WHST) in relation to their lands at Gransha, Derry~Londonderry in response to a consultation on the Derry City and Strabane District Council (DCSDC) draft Plan Strategy (dPS).

The DoH / WHST did not submit a representation to the original consultation period of the dPS in December 2019 / January 2020. This consultation provides the DoH / WHST with the opportunity to confirm their intentions for the future redevelopment of their lands at Gransha.

**SUBJECT SITE**

The extent of the lands (known as Gransha Park), under the ownership of the DoH / WHST, are located within the settlement limit of the extant Area Plan for the area (Derry Area Plan (DAP) 2011), see map extract at Appendix 1. The land extends to circa 70 hectares with the main existing use of the land being for the provision of various health, support services and associated office uses including:

- Waterside Hospital;
- Grangewood Mental Health In-patient Unit;
- Lakeview Hospital;
- Little Orchids Children's Centre; and
- Voluntary organisations including U3A Foyle.

The existing buildings are set in maintained gardens and served by an internal road network and associated car parking.

Hamilton House  
3 Joy Street  
Belfast  
BT2 8LE

T 028 9072 3900 turley.co.uk

- Step up Step down facility to help with flow out of Acute MH hospital & support re integration into the community (step down) as well as supporting patients in the community in crisis to reduce admissions (Step up);
- Development of a low secure facility to support higher risk patients that have been detained under Mental Health Act & who may pose serious risk to public safety;
- Relocation of staff / services from other Trust locations, staff training facility;
- Admin facilities for Trust community teams;
- Residential accommodation for medical students;
- New ambulance hub (in partnership with the Northern Ireland Ambulance Service);
- Centralised community aids and appliance store;
- Transport compound;
- Maintenance workshops;
- New area board HQ; and
- Developments to accommodate the ever growing demand for health services.

Whilst some of the uses proposed do not provide health services directly to the public they will provide essential staff accommodation / maintenance facilities that will enable the continued operation of other health services in the district. For this reason we would request that the Council retains the site as whiteland within the settlement limit of Derry~Londonderry. This zoning will allow the DoH / WHSCT a adequate flexibility to deliver their Masterplan for the site.

## **SOUNDNESS OF THE PLAN**

The keystone of the local development plans system is the principle of 'soundness'. Section 10(6) of the 2011 Act provides that the purpose of the Independent Examination (IE) is to determine, in respect of the development plan document:

- a) whether 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 relating to the preparation of development plan documents; and
- b) whether it is sound.

The Planning Act (Northern Ireland) 2011 does not define the meaning of 'soundness'. However, Development Plan Practice Note 6 – Soundness (DPPN 6), dated May 2017, suggests that it may be considered in the context of its ordinary meaning of '*showing good judgement*' and '*able to be trusted*'.

Furthermore, DPPN 6 states that the tests of soundness are based upon three categories. These three categories relate to:

- how the development plan document (DPD) has been produced;
- the alignment of the DPD with central government regional plans, policy and guidance; and

Paragraph 16.17 states that;

*“the LDP will carry forward most of the Housing zonings / designations from the Derry Area Plan 2011 and the Strabane Area Plan 2001, namely the (substantially) unimplemented Housing zonings, Flats Policy Zone (formerly the DAP designated Flat Zone FL 1) and the associated Flat Prevention Areas (formerly the DAP Flat Exemption Areas)”.*

The DoH / WHSCT strongly agrees with the strategy of retaining most of the existing housing zones and would reiterate that the lands at Zoning H32 are in the process of being brought forward for residential development through the 'Public Land for Housing' programme, providing certainty that these lands will be developed to deliver much needed housing in the city.

#### **HOU 1 Strategic Allocation and Management of Housing Land - Zoned Housing Land and LUPAs**

Policy HOU 1 adopts a sequential approach to managing the release of land for new housing. LDP Phase 1 Zonings – Phase 1 housing land will be zoned on sites (of 0.2 hectares or 10 or more dwelling units in the following circumstances:

- Existing commitments i.e. sites with live residential planning permission;
- Selected Urban Capacity Sites (City and Main Town) and Whiteland Sites (Local Towns) identified at LPP;

The strategy identifies that Phase 2 housing lands are held in reserve and include the following:

- Derry Area Plan (DAP) and Strabane Area Plan (SAP) housing zonings without current residential planning permission; and
- Other Urban Capacity Sites (City and Main Town) and Whiteland Sites (Local Towns).

If, during the LDP period there is a need for Phase 2 housing zonings earlier than anticipated, the following will apply:

- Phase 2 can be re-zoned as Phase 1 as a consequence of an LDP amendment following a Plan review and the re-appraisal of future housing requirements;
- Phase 2 land can be approved through a planning application from a registered housing association for social / affordable housing where there is a localised housing stress / need. Such a need should be supported by NIHE.

Whilst we understand the rationale of Councils approach to Phase 1 / Phase 2 housing lands we are concerned that this is an unsound approach to the delivery of residential development in Derry City. Paragraph 16.20 states that:

*“a criteria-based approach to selecting sites for each phase will be undertaken in the Local Policies Plan (LPP). The selection criteria will take account of a number of factors including: Housing Monitor; Urban Capacity; Windfall and Housing Needs Assessment (HNA)”.*

The Council has published a summary of its Housing Monitor Report 2018 – 2019 however this does not identify individual sites. Without viewing this information we are unable to fully appreciate how the Council has concluded that there is an area of 426.8 hectares remaining for residential development.

As written, the policy will mean that Phase 2 zoned residential lands will be frozen, relying on other Phase 1 developments coming forward before they can be developed. Policy HOU 1 relies on existing committed zonings, which in many cases are large complex zonings where there is a limited prospect of them being developed for

- *The community they seek to serve can access the facility via a number of different forms of transport including walking, cycling and, where available, public transport;*
- *They are appropriate in terms of scale and are in character within their locality; and*
- *They meet the principles as set out in GDP 1."*

Paragraph 18.9 goes on to state that *"the Council aims to protect the existing amenity of current community facilities, such as cemeteries, hospitals, schools etc. from incompatible uses that would impact on their role, function and character"*.

The DoH / WHSCT welcome the Councils acknowledgement of the importance of protecting existing community infrastructure facilities and also for encouraging the extension of these facilities where a clear community need is demonstrated.

As previously outlined the DoH / WHSCT have significant plans for the future development of their lands at Gransha, providing a range of healthcare facilities for the city in the form of direct services / accommodation as well as ancillary developments required to operate health services i.e. transport compound and maintenance facilities.

On this basis the DoH / WHSCT consider that retention of the existing lands under their control at Gransha within the settlement limit as unzoned whiteland is essential to achieve the Councils community infrastructure strategy in Derry~Londonderry.

The lands at Gransha are unique in that they are a public sector owned residential zoning within Derry City. We would request that Zoning H32 is brought forward as a Phase 1 residential zoning, ensuring the lands can be brought forward for social / affordable housing and contribute towards addressing the existing housing need in the city.

If you require any further information in relation to this representation please contact our office.

Yours sincerely



**Director**

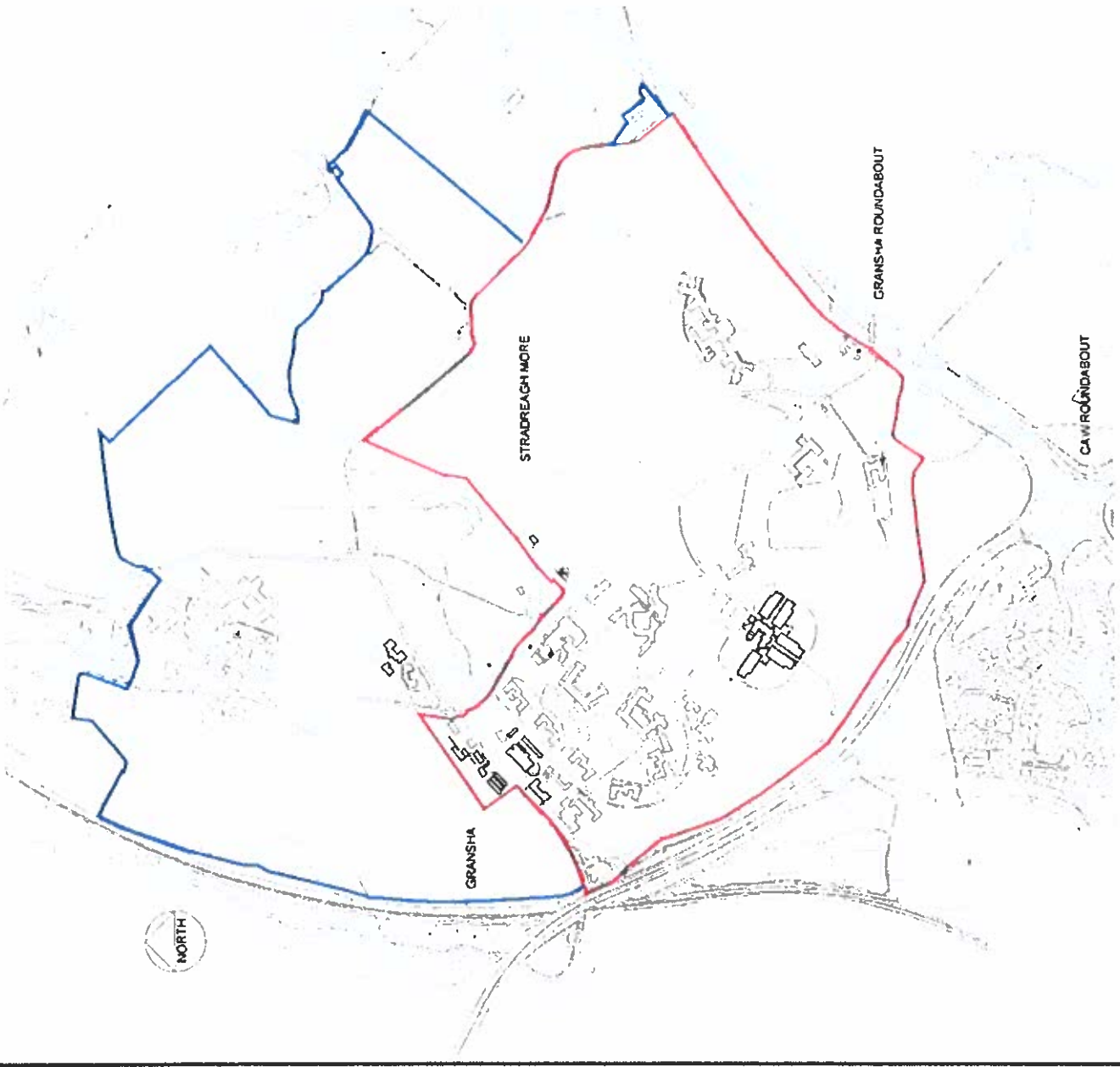


**LEGEND**

DEPARTMENT OF HEALTH LAND  
AND WHSCT LAND WITHIN  
SETTLEMENT LIMIT

DEPARTMENT OF HEALTH LAND  
AND WHSCT LAND OUTSIDE  
SETTLEMENT LIMIT

<b>Construction Division</b>
Client: Assets and Estate Management Branch Department of Health
Project: Gransha/Siradreach More Estate
Drawing: WHSCT Land and DoH Land
Scale: 1:5000 @ A2
Branch: CPD Health Projects
Branch Manager: [Redacted]
Drawn by: G.B. Date: 15 October 2020
Checked by: [Redacted]
Drawing No: 16 / 13





Level 9  
Causeway Exchange  
1-7 Bedford Street  
Belfast  
BT2 7EG

Telephone: [REDACTED]  
e-mail: [REDACTED]  
Our ref: [REDACTED]  
Date: 27 October 2020

[REDACTED]  
Property Management Branch & Management Services Unit  
Investment Directorate  
Department of Health  
Annex 4  
Castle Buildings  
Stormont Estate  
BELFAST  
BT4 3SQ

[REDACTED]

**Local Development Plan (LDP 2032): Draft Plan Strategy – LDP Stakeholder,  
Notification of Re-Consultation**

The Department for Communities is currently taking forward the Public Land for Housing (PLfH) Project which aims to identify unused or under-utilised public sector land that has the potential to be reused for housing as a way of helping to increase housing supply in NI across all tenures.

At a recent Project Board meeting, you had made the Board aware that proposals in the Draft Plan Strategy could potentially impact upon the objectives of the PLfH project in the Derry City and Strabane District Council area. There is a concern that the Draft Plan Strategy, in examining housing need in the area, could potentially de-zone green field lands which are currently zoned for housing.

The PLfH Project has been engaged with your office for some time working towards having some of its land at the Gransha Health Estate, which is currently zoned for 315 housing units, released for housing purposes. We would therefore very much



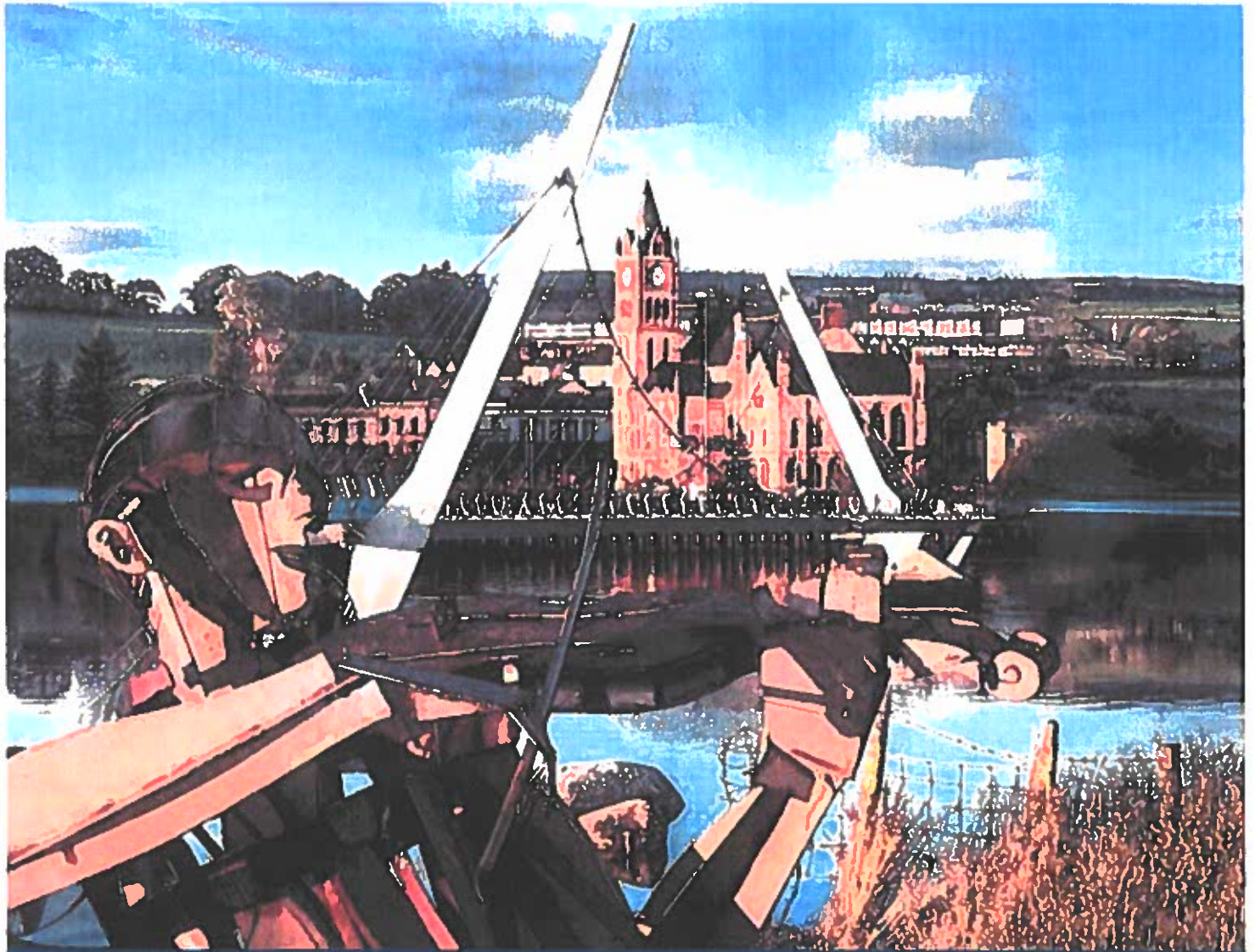


Derry City & Strabane District Council

# 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](http://www.derrystrabane.com/Subsites/LDP/Local%20Development%20Plan)

## How We Are Consulting

Complete this draft Plan Strategy Representations Form and either return by email to [LDP@DerryStrabane.com](mailto: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](http://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](mailto: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 there-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 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 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) [REDACTED]

Last Name (Required) [REDACTED]

Organisation / Group Address - Department of Health

Address (Required) Property Management Branch & Management Services Unit

Investment Directorate, Department of Health, Annex 4, Castle Buildings, Stormont Estate

Town (Required) Belfast

Postcode (Required) BT4 3SQ

Email address (Required) [REDACTED]

On completion, please proceed to Section F

### Agent Contact Details

Title / First Name (Required) [REDACTED]

Last Name (Required) [REDACTED]

Organisation / Group Address

Address (Required) Turley

37 Clarendon Street

Town (Required) Londonderry

Postcode (Required) BT48 7EG

Email address (Required) [REDACTED]

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 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.

N/A

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](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 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)**

See enclosed letter

**(and/ or) Relevant Policy number(s)**

See enclosed letter

**(and/or) Relevant Paragraph number(s)**

See enclosed letter

**(and/or) District Proposals Map**

See enclosed letter

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.

See enclosed letter

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.

See enclosed letter

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