

**Sarah-jayne Boyle**

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**From:** Desmond O'NEILL [REDACTED]  
**Sent:** 27 January 2020 12:56  
**To:** Planning  
**Subject:** LDP Draft Plan Strategy 2032- re James Doherty  
**Attachments:** DOHERTY J RESPONSE REGARDING GLENMORAN - Local Development Plan (LDP) draft Plan Strategy.pdf

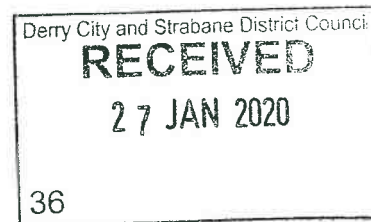
Dear Sir /Madam

I refer to the above and attach a response to The LDP draft Plan Strategy 2032

Kind Regards

Dessie O'Neill

Desmond O'Neill  
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tel 028 82 897052  
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E-mail -  
[REDACTED]

## 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 this section, then proceed to Section D)
- Agent (Please fill in the remaining questions in this section, then proceed to Section E)

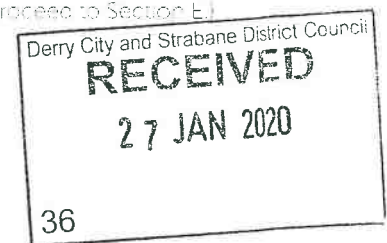
**Q2. What is your name?**

Title

First Name (Required)

Last Name (Required)

Email



**Q3. Did you respond to the previous LDP Preferred Options Paper?**

- Yes
- No
- Unsure

## 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)

N/A

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](http://www.pacni.gov.uk) for further details on the IE procedures.)

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## 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.

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.)

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

- to be addressed by the PAC  P1. Has the plan been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
- to be addressed by the PAC  P2. Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- to be addressed by the PAC  P3. Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?
- 
- to be addressed by the PAC  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

- to be addressed by the PAC  C1. Did the Council take account of the Regional Development Strategy?
- to be addressed by the PAC  C2. Did the Council take account of its Community Plan?
- to be addressed by the PAC  C3. Did the Council take account of policy and guidance issued by the Department

### Coherence and effectiveness tests

- to be addressed by the PAC  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.
- to be addressed by the PAC  CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
- to be addressed by the PAC  CE3. There are clear mechanisms for implementation and monitoring.

## 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)**

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

(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.

Local Development Plan (LDP) 2032

The housing policy is unsound in that proper consultation has not taken place with land owners, local developers and residents in this area of Derry City and Strabane District Council to ascertain what housing need is required in the rural area. The current proposed plan approach is a top-down strategy which will not work in Glenmoran or other rural area areas in the Derry City and Strabane District Council.

Glenmoran has experienced substantial housing growth in the previous planning period this is due to local developers from the area who identified a housing need and were able to provide a much need answer to the housing needs of young families in the local area

No maps of Glenmoran have been provided to establish if the boundary will be reduced or expanded

however, all indications point to a restrictive approach

The proposed expansion of the Glenmoran hamlet will provide proper flexibility for rural dwellers in that area and provide housing opportunity for rural dwellers who will have increasing issues in finding housing site in the Glenmoran area as a result of the new restrictive changes in housing in the countryside (infill policy). The areas identified are a natural expansion of existing housing developments

The provision of additional housing land in Glenmoran will provide a geographic balance to the current spatial imbalance of concentrating most housing opportunities in the west and north of the district

This will also address an inherent unsound aspect in the Local Development Plan (LDP) 2032 in that it places too much emphasis on developing brownfield sites which are not available in Glenmoran

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.

The inclusion of my clients land as identified will help resolve the issues raised and will make the LDP draft 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](mailto: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](mailto: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](mailto:LDP@DerryStrabane.com). If sending by email, please clearly state that your comments are in relation to the EQIA.

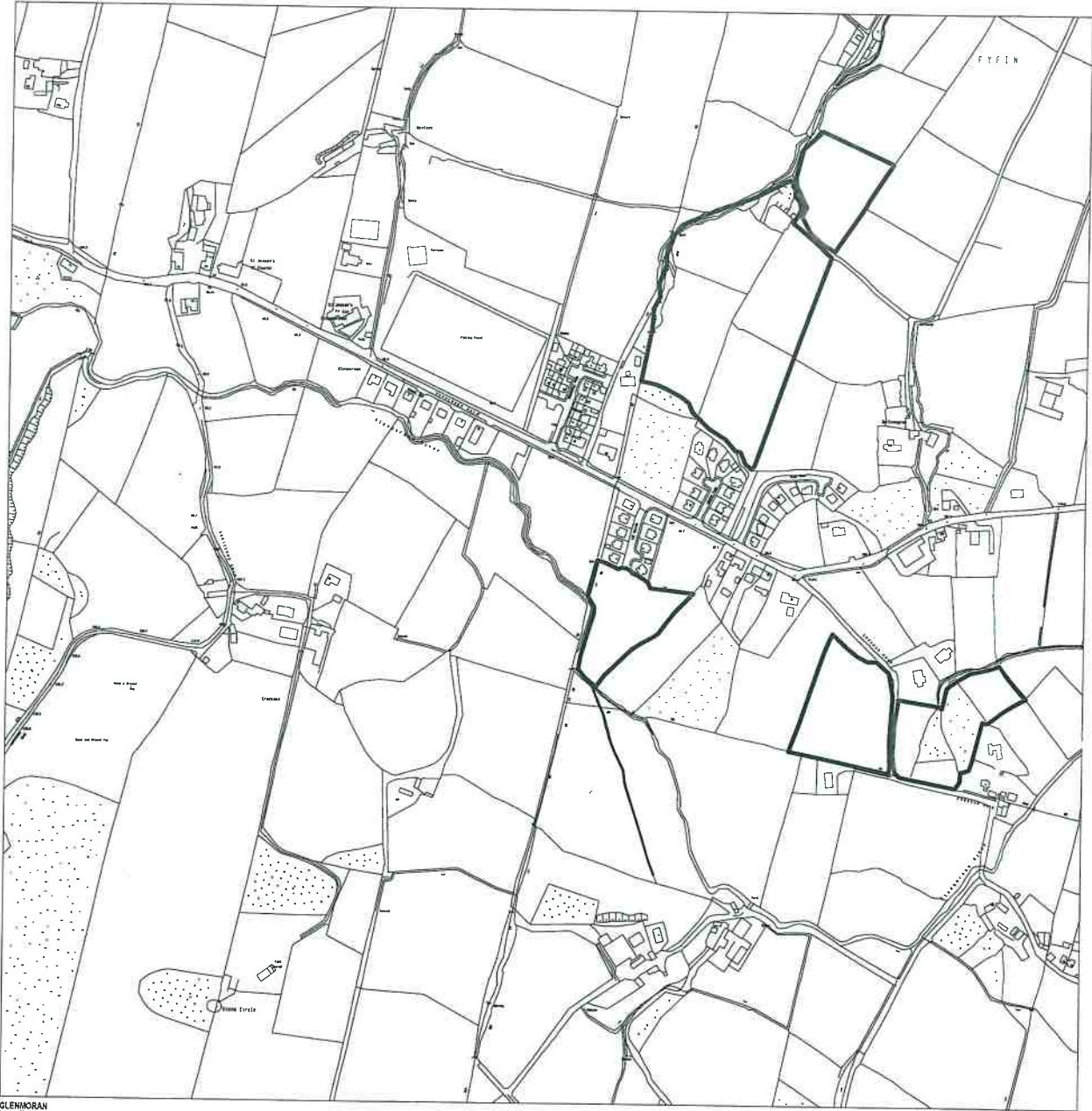
Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

## 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](mailto: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.

# GLENMORAN



GLENMORAN  
Landscape Plan  
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