

Response ID ANON-ZKXW-M31W-V

# LDP-PS-REP-84A

Submitted to Local Development Plan 2032 - Representations form for the LDP draft Plan Strategy and Associated Appraisal / Assessments  
Submitted on 2020-01-17 00:42:15

## Local Development Plan Privacy Notice

### Your Details

Name

Name:

Peter O'Brien

Email Address

Email:

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

Organisation

Did you respond to the previous LDP Preferred Options Paper?

No

### Organisations

Organisation / Group Name

Your Name

Your Name:

Culmore Land and Property Ltd

Email Address:

Your Job Title

Your Job Title:

Company Director

Organisation/Group Address

Address Line 1:

Address Line 2:

Town/City:

Postcode:

Soundness

Type of Procedure

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

Written

Is the draft Plan Strategy Sound?

If you consider the Plan Strategy to be Sound and wish to support the LDP Plan Strategy, please set out your comments below.

**Sound Strategy Comments:**

The Plan Strategy is generally sound EXCEPT in relation to 3 specific related subject areas concerning Culmore Village :-

- The village's low indicative share of the district's Housing for the remaining 12 years of the plan period
- The possibility of the existing vacant, massive Industrial zoning/economic development land NOT being radically reduced or de-zoned
- The possibility of the Culmore Road Proposal being carried forward unnecessarily into a fifth decade without the realistic possibility or need of implementation.

**Is the draft Plan Strategy Unsound?**

**Tests of Soundness**This should relate to only one section, paragraph or policy of the LDP draft Plan Strategy. If you wish to inform us that you consider more than one part of the LDP draft Plan Strategy is unsound, you can submit further representations by completing and submitting additional copies of this section.

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.

**Which part(s) of the draft Plan Strategy are you commenting on?****Relevant Chapter Numbers****Relevant Chapter Number(s):**

16 Housing in Settlements and the countryside

**Relevant Policy number(s):****Relevant Paragraph number(s) :**

Appendix 5 - Housing Allocation Tables

**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.**

**details of why you consider this part of the LDP draft Plan Strategy to be unsound:**

This is unsound in that a vital parameter has not been considered in the estimation of quantum in spatial housing allocation, ie, desirability - providing homes where they are wanted. No assessment or allowance has been made for the comparative demand across the district.

The estimated number of houses for Culmore for the Plan period is too low and falls way short of the capacity, obvious demand, potential need and sustainability of the area. The allocation is unrealistic and inappropriate.

The high growth of housing in Culmore in the recent past reflects the desirability of the area and has been market led. To limit the amount of potential new housing would suppress supply, drive up prices and limit potential occupants to only those who could afford the higher prices.

Furthermore, the allocated number of proposed houses (130, based on a 2017 calculation) could possibly be built out this year, 2020. This could result in no new houses being built for the remaining 12 years of the Plan. Existing younger Culmore residents entering the housing market in the near future could be unable to remain in the area.

**If you consider the LDP draft Plan Strategy to be unsound, please provide details of what changes(s) you consider necessary to make the LDP draft Plan Strategy sound.**

**Details of what changes(s) you consider necessary to make the LDP draft Plan Strategy sound.:**

The existing Culmore settlement limit, as shown within the present DAP 2011, should remain unaltered.

The proposed LUPAs should identify enough residential development land in the present white land to cater for at least the duration of the new Plan, 2032.

The allocation number should be increased to reflect the popularity of Culmore.

**Sustainability Appraisal**

If you wish to submit an 'expression of opinion' in relation to the Sustainability Appraisal (SA) of the LDP draft Plan Strategy (incorporating the Strategic Environmental Assessment (SEA)) please state them below or by email to LDP@DerryStrabane.com. If sending by email, please clearly state that your comments are in relation to the SA.

Sustainability Appraisal :

**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.

Draft Habitats Regulation Assessment (HRA or AA):

**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.

Draft Equality Impact Assessment (EQIA):

**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.

Draft Rural Needs Impact Assessment (RNIA):