LDP-PS-REP-39

Sarah-jayne Boyle

From:

Desmond O'NEILL <

Sent:

27 January 2020 12:52

To:

Planning

Subject:

Attachments:

Response to Derry City and Strabane District Council- LDP draft Plan Strategy 2032.

CURLY HILL DEVELOPMENTS - RESPONSE FOR LAND EVISH & CURLEYHILL - Local Development Plan (LDP) draft Plan Strategy.pdf; CURLYHILL DEVELOPMENTS - RESPONSE REGARDING ARTIGARVAN lands --- Local Development Plan (LDP) draft Plan Strategy.pdf; CURLYHILL DEVELOPMENTS - RESPONSE REGARDING DRUMAHOE lands. - Local Development Plan (LDP) draft Plan Strategy.pdf; CURLYHILL DEVELOPMENTS - RESPONSE REGARDING BREADY lands - Local Development Plan (LDP) draft Plan Strategy.pdf; CURLYHILL DEVELOPMENTS - RESPONSE REGARDING Donagheady lands - Local Development Plan (LDP) draft

Plan Strategy.pdf; THREE RIVERS RESPONSE Lifford Road Strabane -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

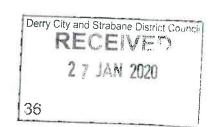
Kind Regards

Dessie O'Neill

Desmond O'Neill
ARCHITECTURAL & DESIGN SERVICES
17 MAIN STREET,
DROMORE,
Cotyrone.
BT78 3AE.
tel 028 82 897052

mobil

E-mail -



Section B: Your Details

Q1. Are you responding as an individual, as an organisation individual, group or organisation? (Required)	
Please only tick one	Derry City and Strabane District Council
Individual (Please fill in Question 2, then proceed to Section	C) 2 7 JAN 2020
Organisation (Please fill in the remaining questions in the si	36n, then proceed to Section D.
Agent (Please fill in the remaining ouestions in the section, t	hen proceed to Section E.)
Q2. What is your name?	
Title MR	
First Name (Required) DESMOND	
Last Name (Pequired) O'NEILL	
Email	
Q3. Did you respond to the previous LOP Preferred Option	ons 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 (Requires)	N/A	
Your Job Title / Position (Reduced)		
Organisation / Group Address (forferent)	from above	
Address (Required)		
Town (Required)		
Postcode (Required)		
On completion, please proceed to Section	on F	

Section E: Agents

Client Contact Details

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Title / First Name (Required	CURLYHILL DEVELOPMENTS
Last Name (Reguled)	CURLYHILL DEVELOPMENTS
Organisation / Group Addr	ress (if dil'erent from above)
Address (Required)	
Town (Reguired)	
Postcode (Required)	
Email address (Required)	
On completion, please pro	oceed to Section F
Agent Contact Details	
Titie / First Name (Required)	DESMOND
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Section F: Soundness

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Unless you specifically request a hearing, the Independent Examiner will proceed on the be that you are content to have your representation considered in written form only.	oasis

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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.

MA

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 partis) 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.).

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to be undressed 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?
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to be addressed by the PAC	C3. Did the Council take account of policy and guidance issued by the Department
	Coherence and effectiveness tests
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to be newbressed 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 undiressed 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.
ii.	

Section K: Which part(s) of the draft Plan Strategy are you commenting on?

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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 landowners, local developers and residents in this area of Strabane to ascertain what housing need is required in the rural area. However, it is, well known that housing land in Strabane is limited, there will be a need to identify additional land for housing by extending the development limits My client is a local developer who has a proven track record of providing homes for families in Strabane and other villages It is essential for Derry City and Strabane District Council to discuss with developers to understand the difficulties faced and if the local plan will deliver My client lands as indicated are undoubtedly required to provide an attractive area for housing graphson in Strabane The sites identified are well placed to provide moviem spacous homes for young families who currently are experiencing difficulty finding homes in the Strabane The availability of existing Road-proposed mosts and new bus links will make this area of Strabane an attractive place to develop housing The land indicated will provide flexibility for the future growth of Strabane The provision of additional housing land in Strabane will provide an essential geographic balance to the dominance of Derry This will also address an inherent unsound aspect in the Local Development Plan (LDP) 2002 in that it, places too much emphasis on developing trounted sites which are not easily developed in Strabane as stated before has proven a track record of building quality homes at an affordable price. Such developers are essential to allow growth and ensure local schools and business are supported. Strabane, especially on the east bank of the river, is very restricted by the existing flood plain, sleeply sloping land to the east and protected sites to the northeast. My client's lands as identified is practically the only area where housing can be facilitated to meet Strabane future needs.
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 issuses raised and will make the LDP draft strategy sound
Attach additional sheetls) 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 Appraisa. (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)

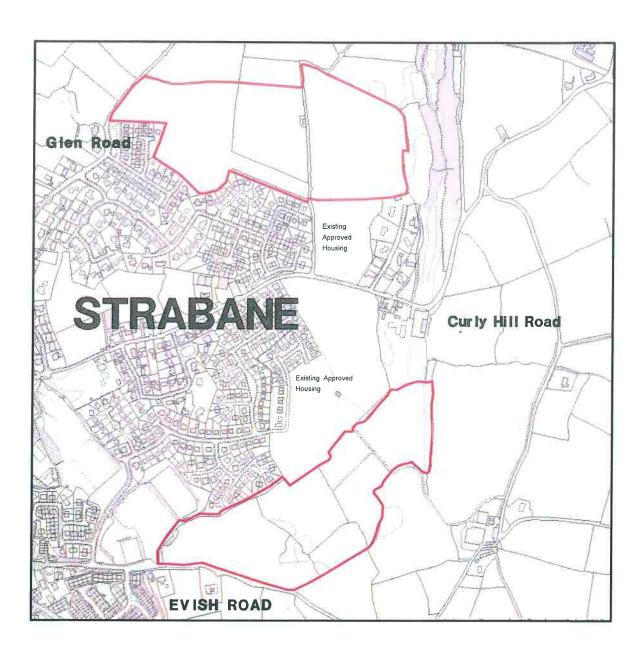
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Section B: Your Details

Post code (Required)

On completion, please proceed to Section F

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Organisation / Group Name	(Required) N/A	
Your Job Title / Position (Rec	ureo)	
Organisation / Group Addres	s (if different from above)	
Address (Required)		
Town (Required)	li .	
Postcode (Regulred)		

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Title / First Name (Required)	CURLYHILL DEVELOPMENTS
Last Name (Required)	CURLYHILL DEVELOPMENTS
Organisation / Group Addres	ss (fidifierent from above)
Address (Required)	28
	LECKPATRICK ROAD
Town (Required)	ARTIGARVAN
Postcode (Required)	BT783AE
Email address (Required)	
On completion, please proce	eed to Section F
Agent Contact Details	
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If you consider the Plan Strategy to be Sound and wish to support the LDP Plan Strategy please

Sound

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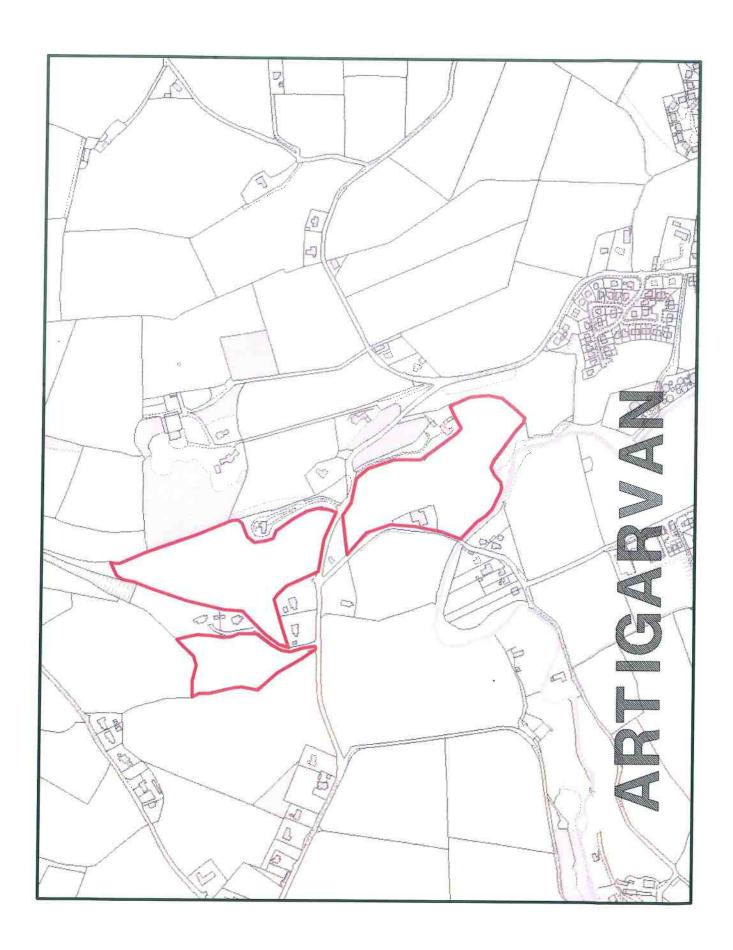
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Sound

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N/A

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and the Grapter	minor(s)
ind/ or) Relevan t	Policy number(s)
nd/or) Relevant F	aragraph number(s)
nd/or) District Pr	posals Map
cel Development Day 1 DD 2020 Dev	Is of why you consider this part of the LDP draft Plan Strategy to be unsou tests(s) you have identified above. Please be as clear and concise as possione on the concise as possion of the place with landrunars, local developers and residents in this area of Deny City.
cal Development Plan (LDP) 2032- Drun he housing policy is unsound in that propo oper consultation and discussions are re- y client lands as indicated are required it unnance is well placed to provide an attra- or client is a local developer who has a p ock record of providing homes for families providing and the second of the consultance e availability of existing Road and bus to unanthe.	tests(s) you have identified above. Please be as clear and concise as possi- ince concultation has not taken place with landowners, local developers and residents in this area of Deny City, inted to ascertain what housing need is required provide an attractive area for housing expansion for Drumshoe two home for young people and retirees families from the surrounding rural areas and the surrounding urban area wan is trabane and other villages. The land identified would be developed immediately and the dwelfings delivered in record time. If to discuss with local developers to help undurstand the difficulties faced in providing modern homes. It is make Drumshoe an attractive place to develop for housing including growth of
aving regard to the ocal Development Plan (LDP) 2032- Drun he housing policy is uncound in that prop roper consultation and discussions are re y client lands as indicated are required in unahous is well placed to provide an attra y client is a local developer who has a p ack record of providing homes for families providing and stabane District Council ne he availability of existing Road and bus he land indicated will provide flexibility for unahous he provision of additional housing land in concentrating most housing of the district is will also address an inherent unsound welcoing Brownfield sites with are not velocing Brownfield sites with are not velocing Brownfield sites with are not welcoing Brownfield sites with are not velocing Brownfield sites with are not welcoing Brownfield sites with are not velocing Brownfield sites with are not velocing Brownfield sites with are not welcoing Brownfield sites with are not provided to the second provided to the provided provided to the provided provided to the provided provided to the provided pro	tests(s) you have identified above. Please be as clear and concise as possi

The inclusion of my clients	land as identified will help resolve make the LDP draft strategy sound		
are reased telesed end will	make the LDF than strategy sound		
Attach additional shee	t(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)) plea	
state them below or by email to LDPaDerryStrabane.com. If sending oy email, please clearly	1
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)

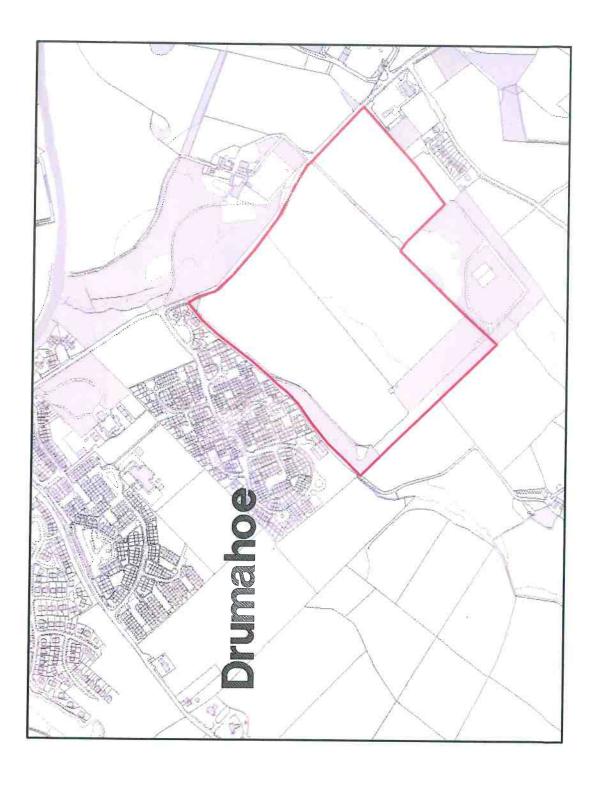
If you have any comments or opinions in relation to the Draft Equality Impact Assessment (EQIA) report of the LDP draft Plan Strategy, please submit them below or by email to LDP@ DerryStrabane.com. If sending by email, please clearly state that your comments are in relation to the EQIA.

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 sneet(s). I necessary, but please be as clear and concise as possible.



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 (Prease 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 MR First Name (Required) DESMOND Last Name (Regured) O'NEILL Email Q3. Did you respond to the previous LDP Preferred Options Paper? Yes Unsure Section C. Individuals Address (Required)

On completion, please proceed to Section F

Town (Requires)

Post code (Reguired)

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 (it differen	t from above)	
Address (Required)		
Town.(Required)		
Postcode (Reguirdo)		
On completion, please proceed to Sect	ion 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)	CURLYHILL DEVELOPMENTS
Last Name (Pequired)	CURLYHILL DEVELOPMENTS
Organisation / Group Address	s (if different from above)
Address (Required)	28
	LECKPATRICK ROAD
Town (Required)	ARTIGARVAN
Postcode (Required)	BT783AE
Email address (Requireo)	
On completion, please proce	eed to Section F
Agent Contact Details	
Title / First Name (Required)	DESMOND
Last Name (Required)	O'NEILL
Organisation / Group Address	(if different from above)
Address (Required)	17
	MAIN STREET
Town (Required)	DROMORE
Postcode (Required)	ВТ783АЕ
Email address (Required)	
On completion, please proce	ed to Section F
Q4. Would you like us to co future consultations on the	ntact you, your client or both in relation to this response or 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.

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Section G: Type of Procedure

Q5. Ple Please s	ease indicate if you would like your representation to be dealt with by: (Required) select one item only
✓ Wr	ritten (Choose this procedure to have your representation considered in written form only)
Or	ral Hearing (Choose this procedure to present your representation orally at the public hearing)
Unless that yo	you specifically request a hearing, the Independent Examiner will proceed on the basis u are content to have your representation considered in written form only.

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Please note that the independent Examiner will be expected to give the same careful

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 midnessed 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 obdressed 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 whitessed 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 **sec**tion, 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 F	Policy number(s)
and/or) Relevant P	aragraph number(s)
and/or) District Pro	pposals Map
	ils of wh y you consider this part o f the LDP draft Plan Strategy to be u nsound tests(s) you have identified above. Please be as clear and concise as pos sible
to ascertain what housing need is required in My client lands as indicated are required to see the seed in the seed to provide a home fit. The availability of existing Road and bus The land indicated will provide flexibility for	er consultation has not taken place with landowners, local developers and residents in this area of Derry City and Strabane District Council. In the rural area. In provide an attractive area for housing expansion for the willage of Bready In young and retirees families at an equal distance from Derry and Strabane. Inlinks make Bready an attractive place to develop the future growth of
Bready. The provision of additional housing land in of concentrating most housing of the distri This will also address an inherent unsound developing brownfield sites which are not	Bready will provide an essential geographic balance to the policy instead of in Strabane and Derry aspect in the Local Development Plan (LDP) 2032 in that it places too much emphasis on available in Bready
The provision of additional housing land in of concentrating most housing of the distri This will also address an inherent unsound developing brownfield sites which are not	
The provision of additional housing land in of concentrating most housing of the district This will also address an inherent unsound developing brownfield sites which are not additional sheet that the additional sheet fyou consider the L.	n Bready will provide an essential geographic balance to the policy instead ct in Strabane and Derry aspect in the Local Development Plan (LDP) 2032 in that it places too much emphasis on available in Bready
The provision of additional housing land in of concentrating most housing of the distribution of concentrating most housing of the distribution of	n Bready will provide an essential geographic balance to the policy instead of in Strabane and Deny aspect in the Local Development Plan (LDP) 2032 in that it places too much emphasis on available in Bready et(s) if necessary, but please be as clear and concise as possible. DP draft Plan Strategy to be unsound, please provide details of what

Section L. Sustainability Appraisal

If you wish to submit an 'expression of opinion' in relation to the Sustainability Appraisa: (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)

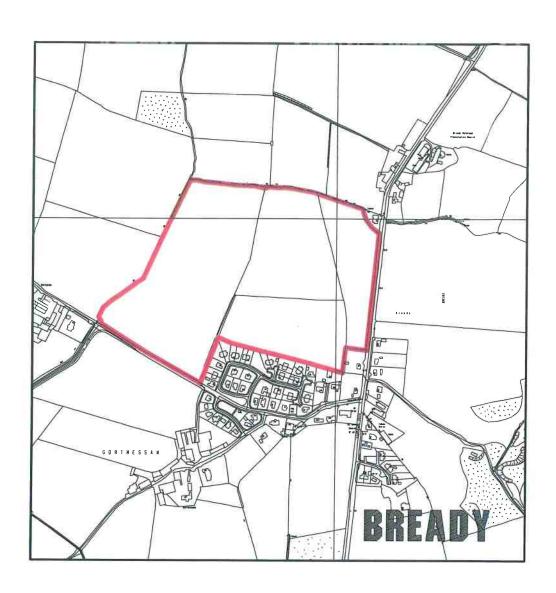
If you have any comments or opinions in relation to the Draft Equality Impact Assessment (EQIA) report of the LDP draft Plan Strategy, please submit them below or by email to LDP@ DerryStrabane.com. If sending by email, please clearly state that your comments are in relation to the EQIA.

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Section O: Draft Rural Needs Impact Assessment (RNIA)

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



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 fil	in Question 2, then proceed to Section C)
Organisation (Pleas	e fill in the remaining questions in the section, then proceed to Section D1
Agent (Please fill in t	he remaining questions in the section, men proceed to Section \hat{E})
Q2. What is your name	7
Title MR	
First Name (Required)	DESMOND
Last Name (Required)	O'NEILL
Ernalt	
Q3. Did you respond to Yes No Unsure	o the previous LDP Preferred Options Paper?
Section C: Inc	lividuals
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 (Regureo)		
Organisation / Group Address (fighterent from	m apove)	
Address (Pequired)		
Town (Required)		
Postcode (Required)		
On completion, please proceed to Section 5		

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 **fro**m you. Please provide details of the individual, organisation or group that you are representing.

Client Contact Details	
Title / First Name (Required)	CURLYHILL DEVELOPMENTS
Last Name (Required)	CURLYHILL DEVELOPMENTS
Organisation / Group Addres	s (if different from above)
Address (Required)	28
	LECKPATRICK ROAD
Town (Required)	ARTIGARVAN
Postcode (Required)	BT783AE
Email address (Requireo)	
On completion, please proce	eed to Section F
Agent Contact Details	
Title / First Name (Required)	DESMOND
Last Name (Required)	O'NEILL
Organisation / Group Addres	ss (if different from above)
Address (Required)	17
	MAIN STREET
Town (Required)	DROMORE
Postcode (Required)	BT783AE
Émail address (Required)	
On completion, please proc	eed to Section F
Q4. Would you like us to co future consultations on the	ontact you, your client or both in relation to this response or LDP? Please only select one
✓ Agent Clier	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.

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Section G: Type of Procedure

Q5. Please indicate if you would like your representation to be dealt with by: (Required)
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.
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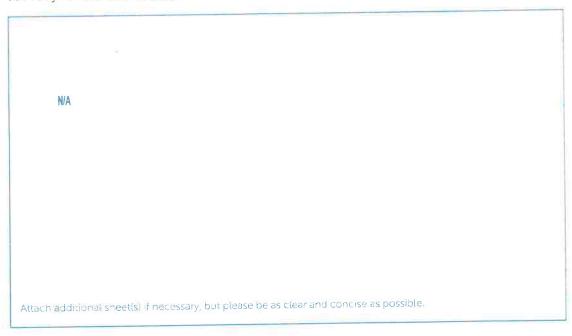
Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

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.



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.

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to be oddressed by the PAC	C3. Did the Council take account of policy and guidance issued by the Department
	Coherence and effectiveness tests
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to be oddressed 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 oddressed 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?

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Relevant Chapt	er number(s)
(and/ or) Releva	nt Policy number(s)
(and/or) Relevar	nt Paragraph number(s)
(and/or) District	Proposals Map
	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
Donagheady is well placed to pro The availability of existing floa The land indicated will provide its Donagheady The provision of	that proper consultation has not taken place with residents in this area of Denry City and Strabane District Council. Inserience is this area of Denry City and Strabane District Council. Inserience of provide an attractive area for housing need in this rural area. In the provide an attractive area for housing expansion wide a home for young and retries from the surrounding rural area. If and bus links make Donagheady an attractive place to develop for housing subtility for the future growth of additional housing land in Donagheady will provide an essential geographic stated If the district in Strabane and Derry It unsound aspect in the Local Development Plan (LDP) 2032 in that it eveloping brownfield sites which are not available in Donagheady

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.

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

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

Section M: Draft Habitats Population Assessment (HPA)

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Section N: Draft Equality Impact Assessment (EQIA)

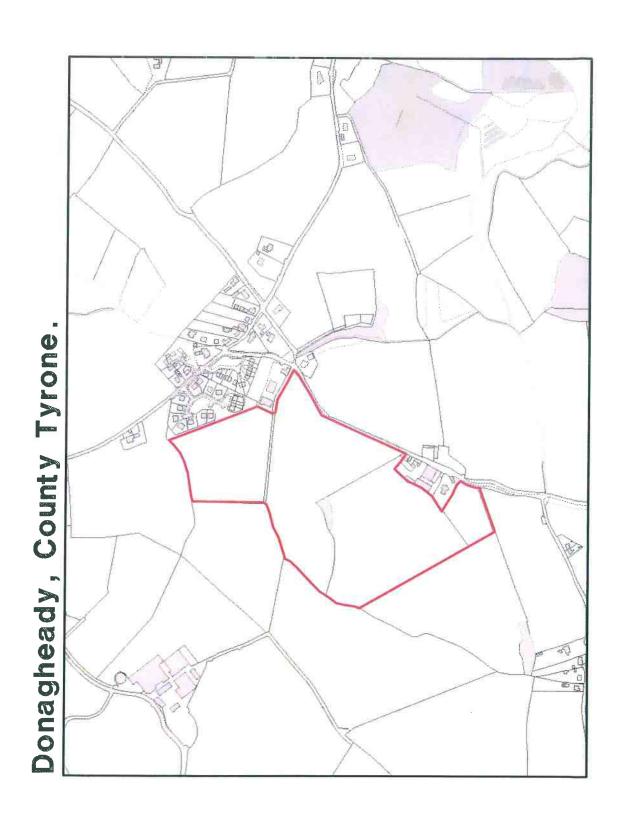
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Attach additional sheet(s) If necessary, but please be as clear and concise as possible.

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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 Obestion 2, trien proceed to Section C)
Organisation (Please	e fill in the remaining questions in the section, then proceed to Section D.)
Agent (Please fill in the	ne remaining questions in the section, then proceed to Section E.)
Q2. What is your name	?
First Name (Required)	DESMOND
Last Name (Required)	O'NEILL
Email	
Q3. Did you respond to Yes ✓ No Unsure	the previous LDP Preferred Options Paper?
Section C: Ind	ividuals
Town/Department	
Town (Required)	
Post code (Required)	
On completion, please p	proceed to Section F

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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 of differen	t from above)	
Address (Required)		
Town (Required)		
Postcode (Required)		
On completion, please proceed to Sect	on 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)	The Three Rivers Project.
Last Name (Required)	
Organisation / Group Address	(f different from above)
Address (Required)	28
	LECKPATRICK ROAD
Town (Required)	ARTIGARVAN
Postcode (Required)	BT783AE
Email address (Required)	
On completion, please proce	ed to Section F
Agent Contact Details	
Title / First Name (Required)	DESMOND
Last Name (Required)	O'NEILL
Organisation / Group Address	(if different from above)
Address (Required)	17
	MAIN STREET
Town (Required)	DROMORE
Postcode (Required)	BT783AE
Email address (Required)	
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✓ Agent Client	Both

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	Oral Hearing (Choose this procedure to present your representation orally at the public hearing)
Unle that	ess you specifically request a hearing, the Independent Examiner will proceed on the basis you are content to have your representation considered in written form only.

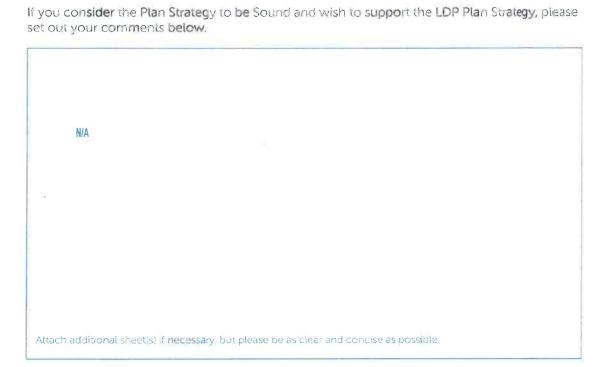
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Section H: Is the draft Plan Strategy Sound?

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Sound



Section I: Unsound

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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?
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	+
·	Consistency tests
to be addressed by the PAC	C1. Did the Council take account of the Regional Development Strategy?
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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.

	ter number(s)
and/ or) Releva	ant Policy number(s)
a lor of neleve	and Poucy Hamber(s)
and/or) Releva	nt Paragraph number(s)
and/or) District	t <mark>Proposals</mark> Map
	details of why you consider this part of the LDP draft Plan Strategy to be unsound
naving regard to	the tests(s) you have identified above. Please be as clear and concise as possible
will allow the river frontage to be The town centre expansion on my For the past hundred years, Shab The Local area plan is fundame historical impediment to develo the plan fails to properly recognise Ballymagony Clady and Artigarva The area plan will need to recognisalitate the opportunities present	opment has not been addressed Strabane has to be promoted in this plan as the natural gateway to the north of Ireland for Donegal Strabane. The Local area a that Strabane is a major urban area and cannot be defined just by its current limits when taken in conjunction with the nearby villages of Liftord. Sion Mills, an its population is much larger than Envisible and equal in number to Omegh and Lettorisenny nitse that Strabane is very well placed (A gateway to and from the Republic of Ireland) to ad by Brexit. Greater flexibility must be built into the local area plan to allow for opportunities to be fully utilised.
Attach additional	sheet(s) if necessary, but please be as clear and concise as possible.
	the LDP draft Plan Strategy to be unsound, please provide details of what consider necessary to make the LDP draft Plan Strategy sound
The inclusion of my the issuses raised and	clients land within the town centre will help resolve d will make the LDP draft strategy sound

Attach additional sneet(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 Appraisa. (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 sneet(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)

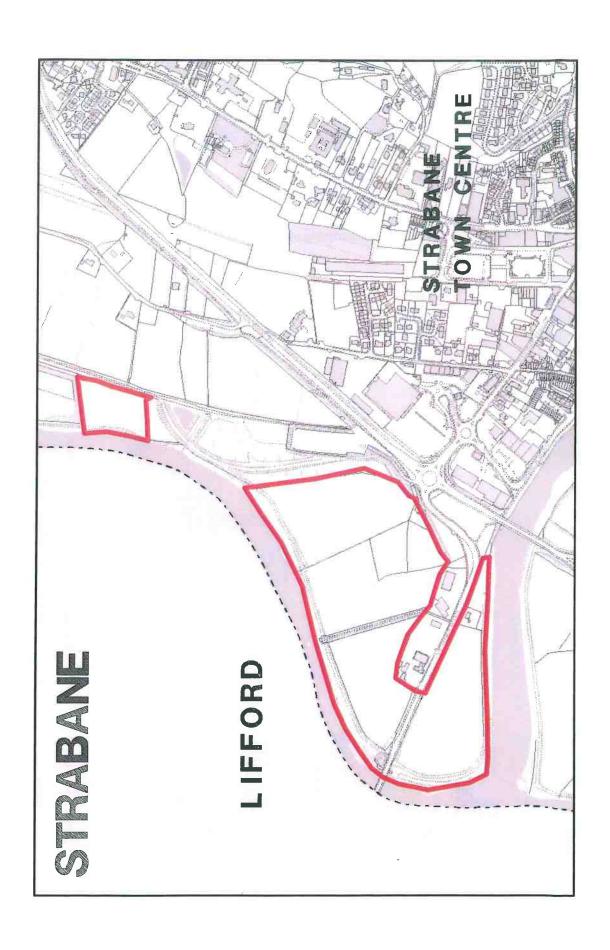
If you have any comments or opinions in relation to the Draft Equality Impact Assessment (EQIA) report of the LDP draft Plan Strategy, please submit them below or by email to LDP@ DerryStrabane.com. If sending by email, please clearly state that your comments are in relation to the EQIA.

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.



Clients Land Excluded From Town Centre And Developments

