

Sarah-jayne Boyle

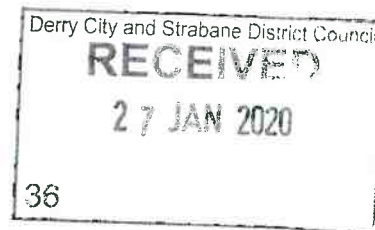
From: Desmond O'NEILL <[REDACTED]>
Sent: 27 January 2020 12:52
To: Planning
Subject: Response to Derry City and Strabane District Council- LDP draft Plan Strategy 2032.
Attachments: CURLY HILL DEVELOPMENTS - RESPONSE FOR LAND EVISH & CURLEYHILL - Local Development Plan (LDP) draft Plan Strategy.pdf; 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 [REDACTED]

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 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

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 E.

Organisation / Group Name (Required)

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)

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On completion, please proceed to Section F

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Title / First Name (Required)

Last Name (Required)

Organisation / Group Address (if different from above)

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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.

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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

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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.

NA

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 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 expansion in Strabane. The sites identified are well placed to provide modern spacious homes for young families who currently are experiencing difficulty finding homes in the Strabane. The availability of existing Road-proposed roads 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) 2032 in that it places too much emphasis on developing brownfield sites which are not easily developed in Strabane. My client as stated before has proven a track record of building quality homes at an affordable price. Such developers are essential for towns like Strabane to flourish. Site flexibility and choice in Strabane 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, steeply 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 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 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.

/

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Section N: Draft Equality Impact Assessment (EQIA)

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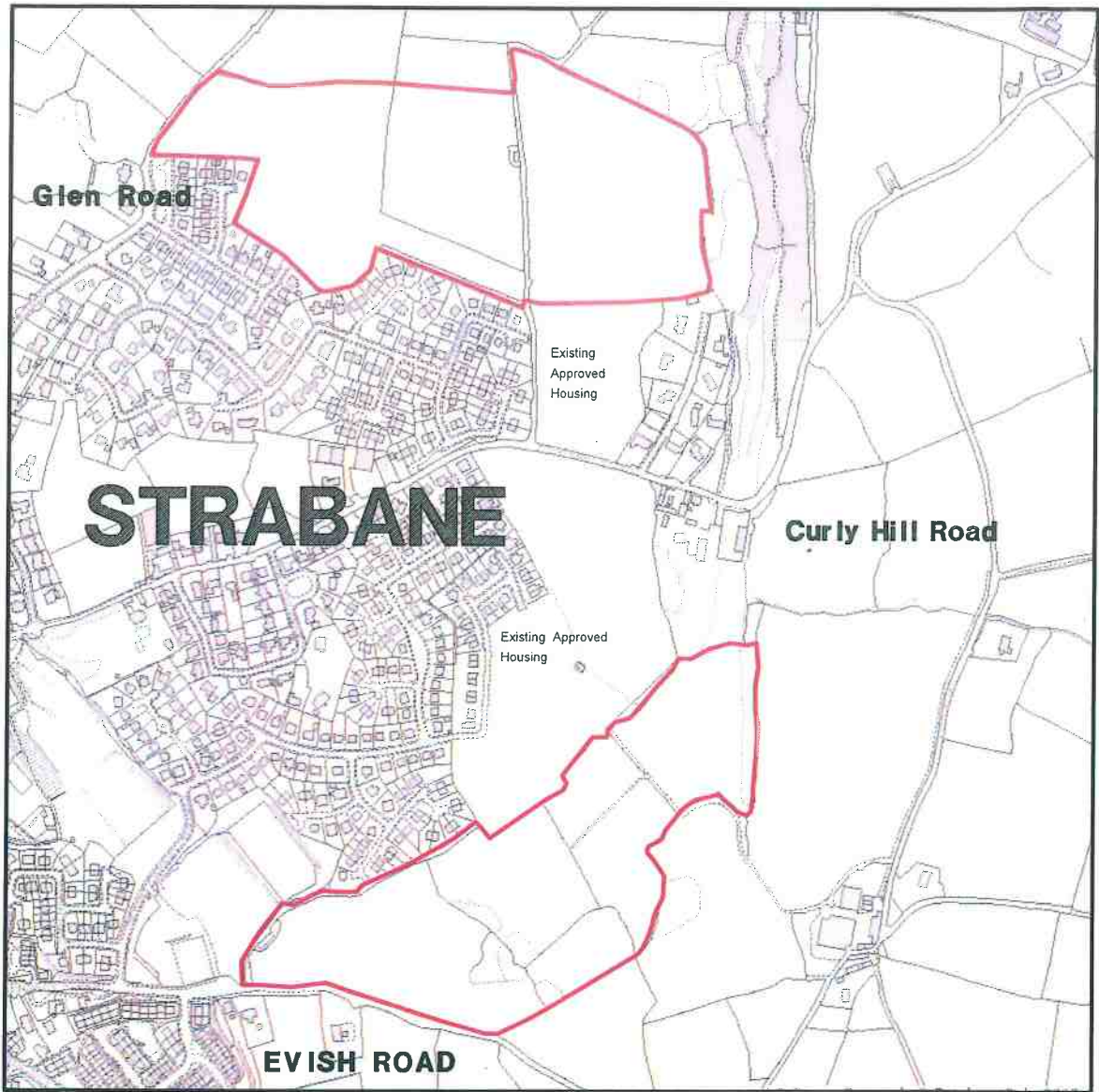
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/

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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

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Last Name (Required)	CURLYHILL DEVELOPMENTS
Organisation / Group Address (if different from above)	
Address (Required)	28
	LECKPATRICK ROAD
Town (Required)	ARTIGARVAN
Postcode (Required)	BT783AE
Email address (Required)	

On completion, please proceed 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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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.

NA

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

Section I: Unsound

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- 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?

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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 test(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 Derry City and Strabane District Council

to ascertain what housing need is required in the rural area.

My client is a local developer who has a proven track record of providing homes for families. 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 required to provide an attractive area for housing expansion for the village of Artigarvan

Artigarvan is well placed to provide a home for young families who currently are experiencing difficulty

finding homes in the rural area and retirees families at an equal distance from Derry and Strabane.

The availability of existing Road and bus links make Artigarvan an attractive place to develop housing

The land indicated will provide flexibility for the future growth of Artigarvan

The provision of additional housing land in Artigarvan village will provide an essential geographic balance to the policy instead

of concentrating most housing of the district in Strabane and Derry

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 easily available in Artigarvan

My client as stated before has proven a track record of building quality homes at a affordable price, such developers are

essential for villages such as Artigarvan to flourish. Site flexibility and choice in these small towns /villages are essential to allow growth and ensure local schools and business are supported.

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

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Section N: Draft Equality Impact Assessment (EQIA)

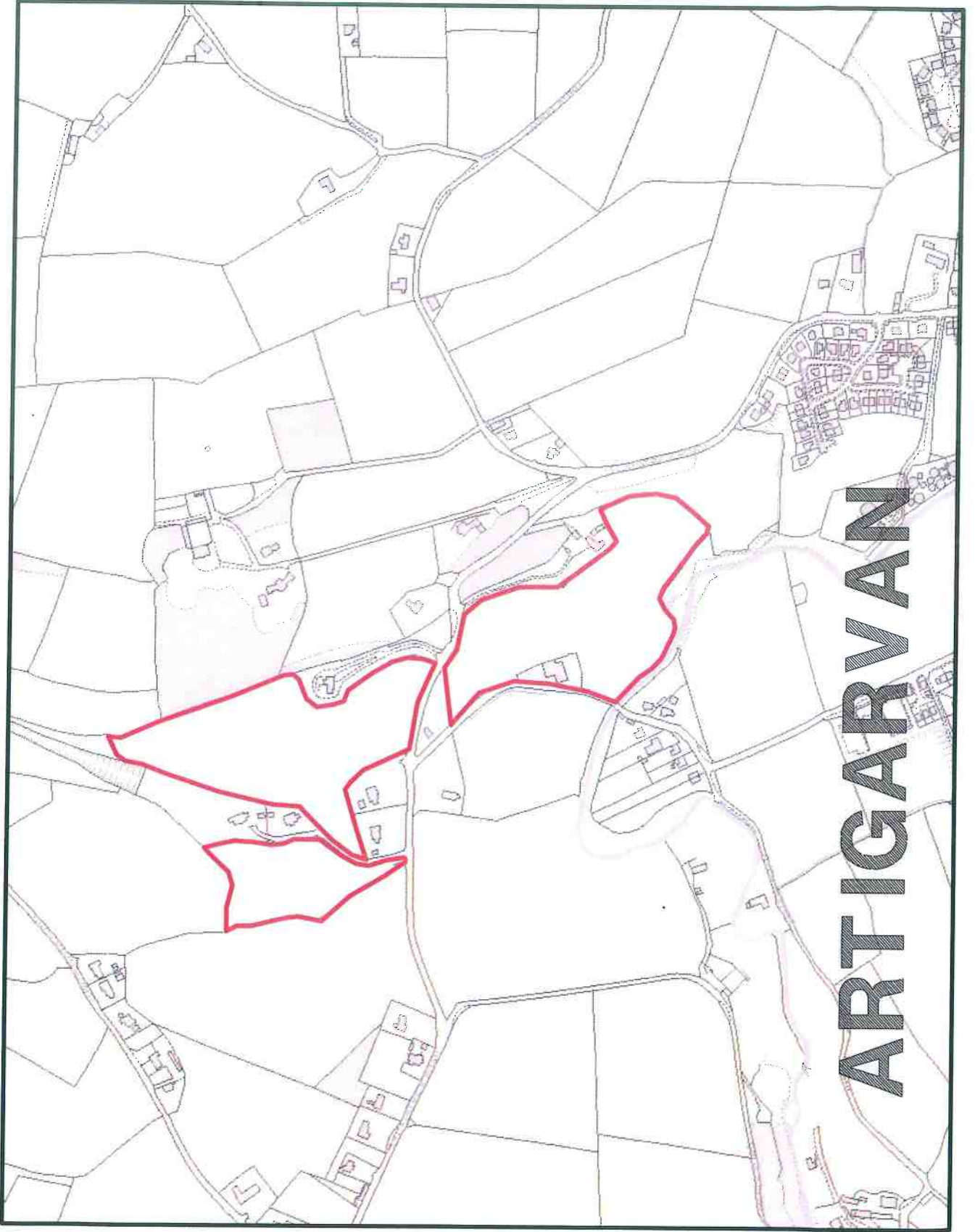
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ARTIGARVAN

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)
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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)

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Postcode (Required)

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Last Name (Required)	CURLYHILL DEVELOPMENTS
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Title / First Name (Required)	DESMOND
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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.

N/A

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

Section I: Unsound

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Consistency tests

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(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 test(s) you have identified above. Please be as clear and concise as possible.

Local Development Plan (LDP) 2032- Drumahoe

The housing policy is unsound in that proper consultation has not taken place with landowners, local developers and residents in this area of Derry City.

Proper consultation and discussions are required to ascertain what housing need is required

My client lands as indicated are required to provide an attractive area for housing expansion for Drumahoe

Drumahoe is well placed to provide an attractive home for young people and retirees families from the surrounding rural areas and the surrounding urban area

My client is a local developer who has a proven

track record of providing homes for families in Strabane and other villages. The land identified would be developed immediately and the dwellings delivered in record time.

Derry City and Strabane District Council need to discuss with local developers to help understand the difficulties faced in providing modern homes.

The availability of existing Road and bus links make Drumahoe an attractive place to develop for housing

The land indicated will provide flexibility for the future growth of

Drumahoe

The provision of additional housing land in Drumahoe will provide an essential geographic balance to the housing policy instead

of concentrating most housing of the district in Strabane and Derry

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 Drumahoe

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

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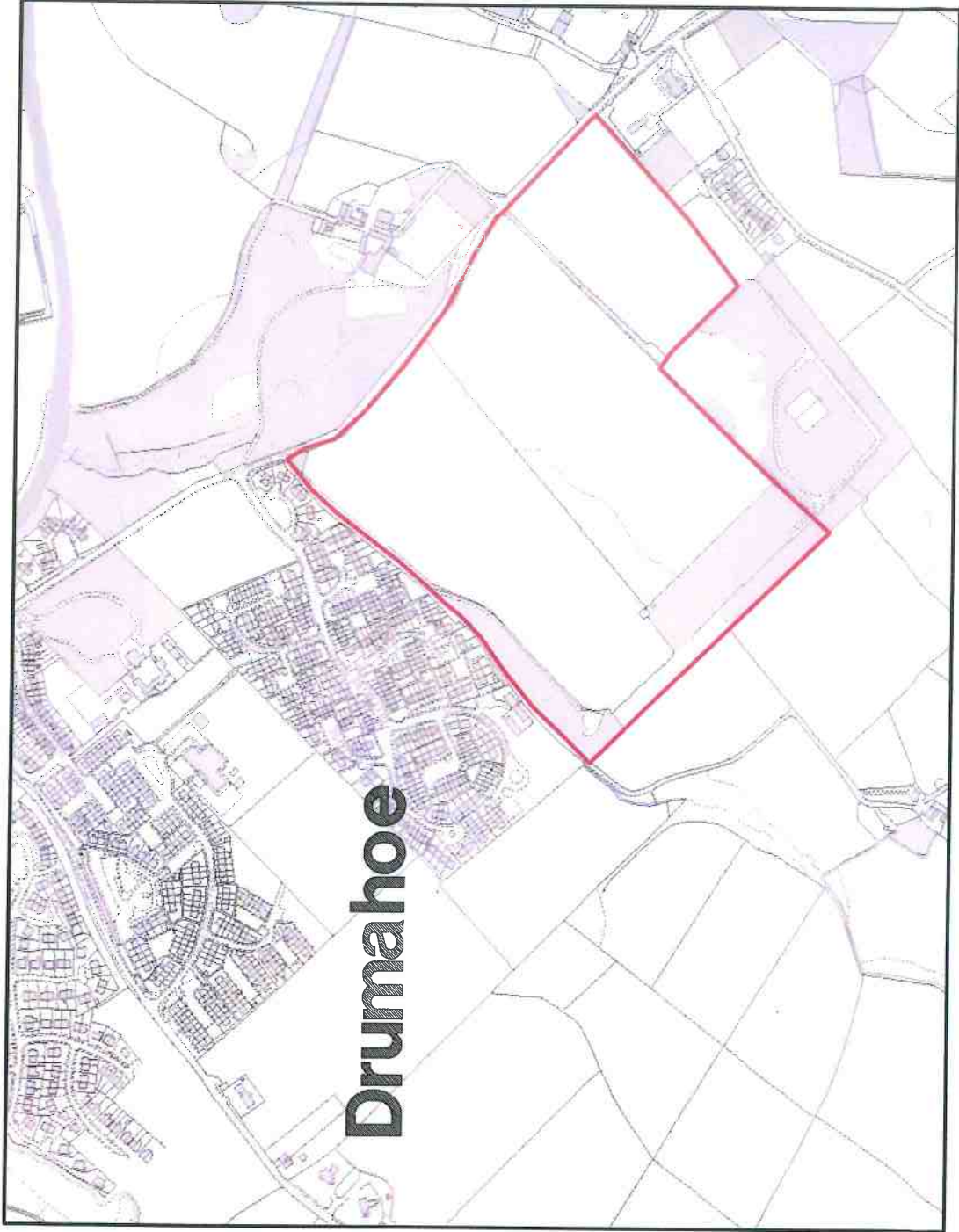
Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

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.



Drumahoe

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

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 for further details on the IE procedures.)

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)

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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.

NA

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 landowners, 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.

My client lands as indicated are required to provide an attractive area for housing expansion for the village of Bready

Bready is well placed to provide a home for young and retirees families at an equal distance from Derry and Strabane.

The availability of existing Road and bus links make Bready an attractive place to develop

The land indicated will provide flexibility for the future growth of Bready.

The provision of additional housing land in Bready will provide an essential geographic balance to the policy instead of concentrating most housing of the district in Strabane and Derry

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 Bready

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


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Section M: Draft Habitats Regulation Assessment (HRA or AA)

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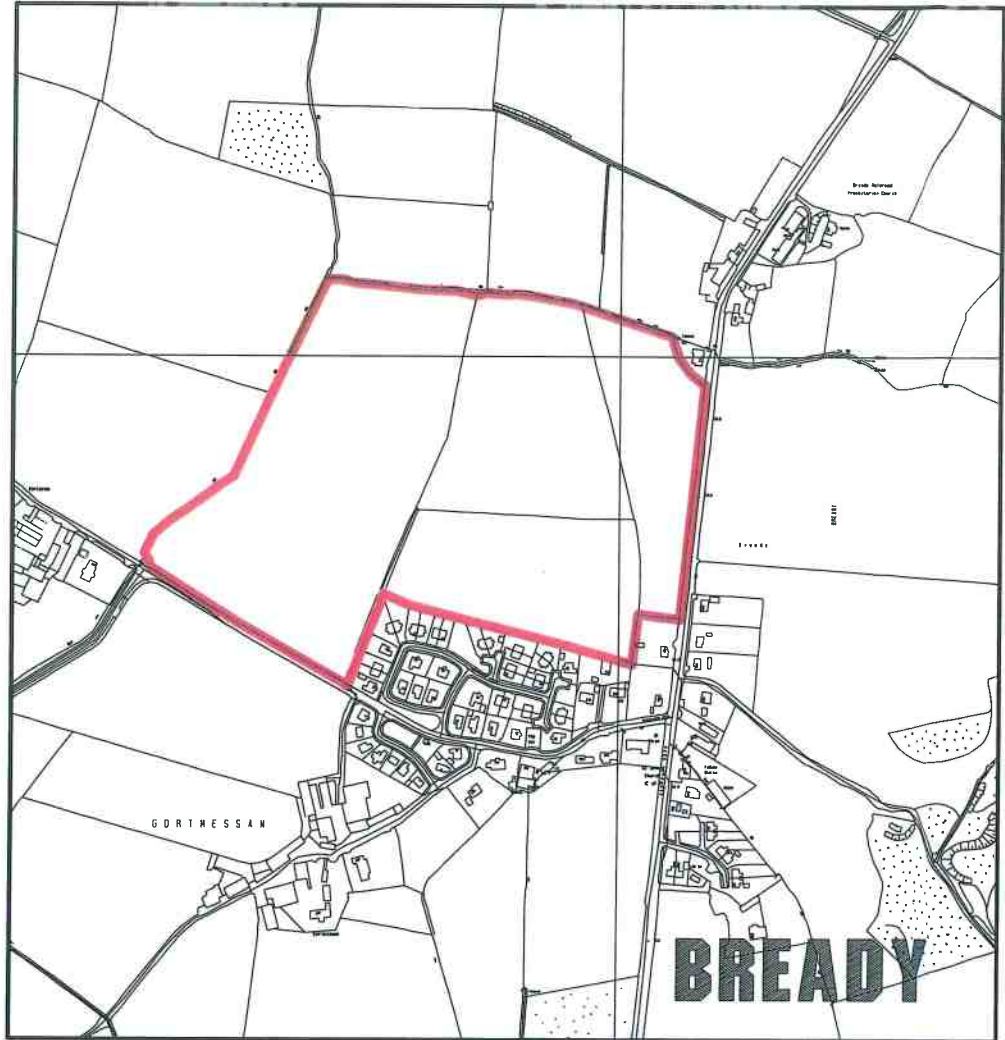
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Please only tick one

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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 E.

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Your Job Title / Position (Required)

Organisation / Group Address (if different from above)

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Postcode (Required)

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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

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Title / First Name (Required)

Last Name (Required)

Organisation / Group Address (if different from above)

Address (Required)

Town (Required)

Postcode (Required)

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- Agent Client Both

Section F: Soundness

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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.

N/A

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

Section I: Unsound

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Procedural tests

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Consistency tests

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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- Donagheedy, County Tyrone.
The housing policy is unsound in that proper consultation has not taken place with landowners, local developers and residents in this area of Derry City and Strabane District Council. Proper consultation and discussions are required to ascertain what housing need in this rural area. My client lands as indicated are required to provide an attractive area for housing expansion for the village of Donagheedy.
Donagheedy is well placed to provide a home for young and retirees families from the surrounding rural area. The availability of existing Road and bus links make Donagheedy an attractive place to develop for housing. The land indicated will provide flexibility for the future growth of Donagheedy. The provision of additional housing land in Donagheedy will provide an essential geographic balance to the housing policy instead of concentrating most housing of the district in Strabane and Derry.
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 Donagheedy.

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

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/

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/

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/

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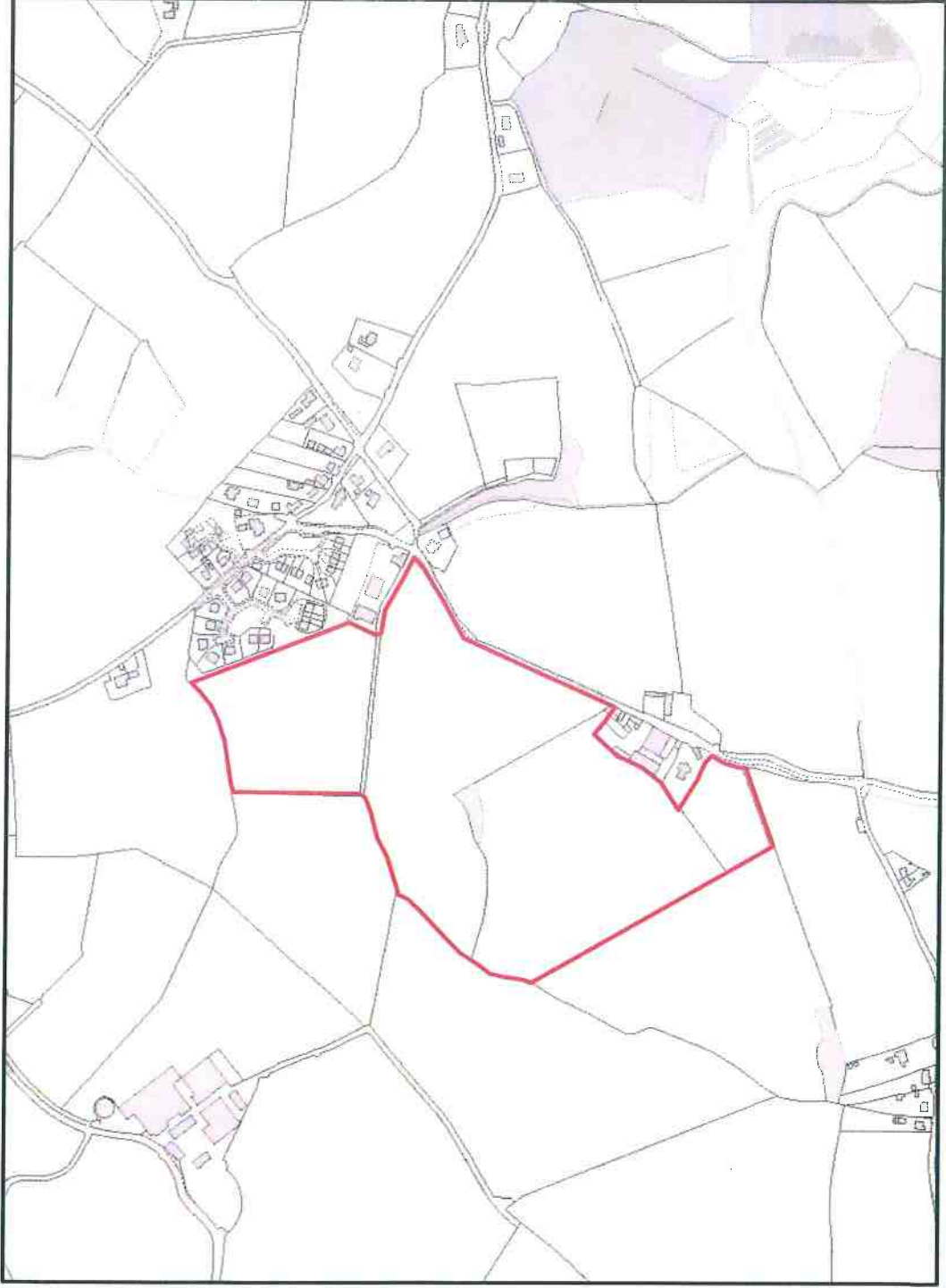
Section O: Draft Rural Needs Impact Assessment (RNIA)

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/

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

Donagheady, County Tyrone.



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

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)

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)	The Three Rivers Project.
Last Name (Required)	
Organisation / Group Address (if different from above)	
Address (Required)	28
	LECKPATRICK ROAD
Town (Required)	ARTIGARVAN
Postcode (Required)	BT783AE
Email address (Required)	

On completion, please proceed 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)	

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

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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.

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.)

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- to be addressed by the PAC C1. Did the Council take account of the Regional Development Strategy?
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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.

The local area plan is unsound in that my client lands as indicated are excluded from the town centre. My client's lands are also indicated as being outside Strabane-limit of development (see boundary map attached.)
The local area plan has not properly considered the current live planning approvals on my clients land.
My clients must be located within the town centre to offer flexibility for the future growth of Strabane. The inclusion of my clients land within the town centre will seek to recognize the natural area for expansion of the existing commercial core towards the west of Strabane town centre. The proposed restriction of development will stymie Strabanes natural development. The inclusion of my clients land will allow the river frontage to be developed and will present Strabane as a progressive dynamic town that plays a major role in this part Northern Ireland.
The town centre expansion on my client's lands will facilitate the provision of major landmark projects and showcase Strabane as a progressive forward looking regional town that is open for business.
For the past hundred years, Strabane has been artificially cut off from its natural hinterland in Donegal. My client lands prove an attractive location for local and international firms to locate to.
The Local area plan is fundamentally unsound in that this historical impediment too development 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 the plan fails to properly recognise 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 Lifford, Sion Mills, Ballymagory Clady and Artiganvan its population is much larger than Enniskillen and equal in number to Omagh and Letterkenny.
The area plan will need to recognise that Strabane is very well placed (A gateway to and from the Republic of Ireland) to facilitate the opportunities presented 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.

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 within the town centre 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 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)

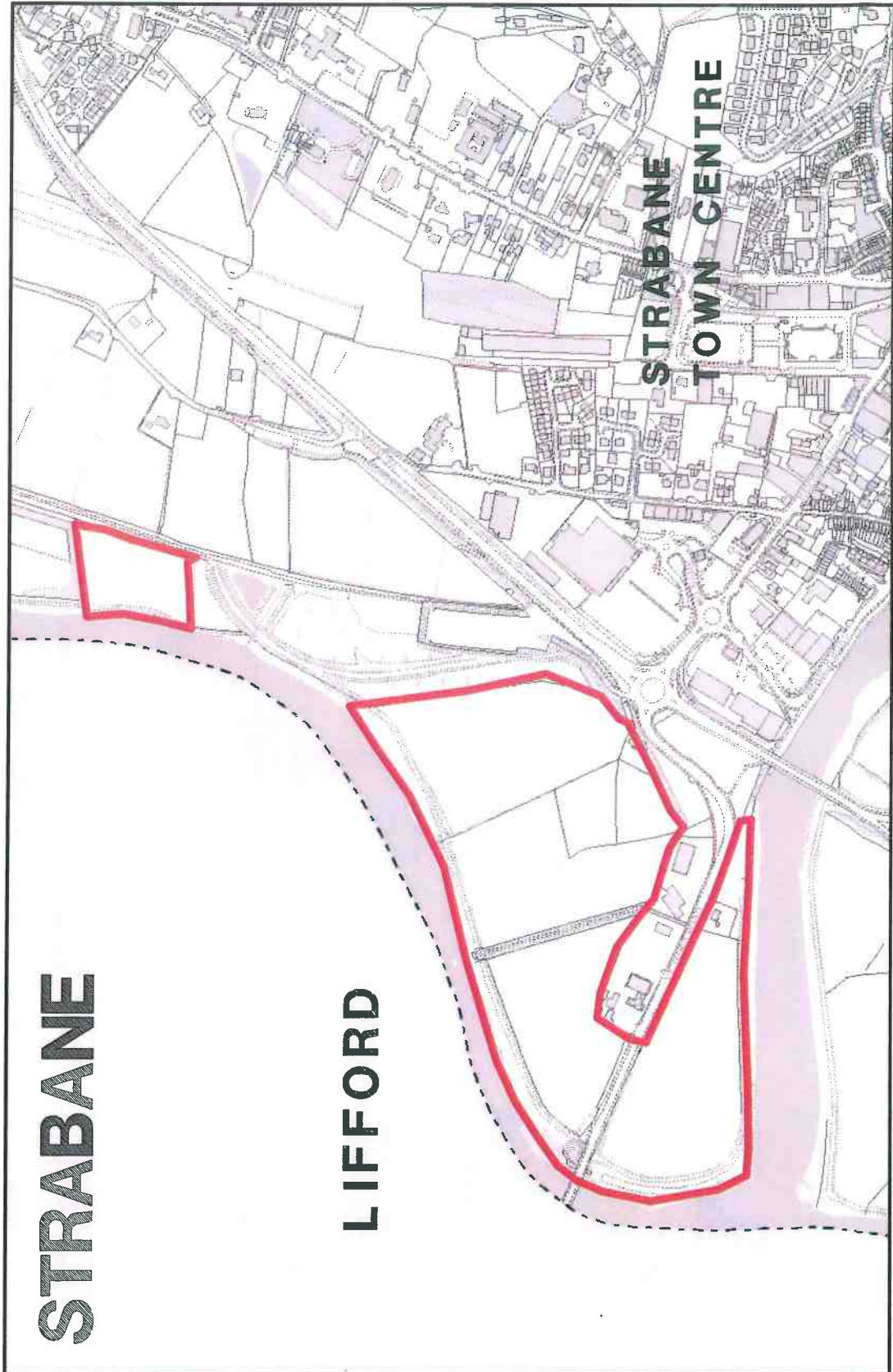
If you have any comments or opinions in relation to the Draft Equality Impact Assessment (EQIA) report of the LDP draft Plan Strategy, please submit them below or by email to LDP@DerryStrabane.com. If sending by email, please clearly state that your comments are in relation to the EQIA.

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



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