

From: Brian Kelly <brian.kelly@turley.co.uk>
Sent: 03 February 2022 17:41
To: Local Development Plan
Subject: Consultation on draft LDP Plan Strategy (Schedule of changes)
Attachments: 220203 CL DCSDC LDP (various).pdf; 220203 CL DCSDC LDP (Apex Housing Association).pdf

Consultation on draft LDP Plan Strategy (Schedule of changes)

Dear Plan Team

Please find the attached representations. Grateful if you could confirm receipt.

Kind regards

Brian Kelly
Director

Turley

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3 February 2022
Delivered by email

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

Dear Sir/Madam

LDP DRAFT PLAN STRATEGY - DPS SCHEDULE OF PROPOSED CHANGES

REFERENCE: LDP-PS-REP-48

Further to the Council's publication of proposed changes to the LDP draft Plan Strategy, this response is made on behalf of Apex Housing Association.

This consultation on proposed revisions to the draft Plan Strategy is welcomed where it demonstrates the Council is responding to the previously submitted representations. The following are comments on the proposed changes, highlighting specific issues that are likely to affect the soundness of the LDP Plan Strategy.

These comments should be read alongside the original representation to the Derry City & Strabane Draft Plan Strategy reference LDP-PS-REP-48.

Growth Strategy & Policy HOU 1

We disagree with the revised housing strategy and in relation to approach to Phase 3 Zonings. The policy, as previously worded, provided for exceptional circumstances with flexibility within the policy to address housing need. The proposed changes do not address the previous weaknesses identified by Turley or the resulting soundness issues with LDP Plan Strategy.

In circumstances where the Council decides to retain the Phase 3 Zonings mechanism, clarification would be required on the implementation of the policy. There should be an explanation of 'extreme localised need' and guidance provided on the extent of the areas to be assessed for need, acknowledging that social housing tenants tend to be less socially mobile.

Based on the above, we would invite the Council to further consider the original draft policy, providing flexibility where an exceptional case is demonstrated. It is respectfully submitted that the policy introduces additional restriction that could further constrain the delivery of homes in those areas with the greatest need.

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Yours sincerely

Brian Kelly 
Director

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