Hannah Flynn

Subject: FW: Response to changes to LDP

Attachments: Response to prposed changes to LDP Febraury 2022.pdf

From: Peter McCarron Sent: 03 February 2022 09:05

To: Lindsay McCorkell; Local Development Plan; Peter McCarron

Subject: Response to changes to LOP

Hi

please find attached my response to the continued LDP consultation.

regards Peter

Peter McCarron February 2022

Representation regarding proposed amendments to LDP.

I would like to comment on some of the proposed changes to the LDP.

- 1. PC 105: In para 13.10 re-instate/keep the phrase *proposed for declaration*. We cannot risk losing valuable sites which have been recognised as such and are due for designation, but the process is not yet complete.
- 2 PC 106: In para 13.11 re-instate/keep the phrase "or are to be", for the reason mentioned above.
- 3. PC 107: In para 13:12 re-instate/keep the phrase "or is proposed for designation".
- 4 PC 181: Seems sensible. The highest level of protection must be afforded to trees. It is right that it should not be easy to interfere with trees subject to TPO. The presumption must always be to protect them. Similarly the presumption should be to keep existing hedgerows and trees more widely.
- 5. I would also like to make a general point regarding Prehen Woods. I have heard that there may be a submission to this process requesting that land near Prehen Woods be re-zoned for housing. I cannot find that submission on the website, so I cannot check this. Prehen Woods is a very valuable site. The LDP must not be changed in any way that would facilitate the rezoning of land near the woods for housing. Thousands of houses are proposed and/or being built at several locations around the city. There is no alternative Prehen Woods. Rather than chipping away at the edge of the wood it should actually be allowed to expand into surrounding areas.
- PC 186: It is right that AHLIs are afforded the highest level of protection. The presumption should be against development as far as possible. The bar for developments in such areas should be set very high as befits the status of AHLI. Such areas will obviously attract attention from developers as by definition they are beautiful areas. However part of the reason they are beautiful areas is because they have been successfully protected in the past. Nothing that risks losing such designations should be permitted.
- 7. As a general comment I would ask that just because no counter-representation may be received to a request for changes which have the potential to negatively impact on our environment, it should not be assumed that no-one would raise a concern if the request was more widely known. Nor should the request automatically be accommodated. I'm sure this is already the case, but it is an important principle I feel is worth stating.
- 8. My final point is related to the last point. The LDP process is very complicated and detailed. It is not possible for an individual like me to keep up with it or even understand the implications of some of the detail and proposed changes. I suspect most people don't even know it is happening despite the consultations. I, like every other resident of the District, have to trust that the Council will produce a plan which takes into account the situation we find ourselves in regarding climate change and loss of biodiversity and wild spaces. Provision of jobs and housing is of course vital. These aspects seem relatively well covered to me anyway. Nothing in the LDP should facilitate opportunistic proposals by parties looking to gain by slight changes to the plan, e.g. rezoning small areas (or indeed

large areas) of valuable habitat for industry or housing. Indeed the opposite should be the case. Areas of valuable habitat in areas otherwise zoned for development should be afforded specific protection.

Thank-you for this opportunity to comment.

Peter McCarron.