

Response ID ANON-ZKXW-M313-R

Submitted to Local Development Plan 2032 - Representations form for the LDP draft Plan Strategy and Associated Appraisal / Assessments
Submitted on 2020-01-17 02:08:30

Local Development Plan Privacy Notice

Your Details

Name

Name:

Peter O'Brien

Email Address

Email:

[REDACTED]

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

Organisation

Did you respond to the previous LDP Preferred Options Paper?

No

Organisations

Organisation / Group Name

Your Name

Your Name:

Culmore Land and Property Ltd

Email Address

[REDACTED]

Your Job Title

Your Job Title:

Director

Organisation/Group Address

Address Line 1:

[REDACTED]

Address Line 2:

[REDACTED]

Town/City:

[REDACTED]

Postcode:

[REDACTED]

Soundness

Type of Procedure

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

Written

Is the draft Plan Strategy Sound?

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

Sound Strategy Comments:

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

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

Is the draft Plan Strategy Unsound?

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

CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.,
CE3. There are clear mechanisms for implementation and monitoring.

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

11 Transport and Movement

Relevant Policy number(s):

TAM 4 Protection for new transport schemes

Relevant Paragraph number(s) :**District Proposals Map :**

Please give full details of why you consider this part of the LDP draft Plan Strategy to be unsound, having regard to the tests(s) you have identified above. Please be as clear and concise as possible.

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

Whilst the proposed strategy for Transport and Movement is not altogether unsound, the possible inclusion in the emerging Plan, yet again, of the Culmore Road Proposal, which has been indicated in the supplementary and Evidence Based Papers prior to the Draft Plan Strategy, would indeed be UNSOUND.

This 40 year-old-plus road proposal cuts through a portion of strategically located remaining white lands adjacent to existing residential **development**. Potential development on these lands has been hampered for this period because of this unnecessary constraint. To avoid continued sterilisation of part of these lands, this proposal should be abandoned at the earliest opportunity.

This road proposal was first mooted in the early 1970s and carried forward in subsequent Plans to cater for anticipated heavy traffic for the huge 44 hectare industrial zoning, none of which was ever occupied, apart from the local meat factory which was in occupation before the zoning.

The present zoning, IND 1 Culmore, is unique within the Derry area in that it has had zero uptake since its inception, not a single entity has **wanted** to locate here. Although there was no uptake in the smaller industrial zoned area in the same location in the previous Londonderry Area Plan 1981-96, and in the preceding one before that, it was decided, somewhat optimistically, to increase the size and "rationalise" the zone for the DAP 2011. The logic of the Road Proposal was also carried forward.

Although only at Plan Strategy stage, it is clear that the thrust of economic activity and zoning will be located more strategically within the district in existing and new areas with better accessibility and connectivity, and clustered with similar and complementary business types. Economic activity will be **channelled** towards the larger existing successful sites, near to the A5, A6 and Buncrana rd and at locations like Fort George and Ebrington.

Given the evolving change of economic activity and future needs of business, as well as more attractive opportunities elsewhere in the district, it is most unlikely that any large scale operation or numbers will locate at Culmore. The need for a bypass to cater for a significant increase in traffic will not arise.

The present prioritised roads infrastructure already in the pipeline, the A5,A6 and Buncrana rd, along with the ambitious plans for possible orbital linkages and a third bridge for the future, will consume regional budgets well beyond the Plan period. Any major expenditure on this area of Culmore, "which leads to the small town of Moville", will be very low on the list of priorities of budget allocation.

The Dap 2011 states that " Developers of these industrial lands will be required to provide the by-pass and other associated roadworks". The hope that a sizeable industrial entity or entities would want to locate here and could finance a by-pass is completely out of touch with reality.

Therefore, the high improbability of private developer funding, lack of affordability and deliverability of the Road Proposal at Culmore render it an unrealistic inclusion in any Development Plan.

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

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

The existing 44 hectare industrial zone in Culmore should be re-zoned and replaced with a suitably scaled, type-classified LUPA identifying a more attractive, sustainable general economic development area which could appeal to business start-ups, smaller enterprises or medium sized logistics and storage businesses appropriate for the semi-rural and residential location.

The Road Proposal should be abandoned because of this diminished need, its realistic deliverability and as a result of the major road improvements and provision of the filter lane at the Foyle Bridge roundabout, which has radically alleviated the traffic congestion on Culmore rd. travelling towards the city.

As the transitional period prior to the adoption of the LPP may be up to 5 years away, which would leave only 7 years left within the Plan period, interim transitional arrangements should be adaptable to take account of the weight of emerging evidence and likely thrust of policy direction as time progresses. Decision making within Development Control should not always have to be postponed for full adoption of the LPP.

Sustainability Appraisal

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

Sustainability Appraisal :

Draft Habitats Regulation Assessment (HRA or AA)

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

Draft Habitats Regulation Assessment (HRA or AA):

Draft Equality Impact Assessment (EQIA)

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

Draft Equality Impact Assessment (EQIA):

Draft Rural Needs Impact Assessment (RNIA)

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

Draft Rural Needs Impact Assessment (RNIA):