

Response ID ANON-ZKXW-M37G-J

Submitted to Local Development Plan 2032 - Representations form for the LDP draft Plan Strategy and Associated Appraisal / Assessments
Submitted on 2020-01-25 14:34:10

Local Development Plan Privacy Notice

Your Details

Name

Name:

Kevin Doherty

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?

Individual

Did you respond to the previous LDP Preferred Options Paper?

No

Individuals

Address

Address Line 1:

[REDACTED]

Address Line 2:

Town:

[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:

No

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.,
CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.

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

Relevant Chapter Numbers

Relevant Chapter Number(s):

16

Relevant Policy number(s):

HOU 1-9

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:

Dear sir/madam

I am writing in reference to the Local development Plan 2032 Draft Plan Strategy. I believe the current draft plan has elements & strategies within it that will hinder & prevent the aims that it is attempting to achieve by playing a supportive role in the development of this council area.

It is my believe that the LDP 2032 should be leading in the way in rebalancing NI development away from East of the province but to the West, similar to policy of regional distribution currently being undertaken in the Republic of Ireland, where regional cities e.g. Cork & Galway are being promoted & encouraged by central government to be developed. The LDP 2032 is basing its figures on a concentration of development in the greater Belfast area. To take the housing element of the plan, according to the HGIs figures this council area should only receive 4.8% of future housing allocation for this province. None of the figures used by the LDP have accounted for the many years of underinvestment, have completely ignored the influence of Co Donegal on the council area & the effects of the 'troubles' on the council area. This is an opportunity for this council to play a constructive role in rebalancing & developing this region.

I believe the section 16 Housing in Settlements & in the Countryside clearly display's the lack of ambition & restrictive elements of the LDP 2032.

16. Housing in Settlements & in the Countryside

The LDP state in 16.2 that Derry City is the principal urban centre & Strabane plays a supportive role, I believe this underestimates the role of Strabane within the region, given its geographical location to other strategically important centres such as Letterkenny, Ballybofey & Omagh, this importance will increase with improvements in the regions infrastructure. It would be a failure for the LDP not to increase the strategic importance of Strabane.

Part 16.4 clearly shows the lack of ambition & restrictive element of the plan by stating that the majority of new strategic housing growth will be delivered through existing housing sites within the existing built-up areas.

For example Strabane currently does not have an oversupply of housing land, it in has effect a chronic shortage of housing land, due in no small part of the history of not having a planning strategy for the area for over 19 years & counting. A fine example of discriminating practices in this region. This has provided for an uncompetitive housing market & one that lacks the range of housing that satisfy's the need of the town.

Under the existing Strabane Area Plan 1986-2001 Strabane had dedicated housing zones comprising of 105ha. Strabane has exhausted the current lands zoned for housing development that can be developed. Due to the current lack of zoned land Strabane town is not benefiting from economic development of housing construction that it should be for an urban centre of its size.

Again in Part 16.7 the LDP is using HGI figures to base its decisions. Even taken the LDP uplift to 9000 dwellings represents only 10% of the predicted housing requirements of NI. A figure that I believe is too low for the ambitions of this area.

Part 16.8 directs how this low housing figure is to be distributed. Again I believe this distribution undervalues Strabane importance to the region & does not take account of Strabane importance to the remaining council area outside of Derry & its strong historic links to the East Donegal area which has always been part of its hinterland as a market town. One may argue that Derry City is robbing Strabane of its housing allocation to bolster its own allocation.

Part 16.11 discusses the LDP role of managing the supply of housing land. However I believe the LDP should allow a greater importance of market forces to determine the level of housing required, as private developers have an important role to play in delivering the areas housing requirements.

Part 16.12 At least the section recognises the current limitations of the land available in Strabane, however as part of my attached analysis I believe the LDP grossly ignores the chronic shortage of dedicated housing land.

Part 16.13 Again states the current housing land is sufficient for the low number of housing units required. I believe this wrong for several reasons. It is wrong to count urban capacity sites, whiteland & windfall allocations in the calculations, but should be based on lands selected specifically for housing, any housing arrived from the other areas should be regarded as additional/bonus housing derived by market forces. In specifically looking at the figures in table 9 for Strabane commitments on zoned housing land reads for 20ha however by analysis I believe only 10ha is available as the reaming 10ha has access issues, the other columns for commitments outside zonings, urban capacity & whitelands in Strabane given the lack of current housing capacity that these urban & Whiteland indeed I find it fancifully some of the figures for urban capacity & whitelands in Strabane given the lack of current housing capacity that these urban & Whiteland have not been developed to date, surely this would indicated that they are not suitable for housing not to mentioning supplying 1200 housing units. Given that Strabane low allocation is only 800 units until 2032, this indicates that Strabane requires no dedicated housing supply until 2040!!!

Part 16.14 I would repeat that I believe that the level of housing required has been grossly under calculated. I would argue that the management of the housing supply should be largely managed by the free market not the public sector as it will be the private companies that will largely deliver the housing required.

Part 16.15 & Part 16.16 It would be more prudent for the LDP to aim for a higher supply of housing & have an adequate overspill of housing units, given the length of time it takes to undertake a local Development Plan especially when one considers that the Strabane Area Plan will be twenty years out of date.

I shall now address the policies that have been promoted by the LDP for Strategic Housing allocation

HOU 1

I again reiterate that the numbers of housing units to be provided are too low for this region.

Where is the mechanism for private developers to apply for housing zones to be rezoned & are we stating that only housing associations are able to supply housing, what about housing stress in the private sector.

Are economic circumstances not an important factor to consider when zoning & unzoning lands. No appeals mechanism for lands that lose zoning or changed to phase2.

I believe it is wrong to assume a strong presumption against development of greenfield sites & that greenfield sites undermine the LDP strategy & I would argue that greenfield sites have an important role to play in the housing supply & housing market. It would be wrong to apply a blanket ban on greenfield sites & to assume that white land & brown field sites will supply the housing requirements, to take Strabane for an example if any sites as stated previously given the lack of current housing capacity that these urban & whiteland have not been developed to date under a twenty year out of date Area Plan, surely this would indicated that

they are not suitable for housing not to mentioning supplying 1200 housing units.
HOU 2

I believe the best way to encourage brownfield sites is to develop specific policies that assist their development such as higher densities, exceptions from open space requirements, financial assistance in the cleaning of the sites, property rates reduction etc
HOU 5, HOU 6 & HOU 8

The policy of forcing house builders to provide a portion of the development to affordable housing, will have the effect of increasing the cost of providing housing, house builders will have to recuperate the costs by increasing the price of the other units, it is effectively taxing housing which will lead to a greater demand for affordable & social housing therefore putting greater demands on the local authorities to supply more units. It will only make the chances of people owning their own home less likely due to the increase in house prices. This policy is allowing local authorities to abdicate their duty by not constructing their own housing units. It will only create a vicious cycle of reduced house construction therefore increasing the demand for social & affordable housing.

This type of policy will lead to further divisions in communities by forcing a smaller number of private home owners to pay more for their homes to allow for free housing for a greater number of members of the community who will be denied the opportunity of purchasing their own home. We need to encourage a society where everyone contributes.

I would argue that the market place should be allowed to determine the housing mix, type, size & tenure.

The policy needs to be careful in not discriminating against small building companies & favouring large house builders by following policies that increase upfront costs of housing development, increase development costs by providing large open spaces, developer contribution charges, insisting on uneconomical quality standards. Small builders are a key component of the housing market ensuring a competitive market place.

This policy should be encouraging policies to lower the costs of house construction through increased supply of housing land, lowering developments costs, not demanding uneconomic quality standards, encouraging a competitive market & tax reliefs for specific type of housing or in particular land areas, this will lead to mixed quality affordable housing developments & importantly a competitive market place where both private & public housing building can exist.

34. Developer Contributions & Community Benefits

I total disagree with this policy, it is effectively a tax on housing development which only discourages housing building & ultimate increases the cost of housing dwellings. The policy should be encouraging house construction not prohibiting it. It is the local authorities duty to provide the necessary infrastructure & service provisions. If the policy where to encourage greater housing building especially owner occupied or rented dwellings it will lead to a greater tax income to local authorities through greater land property rates revenue.

I hope the Local Development Plan take on board my comments & amended there current proposals to reflect the issues I have raised especially

- The number of housing units required
- The importance of Strabane to the region
- The allocation of housing units for Strabane
- Greater influence of the private sector on housing requirements
- The presumption against greenfield developments
- Imposing housing affordable quotes on housing developments
- Increasing development cost
- Promoting developer contributions

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.:
See above

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):