

Chloe Duddy

From: Gemma Jobling <gemma@jpeplanning.com>
Sent: 27 January 2020 16:05
To: Local Development Plan
Subject: Fwd: RE: Land at Strahans Road, Strabane
Attachments: Braidwater _Response to DCSDC - DPS_Strahan Road.pdf

Follow Up Flag: Follow up
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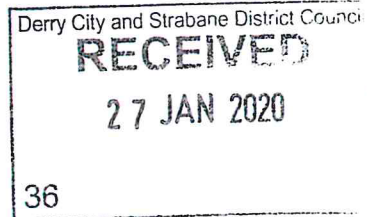
Dear Sir/ Madam,

Please find attached a representation to the Draft Plan Strategy on behalf of our client Braidwater Limited.

We trust his is in order.

Kind regards

Gemma



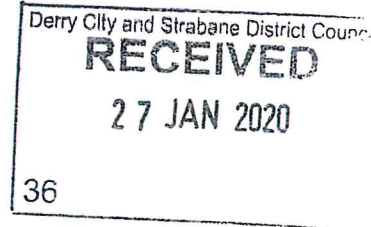
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Derry City and Strabane District Council
Development Plan Team
 Planning Office
 98 Strand Road
 Derry
 BT48 7NN



Dear Sir/ Madam

Date: 24th January 2020

Re: Response to Derry City and Strabane District Council Local Development Plan 2032- Draft Plan Strategy

Your Ref: [Draft Plan Strategy]

We write on behalf of our client, Braidwater Ltd & to make a submission in respect the Derry City and Strabane District Council ("DCSDC") Local Development Plan ("LDC") Draft Plan Strategy ("DPS").

Our ref: 4

The submission considers the policies within the DPS, relevant to our client, having regard to the necessary soundness tests referenced in the Council's document 'Guidance Notes on the Tests of Soundness and Submitting a Representation' and Development Plan Advice Note 6. Our client has a particular interest in the Spatial Growth Strategy and Settlement hierarchy and the allocations for housing, specifically in respect of the allocation for the town of Strabane. In addition to this we draw your attention to specific lands at Strahans Road, Strabane, which we have identified as being suitable for inclusion within the settlement development limit of Strabane for a range of uses including principally housing, with associated recreation space.

Our client welcomes the Plan Vision to make the District a thriving, prosperous and sustainable area. We further welcome the acknowledgment that Strabane is both a main hub town and a gateway, both of which classifications promote growth to strength its strategic position.

Our client is therefore particularly supportive of the following Strategic Objectives;

- *Spatial and Cross-Cutting Objective*
 - i) *To put in place the Council's sound Planning framework of policies and land uses, aligned with the Strategic Growth Plan and taking account of regional priorities, that will deliver high-quality, sustainable developments across the City and District to 2032, contributing to climate-change prevention /adaptation, protecting the environment and meeting the needs (including health, well-being and amenity) of residents and visitors.*
 - (iii) *To further develop and grow Strabane as the main hub, as a prosperous and regenerated town linked to Derry, Tyrone and the rest of the North West, particularly benefitting from its close proximity to Lifford, a key administrative centre for Donegal County. Strabane will be the focus for employment, administration, shopping, health, education and commerce for its local and cross-border hinterland.*
- *Social Development Objective*
 - a) *To provide for approximately 9,000 new, quality homes by 2032, in a balance of private and social housing, in a variety of formats*

designed to meet the needs of families, including single-parent families, small households, the elderly and disabled and single people, at sustainable locations accessible to community services, leisure and recreational facilities, for those people with and without a car. Housing schemes in Derry city, Strabane and the smaller settlements will require imaginative and innovative design, including mixed use schemes, and possibly mixed tenure, to ensure that they link into the existing urban fabric.

In general the DPS Growth Strategy appears to be soundly based to growth DCSD as the second growth area in the region and therefore is in support of the Growth Strategy for Derry City and Strabane set out at Section 5, Part B of the DPS. Our client agrees with the rationale for the LDP Growth Strategy as set out at paragraphs 5.8-5.14 and agrees that's the evidence bases promotes a higher level of growth than envisages through the RDS- HGI figures in order to reflect to the overarching objectives of the DCSDC Strategic Growth Plan.

Our client is generally supportive of the Overall Settlement Hierarchy and agrees with the objective of focusing growth in the main hubs of Derry and thereafter in the main town of Strabane. Our client agrees that Strabane should be promoted as a Main Town, as per the RDS and to do so requires sufficient growth to achieve a 'critical mass' to sit below Derry but must be of a sufficient size to limit other nearby smaller settlements from competing with it.

In light of this our client does have concerns with soundness of the spatial growth allocation as outlined in Part D of the DPS.

Indicative Allocation of Housing to Settlements

While our client welcomes and agrees with the proposed housing growth figures outlined at Part B of the DPS, it does have some concerns with the Indicative Allocation provided at Table 8 in Part D of the DPS and with the allocation of land for housing through the zoning of land within the settlements as referred in section 16 of the DPS.

In respect of Allocation at Table 8, our client is concerned that this will enable a greater growth in the countryside (and associated small settlements) to the detriment of the Strabane allocation. The Countryside & Small Settlement Allocation of 1580 units is significant, accounting for almost 15% of the total growth. It is considered this is disproportionate to the population demographic and appears to conflict with the objective of focusing growth in urban areas as re-states at 5.1 of the DPS:

a hierarchy of defined settlements across the District – focussing on Derry city and Strabane town with a vibrant rural area including local towns, villages and small settlements,

Our client is particularly concerned that the housing percentage allocation for Strabane, when considered in the context of the total quantum allocated for the small towns, villages, small settlements and countryside is disproportionately low. It is therefore concerned that this allocation will not achieve the DPS's Spatial and Cross-Cutting objective at page 45 of promoting Strabane as the main hub.

As Strabane is a viable commuter town, future improvement in transport links to Derry and Lifford, the household demand for Strabane is likely to increase and should have been considered and reflected in the housing allocation. Therefore in light of this our client has concerns as to whether the housing allocation distribution does fully reflect the Regional Development Strategy to focus growth in the main hub towns and whether it has taken sufficient account of policies for neighbouring Councils, in particular Lifford.

In summary the strategic objective to growth Strabane as a hub town is potentially compromised by allowing disproportionate growth in the smaller settlements /countryside, while the focus should remain in the urban centres. As conferred by the Regional Development Strategy 2035 (RDS), the role of the LDP is to "identify and consolidate the role and function of settlements within the cluster". The housing allocation therefore is integral to ensure that sufficient land is included within the Settlement Development Limits to maintain the function of villages as the main service centres for the surrounding rural hinterland.

In respect of the zoned allocation of land through Settlement Limits the client is concerned with the statement at paragraph 16.12 of the DPS that it considers there to be sufficient land within the existing settlement limits and does not foresee the need to extend the limits albeit this is deferred to the Local Policies Plan Stage. It is considered that in some settlements where there is a residual quantum of lands from Derry Area Plan 2011 zonings, this may be due to land not being released for development or due to other developmental constraints. Therefore failure to provide new land could compromise the delivery of housing in the plan period and is thus unsound. The Local Policies Plan needs to consider why previously zoned lands have remained undeveloped and ensure sufficient flexibility in this forthcoming plan to respond to this to ensure the overarching objective of housing is not compromised.

On this basis our client reluctantly objects to the following policies and submits they do not meet the tests for soundness:

➤ **Soundness:**

Object on the basis that this policy fails to meet Test C1 & C3 in that the allocation does not take account of policy and guidance issued by the department in the RDS and the Strategic Planning Policy Statement to focus growth in main hub.

Object on the basis that this policy fails to meet Test CE1 in that the counter allocation of consideration growth in the countryside is counter-productive to the Plan's objectives of promoting growth of Strabane as a main hub town.

Object on the basis that this policy fails to meet Test CE2 in that the allocation to the countryside is disproportionate to the Strategic Growth.

Object on the basis that this policy fails to meet Test CE4 in that the allocation is not reasonably flexible to deal with changing circumstances and specifically to support the role of Strabane as a hub town if additional lands are not included within the settlement limit (para. 16.12).

➤ **Remedy**

The Plan needs to be updated to increase the proportion of the Housing Allocation to the hub town of Strabane, to cement its roles as the second hierarchical settlement and to focus growth in the urban centres, as opposed to diluting this through disproportionate growth in the countryside / small settlements. An increase in the allocation should allow sufficient flexibility to respond to increase householder growth arising from increased employments and its role as a commuter town.

Proposed Site for Inclusion in Settlement Limit of Strabane

Our client does however welcome the recognition at 16.12 that in a small number of settlements including Strabane, where the housing land quantum is limited, there will be a need to identify a limited amount of additional land for housing, either through

selected Urban Capacity sites or a limited extension of the settlement limits. In this regard the Council are directed to the available lands at Strahan Road, Strabane which are suitable for development and are strategically located to positively contribute to the growth of this main hub town.

The lands delineated in Figure 1 below are located at west of Strahans Road, Strabane.



Figure 1 Overview of Lands available for development

The site provides a potential expansion opportunity for Strabane and is well located to tie into the existing built form of the settlement, while being strategically located along the main A5 roads and consequently these lands are particularly well suited to accommodate the future growth of this settlement in that;

- The lands immediately adjoin a residential area and would offer a logical expansion and rounding off to the settlement;
- The site adjoins the existing Holy Cross College and is will boarder the new Gaelscoil Ui Dhochartaigh School, which is proposed to be located in the south of the site as indicated on Figure 1. Therefore this is a logical expansion to provide homes close to schools and community services.
- A suitable means of access can be achieved from the A5 road, occupies a strategic position to development new homes for the town.
- The site is located away form the main river and not vulnerable to flood risk as with the east of the settlement.
- The site comprises gently sloping topography and would be well suited to providing housing;
- The site would offer an opportunity to create a more sensitive edge of settlement buffer, with the potential to create a landscaped buffer along the eastern edge of the site

- This site presents a tangible development opportunity to provide housing over the plan period.

We respectfully request our client's land is included within the Settlement Limit for Strabane. This offers a tangible opportunity to meet the future housing needs and offers a logical expansion of the existing settlement. Our client is committed to delivering development on this land and would ask the Council to consider the benefit of developing the lands Figure '1 for housing with enhanced open space.

Braidwater Limited would welcome the opportunity to remain involved in this process.

We trust this will be given due consideration, but should you require any further information please do not hesitate to contact this office.

Yours sincerely



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Director
Jobling Planning + Environment Limited