



Councillor Glenn Campbell
Sinn Féin



Nollaig 2018 / December 2018

A chara,

Re: Response to the LDP Draft Plan Strategy Consultation

I want to raise the following points in relation to the LDP Draft Plan Strategy Consultation.

Ref: HOU06 – Public Open Space in New Residential Developments (p.67)

I welcome the requirement to provide an equipped children's play area, as an integral part of the development, for residential developments of 100 units or more. I would also request that any new play areas are accessible by all, including children with disabilities. I would suggest that at least one piece of specialised/accessible equipment should be installed in all new play areas that can be used by a child using a wheelchair. I would also ask that if an existing development is to be extended, taking the total number of units to 100 or more, then this too will require provision of a children's play area.

Ref: HOU09 – Rural Replacement Dwellings (p.72)

I would support the view that, if a site has a curtilage, long established boundaries and there is other evidence of it being used as a dwelling (such as pictures, old maps, remains of walls, etc.), this should take precedence over a requirement for all external walls to be 'substantially intact'.

I would suggest removing the requirement for all external walls to be substantially intact. Rather, there should be a requirement for 3 walls or 2 walls visible from critical points as proposed in HOU11 (Redevelopment of a former site for dwelling).

Ref: HOU12 – Dwelling on a farm Business (p.76)

Whilst I agree with the requirement for a farm business to be active, I feel that the requirement to be active for a minimum 6 year period is too prohibitive. A period of 3 years would be more appropriate, as this would be less prohibitive but still sufficient to deter applicants from setting up farm businesses with the sole purpose of securing planning permission.

I also note that many farming transactions, such as purchases and rental income from conacre, are conducted informally. To facilitate this, there should be flexibility on the stated requirement for 'full accounts' (para 3.49 , p.77), with other evidence, such as herd and flock records, accepted as supporting evidence of farm activity.

Ref: HOU14 – Rounding Off and infilling (p.78)

Part 2 of the policy outlines that:

“Infilling will be permitted within a line of buildings where the proposed site is a small gap suitable to accommodate only one dwelling within an otherwise substantial and continuously built up frontage which will not detract from the rural character. For the purposes of this policy, a substantial and continuously built up frontage is a line of at least 3 buildings, each with their own defined curtilage.”

I want to record my opposition to restricting the infill development to 1 site (as opposed to a maximum of 2, as is currently the case under CTY 8 of PPS 21).

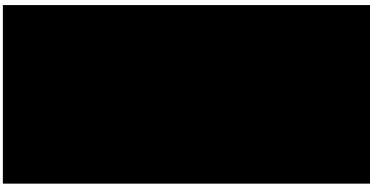
I also do not agree that, for an infill development to be permitted, each of the three relevant buildings should have their own defined curtilage. Clearly, a garage sited adjacent to a dwelling will not have its own defined curtilage, separate from that of the dwelling. I would therefore be in favour of removing this stipulation. Also, in relation to clustering, there is not always an obvious focal point, such as a community building, cross roads, etc. I feel that new policy should accept that clusters can exist for a variety of reasons and that development should be permitted to 'round off' such a cluster, removing the requirement for a focal point to be present.

Ref: HOU17 – Affordable Housing in the Countryside (p. 81)

Whilst I am in agreement with para 3.62 on p. 82, which specifies that a proposed site should be located at a focal point such as a church, school, hall or community facility, I believe that crossroads should be added to this list.

Thank you for your consideration of my consultation response.

Is mise le meas,



Councillor Glenn Campbell