



Derry City & Strabane
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DERRY CITY & STRABANE DISTRICT COUNCIL

LOCAL DEVELOPMENT PLAN (LDP) 2032



DRAFT PLAN STRATEGY

EVb 16a: Urban Capacity and Windfall Study, December 2019

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DERRY CITY AND STRABANE DISTRICT COUNCIL

LOCAL DEVELOPMENT PLAN (LDP) 2032



Evidence Base EVB 16a Urban Capacity & Windfall Study

December 2019

This Document is one in a series which comprises the evidence base that informs the preparation of the Derry City and Strabane District Local Development Plan (LDP 2032) Plan Strategy.

It builds upon the suite of thematic Topic Papers prepared and published alongside the LDP Preferred Options Paper (POP), which established the May 2017 baseline position and identified the key issues that needed to be addressed by the LDP.

This Evidence Base paper updates the baseline POP position and sets out the evidence base that has informed the strategy, designations and policies within the draft LDP Plan Strategy. Evidence has been informed by feedback from public consultation, discussions with Elected Members, input from statutory consultees, stakeholder groups, from other Departments within the Council, liaison with adjoining Councils and through the iterative Sustainability Appraisal process.

The Evidence Base is published as a 'supporting document' in accordance with Regulation 15(a) of the Planning (LDP) Regulations (NI) 2015.

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1.0 Introduction

- 1.1 Derry City and Strabane District Council have prepared a PS as part of the Local Development Plan (LDP) process. As part of the LDP we will identify the amount and distribution of housing land across the district. This is the first LDP to be prepared by the Council since the transfer of planning powers in April 2015; therefore, it is also the first Urban Capacity Study to be undertaken by Derry City and Strabane District Council.
- 1.2 This Urban Capacity study is an important part of the evidence base for the emerging LDP. The purpose of the study is to assess the potential for future housing growth within Derry City and Strabane District Council and to also assess the capacity for different housing types. The study will inform how we allocate housing land in the Local Development Plan.
- 1.3 This Urban Capacity study is an important part of the evidence base for the emerging LDP. However, it does not determine whether a site should be allocated for future development, and does not constitute a land allocation. Land allocations can only be made through the LDP. The Urban Capacity Study also does not grant planning permission for sites, or suggest that planning permission would be granted.

2.0 Strategic and Policy Context

The Planning Act (Northern Ireland) 2011

- 2.1 The Planning Act (Northern Ireland) 2011 requires Councils to prepare a Local Development Plan (LDP). On 1st April 2015, as part of local government reform, Derry City and Strabane District Council assumed responsibility for Planning, and therefore the need to undertake a development plan. Once adopted the Local Development Plan will replace the Derry Area Plan (DAP) 2011, Strabane Area Plan (SAP) 2001, and other operational planning policy set out in Planning Policy Statements (PPS's).
- 2.2 It is essential that a robust and reliable evidence base supports the policy and strategy of the LDP. The first stage in developing the LDP was the Preferred Options Paper (POP). The relevant Evidence Base (EVB) for Housing was EVB 5.
- 2.3 In preparing for the next stage and the publication of the draft Plan Strategy (dPS), it is essential that our previous evidence base relating to housing is updated. To do this, an Urban Capacity study is carried out by Derry City and Strabane District Council.
- 2.4 Guidance to inform the preparation of the urban capacity study is set out in Planning Policy Statement 12 'Housing in Settlements'. This however, was published in 2005 and is considered to be not fit for purpose for our LDP, thus a new methodology will need to be formed taking into consideration firstly, the needs of Derry City and Strabane District Council and secondly, the requirements set out in the RDS and the SPPS as to what needs to be done in formulating a draft Plan Strategy.

The Regional Development Strategy 2035

- 2.5 The Regional Development Strategy 2035 (RDS) acknowledges that housing is a key driver in physical, economic and social change and emphasises the importance of the relationship between the location of housing, jobs, facilities, services and infrastructure.
- 2.6 The RDS provides strategic guidance through Regional Guidance (RG) and Spatial Framework Guidance (SFG) under the 3 sustainable development themes of the Economy, Society and Environment, these include:
 - **RG1:** Ensure adequate supply of land to facilities sustainable economic growth;
 - **RG7:** Support urban and rural renaissance, by developing innovative ways to bring forward under-utilised land and buildings, particularly for mixed use development, and promoting regeneration in areas of social need;

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- **RG8:** Manage housing growth to achieve sustainable patterns of residential development. This is to be achieved by promoting more sustainable housing development within existing urban areas. There is also a focus on ensuring an adequate and available supply of housing to meet the need of everyone is identified;
- **SFG7:** Strengthen the role of Derry as the principle city for the North West. This is to be achieved by continuing to regenerate the city of Derry and meeting the housing needs of the area;
- **SFG8:** Manage the movement of people and goods within the North West. This is to be achieved by enhancing transport linkages and improving the public transport services, and integrating land uses with transportation.

2.7 The RDS recognises that there are significant opportunities for new housing on appropriate vacant and underutilised land, and sets a regional target of 60% of new housing to be located in appropriate ‘brownfield’ sites, within the urban footprint, of settlements greater than 5,000 populations.

Strategic Planning Policy Statement (SPPS) 2015

2.8 The Strategic Planning Policy Statement (SPPS) for Northern Ireland – Planning for Sustainable Development recognises that good quality housing is a fundamental human need that plays a role in how,

“Councils should assess the potential for future housing growth within the urban footprint and the capacity for different types of densities of housing. The urban capacity study should take account of housing development opportunities arising from previously developed land, infill sites, conversion of existing buildings, and possible changes of land use. Consideration needs to be given to the type of housing units likely to be generated. The urban capacity study should be published as a technical supplement to the draft plan.”

3.0 Methodology

- 3.1 Planning Policy Statement 12 'Housing in Settlements' provides a methodology for undertaking urban capacity studies. Given that this methodology was published in July 2005 it is considered to be outdated and does not take into account the new two stage process in preparing Local Development Plans introduced as part of the Planning Act 2011. Therefore, a bespoke methodology has been developed for Derry City and Strabane District.
- 3.2 The Urban Capacity study will form part of the evidence base supporting the Local Development Plan and assist with policy development during the Plan Strategy stage. This Report will consider sites based on their suitability for housing. Urban Capacity sites identified within this report are not an indication of proposed allocation for the Local Policies Plan. Inclusion or exclusion of a site from this assessment does not mean a site is successfully allocated or successfully achieved planning consent.
- 3.3 The Urban Capacity Study assists in determining the realistic capacity of urban sites which will contribute toward the housing requirements for the Local Development Plan. It provides broad conclusions in relation to the overall supply of urban sites within the two main settlements of Derry City and Strabane Town.
- 3.4 The methodology for the Urban Capacity Study consists of the three consecutive stages set out below. Planning Officers of Derry City and Strabane District Council produced a detailed method statement which identified the methodological approach that would be taken for the purposes of this assessment to ensure that a consistent approach was taken when undertaking the work.
- 3.5 The three stages of the methodology are as follows:

Stage 1: Site Identification.

- a. Urban capacity study approach;
- b. Settlements to be assessed;
- c. Define and identify character areas;
- d. Define and identify urban footprint boundary;
- e. Develop a list of 'Candidate Sites';
- f. Presentation of findings.

Stage 2: Site Assessment.

- g. Identify Constraints;
- h. Identify Assets;
- i. Site survey.

Stage 3: Next Steps

- 3.6 This 3rd stage outlines the next steps in relation to how the Urban Capacity study will be utilised during the time period of the Draft Plan Strategy and then through the Local Policies Plan Stage.

4.0 Stage 1: Site Identification

Introduction

4.1 This involved a desk based study to:

- determine the appropriate settlements to undertake the UC study on;
- determine the appropriate urban footprint; and
- identify and divide the settlements into appropriate and distinct character areas for in which to undertake the UC study.

4.2 Urban capacity study approach

Elsewhere in the UK, three alternative broad approach to carrying out urban capacity studies are suggested within ‘Tapping the Potential’ a best practice guide in assessing urban housing capacity:

1. Comprehensive surveys of the whole defined area – these can provide a great deal of useful information, because all potential local opportunities are identified and trends appraised as comprehensively as is possible, it is easier to link this information to implementation strategies, for example, by compiling a database of all potential sites and then tracking them.
2. Priority Area (PA) studies – an alternative and complementary approach is to focus survey work on areas likely to yield a significant amount of capacity, or where housing development would be beneficial or meet policy objectives most fully. Studies at the local level have found this approach to be most useful for identifying the capacity of vacant and derelict land, buildings for redevelopment opportunities, car parks, and conversion of commercial buildings.
3. Typical Urban Area (TUA) studies – have been the most common technique used in urban capacity studies because they reduce the workload whilst delivering reasonable results. TUA studies are likely to be a useful approach at the regional and strategic level pending a full survey.

4.3 In the context of Derry City and Strabane District Council, given the nature and scale of the main settlements and in light of the strategic drive in the RDS (2035) for sustainable development and maximum focus within existing urban footprints, only the first approach involving a comprehensive survey of the whole defined areas is considered to be generally appropriate. This will facilitate assessments of the entire area within the urban footprint by the definition of distinct character areas following an approach as outlined below (application of character assessment approach).

4.4 Within an overall comprehensive approach, use of typical urban area studies for more specific aspects, such as within a town centre may be appropriate. It is also considered prevalent to include economic land in addition to housing as part of the urban capacity study as it cuts down on duplication of work in terms

of site assessment when considering as part of a separate Housing and Economic Development Land availability report.

Settlements to be assessed

- 4.5 The RDS sets a regional target of 60% for the period up until its first review in 2010, for the location of urban housing growth within the existing urban areas of the cities and towns of over 5,000 populations. Derry City (83,163) and Strabane town (13,172) are the only settlements within the District with a population of over 5,000 (Census, 2011). Furthermore, PPS 12 recommends that as a reasonable minimum requirement urban capacity studies should be undertaken for the highest and second highest tiers of settlement in each district. This would similarly encompass Derry City and Strabane Town.

Define urban footprint boundary

- 4.6 The SPPS required councils to assess the potential for future housing growth *within the urban footprint*. The RDS defines urban footprint as;

“The continuous built-up area of the settlement. The boundary will be represented by an uninterrupted line, often lying inside the planned settlement limit. The urban footprint contains land which has a formal urban use including land on the edge of the settlement where it forms part of the curtilage of a building. However, this does not necessarily imply that gardens are acceptable for housing development. Undeveloped zoned land at the edge of the settlement will be excluded. Urban footprints have been identified and set as a baseline as of January 2001”.

- 4.7 The urban footprint is defined also by PPS12 as the continuous built-up area of a settlement, having been identified and set as the baseline of January 2001. The urban footprint for Derry was confirmed in map form in 2004, and this 2004 spatial presentation is based on the 2001 baseline.
- 4.8 There was a similar assessment for Strabane undertaken by Planning Service Headquarters in liaison with the Divisional Planning Office in the spring of 2006. The Division made final adjustments to the footprint for Strabane in the autumn of 2006. PPS 12 in defining the Urban Footprint states that for monitoring purposes it should not be altered for five years. The Division resolved to retain the 2001 footprint for Derry and Strabane as they have a population of over 5,000 and therefore allow a contribution to the RDS 60% target.
- 4.9 It has been considered appropriate when developing the Draft Plan Strategy that an updated Urban footprint should be considered. There have been a number of options considered relating to what year the urban footprint should be updated to:

Option 1 – Retain the existing 2001 urban footprint and carry forward as the basis for the Urban Capacity Study.

Option 2 – Develop a new urban footprint based on the year of the revised HGI which were published in 2012 or 2016, this would allow a revised urban footprint to correlate with the HGI provided by the Department.

Option 3 – Develop a new urban footprint based on the most recent Housing Monitor (2016/17) available prior to starting in-depth examination of the urban area. This also co-insides with the published date of the Draft Plan Strategy.

- 4.10 It was decided that the most logical option would be Option 3, which would allow the most up to date information to be used as part of the evidence base informing the draft Plan Strategy.
- 4.11 Derry City and Strabane Town Urban Footprint boundary has been amended and this has been guided by the definition set out in the RDS. The 2001 urban footprint baseline was the basis for establishing the current urban footprint. Minor changes (additions and deletions) were made to align with GIS boundaries. The urban footprint boundary has been extended in a number of places to account for new development since 2001. Some areas have also been removed where it has been considered that these were wrongly included in the 2001 baseline.

Character Assessment approach

- 4.12 The application of the character assessment approach, involves the classification of the entire settlement into distinct character areas across Derry City and Strabane Town. Strabane was kept as one study areas and Derry City was split into six manageable study areas. The study area has been identified spatially due to their geographical position, they have also been considered against the four character areas types which include:

Type 1 Distinct areas of vacant / underutilised land: sites as a general rule should be of 0.1 hectares' minimum size or with a potential of ten dwellings minimum or less if local circumstances permit.

Type 2 Areas already with a land use commitment:

- a) Non-residential – including important public open spaces, established industrial areas, educational and healthcare premises.
- b) Yet to be established Residential – Comprising development currently under construction or with current planning approval.

Type 3 Established residential areas, possibly with minor non-residential uses having a broadly similar character.

Type 4 Areas with a relatively higher propensity for change: including town centres, mixed use areas, transitional areas.

4.13 Each of the study areas identified have a number of their own distinct character areas within, it was decided to carry out a comprehensive study of each of the study areas and these have been further detailed below:

Table 1: Study areas and character area type

Study Area	Character Areas	Character Area Type
Strabane Town (ST)	This equates to entirety of Strabane Settlement Limits	Mostly type 3 sites with 59 type 1 sites.
Derry City Central Area (DCCA)	This equates to the Central Areas as set out in the DAP 2011.	Mostly type 4 sites with 25 type 1 sites.
Derry City North East (DCNE)	This equates to an area in the north east of the city covering areas such as Limavady Road, Gransha, Ballyoan, Crescent Link, Caw and Kilfennan.	Mostly type 3 sites with 5 type 1 sites.
Derry City South East (DCSE)	This equates to an area in the south east of the city covering Drumahoe, Tullyally, Curryneirin, Belt Road, Trench Road, Top of the Hill, Prehen, Irish Street and Alrnagelvin.	Mostly type 3 sites with 16 type 1 sites.
Derry City West (DCW)	This equates to an area in the west of the city covering Foyle Road, Brandywell, Bogside, Creggan, Rosemount and Marlborough.	Mostly type 3 sites with 11 type 1 sites.
Derry City North West (DCNW)	This equates to an area in the north west of the city which includes the Glen, Hatmore, Hazelbank, Foyle Springs, Ballymagroarty, The Branch, Templegrove, Whitehouse and Coshquin.	Mostly type 3 sites with 19 type 1 sites
Derry City North (DCN)	This equates to an area in the north of the city covering Woodbrook, Skeoge, Pennyburn,	Mostly type 3 sites with 38 type 1 sites.

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	Belmont, Carnhill, Culmore Road, Shantallow, Galliagh, Ballyarnett and Steelstown.	
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- 4.14 An exercise was carried out to assess the study areas against four-character area types and establish a list of potential ‘candidate sites’ to advance the Urban Capacity study.

Develop a list of ‘Candidate Sites’

- 4.15 This stage of the methodology identified the sites, which should be assessed within the Urban Capacity Study process. A proactive approach to site identification was utilised, Urban Capacity sites were selected through a desktop survey of each of the character areas in both Derry City and Strabane Town using the most up to date ortho maps available (2018). Sites were selected based on size and had to be over 0.1ha. In total 173 sites were identified in the initial desktop assessment as Type 3 Sites.

Presentation of findings

- 4.16 Summary of the above findings based on the character areas.

Table 2: Stage 1 Urban Capacity Candidate sites by character area.

Character Area	Total Site Area (hectares, ha.)	No. of Urban Capacity Sites
<i>Strabane Town (ST)</i>	51.47	59
<i>Derry City Central Area (DCCA)</i>	11.71	25
<i>Derry City North East (DCNE)</i>	3.90	5
<i>Derry City South East (DCSE)</i>	20.95	16
<i>Derry City West (DCW)</i>	9.30	11
<i>Derry City North West (DCNW)</i>	35.91	19
<i>Derry City North (DCN)</i>	61.56	38
UC Total	194.80 ha.	173

5.0 Stage 2: Site Assessment

- 5.1 Stage 2 involved progressing the desk top study on to site visits and assessing the suitability of potential sites in terms of any possible constraints that could affect them.

Identify Constraints

- 5.2 A rudimentary assessment of constraints such as flooding potential, Tree Preservation Orders and potential for reservoir inundations was considered on a site by site basis during the April 2017 desktop survey. This was then re-assessed in August 2018 as part of the site survey to consider the most up to date data available to the LDP team. Data was available for the following constraints:
- Flooding-climate change, pluvial, fluvial and coastal
 - Natural heritage designations such as AONB, RAMSARs, ASSIs, SACs, SPAs. Ancient woodlands, area plan designations
 - Built Heritage designations such as monuments, listed buildings, conservation areas, areas of townscape character
 - Open space use designations under DAP 2011 and SAP 2001.
 - Constraints relating to hazardous sites (COMAH) and minerals (ROMPS) pollution (IPRI)
 - Airport consultation zone
 - Tree Preservation Orders
 - Reservoir inundations map
 - Bunrana Road Widening
- 5.3 At this stage, no sites were eliminated, however any constraints were noted and would be considered later again when each site is scored as part of the LPP process to identify which sites have a greater potential for development.

Identify Assets

- 5.4 A rudimentary assessment of assets such as access to local facilities, public transport routes etc. was considered on a site by site basis during the April 2017 desktop survey. This was then reassessed in August 2018 as part of the site survey to consider the most up to date data available. Data was available from the following assets:
- Bus Stops
 - Train station / transport hub
 - Schools
 - Local Centres
 - District Centres
 - Leisure Centres
 - City Centre Limit / Town Centre Limit
 - Greenways / Cycle Paths
 - Parks and Open space

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5.5 This stage did not eliminate any sites, however the presence of the above assets was noted and this will be used to score each site at the LPP stage to identify those sites with the greater potential for development.

Site Survey

5.6 In total, 173 sites were desktop-surveyed and site visited to assess their suitability. An on-site survey was completed and this information was plotted spatially for analysis. Throughout this process, it was important to capture the current use of the site, the size of the site and the potential for the site for housing use. This was all considered on a case by case basis and a decision was recommended if that site should be carried forward as an Urban Capacity site. This was then reviewed by the Senior Officer and a final decision made on each site. The findings of this are summarised in the table below:

Table 3: Stage 2 Urban Capacity (Yes/No) by character area.

Character Area	Urban Capacity Site (Y/N)	Site Area (hectares, ha.)	No. of Urban Capacity Sites
<i>Strabane Town (ST)</i>	Yes	32.14	26
	No	19.33	33
<i>Derry City Central Area (DCCA)</i>	Yes	3.98	5
	No	7.73	20
<i>Derry City North East (DCNE)</i>	Yes	3.35	4
	No	0.55	1
<i>Derry City South East (DCSE)</i>	Yes	12.71	8
	No	8.24	8
<i>Derry City West (DCW)</i>	Yes	0.90	3
	No	8.39	8
<i>Derry City North West (DCNW)</i>	Yes	9.05	8
	No	26.86	11
<i>Derry City North (DCN)</i>	Yes	31.35	23
	No	30.21	15
<i>Total</i>		194.80	173
Stage 2 UC 'Yes' Total		93.48 ha.	77

5.7 In total, at the end of stage 2 of the Urban Capacity study, there are a total of 77 urban capacity sites remaining (93.48 ha). All 77 sites from Stage 2 will be brought forward into Stage 3 which is set out below. The figures from Stage 2 have been used to inform the draft PS and in particular 'Table 2: Summary of Land for Delivery of Housing, in Districts Settlements, at 2017' in the Housing Chapter EVB 16. These figures have been included to give a broad indication of the availability of Urban Capacity sites over the LDP period.

6.0 Stage 3: Next Steps

6.1 Introduction

This section outlines the next steps in relation to how the Urban Capacity Study will be brought forward during the Draft Plan Strategy and then through the Local Policies Plan Stage. It is proposed that the Urban Capacity Study will be updated before the Independent Examination to have the most up to date information available at the time of Examination. This approach set out below will also be applicable thereafter through the LPP stage of the LDP and at any subsequent revision of the Plan or five year review.

Planning History

- 6.2 A Planning history search for each of the sites will need to be carried out to ensure that there has been no planning applications received in the time period between the preparation of the Urban Capacity Study and the revision in the future (in this case before the Independent Examination). Any sites that have had a planning application, either completely or partially within their boundaries, will need to be either removed or their boundaries amended as appropriate. These sites with planning permission will then be captured in the Housing Monitor and will not be considered as Urban Capacity sites.

Updated Site Visit

- 6.3 An updated site visit will need to take place to document any changes in the site from the previous site visit and to make note of any changes that may have an impact on the deliverability or likelihood of the site to come forward. These updated site visits will inform other stages in the process as they will identify any potential issues with the site and allow relevant consultations to be considered.

Consultations

- 6.4 Once the site visits have taken place, it will give an indication of the most appropriate consultees to be consulted depending on the various constraints and assets applicable to each site. This will allow further information from consultees to ensure that we have the most up to date data available for each site to make an informed decision when moving forward into the LPP stage.

Indicative Design Brief

- 6.5 The Indicative Design Brief will be prepared for each selected site at the LPP stage and will set out indicative requirements, specific to each site, relating to the recommended density, potential layout and any relevant Key Site Requirements (KSRs) that detail specific constraints or features to be retained.

Deliverability and Sustainability

- 6.6 Each site will then be scored through a matrix to consider the likelihood for it to be delivered and to consider a number of sustainability features such as proximity to centre, walkability, proximity to public transport. There will also be consideration for land ownership, the potential for connection to services and policy assessment based on the indicative design brief.

7.0 Windfall Assessment

Introduction

- 7.1 Windfall sites, as a source of housing land supply, are normally legitimate development sites that comply with planning policy, but unexpectedly come forward on previously developed land and / or within the settlement boundaries. Windfall sites make an important contribution to housing land supply as they deliver a flexible level of housing year on year in addition to planned development opportunities.
- 7.2 Windfall sites unexpectedly come forward for various reasons, including a change in circumstances for the site or owner, business relocations or closures, distressed sales and demolition of existing buildings. Small sites of less than 5 - 10 units are not assessed in the LDP Housing Land Availability methodology, but consistently come forward for development, creating a steady supply of small windfall sites.
- 7.3 The amount and location of housing delivered on windfall sites each year is flexible by its nature and so difficult to predict or make an allowance for the Housing trajectory to include within our Housing Growth allocation. For this reason, the Housing Monitor aims to proactively identify these unallocated sites.

Strategic and Policy Context

The Regional Development Strategy (RDS) 2035

- 7.4 The RDS 2035 defines Windfall as '*Housing sites that were neither zoned nor anticipated during the formulation of the development plan but which have become available during the lifetime of the plan*'.
- 7.5 The RDS also sets out a number of objectives, 'SFG 7: Strengthen the role of Derry as the principal city for the North West' outlines that the need for housing in the City will continue to increase. These additional dwellings will be provided on land already zoned for housing and on *windfall sites which become available for development*.

The Strategic Planning Policy Statement 2015

- 7.6 The SPPS highlights that '*windfall potential is central to the assessment of future housing land requirement and is a key element of the urban capacity study*'. *Windfall potential arising from previously developed land within the urban footprint can be a key source of housing supply over the course of the plan period*'.
- 7.7 The SPPS goes on to note that a 'full allowance' should be made when deciding the number of sites to identify for development in the plan to prevent excessive allocation of housing land. The scale of the windfall housing allowance will vary

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from area to area and may depend on the approach taken to the urban capacity study. Allowance can be made on the basis of examining past trends in windfalls coming forward for development and estimating likely future windfall potential.

- 7.8 It is recognised in the SPPS that there are a range of methodologies for calculating windfall, and that the methodology used should be robust and care should be taken to avoid under-estimation of windfalls. It is also noted that windfall should be regularly monitored because of its dynamic and changing natures, with monitoring data factored into the plans housing allocation when the LDP is reviewed.

Planning Policy Statement 12 (PPS12) Housing in Settlements

- 7.9 PPS 12 outlines that undertaking a provisional windfall assessment is crucial to the allowance made within the plan for provision of housing through developments not specifically identified by 'zoning; and thus not definitively predicted. It is thus an 'anticipated' extra provision which if not 'allowed for' might prejudice compliance of the plan with the indicative housing allocations. It is considered that examination of past level of windfall will be helpful in the justification of assumed future levels. Overall, the windfall assessment will assist in the allowance made for windfall provision in the plan for each settlement as required.
- 7.10 There are many assumptions required in this type of assessment, which reduce the accuracy and reliability of the conclusions. It is however crucial to the total housing allocation exercise in the plan preparation. These shortcomings are offset by the commitment to prepare an annual housing monitor and undertake a five-year plan review.

Windfall Approach

- 7.11 The windfall approach will seek to examine past trends in terms of windfall, through both completions (2008 – 13) and planning permissions (2014 - 2019). It is also important to consider how other councils are applying windfall and what we can learn from their approach. We also have to consider any likely or future trends that are unique to Derry City and Strabane District Council.

Historic Windfall Trends (Completions)

- 7.12 Through examination of the Housing Monitor, sites are classified into a number of site types, these site types include: Additional units; Infill site; other zoning; Redevelopment site; and Whiteland (Major Site) along with zoned residential. Apart from zoned residential, it is considered that each of the other site types could be classified as windfall and by examining a year on year completion for these types of site that this would give an indication of how many windfall dwellings had been completed in the period 2008/09 – 2012/13.

Table 4: Historic Windfall Trends (completions) for Derry City.

Type of site	2008/09	2009/10	2010/11	2011/12	2012/13
<i>Additional Units</i>	11	18	0	3	2
<i>Infill Site</i>	13	4	2	0	0
<i>Other Zoning</i>	0	0	0	0	11
<i>Redevelopment Site</i>	43	88	46	56	13
<i>Whiteland (Major Site)</i>	35	19	5	2	9
<i>Windfall Total</i>	102	129	53	61	35
<i>Zoned Residential</i>	38	51	141	83	116
<i>Total Completed Units</i>	140	180	194	143	151
<i>Windfall %</i>	73%	72%	27%	43%	23%

7.13 Over this five year period it is clear that there is a high proportion of development through 2008 – 2013 which would be classified as windfall in Derry City. Over the five year period the average windfall development was 47%.

Table 5: Historic Windfall Trends (Completions) for Strabane Town.

Type of site	2008/09	2009/10	2010/11	2011/12	2012/13
<i>Additional Units</i>	0	0	0	0	0
<i>Infill Site</i>	9	6	0	0	0
<i>Other Zoning</i>	0	0	0	0	0
<i>Redevelopment Site</i>	0	19	0	0	0
<i>Whiteland (Major Site)</i>	1	10	2	3	1
<i>Windfall Total</i>	10	35	2	3	1
<i>Zoned Residential</i>	0	7	2	1	0
<i>Total Completed Units</i>	10	42	4	4	1
<i>Windfall %</i>	100%	83%	50%	75%	100%

7.14 Over the five year period it is clear that there has not been a large amount of development take place in Strabane. Secondly the percentage of that development has mostly been through windfall development. Over the five year period the average windfall development was 83%, though the overall numbers are very small, so are easily skewed.

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7.15 From Tables 4 & 5 above, it can be seen that much of the development completed in Derry City and Strabane Town between the years 2008 – 2013 was windfall development. There are a number of factors that influence this, these include; the area was recovering from recession and large amount of zoned land was currently ‘in the system’ seeking planning approval. There was also a reduction in the demand for housing during this period and there were less opportunities to gain finance for both developers and property purchasers.

Historic Trends (Planning Applications)

7.16 Through examination of planning applications approved from the year 2014/15 to 2018/9, sites identified as those approved in zoned residential and all other applications approved outside of zoned housing land were considered as windfall.

Table 6: Historic Trends (Planning Applications) Derry City and Strabane Town.

<i>Type of site</i>	2014/15	2015/16	2016/17	2017/18	2018/19
<i>Windfall Approvals</i>	257	271	199	154	194
<i>Zoned Residential Approvals</i>	211	132	340	600	700
<i>Total Approvals</i>	468	403	539	754	894
<i>Windfall %</i>	55%	67%	37%	20%	21%

7.17 For the purposes of analysing these trends, we have considered only Derry City and Strabane Town. It was considered that even though the other settlement tiers that windfall applies, there were no zonings in other settlements apart from two of our proposed local towns (Castledearg and Newtownstewart) and one of our villages (Sion Mills). It was assumed that these three settlements would have similar or less of a measurable trend due to the smaller amount of completions / applications. It was also considered that all settlements in the village and small settlement tiers would not be examined as there are no planned zonings in each of these, thus all development would be considered windfall. The LDP through the dPS and LPP in the future will be zoning and managing land making it less likely for windfall to come forward in Derry City and Strabane Town.

Other Councils’ Approach

7.18 Whilst preparing the windfall assessment for Derry City and Strabane District Council, it is useful to research and assess what approach neighbouring and other Northern Ireland Council have taken.

Table 7: Other Councils approach to windfall allowance as percentage of total allocation.

Council Area	Total Allocation	Allowance for Windfall	Windfall as percentage (%)
<i>Belfast City Council</i>	29,660	2,000	6.7%
<i>Antrim and Newtownabbey Borough Council</i>	9,750	-	-
<i>Mid and East Antrim Borough Council</i>	4,614	580	12.5%
<i>Mid Ulster</i>	11,000	-	-
<i>Fermanagh and Omagh District Council</i>	4,001	-	-

7.19 Some fields in the table have been left blank as no details of windfall allowance were provided as part of those published draft Plan Strategies. The approach taken for the two Councils that have undertaken a windfall assessment has varied and yielded differential results, indicating that there will not be a uniform approach to windfall assessment across NI.

Likely future trends

7.20 It is envisaged that the new draft Plan Strategy will facilitate a future reduction from the previously high figure (approx. 40-50% windfall per year) over the LDP period as more land will be zoned, therefore reducing the likelihood for windfall to come forward. There has also been a recent trend that many of our larger zonings from the previous area plans are now starting to be developed. This will have an impact on the number of windfall sites coming forward in the coming years.

7.21 As the property market will have a variety of choice through a number of large developers, there will be a restoration of the balance of supply, assuming that demand is matched. It is assumed that the trend of a high percentage of our annual build rate being mostly from windfall development will decrease over the first 10 years of the plan period as the approach is to ensure that our commitments are developed out before any further land is released as Phase 2 or further allocations released.

Windfall summary

7.22 From the historic trends both through planning permissions and completed sites, it is clear that we have had a high percentage of windfall over the last 10 years. Whilst it is too early to draw robust conclusions on how the emerging draft Plan Strategy approach will impact future windfall, it is envisaged that the

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percentage of windfall built per year will decrease. The proposed approach taken when zoning sites at LPP will be critical. It is proposed to review windfall and our Urban Capacity following the Plan Strategy stage and at regular intervals during Plan implementation.

- 7.23 It assumed that windfall over the LDP period will be 10% of our total dwelling capacity. This is seen as the additional amount that is 'likely' to come forward over the life of the LDP period. As the Local Policy Plan progresses, Derry City and Strabane District Council will continue to assess the impact that our policies might have on the delivery of windfall sites, and whether this impact should be reflected in any revised windfall assumptions.