

Hannah Flynn

From: Angela Wiggam <angela.wiggam@turley.co.uk>
Sent: 01 February 2022 17:04
To: Local Development Plan
Cc: Emma Kelly
Subject: Focused Changes - Draft Plan Strategy
Attachments: Heron Bros_Focused Changes.pdf; NIFHA Response_Focused Changes.pdf; Clanmil Response_Focused Changes.docx

Follow Up Flag: Follow up
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To whom it may concern,

Please find enclosed our response to the Focused Changes consultation on behalf of:

- Heron Bros
- Clanmil Housing Association
- NIFHA

Should you have any queries regarding our submission, please contact either Emma or myself.

Kind regards

Angela

Angela Wiggam

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Derry City & Strabane District Council Draft Plan Strategy

Summary of Proposed Changes

January 2022

On behalf of our client, NIFHA, please find below our response to the Focused Changes consultation. These comments should be read alongside our original Representation to the Derry City & Strabane Draft Plan Strategy (LDP-PS-REP-44); for ease of reference a short summary of our previous comments is also set out.

Summary of proposed changes - Derry City & Strabane District Council Draft Plan Strategy

Policy	Turley Response to Draft Plan Strategy	Cross ref.	Proposed Changes Sought by Council	Turley Response
Draft Policy HOUS	There is no evidence is provided to robustly justify the thresholds as set out in draft policy and no evidence is provided to support the view that the policy would deliver sufficient affordable housing.	Paragraphs 4.1 to 4.26	Title amended to 'Affordable and Private Balanced-Tenure Housing in Settlements'. Council is proposing to increase the minimum threshold for the provision of affordable housing from 10% to 20% in respect of developments of 10 units or more, or on sites in excess of 0.5 ha	Disagree with Council's approach. No evidence provided to support this policy change Weaknesses previously identified by Turley remain unchanged
<p>The policy fails to confirm a strategic position on the provision of affordable housing which would provide assurances to private developers and housing associations on the requirements for affordable housing.</p> <p>The draft policy fails against soundness tests P2, P3, CE1, CE2, CE3 and CE4.</p>				

Draft Policy HOU25	The draft policy is overly restrictive of the provision of social housing adjacent to small settlements and villages and fails to take account of potential changes in the level of need or the deliverability of land within settlements.	Paragraphs 4.46 to 4.29	Change relates to the supporting J&A text. The proposal is to expand on the exception to the rule that only one group of housing will be allowed on eligible countryside sites, an extra J&A para after 16.180 expanding on 'generally' (in the policy) – ' <i>if more than one development is required by exception, it must be justified by ongoing social housing need and should be reflective of the scale of the settlement. The design, layout and quantum of development should be as per guidance in paragraph 16.29 [informal groupings of 5 to 10 dwellings].</i>	Currently the policy is capped at 14 dwellings. This change would permit that additional residential units could be delivered, if there is a social housing need. This change addresses the weaknesses previously identified, in that the proposed policy is flexible to respond to changes during the plan period
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