



Derry City & Strabane
District Council

Comhairle Chathair
Dhoire & Cheantar
an tSrátha Báin

Derry Cille & Strábane
Deistrick Cooncil

DERRY CITY & STRABANE DISTRICT COUNCIL

LOCAL DEVELOPMENT PLAN (LDP) 2032



DRAFT PLAN STRATEGY

Evidence Base EVB 16: Housing in Settlements and the Countryside, December 2019

derrystrabane.com/ldp

DERRY CITY AND STRABANE DISTRICT COUNCIL

LOCAL DEVELOPMENT PLAN (LDP) 2032



EVIDENCE BASE PAPER 16: Housing in Settlements and the Countryside

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 Article 15(a) of the Planning (LDP) Regulations (NI) 2015.

CONTENTS

1.0 Introduction to Housing in Settlements and the Countryside	5
2.0 Legislative and Policy Context for Housing	6
3.0 Section 1: Allocation of Housing Land and Strategic Housing	13
4.0 Section 2: Housing in Urban Areas	33
5.0 Section 3: Houses in the Countryside	74
6.0 Sustainability Appraisal	31, 70 & 96
7.0 Equality Impact Assessment	99
8.0 Rural Needs Impact Assessment	100
9.0 Appendix	101

Tables:

Table 1: LGD Level Northern Ireland Housing Growth Indicators 2012 – 2015.
Table 2: Estimate of total housing need in Northern Ireland by Council 2016 – 2030.
Table 3: Housing Evaluation Framework.
Table 4: Indicative Allocation of Housing in DC&SDC by Settlement Tier 2017 – 32.
Table 5: Former Derry District – Housing Completions and Remaining Potential.
Figure 1: Application of a sequential approach and identification of suitable sites.
Table 6: Former Strabane District – Housing Completions and Remaining Potential.
Table 7: Former Derry District Council Area – Completions and Remaining Potential
Table 8: Former Strabane District Council Area Completions and Remaining Potential.
Table 9: Summary of Land for Delivery of Housing, in District’s Settlements, at 2017.
Table 10: Stage 2 Urban Capacity by character area.
Table 11: Summary of Social Housing Need Assessment for Derry City & Strabane District Council by Settlement.
Table 12: Social Housing Need for Derry City & Strabane District by Settlement Type, 2018 -2023.
Table 13: Households by Type 2011.
Table 14: Housing Tenure 2011.
Table 15: Tenure profile of the NI Housing Market.
Table 16: Household Trends 2001 – 2011.
Table 17: Household Projections by Household Type 2017 – 2037.
Table 18: Derry City & Strabane Dwellings by Type 2017.
Table 19: Number of approvals via PPS 21 Policy.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

Table 20: Number of single dwellings and replacement dwellings approved / refused 2002 – 2019.

Table 21: Breakdown of planning trends in DCSDC during various planning policy period from 2002 -2019.

Table 22: Agricultural Census in Northern Ireland 2018.

Table 23: Rural Housing Waiting List Trends 2015 – 2019.

Appendix

Table 1 – Allocation of Housing over LDP Period 2017 – 2032, for DC&SDCs Settlements, based on crude size.

Table 2 – Allocation of Housing over LDP Period 2017 – 2032, for DC&SDCs Settlements, based on Settlement Evaluation and Plan Spatial Strategy.

Table 3: Number of domestic properties (housing stock in DCSDC between 2014 and 2019.

Table 4: Number of domestic properties (housing stock) by type in DCSDC between 2014 and 2019.

Table 5: Household Tenure 2017 – 18.

Table 6: Homelessness in Derry and Strabane District 2017/2018.

Table 7: Derry City Housing Sites Potential Output, Derry Area Plan 2011.

1.0 Introduction to Housing

- 1.1 Good quality housing is a fundamental human need that plays a significant role in shaping our lives and the communities within our District. A home, be it in an urban or rural setting, is a vital part of people's lives and contributes to creating a safe, healthy and prosperous society. The Local Development Plan (LDP) will play a positive and supporting role in the strategic delivery of homes to meet the full range of our housing needs throughout Derry City and Strabane District, within the wider framework of sustainable development.
- 1.2 This Evidence Base (EVB) paper is one in a series which has been prepared to inform the preparation of the Derry City and Strabane District Council Local Development Plan (LDP) 2032. It builds upon the suite of 19 evidence base papers prepared and published alongside the Preferred Options Paper (POP), which established the baseline position as of May 2017 and identified the key issues that need to be addressed by the LDP. The evidence base paper therefore updates our baseline position and sets out the evidence that has informed the Housing policies within the draft Plan Strategy (dPS). Whilst each of the evidence based papers can be read separately, there are inevitably some important related matters with other topics that will need to be read in conjunction with the Housing Chapter and Evidence Base.
- 1.3 It should be noted that the evidence base collected to inform the LDP also informed the basis of a series of additional assessments and appraisals required as part of the plan preparation process, most notably the Sustainability Appraisal. By combining the evidence gathering stages for both the Sustainability Appraisal and the Local Development Plan, we aim to streamline the documentation produced and avoid duplication. It will also help to ensure that sustainable development is embedded in the planning process and that the Sustainability Appraisal is one of the main drivers informing the preparation of the LDP.
- 1.4 The Housing in the Settlements and Countryside evidence base is divided into three sub-sections. These are based upon the three sections outlined in the PS Housing Chapter:
1. Strategic Housing;
 2. Urban Housing and
 3. Housing in the Countryside.

Within the three sections, there is evidence which supports how each policy was decided upon.

2.0 Legislative and Policy Context

2.1 In preparing the new LDP, the Council will have regard to several existing plans and documents that set out the main legislative and policy context and considerations that the LDP is required to include.

2.2 **Regional Policy:**

The current regional policy and guidance sets out priorities for the approach to the location and density of new housing and the assessment and monitoring of housing need, housing land supply and affordable housing. The regional policy context is provided by the Regional Development Strategy 2035 (RDS), the Strategic Planning Policy Statement (SPPS) and regional Planning Policy Statements. A summary of these documents and how they pertain to plan making and housing allocation is provided in the following sections.

2.3 **Regional Development Strategy (RDS) 2035:**

The RDS acknowledges that housing is a key driver of physical, economic and social change and emphasises the importance of the relationship between the location of housing, jobs, facilities, services and infrastructure and must be taken into account when preparing a local development plan.

2.4 The RDS emphasises the significant role that Derry has to play as the principle city of an expanding North West region and the importance of Strabane town as Derry's clustered Main Hub. The RDS introduced the "Plan, Monitor and Manage" approach to providing housing requirements which seeks to ensure that plans become more sustainable, balanced and integrated. The RDS provides strategic guidance through Regional Guidance (RG) and Spatial Framework Guidance (SFG) under the three sustainable development themes of the Economy, Society and Environment. It advises that Sustainable communities are places where people want to live, work and play, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment and contribute to a high quality of life. They are safe and inclusive, well planned, built and offer equality of opportunity and good services for all. The guidance set out below supports the aims of 'A Shared Future' published by the office of the First Minister and Deputy First Minister in March 2005 and recognises the need to: -

- **RG6 Strengthen community cohesion** by developing integrated services and facilities, fostering a stronger community spirit and sense of place and encouraging mixed housing development;
- **RG7 Support urban and rural renaissance** by developing innovative ways to bring forward under-utilised land and buildings, particularly for mixed use development, promoting regeneration in areas of social need, ensuring the environmental quality in urban areas of social need, is improved and maintained with adequate provisions of green infrastructure, and reducing noise pollution.
- **RG8 Manage housing growth** to achieve sustainable patterns of residential development by promoting more sustainable development with existing urban areas and ensuring an adequate and available supply of quality housing to meet the needs of everyone and using a broad evaluation framework to assist judgements on the allocation of housing growth.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 2.5 The RDS seeks to promote more sustainable housing development within existing urban areas by encouraging compact urban forms. Housing land will be identified in Development Plans to ensure an adequate and available supply of quality housing to meet the needs of everyone taking account of existing vacant housing and need identified in the Housing Needs Assessment / Housing Market Analysis (this includes land for social and intermediate housing such as shared ownership and affordable housing).
- 2.6 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 footprints of settlements greater than 5,000 population i.e. Derry and Strabane. Ensuring an adequate and available supply of quality housing to meet the needs of everyone and the use of a broad evaluation framework to assist judgements on the allocation of housing growth to settlements has also been stated.
- 2.7 **Regional Strategic Objectives:**
 The regional strategic objectives for housing in settlements, consistent with regional guidance in the RDS, are to:
- RG6: Strengthen community cohesion;
 - RG7: Support urban and rural renaissance and
 - RG8: Manage housing growth to achieve sustainable patterns of residential development.
- 2.8 **Spatial Framework Guidance (RDS 2035):**
 The RDS Spatial Framework consists of five key components including Derry as the principle city of the North West. The North West is defined as Derry City and Strabane District Council and also extends into County Donegal. These include:
- 2.9 SFG6: Develop a strong North West;
 SFG7: Strengthen the role of Derry City, as the principle city for the North West;
 SFG12: Grow the population in the Hubs and cluster of Hubs and
 SFG13: Sustain rural communities living in smaller settlements and the open countryside
- 2.10 **Strategic Planning Policy Statement (SPPS) ‘Planning for Sustainable Development’:**
 Housing is recognised as a key driver of physical, economic and social change in both urban and rural areas. In furthering sustainable development it is important to manage housing growth in a sustainable way, placing particular emphasis on the importance of the inter – relationship between the location of local housing, jobs, facilities and services and infrastructure.
- 2.11 The SPPS states that the planning system can play a positive and supporting role in the delivery of homes to meet the full range of housing needs of society, within the wider framework of sustainable development.
- 2.12 The policy approach must be: -
- To facilitate an adequate and available supply of quality housing to meet the needs of everyone;
 - To promote more sustainable housing development within existing urban areas; and

- To provide mixed housing development with homes in a range of sizes and tenures.
- 2.13 In preparing Local Development Plans (LDPs) Councils should bring forward a strategy for housing, together with appropriate policies and proposals that must reflect the policy approach of the SPPS, tailored to the specific circumstances of the plan area. Planning authorities must deliver increased housing density without town cramming, sustainable forms of development, good design and balanced communities.
- 2.14 The SPPS also recognises that the planning process has an importance role to play in the delivery of good quality housing that supports the creation of more balanced communities. There is also a need for local authorities to deliver increased housing densities without town cramming and to also to promote sustainable forms of development.
- 2.15 **The Processes for Allocating Housing Land:**
 The SPPS identifies a number of considerations and studies that will contribute to the evidence base that the housing allocations in Local Development Plans should be informed by, these include:
- RDS Housing Growth Indicators (HGIs);
 - Use of the RDS housing evaluation framework;
 - Allowance for existing housing commitments;
 - Urban Capacity studies;
 - Allowance for windfalls housing;
 - Application of a sequential approach and identification of suitable sites for settlements of over 5,000 population;
 - Housing Needs Assessment / Housing Market Analysis (HNA / HMA); and
 - Transport Assessment.
- 2.16 The SPPS also highlight a need to ‘plan, monitor and manage’ approach is necessary to ensure that, as a minimum, a five year supply of land for housing is maintained. Monitoring should be an ongoing process with annual reporting and review. Monitoring must include:
- The housing land supply at the beginning and end of the annual reporting period;
 - The number of net additional units built in the period since adoption of the local policies plan.
- 2.17 **Planning Policy Statement 7: Quality Residential Environments:**
 PPS7 sets out DOE’s Planning policies for achieving quality in new residential development and advises on the treatment of this issue in development plans.
 The main objectives of this Statement are:
- To promote an integrated approach to achieving sustainable and quality residential environments.
 - To promote quality residential development that:
 - creates places for people which are attractive, locally distinctive and appropriate to their surroundings, safe, convenient, adaptable and easy to maintain;
 - respects and enhances features of value and local character and promotes biodiversity;

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- reduces reliance on the private car, supports movement by pedestrians and cyclists, provides adequate and convenient access to public transport and connects well with the wider locality;
- To promote the comprehensive planning and development of residential areas and ensure that adequate information accompanies planning applications which will enable the delivery of an improved design quality and
- To ensure that adequate provision is made for infrastructure and appropriate local neighbourhood facilities as an integral part of residential development.

2.18 Planning Policy Statement 7 (Addendum): Residential Extensions and Alterations:

This addendum to PPS7 provides an additional planning policy for the extension and/or alteration of a dwelling house or flat, including those in multiple occupancy. The key objectives of this Addendum are:

- To promote high quality in the design of residential extensions and alterations; and
- To ensure that such works are sympathetic to the original property;
- Respect the character of the local area; and
- Protect neighbouring residential amenity.

Annex A of the statement sets out detailed design guidance for extensions and alterations.

2.19 Planning Policy Statement 7 (Addendum): Safeguarding the Character of established Residential Areas:

The primary purpose of this addendum is to reinforce existing planning policy on housing within urban areas and introducing additional provisions to protect areas of established residential character, environmental quality and local amenity. It also sets out regional policy on the conversion of existing buildings to flats or apartments. In addition, the addendum contains policy to promote greater use of permeable paving within new residential developments to reduce the risk of flooding from surface water run-off.

2.20 Planning Policy Statement 12: Housing in Settlements:

PPS 12 was prepared to assist in the implementation of the RDS to guide the future pattern on housing by managing future housing growth and distribution, support urban renaissance and achieve balanced communities. The policy objectives of PPS12 are:

- To manage housing growth in response to changing housing need;
- To direct and manage future housing growth to achieve more sustainable patterns of residential development;
- To promote a drive to provide more housing within existing urban areas;
- To encourage an increase in the density of urban housing appropriate to the scale and design of the cities and towns of Northern Ireland; and
- To encourage the development of balanced local communities.

2.21 The PPS states that the Development Plan process is the main vehicle for assessing future housing and land requirements and that housing allocation in development plans.

2.22 Planning Policy Statement 21: ‘Sustainable Development in the Countryside’:

PPS21 sets out the following policy objectives:

- To manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community;

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- To conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution;
- To facilitate development necessary to achieve a sustainable rural economy; including appropriate farm diversification and other economic activity; and
- To promote high standards in the design, siting and landscaping of development in the countryside.

2.23 DCAN 8 Housing in Existing Urban Areas:

The DCAN provides advice on how to ensure that urban and environmental quality is maintained, amenity preserved, and privacy respected when proposals are being considered for new housing development within existing urban areas.

2.24 Creating Places: Achieving Quality in Residential Environments:

This guide describes the contributions to quality and sustainability that developers in Northern Ireland will be expected to make through the design of new residential developments. It seeks to ensure that what is designed and built today will be cherished by both present and future generations. The guide is for use by all those involved in the design of new residential developments and the rejuvenation of existing housing areas.

2.25 Living Places – An Urban Stewardship and Design Guide for Northern Ireland:

This Urban Stewardship and Design Guide aims to clearly establish the key principles behind good place making. It seeks to inform and inspire all those involved in the process of managing (stewardship) and making (design) urban places, with a view to raising standards across Northern Ireland.

2.26 Building on Tradition: A Sustainable Design Guide for the Northern Ireland Countryside (May 2012)

provides assistance to all those involved with sustainable development in the Northern Ireland countryside to understand the requirements of PPS21. The guide promotes quality and sustainable building design in Northern Ireland's countryside.

2.27 Derry Areas Plan (DAP) 2011:

The existing Derry Area Plan 2011 (DAP) was adopted in May 2000, thus pre-dating the RDS and its HGI figures for application across the Plan Area, settlement hierarchy and the countryside. The DAP Housing policies were aimed at ensuring that an adequate and continuous supply of housing land was identified to facilitate the provision of a range of housing opportunities to meet the needs of the community.

2.28 Strabane Areas Plan (SAP) 2001:

The Strabane Area Plan 1986-2001. Beyond the District and Local towns, new house building was also expected to take place not only within the villages and hamlets but also throughout the remainder of the rural area.

2.29 Derry City and Strabane Districts Inclusive Strategic Growth Plan 2017 – 2032:

Derry City and Strabane District's Strategic Growth Plan vision is to have a *thriving, prosperous and sustainable City and District with equality of opportunity for all*. The appropriate strategic allocation of housing has a key role in the successful delivery of this

vision. Published in November 2017 the SGP sets strategic level objectives to provide 12,000 additional households between 2017 – 2037, which the LDP will then help to deliver, spatially.

- 2.30 **Dept for Community Housing Policy and Performance Division** agreed that a key action within its work programme to achieve its Programme for Government housing targets was to take forward a research project to gain a greater understanding of the housing supply and demand landscape in Northern Ireland. The first phase of this research project has taken the form of a Housing Market Symposium comprised of a small number of experts in research areas pertinent to examining housing supply and demand.
- 2.31 **Derry City and Strabane District Council, Review of the population forecasts for Derry City & Strabane District Council, 2017-2032 October 2018, Ulster University Economic Policy Centre.** The purpose of this paper is to review the existing population forecasts within the Community Plan and consider the feasibility of achieving these. The paper sets out recent population trends in NI and locally, the various forecasts for the DC&SDC area, demographic trends in the wider North West City Region and some case studies of university expansion elsewhere and lessons from there for local population. This paper has been used as an additional input to the Local Development Plan for Derry City and Strabane District Council, though it does not provide an update to NISRA's Housing Growth Indicators which are the first reference point for planning policy. See Evidence Base Paper 5a and 5b.
- 2.32 **Household Projections:** NISRA published the NI Household Projections 2012, the key findings from these 2012 figures suggest that each Local Government District will see growing numbers of households between 2012 and 2037. Derry City and Strabane is projected to see an 8% rise by 2037. The greatest projected growth can be found in the number of one and two adult households without children. Most LGD's will experience a decrease in the number of households with children, with the biggest decrease expected in the Derry City and Strabane District. The number of children in the population is projected to decrease during this projection period and particularly from 2022 onwards.
- 2.33 Across the same period, the average household size is projected to decrease across NI with our District sharing with Causeway Coast & Glens, the largest NI projected decline with 7.4%. Our average projected household size will decline from 2.58% (2016) to 2.39% (2041). Thus there will be a greater requirement for smaller units. To meet the needs of all residents, the Council will seek a range of types of accommodation as well as the provision of private market housing. This will include affordable housing, supported housing and accommodation for travellers.
- 2.34 Furthermore, the projected household population can be split into those living in households and those living in communal establishments, in particular residential care homes. The population in communal establishments is projected to rise faster than the population in other residences. This is as a result of an ageing population, of which a relatively large population is projected to live in communal establishments, in particular residential care homes. It is important to note that by 2037, this will only account for 1.6% of the total projected population. This has implications for housing policies on lifetime homes, bungalows etc. When broken down into age bands, the largest increase is for people aged 65 and over. By 2037 the

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

number of people aged 65 and over living in households is projected to increase by 79.1%. This is in line with the ageing population reported in the population projections (79.3%).

- 2.35 The profile of the Council area over the plan period is indicating a change to a more aging population demographic. The percent of those aged 65+ will rise over the plan period from 14.3% (2016) to 21% in 2032. 2018 NISRA statistics further project that the sharpest NI rise in the proportion of one person households will occur in our District, increasing from 28.7% to 33.4% over the period 2016 – 2041. This will most likely be due to young people leaving larger sized households.

3.0 Section 1: Allocation of Housing Land and Strategic Housing

- 3.1 Planning for the future housing growth across the District is one of the core functions of the Local Development Plan, as the provision of housing is key to population growth, which in turn provides the critical mass to support the provision of infrastructure and services such as health, education and community facilities.
- 3.2 The purpose of the strategic housing section is to identify the number of houses needed over the plan period and strategically proportion where those houses will be distributed across the district. The following details the methodology and information used to arrive at the Strategic Housing Allocation in the draft Plan Strategy.
- 3.3 The RDS sets policy directions for the provision of housing that aims to deliver development in a more sustainable manner. Generally, this means providing additional housing in the Hubs (SFG 12) and sustaining rural communities living in smaller settlements (i.e. smaller towns and villages) and in the open countryside (SFG 13). While the emphasis in the RDS is on directing most housing growth to the larger urban areas (or hubs), it also recognises the importance of supporting rural communities so that they remain vibrant and sustainable. The allocation of housing growth to specific locations within the district is a matter for decision through the development plan process.
- 3.4 The RDS Regional Guidance (RG8) recognises the need to manage housing growth to achieve sustainable patterns of residential development including promoting more sustainable housing development within existing urban areas, ensuring an adequate and an available supply of quality housing to meet the needs of everyone and using a broad evaluation framework to assist judgements on the allocation of housing growth.
- 3.5 In accordance with its objective to manage housing growth to achieve sustainable patterns of residential development, the RDS sets a regional target of 60% of new housing to be located in appropriate 'brownfield' sites¹ within the urban footprint of settlements greater than 5,000 population (RG8). In Derry City and Strabane District Council, Derry City and Strabane are the only settlements that have a population greater than 5,000.
- 3.6 **Housing Allocation of land in the District:**
The SPPS advises that housing allocation in Local Development Plans should be informed by:
1. **The RDS Housing Growth Indicators (HGIs)**
 2. **The RDS Housing evaluation framework** – which takes account of the varying capacities of settlements and will assist councils in making judgement on the allocation of housing growth.
 3. **Allowance for existing housing commitments** – i.e. dwellings already constructed from the base date, approvals not yet commenced and residential development proposals likely to be approved.
 4. **Urban Capacity Studies** – an assessment of the potential of brownfield sites to provide housing land, the availability of infill sites and the potential to reuse existing urban buildings.

¹ Brownfield sites are sites within a settlement limit, which are or were occupied by a permanent structure.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

5. **Windfall Housing** – an estimate of the potential housing returns from previously developed land within the urban footprint, which may become available for housing during the lifespan of the Local Development Plan.
6. **Application of a sequential approach and identification of suitable sites for settlements in excess of 5,000 population.**
7. **Housing Needs Assessment / Housing Market Analysis (HNA / HMA)** – carried out by NIHE, these studies provide an evidence base to guide the amount of land required to facilitate the right mix of housing tenures including open market and special housing needs such as affordable housing, social housing, supported housing and travellers’ accommodation.
8. **Transport Assessments** – these may be required for certain sites for residential use to achieve integration with public transport and other alternatives to the car. In addition the SPPS sets out a list of measures that should be contained in LDPs to achieve these aims and policy direction.

3.7 The RDS Housing Growth Indicators (HGIs):

The RDS 2035 identifies regional housing needs through Housing Growth indicators (HGIs) across Northern Ireland. Housing Growth Indicators provide an estimate of future housing need in Northern Ireland. The indicators are used to designate housing land as part of the local development planning process.

- 3.8 The HGIs were updated in April 2016 to reflect the new District boundaries following local government reform. These are calculated on the basis of 2012 – based population projections and provide an indicator for each district between 2012 – 2025. It was previously indicated through the May 2016 RDS Housing Growth Indicator (HGI), that the Council would need approximately 5,775 new houses over the 15-year period of the LDP. This figure was considered in the preparation of the LDP Preferred Options Paper.

Table 1: LGD Level Northern Ireland Housing Growth Indicators 2012 – 2015 – Estimating each of the key 5 components. Estimate of housing need by Local Government District 2012 – 2025.

Local Government District	A	B	C	D	E	F	G
	Number of Households 2025	Second Homes 2025	Vacant Stock 2025	Net Conversions, Closures and Demolitions 2012 to 2025	New Stock Estimate 2025	Housing Stock 2012	Projected New Dwelling Requirement 2012 to 2025
Antrim & Newtownabbey	58,400	400	4,600	200	63,600	56,400	7,200
Armagh, Banbridge & Craigavon	86,600	800	5,400	2,200	95,000	80,600	14,400
Belfast	147,900	2,200	15,300	2,300	167,700	154,000	13,700
Causeway Coast & Glens	57,300	3,700	5,600	2,100	68,700	62,000	6,700
Derry & Strabane	59,400	300	3,800	900	64,300	59,300	5,000
Fermanagh & Omagh	45,700	900	4,500	600	51,700	47,200	4,500
Lisburn & Castlereagh	60,400	500	3,500	700	65,000	55,400	9,600
Mid & East Antrim	57,800	100	4,100	800	62,800	57,400	5,400
Mid Ulster	55,200	100	3,800	1,500	60,600	51,100	9,500
Newry, Mourne & Down	70,900	900	5,100	500	77,400	66,500	10,900
North Down & Ards	68,800	1,000	4,900	1,100	75,800	68,700	7,100
Northern Ireland	768,300	10,800	60,400	13,000	852,500	758,500	94,000

Cells are rounded to the nearest 100. Calculations have been worked out using unrounded data. Therefore summing individual figures in the table above may not add to total.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 3.9 The revised HGI figures from DfI / RDS (September 2019) project a lower indicative requirement of 4,100 dwellings for the District. These levels are well below the current build rates, so their validity as an indicator has to be evaluated. The Council’s senior economist has further reviewed the latest economic and demographic data in October 2019, including the revised HGI figures and has concluded that the LDP ‘Planned Growth’ target levels are still achievable. Therefore, whilst acknowledging the revised HGI figure, this LDP will work towards accommodating these same ambitious-yet-achievable levels of growth, predicated on the 2016 HGI figures.
- 3.10 Despite this statistical downgrading, the Council still believes that 9,000 dwellings over the LDP period is a more appropriate reflection of the District’s aspired growth on the basis that the Council still believes these target levels of houses to be realistic and achievable. As per the SPPS², it would be prudent to provide an additional five years land supply. This would establish the requirement for land for approximately 12,000 dwellings over the LDP period.
- 3.11 The latest HGIs use 2016 based household projections and have been calculated for the time period 2016-2030 to align with the timeframe for the majority of Local Development Plans.
- [2016 based Housing Growth Indicators \(HGIs\)](#)
 - [2012 based Housing Growth Indicators \(HGIs\) and methodology paper](#)

Table 2: Estimate of total housing need in Northern Ireland by Council 2016 – 2030.

Council	2030 estimated dwelling requirement
Antrim and Newtownabbey	4,200
Ards and North Down	5,500
Armagh City, Banbridge and Craigavon	17,200
Belfast	7,400
Causeway Coast and Glens	5,600
Derry City and Strabane	4,100
Fermanagh and Omagh	4,300
Lisburn and Castlereagh	10,700
Mid and East Antrim	5,400
Mid Ulster	10,300
Newry, Mourne and Down	10,000
Northern Ireland	84,800

¹ Estimates are rounded to the nearest hundred. Totals may not add due to rounding.

Source: Department for Infrastructure 2016 Based Housing Growth Indicator Report.

3.12 Housing Evaluation Framework:

The allocation of housing growth to specific locations in a district is a matter for decision through the development plan process. The RDS states that, “the broad evaluation framework is to be used to assist judgements on the allocation of housing growth”.

² SPPS 6.140 – “A ‘plan, monitor and manage’ approach is necessary to ensure that, as a minimum, a 5 year supply of land for housing is maintained.”

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 3.13 The strategic aim of this allocation is to ensure a balanced growth across the District's settlement hierarchy with a focus on Derry City as the regional city of the North West, as well as Strabane Town as a Main Hub plus other housing opportunities in the rural settlements and the countryside. The City's allocation is also mindful of the considerable social housing need, the potential for additional student accommodation with the proposed expansion of Ulster University, Magee campus as well as the urban-focussed trend for more smaller-size dwelling units.
- 3.14 The six tests (see table 3 below) within the Housing Evaluation Framework, are based on the capacity of a settlement to accommodate additional housing growth, with the overall aim of ensuring that the concept of sustainable development is built into the housing allocation process. Another important step in this allocation process is making judgement to achieve a complementary urban / rural balance to meet the need for housing in the towns of the district and to meet the needs of the rural community living in smaller settlements and countryside.

Table 3: Housing Evaluation Framework

Housing Evaluation Framework	
Resource Test	Studies should be carried out to assess and detail the existence of community assets and physical infrastructure such as water, waste and sewage, including spare capacity.
Environmental Capacity Test	An assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made.
Transport Test	Studies should be carried out to assess the potential for integrating land use and public transport and walking and cycling routes to help reduce reliance on the car
Economic Development Test	The potential to facilitate an appropriate housing and jobs balance and to unlock any major strategic development opportunities should be assessed and detailed.
Urban and Rural Character Test	Assessment should be made of the potential to maintain a sense of place, and to integrate new development in a way that does not detract from the character and identity of the settlement.
Community Services Test	The potential to underpin and, where necessary, reinforce the community service role and function of the settlement should be assessed and detailed.

- 3.15 Settlement Appraisals have been undertaken, based upon the RDS evaluation framework which takes account of the six tests. This settlement evaluation information plus the LDP Spatial Strategy has produced an indicative allocation of houses for that settlement over the LDP period.

3.16 Allocation of housing to Settlement Tiers and the Countryside

The Strategic Growth Plan aspires to grow Derry City and Strabane District by approx. 10,000 additional people, 15,000 additional jobs and 12,000 additional households (2017-2037). The aspiration of this LDP is to be the spatial outworking of our Strategic Growth Plan and from this, the Council aims to provide sufficient land over the LDP period (2017-2032, 15 years) to meet this housing requirement.

3.17 Elsewhere, appropriate levels and scales of housing allocation will be provided in the remainder of the settlement hierarchy and countryside to ensure the delivery of the District's Strategic Growth Plan vision, based on a sound and sustainable planned approach to development in settlements and the countryside. The scale, type, uses and form of development in settlements will reflect their role as employment, retail and service centres, their level of accessibility and environmental and infrastructure constraints.

3.18 The majority of new strategic housing growth in the settlements will be delivered through existing housing sites under construction, sites with current planning permission or on 'brownfield' sites within the existing built-up areas. In order to manage and direct this housing requirement, the Council is required to strategically set out an indicative breakdown of where housing is expected to be built over the LDP period, across the settlement hierarchy. The following table sets out the indicative allocation proposed for the LDP period:

Table 4: Indicative Allocation of Housing in DC&SDC by Settlement Tier 2017 – 32.

Settlement Tier	% Share of District's Households	% Share of District's Population	Proposed Indicative % Share of Requirement	Proposed Indicative Number of Dwellings
City	57.9%	55.3%	55 – 65%	4,950 - 5,850
Main Town	9.2%	8.8%	8 – 10%	720 - 900
Local Towns	4.2%	3.9%	3.5 – 4.5%	315 - 405
Villages	13.7%	14.1%	12 – 14%	1,080 - 1,260
Small Settlements	1.8%	1.8%	1.5 – 2%	135 - 180
Countryside	13.1%	16.2%	12 – 16%	1,080 - 1,440
				c. 8,300 – 10,000 c.9,000 average

3.19 Table 4 uses the settlement evaluation information plus the LDP Spatial Strategy in order to produce an indicative allocation of houses for that settlement over the LDP period. The above indicative allocation is relative to the current proportion of households (dwellings) or population in each tier; the allocations are further broken down for each of the District's settlements and the countryside, as set out in Table 1 in the Appendix. It should be noted that the 7th and 8th columns in Appendix Table 1 provide an indicative share, to each settlement, of the District's overall target requirement of 9,000 dwellings. These shares are based directly on a pro rata percentage of their current household / population numbers so are only an initial indication.

- 3.20 In nearly all settlements, there is ample housing land capacity, so the LDP is confident that the indicative numbers of dwellings can be delivered. The LDP Plan Strategy and Local Policies Plan will seek to manage the settlements' housing land supply and the annual housing monitor will measure progress in delivering the desired amount of houses.
- 3.21 **Application of a sequential approach and identification of suitable sites for settlements in excess of 5,000 population:**
 The SPPS outlines a step by step sequential approach to be applied when determining suitable sites for housing in the plan, with previously used land considered first and major expansion and new settlements as the last option.
- 3.22 The SPPS outlines that there may be circumstances where it is appropriate to apply the sequential approach below the 5,000 population threshold.

Figure 1: Application of a sequential approach and identification of suitable sites.



Source: SPPS

- 3.23 **Allowance for Existing housing commitments**
 The SPPS process for allocating housing land requires an allowance for existing housing commitments. Whilst monitoring has been on-going across the former Derry City Council and Strabane District Council since the late 1990s, under the responsibilities of the former Department for Environments (DOE) Planning Service, the future Housing Monitor in Derry City and Strabane District Council will operate with a baseline position of 31st March 2015, the date at which responsibility for planning transferred to the Council and also when the district boundaries were revised, eliminating direct comparisons to historic DOE monitoring outputs.

Table 5: Summary Findings of 2016/2017 Annual Housing Monitor: Former Derry District – Housing Completions and Remaining Potential

	Units completed	% of all Former Derry District Urban completions 1999 - 2017	Remaining Potential Units	% of all Derry District Remaining Potential
Derry City	11, 908	80%	9,426	91%
Villages	2, 550	17%	743	7%
Small Settlements	361	3%	105	
Total Urban	14, 819	100%	10,274	

Table 6: Former Strabane District – Housing Completions and Remaining Potential

	Units completed	% of all Former Strabane District Urban completions 1999 -2017	Remaining Potential Units	% of all Strabane District Remaining Potential
Strabane District Town	2, 141	51%	528	15%
Local Towns	870	21%	1,036	30%
Villages	1, 055	25%	1,526	45%
Hamlets	165	3%	339	10%
Total Urban	4, 231	100%	3429	100%

Table 7: Former Derry District Council Area – Completions, and Remaining Potential

Year	No. Houses Built in Derry	No. Houses Built Remainder	Remaining Potential in Derry District
1999-2000	-	-	-
2000-2001	-	-	-
2001-2002	-	-	-
2002-2003	693	191	11,762
2003-2004	1057	200	10,939
2004-2005	453	206	10,187
2005-2006	234	231	9,999
2006-2007	409	138	9,585
2007-2008	281	98	9,475
2008-2009	145	22	9,702

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

2009-2010	180	30	9,893
2010-2011	194	300	9,954
2011-2012	141	257	10,199
2012-2013	151	51	10166
2013-2014	104	21	10,139
2014-2017	997	114	10,274

Table 8: Former Strabane District Council Area Completions, and Remaining Potential

Year	No. Houses Built in Strabane	No. Houses Built Remainder	Remaining Potential in Strabane District
1999-2000	157	301	3,112
2000-2001	211	132	3,184
2001-2002	189	73	3,047
2002-2003	70	264	2,931
2003-2004	132	100	2,852
2004-2005	148	175	2,565
2005-2006	106	312	2,294
2006-2007	37	240	2,456
2007-2008	26	57	2,723
2008-2009	10	32	3,413
2009-2010	42	13	3,518
2010-2011	4	13	3,624
2011-2012	4	9	3,666
2012-2013	1	6	3,760
2013-2014	5	4	3,755
2014-2017	154	73	3,429

3.24 Monitoring of the current housing land situation has identified that this District currently has a remaining potential of approximately 13,790³ committed housing units i.e. on zoned housing land and/or with planning permission; this equates to approx. 706ha. of housing land. Therefore, the current commitments on these existing identified sites exceeds the amount of houses that the District will be likely to require for the lifetime of the LDP. However, 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.

3.25 A potential issue with so much of our housing being delivered through existing commitments is that there may be limited opportunities for the plan to deliver a supply of affordable housing to meet existing and future need. As such, we hope to supplement provision of affordable housing beyond policy requirements for new sites.

3.26 Zoned Housing Land Ownership Survey

The DAP identified 33 housing zonings across the city (see Appendix Table 7, for full list) and the SAP identified 22 housing zonings. In 2018, known landowners of undeveloped zoned

³ '13,680 committed housing units' from 2016/17 Housing Monitor.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

housing land within the District were contacted via a written questionnaire. The purpose of this was to confirm ownership and to seek confirmation on the likelihood of the land coming forward for development. These included Derry City, Strabane Town, Castlederg, Newtownstewart and Sion Mills. It should be noted that it was not possible to identify all landowners and overall the response rate to the undeveloped zoned housing land questionnaire was over 64% with the majority stating their wishes to retain the land for housing.

3.27 Urban Capacity Studies:

As outlined in the SPPS, the Urban Capacity Study assess the potential for future housing growth within the urban footprint and the capacity for different types and densities of housing. The urban capacity study should take account of housing development opportunities arising from previously developed land, infill sites and conversion of existing buildings and possible change of land use. Consideration needs to be given to the type of housing and density appropriate to each site in order to assess the number of housing units likely to be generated. For full details on the methodology used see EVB 16a. Urban Capacity Study.

3.28 In total 173 sites were desktop surveyed and site visited to assess the suitability of each of the sites. An onsite 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 of the site for housing use. The findings of this are summarised in the table below:

Table 9: Stage 2 Urban Capacity by character area.

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

3.29 In total at the end of Stage 2 of the Urban Capacity study there are a total of 77 urban capacity sites remaining (93.48ha.). All 77 sites from Stage 2 will be brought forward into Stage 3 –

for details see Evidence Base Report 16a. Urban Capacity Study. The figures from Stage 2 have been used to inform the draft Plan Strategy and in particular Table 5: Summary of Land for Delivery of Housing, in Districts Settlements, at 2017. These figures have been included to give a broad indication of the availability of Urban Capacity sites over the LDP period.

3.30 **Windfall Housing:**

As outlined in the SPSS windfall potential is central to the assessment of future housing land requirement and is a key element of urban capacity study. Windfall potential arising from previously development land within the urban footprint can be a key source of housing supply over the course of the plan period. In line with the RDS, it is necessary to make a full allowance for this 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 allowance will vary 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. It is recognised that there are a range of methodologies for calculating windfall. The methodology used should be robust and care should be taken to avoid an under-estimation of windfalls. Windfall should be regularly monitored because of its dynamic and changing nature, with monitoring data factored into the plans housing allocation when the LDP is reviewed.

3.31 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 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.

3.32 It assumed that windfall over the LDP period will be 10% of our total dwelling capacity (commitments on zoned housing land, other commitments (outside zonings) and approx. urban capacity and whiteland). This is seen as an additional amount that is 'likely' to come forward over the plan. As the local 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 (see EVB 16a. Urban Capacity Study).

3.33 **Summary of Land for Delivery of Housing:** The figures in the table 10, have been rounded, since they are designed to give a strategic approximation and revised as a result of further review and continued refinement of the Housing Monitor and of the Urban Capacity (UC) figures. This means that there are now slightly less UC opportunities in Derry and especially in Strabane town (these sites will be further defined at the LPP stage). However, there is still significantly more sites in Derry than could possibly be delivered over the LDP period, so there is no need to amend the indicative allocations approach. However, there may be a need to allocate some additional housing land in parts of Strabane town (at the LPP stage), so this is noted.

Table 10: Summary of Land for Delivery of Housing, in District’s Settlements, at 2017⁴

Settlement Tier (47 No.)	Commitments on Zoned Housing Land		Other Commitments (outside Zonings)		Approx. Urban Capacity & Whiteland ⁵		Windfall Potential ⁶	Total Dwellings Capacity
	Units	Ha.	Units	Ha.	Units	Ha.	Units	Units
City	8,000	400	1,500	44	2,500	125	600	12,600
Main Town	300	20	200	9	1,000	33	75	1,500
Local Towns	700	40	400	24	400	16	75	1,500
Villages	160	9	2,200	130	1,400	93	190	3,760
Small Settlements	-	-	330	30	600	40	45	930
Settlements Total	9,160	469	4,630	237	5,900	307	985	20,500*

Source: DC&SDC Housing Monitor, Urban Capacity Study & Windfall Study. *Rounded figures

3.34 Housing Needs Assessment / Housing Market Analysis (HNA / HMA):

The SPPS suggest that the HNA / HMA provides an evidence base that much be taken into consideration in the allocation, through the development plan, of land required to facilitate the right mix of housing tenures including open market and special housing needs such as affordable housing, social housing, supported housing and travellers accommodation. The HNA will influence how LDPs facilitate a reasonable mix and balance of housing tenures and types. The Northern Ireland Housing Executive, or relevant housing authority, have carried out the HNA / HMA.

3.35 NIHEs Housing Needs Assessment (HNA): The Social Housing Need Assessment is carried out to determine the level of additional accommodation required to meet housing need for general needs applicants who have registered on the Common Waiting List. The HNA details the need for social housing, including supported housing and traveller accommodation. It also provides a summary of the owner occupied housing market in Derry City and Strabane.

3.36 NIHE’s Assessment is based on factors such as:

- what can reasonably be delivered in terms of finance;
- the local strategic guidelines and social housing already started and programmed by Housing Associations, including taking into account existing satisfactory purchases (acquisition of private housing) that are likely to make up some of the need; and

⁴ Figures based on 2016/17 Housing Monitor. Housing Monitor Figures will continue to be updated throughout the LDP preparation process.

⁵ Urban Capacity is identified sites in settlements over 5,000 population i.e. Derry and Strabane. Whiteland is uncommitted land in all other settlements. The figures from both Urban Capacity and Whiteland only count over 5 units / 0.1ha. UC sites will be further evaluated at Local Policies Plan stage.

⁶ Windfall (un-predicted sites) is assumed at 5% of the ‘predicted’ housing units / land for each settlement tier

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- for the purposes of the LDP, it is also considered appropriate to group local housing areas together, assumptions have been made on linkages between the areas based on recent trends and information gathered.

3.37 NIHE also state that the long-term projection for up to 2032 is based on the assumption that current trends will continue in the future, in a policy neutral environment and the figures should be read as an indicator to assist in identifying potential zoning of sites within the LDP. They state that the 5 year need assessment will remain the most robust, will be updated annually and can be referred to by developers when considering the social housing need in a particular area.

- The total new build social housing need for Derry City & Strabane for the period 2017-2032 is 4,750 units.

Table 11: Summary of Social Housing Need Assessment for Derry City & Strabane District Council by Settlement (Source: NIHE 15 year Social Housing Need Assessment to 2032)

Urban Area/Settlement	Total social housing need to 2032	No. units started since April 2017	Remaining Social housing need to 2032
Derry City	4,323	825	3,498
Strabane Town	190	4	186
Rural settlements	238	37	201*
TOTAL	4,750	866	3,884

3.38 NIHE Housing Market Analysis Update (HMA)

The purpose of a Housing Market Analysis is to provide evidence to develop integrated housing policies and approaches to ensure household access to appropriate housing. The HMA Update provides a regional and local housing market context, identifying key housing market drivers and provides an overview of the three main tenures, social housing (including general needs, supported and traveller accommodation), the private rented sector and owner occupied sector. It demonstrates an understanding of current housing market trends and identifies potential future imbalances in the NI housing market (see Section 2: Housing in Urban Areas for more information).

3.39 Transport Assessments:

The SPPS outlines that transport assessments, where appropriate should be carried out when considering certain sites for residential use to achieve increased integration with public transport and other alternatives to the private car. On a case by case basis, the Council may require the submission of a Transport Assessment (TA). This should reflect the scale of development and the extent of the transport implications of the proposal. For applications which may generate significant travel uses, a TA may need to be accompanied by a Travel Plan.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 3.40 In line with the relevant policies contained within the Transport and Movement Chapter, the Council will seek to ensure that when considering certain sites for residential uses, TA's indicate how development of the site has been factored in relation to existing transport movements and infrastructure within the context of government policy aimed at achieving more sustainable travel patterns through a change in transport behaviour. The Council will assess the submitted TA's to consider how the proposal will achieve increased integration with public transport and other alternatives to the private car in line with the strategy for transport and movement as set out in the LDP PS.
- 3.41 **Preferred Options Paper (POP):**
 The Derry City and Strabane District Council Preferred Options Paper was published in May 2017. The research findings contained in the POP, subsequent evidence based papers, together with Member's views and advice from relevant parties/consultees informed options. These options were taken forward and subjected to Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) as part of the POP process.
- 3.42 Within Social Development, it was identified that there were four key issues that needed to be considered when consulting the public, these included:
- A. Strategic Housing Distribution;
 - B. Housing Allocation Quantum;
 - C. Location and allocation of housing land; and
 - D. Social / Affordable Housing and Balanced Communities.

3.43 **Strategic Housing Distribution:**
 In the POP, it was envisaged that Derry City and Strabane would have a planned growth of 155,000 to 160,000 people and it was estimated that there would be a need for between 7,000 to 12,000 new homes. Three strategic options for the distribution of housing were identified and our Preferred approach was Option 3:

	Option 1	Option 2	Option 3
A Strategic Housing Distribution	Dispersed – across the Settlement Hierarchy, including countryside in proportion to settlement tier.	Concentrated – emphasis on urban central, sustainably accessible locations.	Balanced – moderate focus on Derry City as a Regional City, as well as Strabane town as Main Hub plus housing opportunities across the settlement tiers at appropriate scale / densities and in the countryside.

3.44 **Housing Allocation Quantum:**
 In the POP, a number of options were considered including Option 1 using the previous Housing Growth Indicator. It should be noted that the figures provided in the POP were based on a 17 year projection (2015 – 2032) rather than a 15 year projection (2017 – 2032). If the HGI had of been projected over 15 years, this would have given a potential yield of 5,769 dwellings.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

	Option 1 (revised)	Option 2	Option 3
B – Housing Allocation Quantum	Current Housing Growth Indicator (HGI) as per RDS 5,769 dwellings	Balanced, Planned Growth of 12,000 dwellings	Previous Housing Growth Indicator (HGI) as per RDS 16,000 dwellings

3.45 Location and allocation of housing land:

Within the POP it was stated that Derry City would be the focus for residential growth. With a number of commitments, there was a clear need to consider the development of brownfield, windfall and underutilised land in the city centre, to increase density without town cramming and to create sustainable forms of development whilst encouraging balanced communities. Strabane also has a legacy of commitments and zoned housing land as well as having sites with scope to develop some more sustainable opportunity sites.

	Option 1	Option 2	Option 3
C – Location and allocation of housing land	Rely on existing zonings and settlement development limits	Retain committed and zoned housing land for residential, re-evaluate un-committed sites and allocate any further required land in accordance with sequential test in SPPS and deliverability.	Re-evaluate all existing zoned land on the basis of sustainability. Only carry forward zonings deemed sustainable. Allocate all land based on sequential test in SPPS.

3.46 The Preferred Option Paper also stated that though the proportion of social housing stock in the District is considerably higher than for the rest of Northern Ireland, there is a current and ongoing need to ensure suitable small-unit housing, for individuals, families, for the ageing population and those with disability in particular.

3.47 **Social / Affordable Housing and Balanced Communities – Options:** See Section 2: Urban Housing and the responses to this option.

3.48 Summary of POP Responses to Housing A, B & C:

A. Strategic Housing Distribution:

- The focus should be on directing growth to Derry and Strabane to ensure they maintain their status in the settlement hierarchy to accord with the RDS;
- The growth target in the Councils preferred option should be reviewed every five years given the varying economic and social factors that contribute to demand; and
- The plan evidence does not clearly identify the appropriate evidence to underpin the growth strategy or clearly link this strategy with the planned quantum of housing.

B. Housing Allocation Quantum:

- Concern over basing future housing growth on HGI figures which did not go through a consultation exercise or public scrutiny;

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- The generous provision of land i.e. greater than the HGI figures on the website is necessary. To adhere to the actual published figures with RDS 2035 will help properly achieve the objectives of the RDS;
- Supportive of growth figures beyond HGI's;
- DFI stressed HGI is for guidance and not a cap or target to be achieved and
- Reminded of SPPS provision relating to maintenance of 5 year housing supply.

C. Location and allocation of housing land:

- Housing needs to be focused on suitable sites that make a meaningful contribution;
- Housing sites need to be robustly tested for suitability, availability and deliverability;
- Need to assess unimplemented zonings as well as new housing designations to see if they are suitable, available and viable for residential housing;
- Committed sites should be retained in addition to new land;
- The tying up of land which is unlikely to be forthcoming for development needs to be addressed;
- A re-evaluation of lands that were zoned for housing is required to ensure proper account is taken of the accessibility of individual locations by all modes and how that might change with committed changes to existing transport networks and
- It is not clear that mitigation measures are included to reduce negative effects due to WWTW. There is a link between housing and protection of water, natural resources & landscape character.

3.49 **Member's Response:** In addition to the formal consultation exercise, a series of 'round table discussion' (RTD) meetings were held in 2018/2019. A number of issues were raised by the Members at the RTDs:

- 1) The target for jobs should be greater than 8000 (Option 2) and the target for houses greater than 7000 houses. At a minimum as part of the 5-year review the figures will need to be reassessed;
- 2) Not in agreement with the NISRA growth indicators and the Housing Executive figures;
- 3) Zoning Land zoned for housing might not always be in the right place and the Council needs to look at rezoning land to ensure housing is provided where people want to live;
- 4) If industry is concentrated in the north of the district people will want to live there;
- 5) The Council should spread zonings out more evenly.

3.50 **Consultee Responses:**

DFI Roads: Any option taken forward needs to take account of accessibility analysis in terms of existing infrastructure and any required infrastructure (Key Site Requirements) to facilitate development. Without all existing zoned lands being reviewed in terms of sustainability, it will be difficult to ensure that sustainable modes of transport are brought forward for these zones and indeed any new zonings. There is no mention of Creating Places.

3.51 **Invest NI:** Remind the Council of the RDS objective to ensure an adequate supply of land to facilitate sustainable economic growth and also to consider the issue of compatibility of uses, in relation to new housing in close proximity to existing economic / industrial uses and the potential restriction on opportunities to expand existing economic / industrial uses. Wording detail on proposed policy HOU 1 and HOU 2.

3.52 Overall Policy Direction:

3.53 Housing provision in the District’s settlements will be reflective of the LDPs overall Strategic Growth Plan, Spatial Growth Plan and Settlement Hierarchy. The Council will strategically allocate and manage housing for 9,000 new homes for the LDP period. In many of our settlements, the number of existing commitments is sufficient to meet the housing requirement up to 2032 and even beyond. It will only be after these commitments are delivered that a requirement will emerge for the phased release of selected site for housing. As such, the on-going monitoring of housing delivery will be vital to allow for the proper phased and managed release of selected Phase 2 sites.

3.54 Strategic Allocation and Management of Housing Land – Zoned Housing Land and LUPAs.

A criteria-based approach to selecting sites for each phase will be undertaken in the Local Policies Plan (LPP). The selection criteria will take account of a number of factors including: Housing Monitor; Urban Capacity; Windfall and Housing Needs Assessment (HNA). Sites may be zoned at LPP with key site requirements to guide their development. Sites will only be selected where it can be shown that they can accommodate 5 or more dwellings.

3.55 As previously stated, Phase 1 sites that are considered as existing commitments are only those with a current planning permission or that have made a valid material start or where development is ongoing. Any previously permitted site that has not made a material start or has development ongoing prior to their permission expiring may not have the permission renewed and will thus be considered as a Phase 2 site. This will assist commencement and hopefully delivery of housing, rather than contribute to delay and land-banking.

3.56 Phase 1 sites will also include Selected Urban Capacity sites and Selected Whiteland sites. The process for selecting these sites will be outlined and completed at LPP stage A criteria-based approach to selecting the sites for each phase will be undertaken in the Local Policies Plan (LPP). The selection criteria will take account of a number of factors particularly Accessibility Analysis to ensure that the most central / sustainable sites come forward first. An initial analysis has been undertaken to establish the likely potential output of available sites as indicated in Table 2, from which these further sites will be selected.

3.57 Phase 2 sites will be held as a reserve to meet future need. This approach provides a vision for the long term management of our existing oversupply of housing land. Phase 2 housing zonings can be release at an earlier time as detailed in the policy, account will be taken of the latest housing requirements and housing stress / housing need as detailed by NIHE.

3.58 As an exception to the Phased approach, the Council has identified that there may be a very specific shortage of housing land, matched with a very high social housing need, in certain local areas. In these circumstances, if no alternatives can be identified after a sequential consideration, it may be necessary to exceptionally permit some additional housing lands. Such lands, whether inside or outside of settlement development limits, should also be sequentially assessed, to be sustainable, accessible and as centrally located to services as far as possible. The term ‘specialised housing’, refers to supported housing, disability-focused and otherwise as per the NIHE definition.

- 3.59 Development proposal for housing on unzoned ‘greenfield sites’⁷ that are within the settlement limits will not normally be approved as they would undermine the LDP strategy for housing allocation. This will also apply to development proposals for the renewal of existing and lapsed planning permissions (i.e. existing commitments) on ‘greenfield sites’.
- 3.60 **Land Use Policy Areas (LUPAs)** in villages and small settlements will be designated for housing and certain other uses including community uses, open space and economic development, all appropriate to the scale of the settlement. These LUPAs will be designated based on a number of considerations at LPP stages. These will include, but is not restricted to, the settlement’s indicative allocation, sewerage capacity, school capacity and Social Housing Need.
- 3.67 The LUPAs will be identified following a detailed analysis and character appraisal of the settlements, and will focus on providing housing in locations where it is most likely to integrate into the character of the settlement. The LUPAs will also be proportionate with the scale of, and the future housing requirement of, the individual settlement. In recent decades, some of the villages and small settlements, especially those close to Derry and Strabane, have experienced unsustainable levels of housing development, often with no or low levels of nearby service provision. Such developments can be considered to be too large in relation to their position in the settlement hierarchy and the availability of services. Similarly, they are often out of character with the traditional pattern of growth. Conversely, some other villages and small settlements, especially those in remote rural locations have had very little housing growth within their settlement limits, thereby resulting in declining population numbers. Consequently local services such as schools, shops, pubs, sports teams and other community facilities suffer through this gradual decline.
- 3.68 The aim of the LDP is to sustain vibrant rural communities and small settlements, so it will be important to monitor to ensure that adequate amounts of new housing is being approved and built. Therefore, assisted by the designation of LUPA’s in the LDP Local Policies Plan, the LDP Plan Strategy will seek to deliver in the villages and small settlements over the LDP period, the appropriate scale and type of housing developments to reflect their settlement status and level of services so as to sustain them at the heart of vibrant rural communities. Housing developments in villages will be expected to restrict the number and size to reflect the above and the indicative housing requirement in Table 10. Typically, village housing development should be modest-scale of not more than 10 – 20 dwellings. Small settlements should have small-scale housing development of single dwellings, some infill and small groups of typically 5 – 10 dwellings.
- 3.69 **Strategic Allocation of Housing in Settlements – other than Zoned Housing Land and LUPAs**
 In accordance with the proposed policy for Strategic Allocation and Management of Housing Land – Zoned Housing Land and LUPAs, proposals on unallocated ‘greenfield’ sites that are within the settlement limits will be contrary to policy, as they would undermine the LDP Housing strategy. Development on ‘brownfield’ sites within settlements will be encouraged as it can assist in returning derelict sites to a productive use; help deliver more attractive

⁷ ‘Greenfield Sites’ – Land that has not previously been developed.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

environments; assist with economic renewal; and reduce the need for development on existing undeveloped or greenfield sites.

- 3.70 Development on whiteland within settlements will be permitted where the proposal is less than 0.2ha or is for less than 10 units and meets the above HOU 2 criteria, to ensure that sustainable sites come forward. Exceptionally, development will be permitted on open space in accordance with the exception test of policy OS 1, Protection of Open Space.
- 3.80 This approach is in accordance with the sequential approach in the SPPS; however, the LDP will only identify brownfield sites as Phase 1 sites at LPP stage in local areas where there is an identified housing need.
- 3.81 Where suitable brownfield sites are identified, it is vital that any potential impact from such developments on the surrounding character and infrastructure provision, is minimised and that development is planned to contribute to sustainable development. It is essential that housing coming forward from windfall sites meets the same high level of sustainability as the sites identified and zoned in the LDP and that there is sufficient infrastructure capacity to support development.

3.69 **Sustainability Appraisal:**

Throughout their formulation, the policies contained within the Housing in the Settlements and Countryside Chapter have been subject to an ongoing internal sustainability appraisal (SA). This is in addition to the wider external SA, conducted by Shared Environmental Service as part of the wider suite of impact assessments/appraisals required under the Planning Act (Northern Ireland) 2011. The internal appraisal was carried out with the fourteen objectives of the external appraisal in mind (refer to the full wider SA for more information). The process of sustainability appraisal aims to ensure that a council's approach towards policy is the most sustainable of all reasonable options available i.e. having considered any reasonable alternatives. In the case of the Housing policies, it is not considered that there were any reasonable alternatives as any other options would not be in accordance with the RDS 2035 of the SPPS and as such would be considered to be unsound. With regard to the degree of sustainability of each the resulting proposed policies, this is outlined below:

3.70 **Policy HOU1 Strategic Allocation and Management of Housing Land**

As this policy will not substantially influence development that is already committed, for some of the sustainability objectives it may take time before the effects of the policy begin to emerge. The policy approach delivers positive effects on all of the social sustainability objectives, with significant positive effects on the objective to provide good quality, sustainable housing as it will maximise the opportunities to deliver a range of house sizes, types and tenures and houses which meet locally identified needs. The effects on the economic sustainability objectives are mainly negligible, although some positive influences are recognised as the approach will help to enable education and infrastructure service providers to plan for the future.

3.71 A minor positive effect is identified for enabling sustainable economic growth. Housing growth will have a minor negative effect on many of the environmental sustainability objectives, as many committed Phase 1 sites are on land that is currently undeveloped / greenfield. However, over time as the policy has greater influence over the siting of new development proposals it will encourage consolidation and the establishment of a more compact urban form. This should lead to an improvement to minor positive for encouraging active and sustainable travel, which should lead to a related improvements on air quality, reducing the impact to negligible from minor negative. There are several measures and related policies which may work together to help deliver a reduction in the scale of negative effects from housing growth. This option is considered to be a sustainable option.

3.72 **Policy HOU2 Strategic Allocation of Housing in Settlements – other than Zoned Housing Land and LUPAs and Policy HOU11 Redevelopment of Existing Buildings, or Infilling of Sites for Housing**

Through providing opportunities for city centre living / living in settlements, these policies will have a minor positive effect on all of the social sustainability objectives. Minor positive effects are also identified for enabling sustainable economic growth and manage material assets sustainably through encouraging redevelopment of sites and facilitating development in areas where there existing good provision of material assets. These aspects can help to make the district more attractive and enhance vitality and vibrancy in centres. The quantum of housing delivered through these policies will be relatively low and the effect on almost all of the environmental sustainability objectives is negligible. However, a perceptible minor

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

positive effect is possible for the objective to encourage active and sustainable travel as development brought through these policies should have good access to active and sustainable travel options and will benefit those without access to a car. This option is considered to be a sustainable option.

4.0 Section 2: Housing in Urban Areas



- 4.1 The following section provides the existing regional and strategic policies, local and regional context evidence base and POP, Consultees and Members comments and responses to the proposed urban housing policies to provide an explanation and justification as to why the following policy approach has been taken.
- 4.2 In addition to regional policy, supplementary planning guidance for residential development also includes :
1. Creating Places - Achieving Quality in Residential Development (May, 2000);
 2. DCAN 8: Housing in Existing Urban Areas;
 3. The 'Living Places: An Urban Stewardship and Design Guide for Northern Ireland' (September 2014) and
 4. 'Building on Tradition: A Sustainable Design Guide for the Northern Ireland Countryside' (May 2012).
- 4.3 **Preferred Options Paper**
 The following option was put forward in the POP **Social / Affordable Housing and Balanced Communities:**
- 4.4 The LDP will seek to deliver homes to meet the full range of housing needs of our District. This will include private housing, social housing, affordable housing, housing for the elderly, specialist and Traveller accommodation. The provision of social and affordable housing is a major issue for our District, as well as delivering adequate private housing, ideally in mixed-tenure developments. The Council also has a duty under Section 75 of the NI Act 1998 to promote good relations and this is in line with recent central government initiatives to encourage cross-community or neutral / shared-space housing land. The SPPS and PPS 12 Housing in Settlements also strongly encourage the idea of 'balanced communities'. There are opportunities to explore how we can ensure adequate provision through policy requirements or more specific key site requirements on zoned land.

4.5 Social / Affordable Housing and Balanced Communities

	Option 1	Option 2
D – Social / Affordable Housing and Balanced Communities	Incorporate the principle of including social, private and affordable housing & cross – community. Consider policy and mechanisms to deliver balanced communities and meet all housing need / demand. More research needed by Dfi, DfC, NIHE and Council.	More research need by Dfi, DfC, NIHE and Council on this area. The need is not proven for a policy response, to do not include in the Plan. Possible future subject plan or supplementary guidance.

4.6 Option 1 (preferred option): Create environments that are accessible to all and which enhance opportunities for shared communities. Consider policy and mechanisms for delivering balanced communities and mixed tenure housing that contribute to meeting housing need / demand.

Option 2: Maintains status quo approach of having no specific policy approach and possibly relying on future direction via publication of LDP supplementary planning guidance.

4.7 Density of Residential Development

4.8 **Regional Development Strategy 2035:** RG8: Manage housing growth to achieve sustainable patterns of residential development and SPG-HOU 5: To encourage an increase in housing density appropriate in scale and design to the cities of Northern Ireland.

4.9 **Strategic Planning Policy Statement:**

Planning authorities must deliver: increased housing density without town cramming: higher density housing developments should be promoted in town and city centres and in other locations that benefit from high accessibility to public transport facilities. Within established residential areas it is imperative to ensure that the proposed density of new housing development, together with its form, scale, massing and layout will respect local character and environmental quality as well as safeguarding the amenity of existing residents. In residential areas of distinctive townscape character an increase in density should only be allowed in exceptional circumstances.

4.10 **Planning Policy Statement 12, Housing in Settlements:**

Set minimum density levels for all housing sites within urban footprints and where appropriate for whole settlements, parts of settlements or other individual sites as deemed appropriate. Density levels should be appropriate to the character of the surrounding area. Where levels are set for whole or parts of settlements specify, where appropriate, individual sites where variance from this is desired and specify the level of variance required.

4.11 **Planning Policy Statement 13, Transportation and Land Use:** Higher density and mixed use developments should be focused in locations benefiting from high accessibility to public transport facilities.

4.12 As this is a new draft policy there were no responses to the POP on this policy. The policy was discussed and raised no issues at the Members Round Table Discussions.

4.13 Consultation Responses:

DFI Roads responded to the proposed draft policy with the following comment: Density Band 2 (Medium – High) indicates “*Key and link transport corridors including arterial routes within Derry and Strabane and sites adjacent to District and Local Centres*”. Clarity on this would be required and needs careful consideration as these roads are covered under the protected routes policy as part of PPS 3. The policy was amended to refer to the policy being inside the ‘settlement limit’.

4.14 NIHE: Comments regarding the wording stated that some densities outside of the higher bands are built to higher densities and there should be an exception in residential areas.

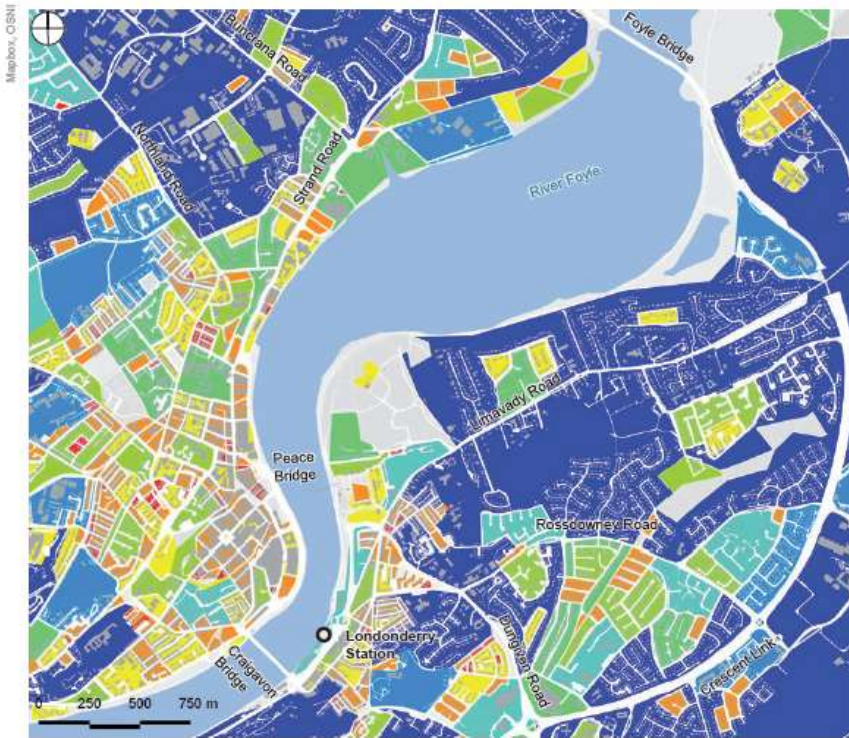
4.15 Local Context:

The current evidence has had regard to the Central Area Map in the Derry Area Plan 2011, where there is more prevalence for medium to high density development in the Designated Flat Zones – FL1. These encourage higher density housing such as flats and apartments. It is recognised that Derry is of a scale where there are identified known nodes within the main arterial routes located in the central area, with more residential areas outside of the central area. It is proposed to have 3 density areas and these will be defined at the Local Policies Plan stage. Applications in the interim period will be dealt with on a case by case basis and will take account of the existing guidance in PPS7 addendum policy LC1 - annex E exception, that includes the wording “along key and link transport corridors (including designated arterial routes) within cities and large towns and sites adjacent to main transportation nodes within cities and large towns”, as an exception and other relevant policy.

4.16 The following maps are from the Derry and Strabane Settlement Studies, September 2019, detailing the urban perimeter block and the Derry riverfront within the Central area of the city showing the location of one storey to 6 storey buildings. This gives an indication where there would most likely be higher densities. The full document can be viewed as part of the Place Making Study (Part a & Part b).

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

Permeability Urban block perimeter



The overall block size in the outskirts of Derry is large and corresponds to more than 20 minutes walk around the perimeter. These areas are mainly residential characterised by a cul-de-sac typology.

However, the historic core has a good level of permeability. The areas around the Walled City has slightly bigger block sizes. The Waterside would benefit from some additional permeability

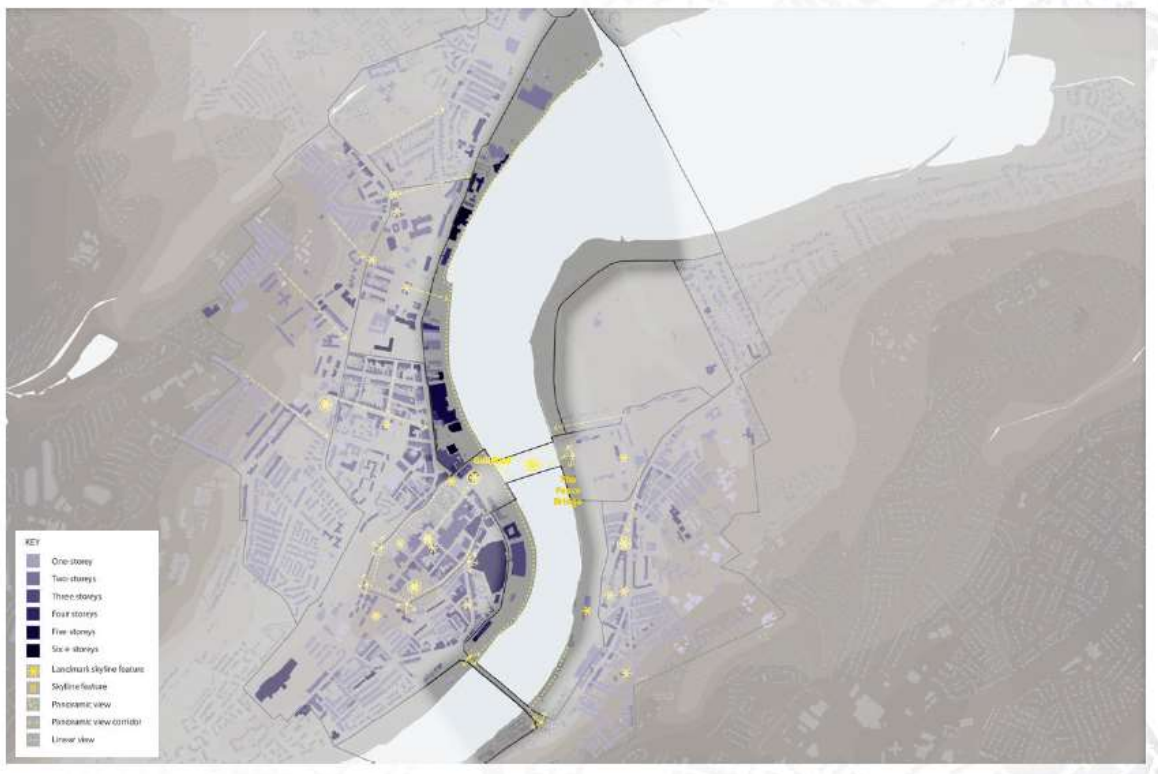
The size of urban blocks is an important indicator of an area's walkability. The urban record shows that central areas with active uses tend to have a finer urban grain that enables more choice for pedestrian movement. Residential areas, by contrast, are typically less permeable and offer less movement choice.

Block size (perimeter (m) and walking time (min))

0 – 200	
200 – 400	5min walk
400 – 600	
600 – 800	10min walk
800 – 1,000	
1,000 – 1,200	15min walk
1,200 – 1,600	>20min walk

Space Syntax Limited © 2018

DERRY: RIVERFRONT



4.17 Overall Policy Direction:

This policy is also in accordance with the SPPS as it states that the LDP should set density levels for housing sites appropriate to the location of the site and the character of the surrounding area. This is a new policy aimed at promoting an increased density in housing developments, to achieve a more sustainable form of development by encouraging compact urban forms and promoting more housing within existing urban areas and along key and link transport corridors thereby supporting more sustainable housing. This will seek to make the best use of urban land and generally support the viability of public transport services. Three density bands are proposed as a guide to inform proposed developments within the relevant areas.

4.18 Protection of Existing Residential Accommodation

4.19 **1. Regional Development Strategy 2035: RG8:** Manage housing growth to achieve sustainable patterns of residential development. The emphasis is on managing housing growth to ensure that there continues to be a focus on developing more high quality accessible housing within existing urban areas without causing unacceptable damage to the local character and environmental quality or residential amenity of these areas.

2. Strategic Planning Policy Statement: Measures to be contained in Local Development Plans include: identify areas within town centres where existing residential development will be protected.

3. Planning Policy Statement 12, Policy HS1, Living over the Shops.

4. Planning Policy Statement 7, Quality Residential Environments: Policy QD1: Quality in New Residential Developments.

5. Planning Policy Statement 7, Addendum, Safeguarding the Character of Established Residential Areas. Policy LC 1: Protecting: Local Character, Environmental Quality and Residential Amenity (in addition to QD1).

4.20 Derry Area Plan 2011:

There were a number of policies, geared to the bolstering of the existing residential component in the Central Area and their realisation that would bring about an increase in the permanent population living in and therefore contributing to the Central Area, its vitality and attractiveness.

- **Proposal CA 5 Protection of Residential Stock.** The Department defined existing residential areas within the Central Area, as it recognised the importance of a strong residential component to the general well-being of the Central Area. These areas represent the remaining concentrations of housing accommodation with the Central Area. Elsewhere where housing is not the primary use, a change to non-residential use may be acceptable and the protection of residential amenity will be a prime consideration when dealing with planning applications on sites adjacent to existing dwellings.
- **Policy CA 3 Housing on Opportunity Sites.** The Department will encourage the provision of new residential development within the Central Area provided the function of the Commercial Core is not prejudiced.
- **Housing Policy H 5, Flats Policy Area,** where the conversion of property to flat use would be acceptable in principle.

- **Policy CA 4 Residential Use on Upper Floors**, where the provision of flats on the vacant upper floors of property within the Commercial Core is encouraged.

4.21 **Strabane Area Plan:** Objectives within Strabane Town sought to protect the character and amenity of existing residential use.

4.22 **Members and Consultee Response:** There was no changes to the proposed policy regarding this policy following consultation with Members and Consultees.

4.23 **Overall Policy Direction:**

This is a revision of Policy CA 5 from the Derry Area Plan which sought to protect residential stock from alterations or changes into other uses within the city / town centre or local / district centres. It aims to keep residential accommodation as the primary use and any changes must be subordinate to that use. This policy therefore seeks to restrict the type of non-residential proposals permitted in established residential areas and areas where higher density residential accommodation is appropriate, such as highly accessible locations fronting onto main arterial routes in Derry and Strabane. Where non-residential uses are permitted, they should be complimentary to the surrounding residential uses and protect established residential amenity. Policy H5 and CA 4 from the DAP have been considered in the proposed policy on Flats/Apartments.

4.24 **Affordable Housing in Settlements**

4.25 **Regional Development Strategy 2035:** Regional guidance, RG8 is to: Manage housing growth to achieve sustainable patterns of residential development. The varied housing needs of the whole community need to be met. This includes the availability of affordable and special needs housing.

4.26 **Strategic Planning Policy Statement:** The Housing in Settlement section of the SPPS states that the Housing Needs Assessment / Housing Market Analysis (HNA/HMA) will influence how LDPs facilitate a reasonable mix and balance of housing tenures and types. For the purposes of the SPPS, Affordable Housing relates to social rented housing and intermediate housing for eligible households. The development plan process will be the primary vehicle to facilitate any identified need by zoning land or by indicating, through key site requirements, where a proportion of a site may be required for social/affordable housing. This will not preclude other sites coming forward through the development management process.

4.27 **Planning Policy Statement 12:** The two policies relevant to social and affordable housing are: Planning Control Principle 4 – Balanced Communities and Policy HS2 Social Housing: Planning

4.28 **Draft Planning Policy Statement 22 ‘Affordable Housing’**, was published for public consultation in June 2014 at the same time as Department for Social Development’s draft ‘Developer Contributions for Affordable Housing’ policy. The former DSD were taking forward research which both Ministers were to consider before finalising any future policy on Affordable Housing.

- 4.29 **Derry City & Strabane District Council's Strategic Growth Plan:** Key actions included providing quality social and private housing in sustainable urban and rural neighbourhoods to meet the needs of our growing population providing attractive places to live within easy access to local services and amenities with the focus on affordable housing providing high quality living environments making up diverse and sustainable communities.
- 4.30 **Department for Communities (DfC)** A key area part of DfC's business is to increase new housing supply (in particular affordable housing supply) and support households to sustain homeownership as reflected in the Draft Programme for Government (PfG) Framework 2016-2021 (Outcome 8 - Indicator 8 and Outcome 11 - Indicator 48). DfC, delivering on a commitment set out in the Housing Strategy 'Facing the Future' (2012-17) and the draft Programme for Government, has published a public consultation on proposals to improve how social homes are allocated.
- 4.31 In 2013, three independent reports, prepared by the Universities of Ulster and Cambridge, were published for public comment. This included current approaches to accessing and allocating social housing in Northern Ireland and best practice approaches to accessing and alleviating social housing in Britain and the Republic of Ireland. DfC have undertaken a review of NI's social housing to make sure the existing delivery structures, including the Housing Executive, housing associations and the Department, are as effective as they can be. <https://www.communities-ni.gov.uk/publications/fundamental-review-social-housing-allocations-policy>.
- 4.32 **Northern Ireland Housing Executive:** The Housing Executive believes that planning policy, while enabling the delivery of new homes to meet needs, should also ensure that growth contributes positively to the creation of mixed, inclusive and sustainable communities and delivers high-quality, well-designed homes and neighbourhoods. The Housing Executive advocate policies within the Plan Strategy to provide much required land for affordable housing, which can help address affordable housing need.
- 4.33 **NIHEs Housing Needs Assessment Plan:** The Social Housing Need Assessment is carried out to determine the level of additional accommodation required to meet housing need for general needs applicants who have registered on the Common Waiting List. The HNA details the need for social housing, including supported housing and traveller accommodation. It also provides a summary of the owner occupied housing market in Derry City and Strabane.
- 4.34 **NIHEs Housing Investment Plan:** The Plan reports on progress over the past 12 months and presents programmes for the coming year. It includes a Common Waiting List, which is a database and is split into a number of smaller geographic areas to facilitate applicants' areas of choice for housing. For reporting purposes an annual Social Housing Need Assessment is produced from the Common Waiting List at the end of March each year. This allows the Housing Executive to assess the level of social housing need for defined geographic areas. The level of social housing need is projected for a five year period from March each year. This is presented annually to each of the councils in the Housing Investment Plan.

4.35 Definitions of Affordable Housing (SPPS):

Affordable housing relates to social rented housing and intermediate housing. These are defined in the SPPS:

Social Rented Housing is housing provided at an affordable rent by a Registered Housing Association; that is, one which is registered and regulated by the Department of Communities as a social housing provider. Social rented accommodation should be available to households in housing need and is offered in accordance with the Common Selection Scheme, administered by the Northern Ireland Housing Executive, which prioritises households who are living in unsuitable or insecure accommodation.

4.36 Intermediate Housing consists of shared ownership housing provided through a Registered Housing Association (e.g. the Co Ownership Housing Association) and helps households who can afford a small mortgage, but that are not able to afford to buy a property outright. The property is split between part ownership by the householder and part social renting from the Registered Housing Association. The proportion of property ownership and renting can vary depending on householder circumstances and preferences. This definition of intermediate housing used for the purpose of this policy may change over time to incorporate other forms of housing tenure below open market rates, and is regulated by a Registered Housing Association.

4.37 Revised Definition of Affordable Housing: The Department for Communities is seeking views on its proposals to change the Definition of Affordable Housing. The current definition of affordable housing was drafted to reflect the affordable housing products available at the time of its development, namely social housing and shared ownership housing. The consultation paper has been drafted to capture the Department's initial thoughts as to what a new definition of affordable housing might look like and to test thinking more widely on this issue.

<https://www.communitiesni.gov.uk/sites/default/files/consultations/communities/dfc-consultation-paper-affordable%20Housing.pdf>

4.38 Social housing in Northern Ireland is defined as 'housing provided at an affordable rent by registered Social Landlords' and is allocated through a Common Waiting List administered by the Northern Ireland Housing Executive. The Housing Executive has a statutory duty under the Housing NI Order 1981 to 'regularly examine housing condition and need'.

4.39 Responses to the POP on social and affordable housing issues:

There were a number of representations to the POP regarding social and affordable housing issues, namely DFI HED, DEARA, NW Devt. Office, NIHE, Elected Member, Foyle Civic Trust, Enagh Youth Forum, Outer North Neighbourhood Partnership, Cycle Derry, Planning Agents and members of the public.

These responses included the following comments:

1. Social Housing Projections: Section 2 fails to examine social housing projections for the whole plan period and clearly there is an underestimation of social housing need for the LDP;
2. Preferred option on housing allocation quantum is silent on the proportion of social housing required to meet assessed need;

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

3. Future of Social Housing: concerns about the disadvantage and deprivation of social housing in the future;
4. Affordable housing definition (Social rented housing & intermediate housing) needs to be set out as per SPPS) and
5. Mixed Housing Concerns about social housing on edge of city – creating ghettos of the future.

4.40 Local Context:

4.41 NIHE Housing Needs Assessment (HNA):

NIHE provided a 15 year Social Housing Need Assessment to 2032 Report in December 2018 for Derry City and Strabane District Council. The long-term projection for up to 2032 is based on the assumption that current trends will continue in the future, in a policy neutral environment, therefore the figures should be read as an indicator to assist in identifying and potential zoning of sites within the LDP. The total new build social housing need for Derry City & Strabane for the period 2017-2032 is 4,750 units. The 5 year need assessment will remain the most robust, will be updated annually, and can be referred to by developers when considering the social housing need in a particular area.

4.42 According to the 2011 Census Derry City & Strabane has a higher proportion of social housing at 21% compared to 15% for Northern Ireland as a whole. There remains over 8,903 Housing Executive units with over 11,000 units sold. There are approximately 3,500 no Housing Association Properties in Derry City & Strabane with almost 700 under construction in 2017.

4.43 Waiting list trends for the last five years in Derry City & Strabane show an upward trend in both overall number of applicants and of applicants in Housing stress. Housing need for the District has consistently increased annually between 2014 and 2019, despite the approval and ongoing construction of a considerable number of social dwelling units recently. According to the NIHE figures for March 2019, there were 4,510 applicants on the waiting list for Derry City & Strabane with 3,401 in housing stress. There were 917 allocations over the year. The total number of applicants in housing stress has increased consistently every year since 2002 from a figure of 1,031 to 3,401 at March 2019, despite the approval and ongoing construction of a considerable number of social dwelling units recently.

Table 12: Social Housing Need for Derry City & Strabane District by Settlement Type, 2018 -2023

Settlement Type	Social Housing Need (Units)
	5 years (2018 -2023)
City (Derry)	2,473
Main Town (Strabane)	139
Other Settlements	132
Derry City & Strabane District Total	2,744

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

Source: NIHE Derry and Strabane, Housing Investment Plan, 2019-2023

- 4.44 Therefore, though the proportion of social housing stock in the District is considerably higher than for the rest of Northern Ireland, there is a current and ongoing need to ensure suitable small-unit housing, for individuals, families, for the ageing population and those with disability in particular.
- 4.45 The number of allocations has remained fairly constant, but with a downward trend. In common with the rest of Northern Ireland, single applicants make up the largest group on the waiting list, but small families are also predominant.
- 4.46 The areas of highest need often coincide with those areas where suitable development land is in short supply. Housing associations report difficulties in obtaining sites in areas of high housing need. This results in having to acquire sites on the open market and therefore subject to market fluctuations. This will put further pressure on the waiting lists for those areas.
- 4.47 Smaller households account for the bulk of the waiting list. Single, older persons and small family households comprise 89% of the housing stress waiting list in the council area. Future housing mix in new social housing will need to cater for these household groups. The predominance of single and smaller family households and the welfare reform agenda will mean that new social housing will comprise a high proportion of one and two bedroom dwellings. This will mark a departure as much of the social housing stock reflects the earlier redevelopment programmes which mainly provided larger family housing.
- 4.48 **Intermediate Need:**
Intermediate housing can take different forms and is housing made available to eligible households for rent or purchase, which have prices higher than the social housing sector but are below open market rates. A key objective of DfC's Housing Strategy was to support access to the owner occupied market by developing intermediate housing options, therefore, in Northern Ireland; intermediate housing usually refers to low cost home ownership. Co Ownership Housing is the best-known scheme in Northern Ireland for people who wish to buy a home but who cannot afford to do so without help. A share of between 50% and 90% of the home's value is bought and the remainder is rented from Co Ownership Housing. Almost 26,000 houses have been purchased through the scheme since it was established in 1978. There is a cap on the value of the property that can be bought using the scheme; at April 2017, this was £160,000. This is higher than the current average house price in Derry City & Strabane, at £118,000. In 2016/17 17 properties were purchased in Derry City & Strabane through Co Ownership.
- 4.49 Other newly launched intermediate housing schemes in Northern Ireland include Fairshare, which allows people to partner with a housing association to buy a property. Similar to Co Ownership, a share of 50% and 90% of the property can be bought and a rent is paid. Participating housing associations include Apex, Choice and Clanmil. In addition, OwnCo Homes, a rent to own scheme, was established in 2016. This is a private, not for profit, subsidiary of Co Ownership, which is a fixed term rental commitment, with an opportunity for home ownership.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 4.50 Currently, the Housing Executive calculates intermediate housing need using a model established by Professor Glen Bramley and adopted by the Welsh Assembly. This model assesses demand by examining:
- median income levels;
 - lower quartile house prices;
 - income needed to purchase a, e.g., 50% share of a lower quartile property; and
 - household projections.
- 4.51 It has been calculated that in Northern Ireland 1,053 new intermediate units are needed each year with 44 units per annum in Derry City & Strabane. Evidence shows that the owner occupied market in Northern Ireland and Derry City & Strabane has stabilised. This recovery has stabilised since 2013, as house prices, transactions and new build have increased in Derry City & Strabane and across Northern Ireland.
- 4.52 Derry City & Strabane has more or less followed the same trends as the Northern Ireland housing market albeit at a lower rate. Although house prices are lower than average, wages are also and ability to afford a mortgage ranks Derry City & Strabane as one of the more affordable District Council areas in Northern Ireland. However, if prices continue to increase, and with levels of inflation increasing, interest rates rises and decreasing wages, local people who have lower median incomes may find it increasingly difficult to purchase a home.
- 4.53 **Mainstreaming Mixed-Tenure in Northern Ireland – Tenure Blindness**
 The Department for Communities (DfC) and the Northern Ireland Federation of Housing Associations (NIFHA) have collaboratively produced and published this thinkpiece. Our aim is to further the discussion and debate on the future role of mixed-tenure development in Northern Ireland, as part of the wider housing and regeneration agenda. [Mixed Tenure Thinkpiece report](#).
- 4.54 The report states ‘Tenure blindness’ appears to be widely accepted as a key component in the development of any successful mixed tenure development and was certainly advocated by both Yorkshire Housing and Wakefield and District Housing. In essence, tenure blindness means that there should be no architectural distinction (particularly in the external specifications and standard of finishes) between tenures and that any external design differences should be minimal. One of the key reasons for adopting a tenure blind approach within mixed tenure developments is to help avoid any potential stigmatisation of social housing. Research has shown that visible differences in tenure can contribute to a sense of difference and division between residents which would of course be entirely counterintuitive to efforts to promote mixed-tenure communities in which neighbourly relationships can thrive.
- 4.55 There are of course challenges in providing tenure blind housing. Space standards are considered to be particularly important for social housing, and in the interests of efficiency, housing associations often use their own standard house types for their affordable housing provision. However private developers generally prefer to define their own standards, in line with building regulations, in order to provide a wider range of features for their target market such as garages and en-suite bathrooms.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 4.56 In practice therefore, efforts are made to limit any design differences between tenures to internal rather than external specification where possible. Often homes of different tenures on the same development will comprise of the same outside appearance, but will have different internal specifications depending on tenure type for example, offering a wider choice in kitchens and bathrooms where the property is to be sold. In apartment blocks, tenure blindness may involve having mixed cores, mixed entrances and mixed amenity spaces. A simple product can often meet market demands and both associations visited had reduced specifications and unnecessary additions in their developments.
- 4.57 Further studies, following will provide an up to date audit of the amount of social housing dwellings that have been approved. This will include the amount of zoned housing land that has developed affordable housing. It will be important to monitor this in terms of the affordable housing policies and the thresholds proposed.
- 4.58 **Consultee Responses:**
NIHE: The Housing Executive would like to see an affordable housing policy which provides affordable housing units to meet need and to promote balanced and sustainable communities through mixed tenure development and suggested the following policy option, including a proposed policy with a 20% threshold for 5 or more units or on a site of 0.5ha or more, 25% for Derry City and 10% in all other areas. They also wanted a 10% proportion in the interim period. NIHE also suggested an off-site provision to be included on a case by case basis.
- 4.59 **Dept for Communities: Housing Supply Policy:** The Department welcomes the Council's intention to deliver affordable housing (social and intermediate) in a mixed tenure setting. They referred to the research and affordable definition consultation and to re-wording of policy from the provision of 'private and social housing' to 'private and affordable housing'. They also noted that the proposed policy will only provide around a quarter of the sites required for social housing development (10% of 12,000 sites identified as being required for overall housing need).
- 4.60 **Overall Policy Direction:**
This District has been the focus of significant social housing need over many years. However, it is considered that the recent number of large social housing site approvals has substantially contributed to meeting this demand. Affordable housing policy needs to be well implemented and it is recognised that local circumstances and local housing markets must be taken into consideration. Whereas NIHE suggested a 25% threshold, over the life of the LDP period, it is considered that the proposed 10% requirement will still deliver and maintain an appropriate supply of affordable housing consistent with the future needs of the District, whilst still ensuring a balanced mix of housing tenures. The policy also permits for this 10% figure to be raised or lowered accordingly on a case by case basis so it should not be regarded as a fixed bar. Definitions of affordable and intermediate housing are provided in the J&A and will be subject to review follow the Department for Communities findings on the Definition of Affordable Housing Consultation.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 4.61 Mixed Tenure and Tenure Blindness has also been included in this policy. Whilst there may be resistance from some private developers, recent research has favoured this approach where the design and external appearance of the affordable housing in the development should reflect the character of the remainder of the site. The viability and deliverability issues will be monitored along with the location of the proposals, any constraints and the mix of housetypes and tenures proposed.
- 4.62 The policy also states that all housing localities will normally be expected to have no more than 70% of either private or affordable houses with an exception to justify if this can't be achieved. To reflect the different needs in rural villages and small settlements, the policy proposes a minimum viable number of affordable units will be 2 in a development of 10 or more. Similarly, sites below the normal threshold of 10 dwellings may also need to provide affordable housing if there is an identified need.
- 4.63 It is recognised that that the development plan process will be the primary vehicle to facilitate any identified need by zoning land or by indicating, through key site requirements, where a proportion of a site may be required for social/affordable housing. This will be considered at the Local Policies Plan stage.
- 4.64 The draft policy proposed that off-site provision will only be acceptable in exceptional circumstances for example, if the housing priorities could be better met in an alternative location, determined by the Council, in consultation with NIHE. Provision of affordable housing units on an alternative site will be in addition to any applicable affordable housing requirement arising from the development of any market housing on the alternative site. The policy also requires applicants to have secured planning permission for the required amount of off-site affordable housing before any occupation of the market housing development on site and an off-site Developer Contribution will also be considered on a case by case basis. There is a chapter in the draft Plan Strategy on Developer Contributions and Community Benefits for further information.
- 4.65 **House Types, Size and Tenure**
- 4.76 **Regional Development Strategy 2035:** RG6: Strengthen community cohesion from the RDS encourages mixed housing development and states that 'Neighbourhoods with homes in a range of sizes and tenures will allow heterogeneous populations to live together. Diverse populations lead to more stable communities and can help reduce social isolation'.
- 4.67 **Strategic Planning Policy Statement:** The SPSS states that 'offering a variety of house types, sizes and tenures in housing schemes will therefore help with meeting the diverse needs of all the community and enhance opportunities for shared neighbourhoods. The SPSS also states the measures to be contained in the LDP include: where justified, specify those sites or areas where the development of certain house types or a mix of house types will be required.
- 4.68 **Planning Policy Statement 12:** Planning Control Principle 4: Balanced Communities. Achieving balanced communities is one of the major themes for housing in the RDS.

HS4 House Types and Size: This policy complements PPS 7 which already advises that on large sites a range of densities, building forms and a mix of house types will be required to help enhance quality and sustainability.

4.69 **Planning Policy Statement 7 – Policy QD1 – Quality in New Residential Development.** The developer is advised to consider layout considerations such as the design of housetypes and on large sites a range of densities, building forms and a mix of house types will be required to help enhance quality and sustainability.

4.70 **Derry City and Strabane’s Strategic Growth Plan** The Strategic Growth Plan has a vision to have a thriving, prosperous and sustainable City and District with equality of opportunity for all and housing has a key role in this process.

4.71 **The Northern Ireland draft Programme for Government** states that there should be more support for shared housing and incentivise the development of more mixed tenure, mixed use sites. It is recognised that mixed-tenure development has the potential to help us maximise on the delivery of these benefits for all sections of society.

4.72 **Mixed Tenure Draft Thinkpiece:** The Department for Communities’ Housing Supply Unit has partnered with the Northern Ireland Federation of Housing Associations (NIFHA) to produce a draft thinkpiece aimed at stimulating debate and discussion about how we might mainstream mixed-tenure development in Northern Ireland. Mixed tenure is residential development which combines a range of tenure options, which can include owner-occupier housing, shared ownership housing and rental properties (social, intermediate and private). The draft thinkpiece was aimed at adding to collective knowledge about the key issues in the mixed tenure debate. It is used to inform discussions with providers of social and affordable housing and the wider housing sector, including private developers, lenders, local government, planners, architects and construction industry representatives, about how to work together to deliver mixed-tenure developments that work within the Northern Ireland context. [Mixed Tenure Thinkpiece report](#)

4.73 **Derry City and Strabane District Council’s LDP Preferred Options Paper:** The Preferred Options Paper received a few responses relating to housetypes and sizes in the District. These included:

- Rents – what will the LDP do to address these. Explained not a direct issue for or controlled by the LDP but will form an important part of the consideration around tenure types / house styles.
- If there were not to be new / additional house zonings, this would be a surprise / disappointment and may stifle attempts to promote multi-tenure type developments.
- Mixed community / house types / tenure character praised and this would wish to be continued.
- Housing mix – how will they be delivered.

4.74 **Member’s Response:** Members keen that LDP should promote balanced and indistinguishable mixed tenure developments.

4.75 Consultee Response:

NIHE requested that mixed tenure development is promoted within the LDP strategy and believe that as well as addressing high levels of affordable housing need, balanced communities and cohesive communities could be delivered by requiring all new housing developments to make a contribution towards the delivery of onsite and integrated affordable housing units.

4.76 Local Context:

Mixed tenure is residential development which combines a range of tenure options, which can include owner-occupier housing, shared ownership housing and rental properties (social, intermediate and private). The focus of mixed-tenure development is fostering greater social, economic and community mix to support thriving and sustainable communities.

Academic and other research, as well as anecdotal evidence, identifies a number of positive impacts from mixed tenure development including.

- reducing ‘place and tenure-based’ stigma;
- reducing levels of crime and antisocial behaviour;
- improving a sense of community and social cohesion;
- better job prospects and improved school attainment; and
- improved physical and mental health of residents.

4.77 In Northern Ireland, mixed tenure development can support greater integration in terms of shared housing and shared space. DFC report 90% of social housing areas remain segregated into predominantly single identity communities. Creating more mixed tenure communities could allow people greater choice and flexibility and encourage integration and inclusion.

4.78 Purposeful mixed tenure, whereby housing developments are designed from the outset to include different tenure options, is not standard practice in Northern Ireland. However, several of the larger housing associations are beginning to integrate shared ownership housing into predominantly social housing developments.

4.79 It should be noted, that there has been concern amongst private developers, that the inclusion of social and intermediate housing could devalue their market sale properties and discourage potential buyers. However, research has shown that it is the quality of design, layout and location that influence house prices and that there is little evidence that a spatially integrated mix of tenures has any impact on buying or selling homes. The National House-Building Council Foundation and Homes and Communities Agency Report Tenure Integration in Housing Developments’ states that it is widely recognised that involving residents in the planning, design and management of neighbourhoods leads to better outcomes for residents and estate management teams.

4.80 According to the 2011 Census, the majority of household types were detached dwellings, which accounted for 33% of housing stock across the District, followed by semi-detached at 31% and terraced dwellings at 28%, which is broadly reflective of household types across Northern Ireland.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

4.81 The composition of house types has changed slightly between 2001 and 2011. Strabane sits significantly higher than the NI average in terms of % of detached properties, while Derry sits significantly lower. This is partly due to the large proportion of housing in the countryside and partly due to the nature of post war, private sector housing development in settlements. Overall the actual % numbers for detached properties between 2001-11 remain relatively unchanged. By way of contrast the opposite is true for semi-detached properties with Derry ahead of the NI average and Strabane slightly below. Between 2011 – 11, both districts experienced slight increases in the proportion of flats and a slight decrease in terrace dwellings.

Table 13: Households by Type 2011

	Detached	Semi-Detached	Terraced	Flats	Other*	Total
Derry City and Strabane	18,666 (32%)	17,592 (30%)	16,568 (29%)	4,442 (8%)	819	58,087 (100%)
NI	277,132 (37%)	207,904 (28%)	187,678 (25%)	64,518 (9%)	11,003	748,235 (100%)

Source: NISRA, Census 2011

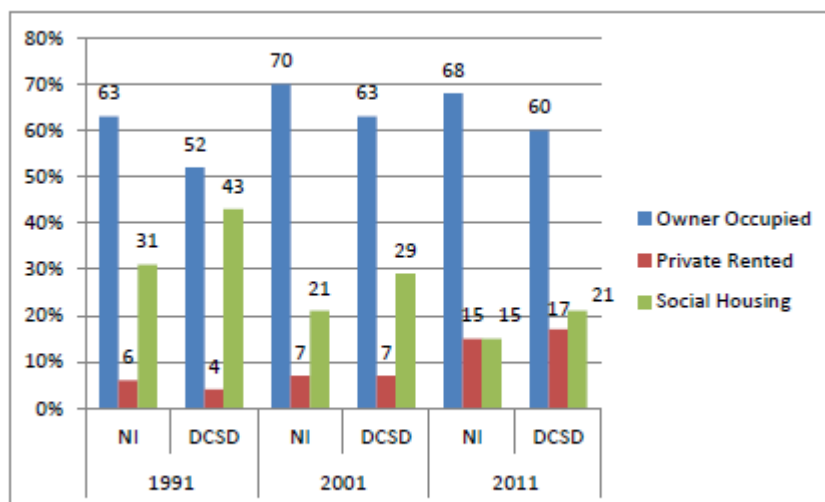
Table 14: Housing Tenure 2011

	Owner/Occupier	Social Housing	Private Rented and Other	Total Households
Derry City and Strabane	27,080(45.7%)	11,160 (18.8%)	14,370 (24.3%)	59240,596 (100%)
NI	469,070 (61.72%)	125, 440 (15%)	110,760 (14.6%)	760,000 (100%)

Source: NISRA, Census 2011

4.82 There have been substantial changes to the tenure profile of the Northern Ireland housing market. While owner occupation has remained fairly consistent, it appears to be following a downward trend. Between 1991 and 2011, the census recorded a substantial increase in the proportion of Private Rented Sector (PRS) properties, resulting in a falling percentage share for social housing. Owner occupation levels in Derry City and Strabane remain significantly less than NI average, while social housing has a higher than average proportion – see table 14 below:

Table 15: Tenure profile of the NI Housing Market



Source: NISRA

4.83 The long-term trend towards the formation of smaller and single person households have ensured that household growth has occurred across Northern Ireland. The increase in single person households throughout the UK reflects a mix of factors. These include higher divorce rates and higher numbers of adults delaying marriage and child bearing until they are in their 30s. However, the factor that is of most significance is older people that outlive their partners continue to live alone for a longer time.

Table 16: Household Trends 2001 – 2011

	2001	2011	Change 2001-2011	
			Number	%
Derry City & Strabane	48,921	55,569	6,648	13.6
Northern Ireland	626,718	703,275	76,557	12.2

Source: NISRA

- 4.84 Household figures, summarised in Table 16, suggest that from 2001 to 2011:
- The number of households in Derry City & Strabane increased by 13.6%, which is above the Northern Ireland rate of 12.2%;
 - The 2011 census shows that 28% of Derry City & Strabane households were 1 person and 28% of households were 2 person;
 - The average household size in Derry City & Strabane was 2.6.

Table 17: Household Projections by Household Type 2017 - 2037

	2017	2037	Change 2017-37	
			Number	%
Northern Ireland				
Single person households	204,202	240,225	36,023	18%
Two adults without children	200,014	248,093	48,079	24%
Other households with no children	109,502	120,365	10,863	10%
Lone adult with children	43,214	43,492	278	1%
Other households with children	170,367	160,475	-9,892	-6%
All households	730,299	812,650	82,351	11%
Derry City & Strabane				
Single person households	16,755	20,323	3,568	21%
Two adults without children	13,481	15,713	2,232	17%
Other households with no children	9,190	8,915	-275	-3%
Lone adult with children	5,029	4,329	-700	-14%
Other households with children	13,130	11,355	-1,775	-14%
All households	57,585	60,635	3,050	5%

Source: NISRA

- 4.85 Table 18, below, shows the current housing by type in Derry City & Strabane at April 2017. While the number of bedrooms spaces cannot readily be identified, it could be assumed that units with fewer bedrooms are made up of apartments and terrace properties. Using this assumption, the current proportion of smaller properties is less than 46% of all stock. We can also calculate that smaller households (single households and two adults without children), currently make up 53% of all households. By 2037, it is projected that small households will make up 59% of the population. Consequently, smaller size, new build houses in Derry City & Strabane, across all tenures, will be required to meet future household need.

Table 18: Derry City & Strabane Dwellings by Type 2017

	Apartment	Detached	Semi detached	Terrace	Total
Number	6,287	17,987	15,558	21,211	61,034
Percentage	10.3%	29.5%	25.5%	35.8%	100%

Source: LPS

4.86 The increase in smaller households means that the housing needs of people could be met through an increased supply of smaller units. However, not all one or two people households may want to live in a smaller property if they can afford a larger property. The 2011 census states that 23% of people had a long-term health problem or disability, which limited their day-to-day activities. This proportion is likely to increase with an estimated 23% of the population being aged 65+ by 2037. The household needs of those with a disability or mobility problems will need to be addressed through policies in planning, housing and social service sectors. This could lead to an increased demand for wheelchair, adapted, and Lifetime Home properties.

4.87 Overall Policy Direction:

The proposed policy has been adapted from HS4 House Types and Size in PPS 12. Members had suggested that the threshold was amended to 10 units, from the original policy to make it easier to administer and also reducing the apartment development threshold from 25 units to 10 units. The comments received have ensured an approach that is tailored to the District. The J&A also recognises that the Council is also supportive of achieving more-balanced and diverse communities in terms of shared-space and breaking down traditional community divisions. Whilst the LDP policies can not directly require cross- community balance, these varied housing developments and the increasing amounts of housing in central, more-neutral and accessible locations will all assist in achieving more-sustainable communities across the District.

4.88 Accessible Housing (Wheelchair and Lifetime Home Standards)

4.89 **Regional Development Strategy 2035:** Policy RG8 'Manage housing growth to achieve sustainable patterns of residential development' states the varied housing needs of the whole community need to be met, including special needs housing.

4.90 **Strategic Planning Policy Statement:** The SPPS states that 'Design is not limited to the appearance of a building or place but should also encompass how buildings and places function in use and over the lifetime of a development'. SPPS includes as a Core Planning Principle and as a strategic policy objective the need to provide a variety of house types, sizes and tenures as a means of providing a good quality housing offering and as a way of achieving balanced communities.

4.91 **Derry Area Plan 2011:** Policy BE 11 Access to Buildings for People with Disabilities states that the needs of people with disabilities will be taken into consideration in the determination

of planning applications for the development of buildings to which the public have access however there are no policies for housing.

- 4.92 **UN’s Convention on the Rights of Persons with Disabilities (CRPD)** Article 19 of the CRPD ‘Living independently and being included in the community’ states Parties to the Convention (including the UK) ‘recognize the equal right of all persons with disabilities to live in the community, with choices equal to others, and shall take effective and appropriate measures to facilitate full enjoyment by persons with disabilities of this right and their full inclusion and participation in the community.
- 4.93 **Section 75 and Disability Discrimination Act 1995** Section 75 of the Northern Ireland Act 1998 requires public authorities, in carrying out their functions, to have due regard to the need to promote equality of opportunity between nine equality categories, including persons with a disability.
- 4.94 **Draft Programme for Government** (October 2016) There are indicators which show that there is an under-supply of appropriate housing for particular groups, including housing for older people. To address this, actions are established, for example, to improve independent living and the provision of suitable homes, and that there should be more accessible homes for wheelchair users within the private rented and owner occupied sectors.
- 4.95 **A Strategy to Improve the Lives of People with Disabilities 2012 – 2015** A Strategy to Improve the Lives of People with Disabilities 2012 – 2015, was published by the Office of the First Minister and Deputy First Minister, in January 2013. This goal is linked to Article 19 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD). The Strategy promotes a concept of Independent Living, which advocates greater choice and control for disabled people. It recognises that in order for people with disabilities to live independent lives practical support, systems and resources are required.
- 4.96 **Mainstreaming Mixed-Tenure in Northern Ireland – Lifetime Homes:**
 The Department for Communities (DfC) and the Northern Ireland Federation of Housing Associations (NIFHA) have collaboratively produced and published this thinkpiece. The report included the following comments regarding Lifetime Homes as summarised:
- A key difference noted during the study trip was that Yorkshire and Wakefield and District had more flexibility in designing their specifications. Whilst incorporating good standards of design which are Building Control compliant, they work to different specifications and build to smaller space requirements than Northern Ireland’s social housing which is built to the ‘Lifetime Homes Standard’ required by the Housing Association Guide.
 - Some study trip participants suggested therefore that consideration could be given to: how we might reduce some of the ‘Lifetime Homes’ specifications in Northern Ireland, whilst continuing to adopt the key principles; and how to ‘square the circle’ of using the same developer and different specifications for social and private provision.
 - Some stakeholders noted ‘Lifetime Homes’ was not onerous for developers with minimal cost differences between these and those of current Building Control standards.

- 4.97 **Accessible Housing:** The term accessible housing is defined as housing that is designed to Lifetime Home standards or wheelchair standards as set out in Department of Communities' Housing Association Guide, found at the following link: <https://www.communities-ni.gov.uk/collections/housing-association-guide>. Standards for Lifetime Homes and wheelchair housing are already in place in Northern Ireland for social housing developments.
- 4.98 **Lifetime Homes Standards:** are a series of sixteen design criteria intended to make homes more easily adaptable for lifetime use at minimal cost. In Northern Ireland, all social homes are currently built to Lifetime Homes Standards. Lifetime Home standards were developed to ensure that homes are accessible and inclusive, to support the changing needs of individuals and families at different stages of life. Lifetime Homes are flexible, designed to create better living environments for everyone, from raising children, coping with illness or dealing with reduced mobility in later life, allowing people to remain independently for longer in their own homes. The development of homes within these standards is especially important in the context of an aging population and can prevent the need for costly and disruptive adaptations.
- 4.99 Features of "Lifetime Homes" ensure that a home can develop as the occupier. These include:
- Ample parking space close to home with level access;
 - Wider doorways;
 - Ground floor living room adaptable as an additional bedroom;
 - Accessible WC on ground floor with shower room potential;
 - Space and design for stair and floor lifts, hoists and wheelchair adaptable if required;
 - Easy open windows and easy bin access.
- 4.100 **Habinteg 'Towards Accessible Housing':** The Habinteg 'Towards Accessible Housing' toolkit highlights that the 'costs of inaccessible housing are wide-ranging and significant. They include:
- the costs of residential care that could otherwise be avoided;
 - levels of social care that could be reduced or removed;
 - impacts on independent living, employment and social life;
 - falls and other accidents which can be life changing or fatal;
 - mental health impacts; impacts on general health;
 - avoidable hospital admissions; and
 - increased stays in hospital due to lack of accessible housing to return to ('bed blocking').
- 4.101 The Habinteg toolkit also states 'Department of Health data that one night in hospital costs the NHS around £273; while one week's residential care averages £550. So the estimated £521 cost of building a 3-bedroom home to lifetime home standard would be met by just one week in residential care.' As Lifetime Homes are designed to meet changing needs, people are able to remain at home with less likelihood of being placed in sheltered accommodation or nursing homes prematurely.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 4.102 **Standard wheelchair housing:** is primarily designed to aid independent living for people with physical disabilities and those who also need a wheelchair for day to day mobility and require the larger areas and circulation areas afforded by this accommodation type. Housing Associations already cater for identified wheelchair need in their social housing planning applications. However, demand from people with a disability who wish to own their own homes, or rent privately, cannot readily be met, as there is no requirement for market housing to provide wheelchair accessible homes. Currently, approximately 35,000 people in Northern Ireland require a wheelchair on a daily basis, with 1,164 new wheelchair users registering (October 2016-Sept 2017, Musgrave Park Hospital).
- 4.103 **Department for Communities’ (DFC) Housing Association Guide** states that in developing wheelchair standard housing, Housing Associations are encouraged to consider the following key design principles and aims:
- generally, design that supports independent living, improves quality of life and contributes to wellbeing;
 - a universal approach to design, which seeks to achieve homes that are inclusive for a wide range of wheelchair users, and which takes account of a variety of other disabilities where possible. (e.g. dexterity, cognitive function, and hearing or sight impairments);
 - flexible and adaptable design to help future-proof for changing needs of occupants (e.g. ageing or degenerative diseases);
 - a default position of design for ‘assisted’ rather than ‘independent’ wheelchair users;
 - the provision of optimum floor space that takes account of aspects such as carers, larger turning circles, equipment, storage and flexibility (e.g. a ‘loose-fit, long life’ approach); and
 - consideration of a range of housing forms, including two storey wheelchair homes that can help dwellings integrate with the community and support higher densities, when required.
- 4.104 **Housing Executive’s Grants Department** demonstrates that, converting a ground floor bathroom to wheelchair standards in a Lifetime Home, costs approximately £3,000. This is in comparison to adapting a house not designed to Lifetime Home standards, where a ground floor bathroom, often requires an extension. It is calculated that an extension and equipment for a wheelchair bathroom in a home designed without Lifetime Home standards costs approximately £13,350 or an independent wheelchair user, and £14,530 for an assisted wheelchair user. Additional evidence from Housing Executive’s Grants Department states that the cost of adapting a private sector home, to provide a ground floor bathroom and bedroom, often requires an extension and costs in excess of £25,000. Accessible housing, therefore, provides substantial savings in publically financed Disabled Facilities Grants (DFGs). In addition, as DFGs are means tested for adults, some households who require an adaptation could be placed under significant financial pressure in trying to self-fund accessible housing.
- 4.105 The Building Regulations in England were revised in 2015 to incorporate many of the Lifetime Homes Standards. There is pressure for a similar change to the NI Building Regulations as the relatively minor additional costs per dwelling are considered to be outweighed by wider significant social benefits, including the current and anticipated cost of inaccessible housing.

4.106 Derry City and Strabane’s LDP Preferred Options Paper:

There was a limited response to Lifetime homes as a policy didn’t exist in the PPSs, however there was a comment that Lifetime Homes should have a minimum requirement for social housing, including bungalows and lifetime homes.

4.107 Local Context:

The 2011 census states that 23% of people had a long-term health problem or disability, which limited their day-to-day activities. This proportion is likely to increase with an estimated 23% of the population being aged 65+ by 2037. The household needs of those with a disability or mobility problems will need to be addressed through policies in planning, housing and social service sectors. This could lead to an increased demand for wheelchair, adapted, and Lifetime Home properties.

4.108 NISRA’s area statistics at 2018 for DCSD state:

- 19% of the population of Derry City and Strabane were aged 60+ years and 1.4 were aged 85+ years;
- The population of Derry City and Strabane aged 60+ is expected to rise by 66% by 2039;
- 23% of people had a long-term health problem or disability that limited their day-to-day activities (2011 Census);
- 75% of those aged 65+ years were living with a long-term health condition, of which 44% had a mobility or dexterity difficulty and 65 % said that their day-to-day activities were limited (2011 Census);
- 11% of people stated that they provided unpaid care to family, friends, neighbours or others (2011 Census);
- Of those aged 65+ years 72% lived in households that were owner occupied and 6% of households lived in the private rented sector (2011 Census);
- 8% lived in households that had been adapted or designed for wheelchair use; and
- 14% lived in households that had been adapted or designed for other physical or mobility issues.

4.109 New Wheelchair Users: Musgrave Park Hospital statistics report there were 131 new users in DCSD during 2016/17. This equates to 34% of the HGI and 16% of the identified LDP potential. Of the 131 new wheelchair users, 97 users, or 74%, lived in the owner occupied and private rented sector. This means that the proportion of new wheelchair users in the private sector (outside of nursing homes), in relation to the HGI is 25%, and 12% of the identified preferred housing growth in the LDP. 55% all wheelchair users lived in households of three or more people; consequently 45% were lived in households of one or two people indicating different sizes and types of housing units are required. Only 2 new wheelchair user households living in the private sector stated their home was wheelchair accessible.

4.110 Consultee Responses: NIHE: Strongly welcomes this policy. Following consultation with NIHE they believe these standards can be used in the development of accessible housing in the private sector and have provided policy wording, where it states that all new housing, regardless of tenure will be required to comply with the Lifetime Homes Standard and that in addition, at least 10% of new dwellings on developments of 20 dwellings or more will be required to be built to wheelchair accessible standards.

4.111 NIHE would like to see LDP require a proportion of wheelchair units to be provided on all housing developments including market housing over a certain threshold. While this could be marketed directly for wheelchair users, it could also be sold to non-wheelchair users. The purpose is to increase accessible housing stock, addressing an undersupply of appropriate housing for all, in the long term.

4.112 Dept for Communities, Housing Supply Policy:

The LTHs standard is managed by Habinteg (England) and there are 16 standard design criteria. DfC, however, adds an additional 9Nr. criteria, including the provision of straight flights of stairs (no winders), outward opening bathroom doors, and the provision of floor formers for future showers, etc. These additional standards go beyond the normal LTHs requirement and therefore this may need to be taken into account, if this has not already happened.

4.113 Overall Policy Direction:

The above evidence shows that there is a clear and growing need for accessible housing. Having considered all the above evidence, local context and responses from Members, the approach is for all new housing, regardless of tenure will be required to comply with the Lifetime Homes as set out in the Department of Communities, Housing Association Guide. The approach is widely acknowledged to be the best mechanism available to deliver flexible and adaptable housing to meet a whole range of needs. The onus will be on the developer to demonstrate by way of a Compliance Statement that the dwellings are in accordance with the standards set out in DFC’s Housing Association Guide. For developments over 5 units, every applicant must state how they have considered and are proposing to address Wheelchair Standards as set out in DFC’s Housing Association Guide.

4.114 Quality in New Residential Development

4.115 **Strategic Planning Policy Statement:** The SPPS contains specific policy for safeguarding the character of established residential areas. The SPPS states that Councils should bring forward local planning policy or guidance for achieving quality in residential development.

4.116 The relevant policies for New Residential Development that currently exist are

1. **PPS 7, ‘Quality Residential Environments’**, Policy QD1 Quality in New Residential Development;
2. **PPS 7, Addendum.** Policy LC3 Permeable Paving in New Residential Developments;
3. **PPS 12: Housing in Settlements, Planning Control Principle 2 – Good Design;**
4. **Derry Area Plan 2011 - Policy H1 Housing Design and Layout and Policy H 2 Open Space Provision in New Housing Areas.**

4.117 Derry City and Strabane City Council’s LDP Preferred Options Paper.

There were a number of POP responses relevant to the design of housing including the following responses:

1. Supportive of high standards of design and housing future proofing;
2. Keen to see guidance with LDP on minimum space standards, open space, active travel and providing safe and secure neighbourhoods;

3. Landscape proposals should be required for all housing developments where communal open space is required;
4. Larger housing schemes need to include community facilities such as retail, health shared amenities and leisure;
5. Secured by Design should be included in LDP and
6. Important to have playparks in residential areas.

4.118 **Consultee Responses:**

1. **DCSDC Environment and Regeneration:**

- Site specific conditions are addressed such as biodiversity, connections to existing parks, greenways, climate adaptation considerations etc;
- Add specific reference to greenways, walkable neighbourhoods, open space and trees.

2. **DFI Roads:** Reference should be made to Creating Places May 2000.

3. **NIHE:** Would like to see additional criteria re energy efficient homes and renewable energy homes in the proposed policy. The General Development Principles, GDPOL 1 & 2 refer to sustainability and energy efficiency.

4. **Historic Environment Division:** Recommended policy wording from 'favourable consideration' to 'will be sought'.

4.119 **Overall Policy Direction:**

Overall there was general support for the policy within QD1, Quality in New Residential Development which has been carried forward, along with Policy LC 3 Permeable Paving in New Residential Developments which has been incorporated into this policy. Some extra wording in the criteria refers to level requirements, appropriate connections to blue and green infrastructure and SuDS, as per feedback from consultees and planning officers. The Justification and Amplification also references 'Living Places' and Design and Access Statements and refers to DPOL policies in the General Principle policies which reference more detailed information about SuDS.

4.120 **Design Concept Statements, Concept Master Plans and Comprehensive Planning.**

4.121 **Strategic Planning Policy Statement.** Supporting Good Design and Positive Place Making is included in the SPPS. In preparing LDPs, the SPPS states that 'A design concept should be sought from and agreed with the developer incorporating sustainable elements such as good linkage of housing with schools, community facilities and public transport; provision for cycling; adequate provision of open space and landscaping integrated with broader green and blue infrastructure systems; energy efficient design of housing units and use of sustainable drainage systems, where appropriate'.

4.122 **Planning Policy Statement 7:** 'Quality Residential Environments. Policy QD 2: 'Design Concept Statements, Concept Master Plans and Comprehensive Planning.

4.123 **Developer Contributions:** In June 2014 the Department for Social Development (DSD) published a consultation document to seek views on options for a scheme to secure developer contributions towards affordable housing in NI. At the same time draft Planning Policy Statement 22 'Affordable Housing' was published by the Department for the

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

Environment (DOE). It stated that the proposed introduction of developer contributions, “...will promote a mix of housing particularly in terms of tenure, price and household composition including families with children, single person households and older people.” As neither of these previous documents were ever implemented prior to the transfer, DSD therefore commissioned further independent research in 2015 to provide up to date and Northern Ireland specific evidence on the economic impact of introducing a Developer Contributions Scheme. A report from this study was formally published in December 2015. The viability testing contained within the study report confirms the relative weakness of the current housing market in Northern Ireland with questions over the viability of developing 100% market housing in many parts of Northern Ireland.

4.124 Derry City and Strabane City Council’s LDP Preferred Options Paper.

There were a number of POP responses relevant to the design of housing including the following responses:

1. Supportive of high standards of design and housing future proofing;
2. Larger housing schemes need to include community facilities such as retail, health shared amenities and leisure;
3. Keen to see guidance on safe and secure neighbourhoods;
4. Landscape proposals should be required for all housing developments where communal open space is required;
5. Secured by Design should be included in LDP;
6. Important to have playparks in residential areas and
7. Should allow for other uses within residential developments – live/work units, business workshops etc.

4.125 Consultee Responses:

1. **DCSDC Environment and Regeneration:** QD2 Guidance should include specific reference to the Green Infrastructure Plan and Climate Adaptation Plan (both currently under development). Suggest that Parks Management Section are consulted at concept design stage to ensure requirements for open space, play, recreation, biodiversity, connectivity, greenways etc. are met at early stages, to encourage the integration of Green Infrastructure and Climate Adaptation principals into design development.
2. **NIHE:** Refer to play facilities where required in the J&A in the proposed policy.

4.126 Member’s Response: In addition to the formal consultation exercise, a series of ‘round table discussion’ (RTD) meetings were held in 2018/2019. Members did not have any specific issues with this policy but were keen to have the inclusion of Developer Contributions / Community benefits contained within LDP General Principles. Reference to this has also been included within this policy.

4.127 Overall Policy Direction:

This policy has been carried forward, relatively unchanged from Policy QD2, Design Concept Statements, Concept Master Plans and Comprehensive Planning in PPS7. However, the thresholds of when a CMP is required has been amended from 300 dwellings to 200. This has been proposed to reflect potentially smaller sizes of housing development in the District that will come forward across the LDP period and will ensure that well-designed CMPs will be applicable over potentially a larger number of smaller developments rather than a limited

number of larger ones.

4.128 **Residential Extensions and Alterations**

4.129 **Strategic Planning Policy Statement.** The SPPS states that Councils should bring forward local planning policy or guidance for residential extensions or alterations.

Planning Policy Statement 7, Addendum: Policy EXT1 Residential Extensions and Alterations.

4.130 **Consultation Responses:**

NIHE – they noted that some smaller houses requiring disabled extensions only have on street parking and criteria (d) does not refer to this issue.

There were no specific issues raised by the Members to this policy.

4.130 **Overall Policy Direction:** This policy has been carried forward from PPS7 Addendum EXT 1, Residential Extensions and Alterations as it generally was working well. There was policy clarification following discussions with Development Management officers to note in the proposed policy that the requirement of ‘Guidance for Residential Extensions and Alterations’, to share facilities such as a kitchen will not be afforded determining weight in the assessment of proposals for ancillary accommodation. This follows planning appeals rulings on these type of applications. The J&A also clarified that this policy applies to extensions in the countryside. Given the volume of J&A in the existing PPS 7 Addendum the draft Plan Strategy document notes that this will be contained in Guidance for Residential Extensions and Alterations.

4.131 **Redevelopment of Existing Buildings, or Infilling of Sites for Housing**

4.132 **Strategic Planning Policy Statement** The SPPS generally accords with Policy LC1 of PPS7 Addendum, however it does not refer to space standards.

4.133 **Planning Policy Statement 7, Addendum Safeguarding the Character of Established Residential Areas.** Policy LC1 – Protecting Local Character, Environmental Quality and Residential Amenity, seeks to protect local character, environmental quality and residential amenity within established residential areas, villages, and smaller settlements and sets out criteria in relation to density, pattern of development as well as specifying space standards for new dwellings and apartments.

4.134 There were no specific comments on this policy from the POP, Members and Consultees.

4.135 **Overall Policy Direction:**

Following discussions with Development Management officers this policy appears to be working well and as such this policy has carried forward from Policy LC 1 in PPS 7 Addendum including the space standards will be brought forward into the Annex in the draft Plan Strategy.

4.136 **Flats and Apartments**

4.137 **Strategic Planning Policy Statement:** The SPPS encourages sustainable development by accommodating housing through recycling buildings and encouraging compact urban forms.

4.138 **Planning Policy Statement 7, Addendum Safeguarding the Character of Established Residential Areas.** Policy LC 2 – The Conversion or change of use of existing buildings to Flats or Apartments, sets out policy on the conversion of existing buildings to flats or apartments.

4.139 **PPS12 – Policy HS1 Living over the Shop** ‘Living over the Shop’ brings many social and economic benefits and is a cost-effective means of accommodating additional housing. Underused or wasted space is brought back into use and the fabric of buildings is put into good repair and maintained. It can provide a useful source of affordable rented housing and can contribute to the vitality and viability of town centres.

4.140 **Derry Area Plan 2011:**

1. Policy CA 4 Residential Use on Upper Floors;
2. Policy H 5 Designated Flats Zones;
3. Policy H 6 Conversions Outside the Designated Flats Zones;
4. Policy H 7 Flats Development and Redevelopment Outside the Designated Flats Zones.

4.141 **Consultation Responses:**

1. **NIHE:** supported the wording of the draft policy and supports the policy including Living over the Shops.
2. **Dept for Communities, Housing Supply Policy:** The Department welcomes the focus on reusing empty town and city centre premises to provide housing which will help to revitalise town and city centres and reduce dereliction. A more common term coming into general use is ‘city/town centre living’ of which LOTS would be one aspect along with other place shaping and place making considerations.

4.142 **Local Context:** A preliminary history check of College Terrace, Abberfoyle Terrace, Clarence Avenue, Asylum Road, Fountain Street and Simpsons Brae showed a number of applications for flats refused in these streets over the years, however there have been a number of approvals for HMOs in these streets. A more detailed consideration will be carried out at Local Policies Plan stage to decide whether these streets merit the prevention of flats/apartments against the proposed new policies.

4.143 **Overall Policy Direction:**

This policy has been brought forward with amendments to Policy LC 2 in PPS 7 Addendum. This policy has also been amended to include the Living over the Shops which is policy HS1 in PPS12 as the criteria are similar. The DAP policy wording has largely been brought forward with amendments to consolidate wording from LC2 and the DAP policies. The former DAP ‘Designated Flats Zone’ is retained as an Interim designation and will be called a ‘Flats Policy Area’ in the new policy. It is clarified that it will equate to the Density Bands 1 and 2

which will be defined at the LPP stage. The former Flats Policy Exemption Areas in DAP are now to be called ‘Flats Prevention Zones’, for clarity. Within these areas, it is considered that the ‘prevention’ should remain limited to flats / apartments.

4.144 **Specialist Residential Accommodation**

4.145 **SPPS – Supported Housing – Page 75, 6.147** The SPPS states that the HNA/HMA will identify the range of specific housing needs, including supported housing needs. The HNA/HMA will only relate to that need which cannot be met through a general needs housing solution but requires the provision of a specialised, accommodation-based solution.

4.146 **Derry Area Plan 2011 - Policy H 4 Housing for People with Special Needs.** Planning permission will normally be granted for a residential or nursing home in a residential area provided there are no convincing objections on traffic or amenity grounds.

4.147 **NIHE:** supported the wording of the draft policy.

4.148 **Local Context:**

Population projections over a 10 year period from 2014-2024 predict that in the Derry City and Strabane district, the population aged 65 and over will increase by 27.7% which is above the NI average of 25.8%. The population aged 85 and over is predicted to increase to 42.4% which is above the NI average of 39.7% (NISRA Population projections 2014). In contrast, the proportion of people aged 65 and over is currently and projected to 2024 to be slightly higher than the NI average.

4.149 Supported housing is for individuals who cannot live independently in their own home. They require extra housing support and/or an element of care in addition to a home. Funding for the additional services is allocated from the Supporting People budget which in Derry City & Strabane in 2016/17 amounted to £8.78 million and supported 1,862 people. Accommodation can be self-contained or shared. Shared housing can include cluster dwellings, group homes or hostels. Some schemes will provide the services of a warden who may be a resident.

4.150 **Older Peoples Residential Care**

The Trust provides residential care for older people in a number of towns through the western Trust Area. Within our District, care is provided at:

- **Greenfield Resident Home**, Melmount Road, Strabane, it provides care and accommodation for 34 residential and 1 Day care client for over 65 years who do not need hospital or nursing care but need a safe and comfortable environment.
- **Rectory Field Residential Home**, Limavady Road, Derry, is a 35 bed home which provides 24 hour care to older people on a permanent, temporary or respite basis.
- **Seymour Gardens Residential Home**, Nelson Drive, Derry, it caters for 26 residents with memory impairment.
- **William Street Residential Home** caters for 27 residents.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 4.151 The Trust provides a number of places and the remainder are provided by the independent sector. For example Apex Housing provide supported living for Older People at Daleview House (Shepherd's Glen), Alexander House (Bishop Street) and Abbey House (The Little Diamond). Supported living for adults with learning disabilities is provided at Iona House (Strabane), Belmont Cottages (Racecourse Road), Beechway House (Shepherd's Way) and Ardavon (Bonds Hill). Supported living accommodation for people with Mental Health issues is also provided at Ballyoan House in Gransha, Clondermott House (Clondermott Park), Dunvale House (Duncreggan Road) and Parkview Castlederg. Castlederg has 2 Residential Care Homes, Parkview (Apex) and Silverdale (Private) and Newtownstewart has 1 nursing home, Bell-Gray (Apex. Closed July 2016). There are a number of privately owned nursing homes throughout the District.
- 4.152 **Consultee Response:**
NIHE: supported the wording of the draft policy. There is currently no identified requirement for new supported housing in Derry City & Strabane District Council for the period 2017/18 – 2019/20. This will be kept under review.
- 4.153 **Overall Policy Direction:**
Specialist housing provides for people with specific housing needs, particularly in relation to impaired physical and mental health and old age. The need for specialist housing is likely to increase as there is an ageing population and relatively high levels of poor health in parts of the District. Policy H4 Housing for People with Special Needs, in the DAP has been amended and replaced to include criteria that meets community needs and that there is convenient access to relevant local services and facilities. This will be subject to meeting all other relevant policy requirements.
- 4.154 **Traveller Accommodation**
- 4.155 **SPPS** – Traveller Accommodation is referenced in the implementation of the SPPS. It states Travellers have distinctive needs which will be assessed as part of the local HNA/HMA. Where the HNA/HMA identifies a demonstrable need for Travellers specific accommodation, planning permission will be granted for a suitable facility to meet this need. This may be provided through a grouped housing scheme, a serviced site or a transit site, subject to meeting criteria. Where a need is identified for a transit site or a serviced site, which cannot readily be met within an existing settlement in the locality, proposals will be required to meet the policy requirements in respect of rural planning policy for social and affordable housing.
- 4.156 **PPS12** – Planning Control Principle 4 – Balanced Communities and Policy HS3 Travellers Accommodation Where a local housing needs assessment identifies that there is a demonstrable need for Travellers specific accommodation, planning permission will be granted for a suitable facility which meets this need and includes criteria that needs to be met.
- 4.157 **Northern Ireland Human Rights Commission (the Commission) report “Out of Sight, Out of Mind”:** Travellers' Accommodation in NI, was published in March 2018. The Commission adopted a case study approach in four local Council areas, including Derry City and Strabane District Council. The report outlines the Commission's 45 recommendations for

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

both Local Councils (page 314) and Public Authorities (page 307) to implement, including 4 recommendations for Local Councils, on eof which was to ensure Local Councils should take reasonable steps to prevent undue delays in the planning application process relating to Travellers' accommodation. They should also ensure that all planning processes are fair, impartial and transparent.

- 4.158 **Comprehensive Traveller Accommodation Needs Assessment:** The Housing Executive commissioned and published Comprehensive Traveller Accommodation Needs Assessments in 2002, 2008 and 2015 to establish the accommodation needs (for social housing, Traveller specific Group Housing, serviced sites and transit sites) of the Irish Traveller Community across Northern Ireland. In 2019, new research will be undertaken to provide the necessary information to enable a new Irish Traveller strategy to be developed for the period 2020-25.
- 4.159 **Local Context:** Currently, there is no new Traveller need identified for the Derry City & Strabane District. Despite there being no identified need at present, the Housing Executive is currently carrying out site investigation studies in an effort to find a temporary transit site in Strabane Town. This is due to the fact that the current transit site lies within the planned A5 road works. One Serviced site (Daisyfield) is currently available in Derry for those Travellers who prefer to reside in static mobile home type accommodation. For those Travellers who wish to remain nomadic, two transit sites are available in Greenbrae, Strabane and Ballyarnet in Derry.
- 4.160 **Responses to the POP:** Lack of quality product for traveller's accommodation.
- 4.161 **Consutlee Repsonses:**
NIHE: They strongly supported the wording of the draft policy. They suggested that the words for single family traveller shouldn't be stated as it implies that the development is only built for one family. Also the term Irish Traveller is used by NIHE as a statutory obligation. Following consultation with the Council's Good Relations Officer, the state that the term "Travellers" is correct and inclusive of all travelling communities whereas the Irish Traveller is a specific grouping within the "Traveller" definition.
- 4.162 **Member's Response:** In addition to the formal consultation exercise, a series of 'round table discussion' (RTD) meetings were held in 2018/2019. Member's acknowledged the importance of making sure that as a Section 75 group it is important that the plan adequately meets the needs of travellers.
- 4.163 **Overall Policy Direction:**
HS3 (Amended) Travellers Accommodation has been brought forward into the Strategy. PCP4 in PPS12, also includes the line 'where a need is identified for Travellers, specific accommodation this should be facilitated at suitable sites. This policy states that where a local Housing Needs Assessment identifies that there is a demonstrable need for Travellers specific accommodation, planning permission will be granted for a suitable facility which meets this need. Where a need is identified the Local Policies Plan will identify suitable traveller site(s).

4.164 **Houses in Multiple Occupation Policy Areas and outside of HMO Policy Areas**

- 4.165 **Planning (Use Classes) Order (Northern Ireland) 2015:** An HMO is a sui generis use for the purpose of the Planning (Use Classes) Order (Northern Ireland) 2015 and thus planning permission is always required for a change of use to an HMO (sui generis use are those that do not fall within any particular use class).
- 4.166 **Strategic Planning Policy Statement:** Paragraph 2.3 states that the basic question to be addressed is whether the development would unacceptably affect amenities and the existing use of land and buildings that ought to be protected in the public interest. Section 4 sets out the planning principles when making decisions. Paragraph 4.12 relates to the safeguarding residential and work environs. Paragraph 5.72 states that all planning applications should be guided by the principle that sustainable development should be permitted, having regard to the development plan and all other material considerations, unless the proposed development will cause harm to interests of acknowledged importance.
- 4.167 **The Housing (NI) Order 2003** identifies an HMO as a house occupied by more than two qualifying persons – being persons who are not all members of the same family. See Evidence Base 16b: HMO study for further information.
- 4.168 **Derry Area Plan 2011:** The DAP has a policy controlling flat conversions, however there is no policy on HMOs (a policy lacuna). CA5 of the DAP relates to the protection of existing residential areas within the Central area and recognises the importance of a strong residential component to the area’s general well-being. The DAP and prevailing regional policies aim to encourage a strong vibrant and diverse central area. A mix of residential tenure in an area assists such diversity and vibrancy in the central area of a city.
- 4.169 **Dept for Communities, Housing Supply Policy:** Asked for the Council to consider additional amplification/ clarification regarding bedroom threshold, clarity in language and other wording in the criteria listed in a draft policy presented to them.
- 4.170 **Local Context:**
There are currently 485 HMO properties within the Derry City & Strabane District according to the Statutory Registration Scheme Northern Ireland 2018. The HMO concentration areas and ‘Hotspots’ for Derry City can be seen below and in figure 1 of the EBB 16b: HMO Study paper. The Hotspots map shows that the majority of the Derry City HMOs are in close proximity to Higher Education Faculties.
- 4.171 NIHE research on the private rented sector for Derry City & Strabane District Council Area show lifestyle choices for single and younger persons between the ages of 18-29 are having a greater impact on the housing market. The postponement of family and traditional longer-term households has led to a significant rise in the number of single person households. The increase in the amount of younger people leaving home after University to seek work elsewhere is also increasing. Those leaving to work abroad will also be seeking short-term affordable accommodation.

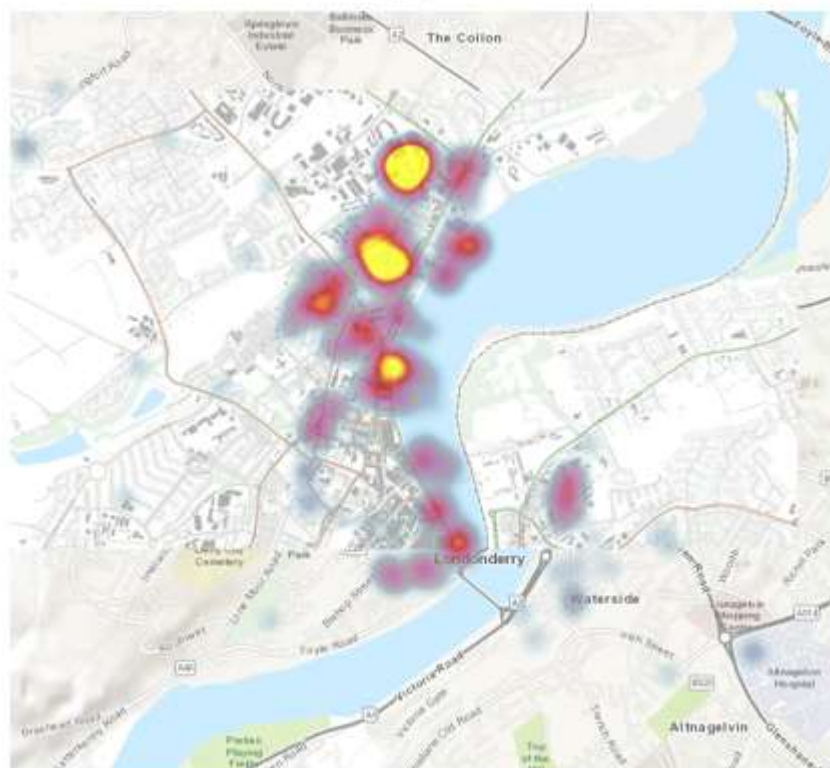
Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 4.172 Many students will continue to live at home while studying, however a large amount of students, particularly international students will require residence while attending the Magee Campus of Ulster University. This will therefore lead to an increased amount of students seeking private rental accommodation and in particular HMOs. Ulster University, Magee campus plans to double its current student numbers to 9,400 by 2025, with full time undergraduates being increased by approximately 2,600 to 6,000. Magee currently has 680 places within the managed campus halls based at Coppin House and Duncreggan student village. As stated in the Ulster University Estate survey 2018-2019, there are currently no plans to expand the amount of living spaces for students.
- 4.173 It could be argued that residents of HMOs could be noisier and thus create more general disturbance than other more settled residents. However, any breach is a matter for the owner and letting agent in the first instance. It would not be in their interest to have ongoing disputes with neighbouring residents and any complaints could be dealt with by Environmental Health.
- 4.174 The SPPS states that a basic question is whether a proposal would unacceptably affect amenities and the existing use of land and buildings that ought to be protected in the public interest. A recent PAC appeal report at Grafton Terrace, Derry regarding floor space issues stated that ‘there were no objections from EH and the PAC was not convinced that the size and scale of the living accommodation proposed within the appeal property is insufficient to cause detriment to the residential amenity of prospective residents’. The following recent appeals have been considered as part of this evidence base, namely 2017/A0152, 2018/A0161, 2018/A0068 and 2017/ A0196.



Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

Concentrated HMO Zones within Derry City



4.175 **POP Responses:** New housing needed for university expansion – with HMOs or purpose built accommodation.

4.176 **Consultee Responses:**

NIHE: The HMO market is driven by growing demand from students, single persons, migrant workers and young professionals. As the opportunity to rent social housing from either the NIHE or a Housing association is limited, HMOs are a valuable source of affordable housing for many. Derry and Strabane is likely to have ongoing need for low cost affordable housing. The demand for HMO accommodation is likely to be sustained as a consequence of welfare reform, changing patterns of household formation and student accommodation.

4.177 **Dept for Communities: Housing Supply Policy:** The Council may wish to provide additional amplification/ clarification and in particular the wording of criteria listed and also to note that HMO licencing provides scope to control the overall number of occupants in a HMO, which may be a more suitable way of controlling the risks of overcrowding than a blanket planning constraint. They also suggested the Council consider the impact of criteria likely to restrict the scope to provide HMO accommodation in the context of the reduction in average household size and the increase in single persons households (and changes to benefit system, which has meant that for many people this is the only viable affordable housing solution).

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

4.178 **Member's Response:** Members expressed initial concern at a suggested HMO policy limit of 30% but later agreed that the policy could be continued to be drafted with this level. Members were keen to ensure that surrounding residential amenity was protected and that the policy should ensure that all HMO's provide a reasonable standard and size of accommodation for HMO occupants.

4.179 **Overall Policy Direction:**

As there are policies on HMO development for the District it was considered that there was a need to provide a policy for Houses in Multiple Occupation (HMOs) as an important component of the housing provision in the District. It is acknowledged that the proliferation of one type of accommodation can be detrimental, however pro-active management of the numbers of specific accommodation types helps to maintain the amenity of local areas. Pro-active policies identifying appropriate locations that are able to accommodate such developments can also help to reduce the pressure in these core areas, recognising that there is a rising demand for shared forms of accommodation within Derry and Strabane.

4.180 Within designated HMO policy areas, it is proposed that planning permission will only be granted where the numbers of HMO dwelling units does not exceed 30% of all dwelling units within the policy area. Based on a desk top study none of the hotspot areas surveyed exceeded 30% and it was considered a reasonable sized threshold within these hotspots concentration areas. This is to ensure that HMOs do not become over-dominant within established residential areas with the potential to impact on residential amenity.

4.181 Outside of HMO policy areas, planning permission will only be granted for further HMO development where the number of HMOs does not exceed 10% of dwelling units on that road or street. Similarly, this is to ensure that HMO influence is managed in those well-established residential areas where HMO's have yet to reach a significant level of occurrence.

4.182 The second policy relates to change of use applications from existing buildings to HMOs, extension / alteration to houses and flats used as HMOs or new build HMOs. The thrust of the policy is to permit and manage the development of HMO's whilst simultaneously safeguarding residential amenity.

4.183 To manage HMO development in settlements in the interim period until the LDP Local Policies Plan is adopted, the J&A states that the Council will not permit more than 30% of any of the houses within any street to be granted for further HMO development.

4.184 The limit of 4 bedrooms is included in the policy, because it can be assessed in planning application drawings, it is enforceable and it is more defensible. The number of persons habiting the HMO was an issue raised by Members and it was considered that the HMO licensing is a more relevant tool to limit number of persons rather than Planning.

4.185 **Large Scale Managed Student Accommodation**

4.186 **Strategic Planning Policy Statement:** Paragraph 2.3 states that the basic question to be addressed is whether the development would unacceptably affect amenities and the existing use of land and buildings that ought to be protected in the public interest. Section 4 sets out the planning principles when making decisions. Paragraph 4.12 relates to the safeguarding residential and work environs. Paragraph 5.72 states that all planning applications should be guided by the principle that sustainable development should be permitted, having regard to the development plan and all other material considerations, unless the proposed development will cause harm to interests of acknowledged importance. A significant student population can bring vibrancy and vitality to the day and evening economy when sustainably located.

4.187 There are currently no policies in the Derry Area Plan and the Strabane Area Plan which specifically relate to Large Scale Managed Student Accommodation.

4.188 **LDP Context:**

Derry city has long had the ambition and potential to develop into a ‘university town’, centring on the Magee campus of Ulster University. Since the 1984 launch of a four-campus model for the University, the Magee campus has developed from less than 300 students to more than 4,000 now with ambitions to at least double this number again by the 2030s. In addition, there are plans for a further expansion to the North West Regional College campus in Derry city, with an increase in student numbers. See Derry & City Strabane District Council, Review of the population forecasts for Derry City & Strabane District Council, 2017 – 2032.

4.189 **POP Response:** There were no responses directly related to this type of housing as this is a new policy.

4.190 **Member’s Response:** Members were supportive of the proposed draft policy with discussions of thresholds.

4.191 **Overall Policy Direction:**

Although students are often most closely associated with HMOs, it is recognised that students can also be accommodated in university Halls of Residence, alternative forms of privately rented housing and Large Scale Managed Student Accommodation. Well-managed accommodation can play an important role in growing the city centre population through the development of balanced communities with an appropriate mix of housing types and tenures.

4.192 This policy will allow for the development of purpose built student accommodation The Council recognise that students studying and living in Derry and Strabane make a significant contribution to the local and regional economy, and the regenerative benefits that student accommodation brings to the city. It also needs to recognise the need to ensure that the accommodation provided for residents is of a satisfactory standard and that the impact on neighbouring properties is not detrimental to their amenity.

4.193 The policy will therefore seek the development of suitably sized, well-designed and sustainably located student accommodation to serve the relevant educational locations. It is

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

envisaged that such development will largely be city centre located to enable the maximum social and economic benefits. There is no minimum-size restriction due to lack of supporting 'evidence' for this specific threshold and to recognise the likely smaller-scale than in other large cities.



4.194 **Sustainability Appraisal:**

Throughout their formulation, the policies contained within the Housing in the Settlements and Countryside Chapter have been subject to an ongoing internal sustainability appraisal (SA). This is in addition to the wider external SA, conducted by Shared Environmental Service as part of the wider suite of impact assessments/appraisals required under the Planning Act (Northern Ireland) 2011. The internal appraisal was carried out with the fourteen objectives of the external appraisal in mind (refer to the SA report for more information).

4.195 The process of sustainability appraisal aims to ensure that a council's approach towards Housing in the Settlements and Countryside is the most sustainable of all reasonable options available i.e. having considered any reasonable alternatives. In the case of Housing in the Settlements and Countryside policies, it is not considered that any of the alternatives could be considered to be reasonable as there are strict legislative requirements pertaining to waste. The proposed policies are the only realistic options to meet the aims of the RDS, SPPS and waste management legislative framework.

4.196 With regard to the degree of sustainability of each the resulting proposed policies, this is outlined below:

4.197 **Policy HOU3 Density of Residential Development**

This policy has a minor positive effect on all of the social sustainability objectives by encouraging development that can take advantage of the facilities and series located around it and particularly the opportunities for active and sustainable travel. However, it is recognised that development along arterial transport routes may have poorer surrounding air quality. Positive effects are also identified for all of the economic sustainability objectives though facilitating opportunities for accommodation that suits students and supporting town centre living with associated access to material assets and enhancing vibrancy and vitality. This approach also supports the environmental sustainability objectives to protect physical resources and use sustainably, reduce causes of and adapt to climate change and to protect, manage and use water resources sustainably and minor positive effects are identified. Facilitating greater densities of development in areas where there is good access to active and sustainable travel will deliver significant positive effects on the objective to encourage active and sustainable travel. Development under this policy will be in settlements only and the effect on the other sustainability objectives is negligible. This option is considered to be a sustainable option.

4.198 **HOU 4 Protection of Existing Residential Accommodation**

By keeping residential areas residential, this option will deliver a minor positive impact on all of the social sustainability objectives. Maintaining a population in central areas will help to support vitality and vibrancy in town centres, leading to a minor positive impact on the objective to enable sustainable economic growth. As this policy will only influence areas where there is existing development in established city and town centres, it has a very limited influence on the environmental sustainability objectives. A minor positive impact is identified for the objective to encourage active and sustainable travel as housing protected under this policy should be highly accessible to several forms of active and sustainable travel. A positive

effect is also identified for protecting, conserving and enhancing the historic environment through retaining townscape character in identified areas which may have historical links to industrial heritage. The effect may be strengthened at LPP if new sites in the former Strabane AP are included. This policy is considered to be a sustainable policy.

4.199 HOU 5 Affordable Housing in Settlements, HOU 6 House Types, Size and Tenure, HOU 7 Accessible Housing (Lifetime Homes and Wheelchair Standards).

The approach of requiring new residential development to be comprised of a mixture of house types, tenures and sizes and to be accessible and adaptable has a significant positive impact on all of the social sustainability objectives. The approach supports social and intergenerational contact and promotes inclusion. It helps to reduce factors causing inequality and delivers housing that is flexible and capable of becoming a 'lifetime home'. A significant positive effect is also identified on the objective to enable sustainable economic growth, as the approach will help to provide housing for employees across a range of employment sectors and makes the district a more attractive place to live, work, visit and invest. As these policies will only affect the composition of housing and do not influence the quantum or location of housing, they do not have any perceptible impact on the environmental sustainability objectives, however some positive and negative influences are identified. This policy is considered to be a sustainable policy.

4.200 HOU 8 Quality in New Residential Developments and HOU 9 Design Concept Statements, Concept Master Plans and Comprehensive Planning.

This approach delivers positive effects on almost all of the sustainability objectives. The policies seek to create high quality, sustainable, accessible and safe residential environments. The emphasis on accessibility and creating linkages through walking and cycling strongly supports the objectives to improve health and well-being, to strengthen society and to encourage active and sustainable travel and significant positive effects are identified. Encouraging quality design and concept masterplanning of larger developments helps to ensure that natural features are preserved and incorporated sensitively into developments and encourages more efficient and sustainable pattern of development. This policy is considered to be a sustainable policy.

4.201 Policy HOU 10 Residential Extensions and Alterations

This policy has quite a narrow influence and will only occur in conjunction with existing residential development. It therefore has very limited effects on the majority of the sustainability objectives. Through facilitating housing extensions and alterations which help to meet the needs of the occupants, minor positive impacts are delivered for the objectives to improve health and well-being and to provide good quality, sustainable housing. While some positive influences are identified in terms of using land efficiently, retaining natural assets and sustaining local character and appearance there are no perceptible impacts on any of the other sustainability objectives. This option is considered to be a sustainable option.

4.202 HOU 12 Flats and Apartments, HOU 13 Houses in Multiple Occupation (HMO) Management Areas, HOU 14 Houses in Multiple Occupation (HMO) and HOU 17 Large-scale managed student accommodation.

The policies encourage housing types that are affordable and promote positive social interaction and the inclusion of all groups which delivers positive effects on all of the social

sustainability objectives. The policies also seek to reduce the risk of nuisance or amenity impact and promote safe communities. Significant positive impacts are identified for the objectives to strengthen society and to provide good quality, sustainable housing. Positive effects are also seen for all of the economic sustainability objectives through the support these policies will give to students and employees with lower incomes. By supporting the reuse of existing properties in some areas and directing higher density development to the areas that are best suited to accommodating it, these policies support the proximity principle and will enable people to access to a wider range of utilities and infrastructure services. Significant positive impacts are predicted for the objectives to enable sustainable economic growth and to manage material assets sustainably.

4.203 As the policies relate to development within areas that are already urban, the effects on the environmental sustainability objectives are also positive in the majority of cases, with neutral effects on natural and water resources. A significant positive effect is identified for the objective to encourage active and sustainable travel as these policies indirectly encourage greater population densities in areas that are most accessible to active and sustainable transport routes and should support less reliance on cars in these areas. Significant positive impacts are also indicated for the objective to protect, conserve and enhance the historic environment as the policies support the reuse of old buildings, but include safeguarding measures to protect streetscape and townscape and require development to respect and maintain the character of areas. This option is considered to be a sustainable option.

4.204 HOU 15 Specialist Residential Accommodation

The option has a positive impact on all of the social sustainability objectives through enabling the provision of suitable accommodation for people with physical or mental health issues or specific needs. The policy approach helps to reduce inequalities through the requirement of this type of development to be accessible to relevant local services and facilities, including local shops, public transport routes and health facilities and encourages positive social interaction. Minor positive impacts are identified for the objectives to improve health and well-being and to strengthen society. These are expected to strengthen over time to significant positive in the long term, as the provision of high quality specialist residential accommodation may become increasingly important in the context of an ageing population, which is a key sustainability issue in the district. A significant positive impact is also identified for the objective to provide good quality, sustainable housing as the option will help to deliver the objective's aims for an increased amount and range of housing including specialist housing that meet the needs of specific groups of people. The impacts on the remaining sustainability objectives are mainly negligible although some positive influences are identified. However, the requirement for development under this policy to be conveniently accessible to sustainable transport routes and close to relevant local services and facilities has a minor positive effect on the objective to encourage active and sustainable travel. This option is considered to be a sustainable option.

4.205 HOU 16 Travellers Accommodation

This option has a positive impact on all of the social sustainability objectives and a significant positive effect on the objective to strengthen society as it will enable Travellers to gain access to facilities and services and will deliver on meeting identified needs for Travellers and reduce inequalities between different groups within society, including the most deprived

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

communities. The settlements – first approach also supports the sustainable management of material assets, leading to a minor positive impact identified for this objective. No other impacts on the sustainability objectives are identified, however some positive influences on the economic and environmental sustainability objectives are noted through the policy directing accommodation to settlements. This option is considered to be a sustainable option.

- 4.206 A draft Habitats Regulations Assessment (HRA) has also been undertaken and published for consultation with the Draft Plan Strategy. It similarly determines possible adverse effects on the integrity of European sites (Special Areas of Conservation and Special Protection Areas) as a result of the policies within the LDP. This assessment also includes Ramsar sites under the provisions of the Ramsar Convention.

5.0 Section 3: Housing in the Countryside



- 5.1 Derry City and Strabane District Council aims to strike a balance between the need to sustain a strong and vibrant rural community, while simultaneously delivering sustainable Council services and protection of the environment. For the purpose of this document the countryside is defined as land lying outside of settlement limits as identified at Local Policies Plan stages.
- 5.2 **Regional Development Strategy:** The RDS sets a clear strategic objective for rural areas (SFG 13) to sustain rural communities living in smaller settlements and open countryside. The RDS places an onus on Derry City and Strabane District Council to address economic, social and environmental issues in rural areas.
- 5.3 **Strategic Planning Policy Statement:** The SPPS underpins the regional guidelines in the RDS by promoting sustained housing development in the countryside. The aim is to manage development in a manner which strikes a balance between protection of the environment from inappropriate development, whilst supporting and sustaining rural communities consistent with the RDS.
- 5.4 The SPPS adopts quite a similar approach to Planning Policy Statement 21 “Sustainable Development in the Countryside”, based on clustering, consolidating and grouping new development, particularly new residential development, with existing established buildings and the re-use of previously used buildings. It also states that all new development in the countryside must integrate, respect rural character and be appropriately designed. It should not mar the distinction between settlements and the countryside or result in urban sprawl and it should reflect and complement the overall approach to housing growth in the plan area.
- 5.5 **Strategic Growth Plan** Derry City and Strabane District’s Strategic Growth Plan vision is to have a *thriving, prosperous and sustainable City and District with equality of opportunity for*

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

all. The appropriate opportunities for housing in the countryside has a key role in the successful delivery of this vision.

5.6 **Derry Area Plan 2011:** The DAP designated a Greenbelt to protect the open countryside from urban sprawl and ribbon development. Similarly, Countryside Policy Areas were designated to protect those areas of countryside where any future development could adversely affect the rural character of their landscape. PPS 14 & PPS 21 subsequently superseded the policies for such areas.

5.7 **Strabane Area Plan 2001:**

There were a number of references and policies for housing in the Countryside, regarding:

- the location, siting and design of buildings in the Countryside and also the ancillary works or treatments to their immediate surroundings;
- Green Belt Policy on residential development;
- Permission for a dwelling for occupation by a person engaged in the whole time management of a commercial or industrial undertaking;
- Permission to renovate, rebuild or replace an existing dwelling;
- Permission to build a dwelling in the Green Belt;
- Permission to build a dwelling under special, personal or domestic circumstances to live at a particular location in the rural area.

5.8 **Key Considerations:**

Within Derry City and Strabane District, there are a number of key statistics relating to rural housing that have informed the formulation and adaption of the new policies within the Plan Strategy. As there is an indicative housing requirement over the LDP period of 1,080 – 1,440 (see Section 1, Table 4), it was considered appropriate to consider what the existing policies are delivering in terms of approvals and if this would meet the future need over the plan period.

5.9 Table 19 below shows the total number of approvals over a ten year period, from 2010 as this is the year that Planning Policy Statement 21 came into effect. Taking the average number of houses approved per year (88) under the current PPS 21 policy and projecting the housing potential over the LDP period it gives a potential for 1,290 approvals. It is noted that approvals however do not equate to the number of rural houses that have been built over the same period as there is anecdotal evidence that a proportion of previous approvals in the countryside have not made a ‘material start’ and have yet to complete development.

Table 19: Number of approvals via PPS 21 Policy

Time Period PPS 21 (2010 to date)	No of New Single Dwellings approved (CTY 2a, 4, 7, 8, 10)	No of Replacement Dwellings approved (CTY 3)	Total No of Approvals per year under PPS 21.
2010	84	53	137
2011	84	29	113
2012	72	24	96
2013	38	15	53

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

2014	35	33	68
2015	33	24	57
2016	53	13	66
2017	63	37	100
2018	65	30	95
2019	66	27	93
Total	593	285	878
Average over 10 years	59	29	88

Source: DFI Statistics

- 5.10 In the 2003-2007 period, large numbers of outline permissions for single rural dwellings were approved but quite a few lapsed after the 2008 recession. Then, of the full and reserved matters planning permissions, some lapsed and others made a material start and these houses remain to be 'built' over the LDP period. It is not known how many such rural foundations remain, however it could be assumed that 5-10% of planning permissions will not be built.
- 5.11 There were a total of 285 approvals, from 2010 - 2019 under policy CTY 3 Replacement Dwellings in PPS 21, however, it was considered that there would be no anticipated net gain from replacement dwellings to our existing household stock. Thus, taking into consideration all other approvals at an average of 59 per year and projecting the housing potential over the LPD period it gives a projection of 878 rural approvals under the existing PPS 21 policy.
- 5.12 Table 20 below details the number of approvals and refusals in the rural area from 2002 – 2017. It is clear from the table that there are various trends, which influence the number of applications received for rural houses. This is evident for example, when there has been changes to rural policy, there is a corresponding influx of applications or if the housing market is in a 'boom' state then this can lead to more speculation from members of the public submitting applications for rural housing.

Table 20: Number of single dwellings and replacement dwellings approved / refused 2002 – 2019

Year	No. of single dwellings approved	No. of Replacement Dwellings approved	Total approved (approval rate %)	No. of single dwellings refused	No. of replacement dwellings refused	Total refused	Total no. of decided applications for single dwellings & replacements	Total no. of received applications for single dwellings & replacements
2002	134	52	186 (81.9%)	37	4	41	227	390
2003	259	84	343 (87.7%)	42	6	48	391	566
2004	228	78	306 (71.6%)	116	5	121	427	697
2005	437	111	548 (72.5%)	205	5	210	728	842
2006	249	76	325 (54.5%)	261	10	271	596	417
2007	55	67	122 (58.3%)	66	21	87	209	188
2008	49	58	107 (95.5%)	3	2	5	112	111
2009	86	67	153 (91%)	12	3	15	168	227
2010	84	53	137 (72.4%)	46	6	52	189	153
2011	84	29	113 (79.5%)	22	7	29	142	106
2012	72	24	96 (88%)	11	2	13	109	81
2013	38	15	53 (79%)	14	0	14	67	76
2014	35	33	68 (93.1%)	3	2	5	73	97
2015	33	24	57 (89%)	7	0	7	64	85
2016	53	13	66 (92%)	5	0	5	71	33
2017	63	37	100 (95.2%)	5	0	5	105	111
2018	65	30	95 (98.9%)	1	0	1	100	107
2019	65	27	92 (98.9%)	0	0	1	99	102
Total	2089	878	2967 (76%)	852	73	926	3903	4389

Breakdown of planning trends in DCSDC during various planning policy periods from 2002- 2016. All application approved and refused for single dwellings and replacement dwellings in the District (Excluding Reserved Matters). Total received applications varies from total decided, due to applications being received towards the end of the year and decided in the next year.

Source: DFI Statistics

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

5.13 Table 21 details planning trends from 2002 – 2019 under the different policies, PSRNI, PPS 14, draft PPS 21 and PPS 21. This table also shows the change from Local Government Reform (LGR), when council assumed planning powers and the impact that this has had on the implementation of PPS 21.

Table 21: Breakdown of planning trends in DCSDC during various planning policy period from 2002 -2019

Time Period	No. of apps. for dwellings in c/side	Single dwellings approved	Single dwellings refused	Replacement dwellings approved	Replacement dwellings refused	Total approvals	Approval rate	Refusal rate
2002-March 2006 (PSRNI period)	1932	1135	443	333	21	1468	75%	25%
March 2006 to November 2008 (PPS 14 period)	780	274	283	191	32	465	60%	40%
November 2008 to June 2010 draft PPS21 period)	257	140	14	100	3	240	93%	7%
June 2010 to December 2016	645	362	106	160	17	522	81%	19%
Local Government Reform 2015	64	33	7	24	0	57	89%	11%
2016 onwards; since all refusals going to Committee	375	246	12	97	0	353	94%	6%

All application approved and refused for single dwellings and replacement dwellings in the District (Excluding Reserved Matters)

Source: DFI Statistics

5.14 **Development Pressure:** The draft Plan Strategy has proposed that where a rural landscape or local rural character is threatened by development pressure, the locality will be designated through the development plan system as a key environmental designation such as Special Countryside Area (SCAs) and Areas of High Landscape Importance (AHLIs) to protect important landscapes and proposed Green Belts around Derry and Strabane. This will contain urban sprawl and development pressure in the countryside. See Evidence Base 6c, Development Pressure Analysis.

5.16 Dwellings on Farms

5.17 Strategic Planning Policy Statement: The SPPS reflects the thrust of Policy CTY10, and suggests that a provision should be made for a dwelling house on an active and established farm business to accommodate those engaged in the farm business or other rural dwellers. Dwellings on farms must also comply with LDP policies regarding integration and rural character. A dwelling on a farm under this policy will only be acceptable once every 10 years. The proposed dwelling must be visually linked or sited to cluster with an established group of buildings on the farm holding.

5.18 It should be noted that the SPPS does not give the option of siting a dwelling at an alternative site away from the farm buildings. The SPPS is also silent on the assessment of a dwelling for those involved in keeping horses for commercial purposes. Following the repeal of Article three of the European Council Regulation No. 74/2009, the definition of agricultural activity for the purposes of the SPPS has been updated to that set out in Article four of European Council Regulations (EC) 1307/2013.

5.19 Since the publication of the original Planning Policy Statement 21 ‘Sustainable Development in the Countryside’ there have been a number of advice notes issued by Planning Service Headquarters to assist in the interpretation of the policy. The advice notes were issued in May 2010, September 2010, December 2013 and November 2014. Below is a summary of the changes made to the policy through the advice notes:

<p>May 2010</p>	<p>EU and DARD re-defined agricultural activity as “the production, rearing or growing of agricultural products including harvesting, milking, breeding animals and keeping animals for farm purposes, or maintaining the land in good agricultural and environmental condition”.</p> <p>Therefore for the purposes of determining planning applications under Policy CTY 10, Planning Service defined an active farmer as: -</p> <ol style="list-style-type: none"> 1. A person or persons who have a DARD Agricultural Business Identification Number and are actively involved in farming their own land (or land taken in conacre) on a full or part time basis. The level of agricultural activity is not an issue. Such persons will normally (but not exclusively) be in receipt of Single Farm Payment for their own land. 2. A person or persons who own agricultural land and maintain that land for agricultural purposes, have a DARD Agricultural Business Identification Number, are in receipt of Single Farm Payment and let the land on conacre (or are entitled to Single Farm Payment and allow this to be claimed by the person renting the land in conacre).
<p>September 2010</p>	<p>Within existing Policy CTY 10, there is no reference to circumstances where the farm holding has no building or group of farm buildings for a dwelling to visually link or cluster with.</p> <p>The Department of the Environment (DOE), Planning and Natural Resource Division (PNRD) advised that as applications for a house on a farm without any buildings was consider by DARD to be a rare occurrence no references were made to this situation in the final document.</p> <p>It was advised the for the purposes of determining application where there are no buildings on the farm, the site should comply with policies CTY 13 (a-f), CTY 14 and CTY16, similar to application where an alternative site is being considered under criterion (c).</p>

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

5.20 **POP Responses:** There were mixed responses to the CTY 10 policy in PPS21. These included:

1. PPS 21 does not enable broad-based rural regeneration - instead it enforces sprawling suburban style housing estates concentrated in rural villages and hamlets;
2. PPS 21 precludes any rural development beyond farming and farm diversification;
3. LDP should limit growth of dispersed, single dwellings in the countryside;
4. Concern that young families will not be able to establish themselves in the countryside and this will have a major impact on the rural population;
5. Dilution of the 6 and 10 year criteria will widen the door to suburbia in the countryside and
6. Development in countryside needs tightly controlled.

5.21 **Key Consultees:**

There were a number of mixed responses from consultees, in particular to dwellings on farms:

- DFI recommend that new Council policy on Dwellings on Farms would include criteria C of existing policy CTY 10;
- Policy should be more open to allow people from non-farming backgrounds to live in the countryside;
- Policy is too restrictive to allow people to live and work in the Countryside;
- 1 in 10 year rule on farms was considered unfair and
- Regarding integration – this could be achieved by better design.

5.22 **Member's Response:** Members made it very clear about the importance of the rural needs of the District, so that there was not an undue urban bias. They emphasised the need for vibrant rural communities, for a healthy living countryside as well as strong rural settlements. They gave numerous examples of de-population, aging population profile, lack of young people, falling school rolls/closures, struggling sports teams and pressure on other community infrastructure. In particular, it was requested that planning policies needed to permit more people to live in the in the countryside, not just on farms, and for more employment to keep people in the countryside. In particular there were a number of issues highlighted regarding dwellings on farms and CTY10:

- Difficulties with getting planning permission;
- Children of farmers can't get permission;
- PPS 21 considered too rigid;
- One house every 10 years is not enough;
- Non farming rural dwellers have a right to live in the countryside, as it will affect schools etc;
- There is a need to consider the Donegal system (kinship) - see paragraph below on Kinship;
- They felt that succession planning as farms transition from generation to generation will become increasingly more frequent during the LDP period as elderly farmers hand over / pass on farms to family members or others.

5.23 **Kinship** – A paper was prepared for the then Environment Minister on “non-farming rural dwellers” by an independent panel in 2008. This was during the Draft PPS 21 period. The independent panel concluded that planning policy should not create a special category for

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

the non-farming rural dweller. Planning decisions for single houses should not be determined on the basis of kinship, connection or occupation. With particular reference to “kinship”, it is advised that “apart from the practical difficulties in terms of implementation, assessment and enforceability, there would be potential for arbitrary circumvention of other important policies if the concept of kinship were to be embodied in policy: ‘policies that are designed to encourage appropriate rural development’. It suggests that any policy may fall short of meeting the legislative requirement of “orderly and consistent” development and the overarching aims and objectives of the RDS and SPPS.

5.24 In recent years, an EU Court decision, known as the Flemish Decree, concluded that policies such as ‘kinship’ were unlawful and discrimination contrary to principles of free-movement and equality of opportunity (to live in the countryside) for persons from all EU countries. Whilst the legal implications of this decision are being widely considered, it is clear that such policies focussed upon ‘the applicants’ rather than ‘the development’ are likely to be legally flawed, so the Council is recommended to stay clear of such kinship style policies.

5.25 **Development Management:** Consultation with Development Management colleagues considered this policy in particular required a review in terms of wording, clarity and comparability with other relevant policies.

5.26 **Local Context:**
 With a total of 1,771 farms this means that there is the potential for the same number of farm dwellings. However, it is thought to be unlikely that all 1,771 will come forward during the life-time of this plan. It is envisaged that the current trend of farm dwellings approved will continue.

5.27 Based on the information above, Policy CTY 10, Dwellings on Farms was analysed in a local context within the District. Based on the data gathered from 2017/18 to 2018/19 a total of 73 applications were approved for dwellings on farms.

5.28 According to the ‘Agricultural Census in Northern Ireland 2018’, carried out by DAERA, our District has 1,771 farms, 75% of these would be considered very small, 13% small, 5% medium and 7% large. Out of the 11 new council areas DCSDC would rank 7th in terms of the number of farms that it has. The 2019 Agricultural Census is underway (June 2019).

Table 22: Agricultural Census in Northern Ireland 2018

District Council	Average SO/farm (€ '000)	Farm Business Size									
		Number of Farms					Percentage Distribution				
		V. Small	Small	Medium	Large	Total	V. Small	Small	Medium	Large	Total
Derry City and Strabane	74.3	1,324	230	89	128	1,771	75	13	5	7	100

5.29 **Overall Policy Direction:**
 This policy has been derived from policy CTY10 within Planning Policy Statement 21 ‘Sustainable Development in the Countryside’. Policy CTY10 was introduced in recognition

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

of changing farming practices and to help support rural communities. It was considered that there was a continuing need for new dwellings on farms to accommodate those engaged in the farm business and other rural dwellers.

- 5.30 As this policy is likely to generate the majority of additional new rural dwellings during the LDP period, it has been subject of significant review to provide definition and clarification to assist with policy interpretation for planning officers and those submitting applications in the District.
- 5.31 The policy and its justification and amplification has been updated from PPS 21, CTY 10, Dwellings on Farms, to reflect additional guidance on how the policy is interpreted and applied since 2010 when the policy was first published. The three key criteria that were included in PPS 21 CTY 10 are still applicable however there has been clarification added to each.
1. The farm business still has to be currently active and has to have been established for at least 6 years prior to the date of application; and
 2. No dwelling or development opportunities (outside settlement limits) have been sold off from the farm holding within 10 years of the date of the planning application;
 3. The new building should be sited to cluster with an established group of buildings on the farm (in the first instance). Exceptionally, consideration may be given to an alternative site elsewhere on the farm, provided there are no other sites available that would cluster, and where there are either:
 - a. Demonstrable health and safety reasons; or
 - b. Verifiable plans to expand the farm business at the existing buildings; or
 - c. It can be shown that an alternative site nearby would result in demonstrable landscape, natural and / or historic environment, access and amenity benefits.
- 5.32 Additional ‘and / or’ clarification has been added into the permutations / bullet points to make it clear which have to be met as essential and which are acceptable alternatives. For the active and established test there is a time frame added that these have to be ‘prior to the date of the planning applications’. This time frame is also applied to the 10 year rule that no dwelling or development opportunities (outside settlement limits) have been sold off. This is to add clarification for processing planning applications relating to farm dwellings. The need for the farm business to be currently active and established for at least six years is being retained as this will ensure the proposed dwelling is on a genuine farm. A clearer definition is included requiring applicants to meet both the ‘active’ and ‘established’ tests. The definition of ‘active’ is based on the SPPS and the most up to date guidance.
- 5.33 The third criteria has been altered the most from CTY10, as the need to be visually linked has been removed and there has been an additional exception added to allow a farm dwelling to be located away from the farm where it can be demonstrated that an alternative site nearby would result in demonstrable landscape, natural and / or historic environment, access and amenity benefits. It was considered that this would allow farm dwellings to be located on other parcels of farm land that might fit better into the landscape than those that can just be shown to cluster or visually link with the farm and have no consideration for design, integration or siting.

5.34 The policy then refers the applicant onto the new policies associated with rural character and integration and design of buildings in the countryside. There is also a stricter test for applicant within the greenbelt. In this instance applicants will be required to cluster with the existing farm and there will be no exception for criteria 3 (c). There is also a provision for a farm dwelling where the farm holding has no group of farm buildings for a dwelling to cluster with. The justification and amplification has been updated to make it clearer for applicants if they meet the requirements set out in the policy.

5.35 **Dwellings for Established Non-Agricultural Business Enterprise**

5.36 **Regional Development Strategy 2035:** To sustain rural communities, new development and employment opportunities which respect local, social and environmental circumstances are required. This means facilitating the development of rural industries, businesses and enterprises in appropriate locations, and ensuring they are integrated appropriately within the settlement or rural landscape.

5.37 **Strategic Planning Policy Statement:** The SPPS is similar however is less detailed than Policy CTY 7. The SPPS makes a provision for a new dwelling in connection with an established non-agricultural business enterprise. A site-specific need must exist that makes it essential for an employee of the business to live at the site of their work. It is important to note that the SPPS refers to ‘an employee of the business’ rather than ‘one of the firm’s employees’. The SPPS also does not include criteria relating to siting or integration and does not refer to approvals being subject to an occupancy condition.

5.38 **Planning Policy Statement 21:** CTY 7: Dwellings for Non-Agricultural Business Enterprises. Established non-agricultural business enterprises, located in the countryside, may require residential accommodation. The presence of such a business is not, of itself, sufficient justification to grant permission for someone to live on the site. Applicants must provide sufficient information to show that there is a site specific need which makes it essential for one of the firm’s employees to live at the site of their work, as against a general desire for a dwelling in association with the business.

5.39 **POP Responses:** These included a response welcoming the potential for enhanced opportunities in relation to new dwellings in countryside and a need for a more active rural community.

5.40 **Member’s Response:** A number of issues were raised by the Members at the RTDs.

- Members were keen that the proposed policy should be more positive and provide opportunities for non- farming rural dwellers;
- There could be some degree of relaxation within the District that would merit amendment of this policy and
- They believe that existing rural businesses contribute to the sustainability of their area in a similar fashion to farms.

5.41 **Local Context:**
 The guiding principle for policies and proposals for economic development in the countryside is to provide opportunities likely to benefit and sustain the rural community, while protecting

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

or enhancing the character of the rural area. A number of economic development opportunities exist for small scale economic development, home-working, appropriate re-development and re-use of rural buildings for a range of appropriate uses. Such established non-agricultural business enterprises located in the countryside, may require residential accommodation to help sustain rural business and to help support employment in rural communities.

5.42 A recent study of data from 2017/18 to 2018/19 showed a total of 2 applications were received in relation to CTY 7. Applications for non-agricultural dwellings are low in number, with the majority of applications submitted being in relation to an associated farm/agricultural use, infill developments or replacement dwellings.

5.43 **Overall Policy Direction:**

This policy and its justification and amplification has been amended from PPS21, CTY 7, to follow a similar policy test as farm dwellings. This is a more positive policy to reflect the Member's feedback that a similar opportunity should be afforded to rural businesses to help sustain them into the future and to create a vibrant rural community. Previously the policy was more restrictive in that an occupancy condition was required in all cases. This will afford an opportunity to a key person who has had an established business to have a dwelling associated with that business provided there is appropriate documentation and business accounts as evidence. Definitions of key terms are included within the justification and amplification. There is also a requirement for any applicants to regularise their operation through a Certificate of Lawful Development (CLUD), if necessary. Within the Green Belt a stricter policy test will be applied to require the dwelling to be located on-site and an occupancy condition attached as per the previous policy, CTY 7.

5.44 **Restored and Replacement Dwellings**

5.45 **Strategic Planning Policy Statement:** The SPPS is less detailed than Policy CTY3 however, it covered some of the primary themes. The SPPS states that provision should be made for the replacement of existing dwellings where the building to be replaced exhibits the essential characteristics of a dwelling and as a minimum, all external structural walls are substantially intact. Replacement dwelling must be located within the curtilage of the original dwelling where practicable, or at an alternative position nearby where there are demonstrable benefits in doing so. Replacement dwellings must not have a visual impact significantly greater than the existing building. In cases where the original building is retained, it will not be eligible for replacement of a listed dwelling unless there are exceptional circumstances.

5.46 The SPPS does not mention that agricultural buildings or those of a temporary construction will be ineligible. It is also silent on:

- the replacement of redundant non-residential buildings with single dwelling where their replacement brings about environmental benefits;
- the replacement of fire damaged buildings;
- specific criteria for the replacement of non-listed vernacular dwellings and
- criteria on design, services or safe access for all replacement cases.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 5.47 The SPPS refers to unlisted vernacular buildings in Para 6.24, but not specifically under the section Development in the Countryside. It states that applications that directly or indirectly affect such buildings will be judged on the scale of any harm or loss and the significance of the heritage asset. The approach of the SPPS is to promote the re-use of previously used buildings.
- 5.48 **Planning Policy Statement 21:** CTY3 from PPS 21 is a policy for the provision of replacement dwellings where dwellings to be replaced exhibits essential characteristics of a dwelling and all external structural walls are substantially intact. The policy states that agricultural buildings or buildings of a temporary construction will not be eligible for replacement and also sets out when a non-residential building can be replaced with a dwelling and deals with the replacement of fire damaged dwellings. Policy CTY3 also seeks to retain non-listed vernacular dwellings and promote their sympathetic renovation and continued use rather than replacement. However, exceptions are listed detailing when replacement of such dwellings will be acceptable. CTY3 also sets out five criteria all replacement proposals must meet including siting, visual impact, high quality design, provision of services and safe access.
- 5.49 **POP Responses:**
No specific POP responses relating to replacement dwelling policy.
- 5.50 **Key Consultees:**
DFI in reference to the review of PPS 21 noted their satisfaction that the provision of the existing policy CTY3 replacement dwellings will be included in any new policy.
- 5.51 **Member's Response:** There was a need to enhance the opportunities to build on replacement sites by revising the definition of a replacement property;
- The opinions of Members was also sought in relation to a 'call for evidence' for the SPPS, including members suggesting that there was a need for a looser policy relating to replacement buildings;
 - Clarification about 'scale', however it was also felt to put in specific descriptors risked constraining the intent of the policy.
- 5.52 **Development Management:** Planning officers requested clarity on the definition of 'structural status' and 'essential characteristics' of the building to be replaced.
- 5.53 **Local Context:**
In Derry City and Strabane District Council, there is approximately 8024⁸ households in the countryside. Under this policy, there is the potential for all of these houses to be replaced however, this is unlikely to happen. It is envisaged that only a small number of replacement dwellings will be approved over the life time of the plan and that the trend of approvals for this policy will continue. Based on the data gathered from 2017/18 to 2018/19 a total of 57 applications were approved for replacement dwellings.
- 5.54 **Overall Policy Direction:**

⁸ No. of Rural Households calculated using 2017 pointer data.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

This policy promotes the restoration of non-listed vernacular dwellings. Otherwise, the policy text permits the sympathetic replacement of existing dwellings and even the replacement of a redundant non-residential building. Additional clarification has been provided to define the type of structures that can be replaced and the essential characteristics of a dwelling. The replacement of existing dwellings is important to the renewal and upgrading of the rural housing stock. All permissions for a replacement dwelling granted under this policy will be subject to a condition requiring demolition of the existing dwelling or restricting its future use if it is to be retained as part of the overall development scheme. Additional J&A to state that proposals for replacement dwellings should refer to ‘Building on Tradition – A Sustainable Design Guide for the Northern Ireland Countryside’ and consideration be given to scale, size and form of buildings and that the advice (definition and characteristics of Rural Vernacular Dwellings) set out in ‘A Sense of Loss – The Survival of Rural Traditional Buildings in Northern Ireland’ will be employed to help determine what constitutes a vernacular dwelling or building for the purposes of this policy.

5.55 The Conversion and Re-use of Other Rural Buildings

5.56 Strategic Planning Policy Statement: The SPPS promoted the re-use of previously used buildings. The SPPS also separated the previous policy CTY 4 into one for ‘residential use’ and another for when the end use will be ‘non-residential’. The policy text in the SPPS has been revised to clarify the intent of CTY4. The SPPS referred to a ‘locally important buildings’ rather than ‘a suitable building’ as stated in CTY4. The SPPS also states that for the conversion of an existing building to ‘residential use’, where the original former dwelling is retained as an ancillary building to the new dwelling, it will not be eligible for conversation back to a dwelling.

5.57 Planning Policy Statement 21: Policy CTY 4 highlights that the reuse and sympathetic conversion of non-residential buildings can represent a sustainable approach to development in the countryside. It is however acknowledged that there may be occasions where the replacement of such buildings can result in significant environmental benefits.

5.58 POP Responses:
Historic Environment Division welcomed the re-use of vacant or underused historic buildings in the countryside which they consider would benefit community cohesion, vitality and tourism in the area. The proposed policy BH 8 Conversion and Re-Use of Locally important Unlisted Vernacular Buildings (Historic Environment Chapter) supports and delivers the same policy intent of re-use / conversion for rural / locally important buildings as provided for within the proposed policy for the Conversion and Re-Use of Other Rural Buildings.

5.59 Member’s Response: Members were keen to provide opportunities through the conversion and re-use of existing buildings for agricultural and other suitable rural development uses.

5.60 Local Context:

Based on the data gathered from 2017/18 to 2018/19 a total of 1 application was approved in relation to CTY 4.

5.61 Overall Policy Direction:

This policy has been largely carried forward from PPS 21 CTY 4 with additional definition clarification. There is the potential for the reuse of an existing non-residential building as a dwelling and exceptionally, planning permission may be granted to conversion of a traditional building to more than one dwelling. The Council will focus on providing opportunities through farm diversification, agriculture and forestry development and the conversion and re-use of existing buildings for agricultural and other suitable rural development uses.

5.62 Clarification is provided as to what constitutes an acceptable building for conversion or extension, stating that it must be of traditional construction, usually masonry and slate/tiles and be of architectural or historic merit that makes a positive contribution to the locality. Reference to the Green Belt Policy has been included to allow replacement of other buildings.

5.63 New Dwelling in Existing Clusters in the Countryside

5.64 **Strategic Planning Policy Strategy:** The SPPS adopts a policy approach based on clustering, consolidating and grouping new development, particularly new residential development with existing established buildings. The SPPS states that provision should be made for a dwelling at an existing cluster of development which lies outside a farm provided it appears as a visual entity in the landscape and is associated with a focal point and the development can be absorbed into the existing cluster through rounding off and consolidation and will not significantly alter its existing character, or visually intrude into the open countryside.

5.65 The policy within the SPPS for new dwellings in existing clusters is less detailed than policy CTY2a in the criteria to be adhered to, however, the main provisions are detailed and no new or additional criteria have been added. The SPPS does not detail the types / number of buildings deemed to be a cluster, does not define what constitutes a focal point nor does it state that the site should provide a suitable degree of enclosure or avoid adversely impacting on residential amenity.

5.66 **Planning Policy Statement 21:** CTY2a within PPS 21 provides opportunities to gain approval for a dwelling in an existing rural cluster, provided the cluster is outside of a farm and consists of four or more buildings, three of which must be dwellings. The cluster must appear as a visual entity in the landscape and must be associated with a focal point e.g. community building or is located at a crossroads. The site must provide adequate enclosure and be bounded on at least two sides with other development in the cluster. The development of the site should not significantly alter the character of the site or countryside and should not affect residential amenity.

5.67 **POP Responses:** Proposed amendments e.g. CTY2a clustering, farm clustering widens the door to suburbia in the countryside.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

- 5.68 **Member's Response:** Terms such as cluster and focal point should be clearly defined in policy. Development can be accommodated within the current rural policy e.g. at nodes for a dwelling in a cluster and an infill dwelling. Members debated clusters and focal points in particular crossroads and 'Y' and 'T' junctions. Some members advocated for clustering on both sides of a road, while others cautioned this approach and agreed that there should be a key definition in regarding what this policy can deliver.
- 5.69 **Development Management:** DM colleagues requested accompanying Justification and Amplification for CTY 2a as currently none in PPS21. DM also considered that all tests need to be met as set out in the policy and this should be emphasised. It was noted that recent PAC appeal decisions did not apply all the tests. DM also asked for further clarity on what constitutes a 'focal point' as set out in CTY 2a.
- 5.70 **Local Context:** From 2017/18 to 2018/19 a total of 10 applications were received in relation to CTY 2a. Dwellings have traditionally been developed in informal clachan- type groupings, often around focal points such as a rural church, school, community buildings / facility, graveyard or sports facility. Some of the rural clusters already have a small WWTW and they have been considered as candidates for small settlements as part of the LDP preparation.
- 5.71 **Overall Policy Direction:** This policy has been carried over from PPS21, CTY 2a – New Dwellings in Existing Clusters, with the proposed policy re-worded with more clarification from CTY 2a. Whilst there has been a considerable amount of single, isolated dwellings built over the recent decades, it is considered to be a much more sustainable approach to provide opportunities for rural dwellings clustered with the existing groups of buildings and strong identified focal points. Overall, the thrust of the policy and the J&A is to focus new houses on these particular clusters and approve a suitable proposal for new dwellings that build upon and consolidate identified focal points. Within the Green Belt, it is proposed not to grant Planning permission for new dwellings in existing clusters in the countryside. Proposals for appropriate-scaled economic and social development will also be sympathetically considered.
- 5.72 As PPS 21 contained no J&A, this has now been added and contains reference to an indicative range of features that will be considered as 'focal points'. Focal points considered as part of a proposal relating to existing clusters will include a church, school, community buildings / facility, graveyard, rural housing estates, a cross-roads, a long-established rural shop / post office or other long-established rural business or sports facilities. Such focal points should be widely recognised as such in the locality and does not include natural features, spread-out or very local features – such as a forest / woodland, a rural bridge, agricultural buildings or small ancillary features like telephone or post boxes.
- 5.73 In criteria 3, the emphasis will be on ensuring that the cluster is associated with an established focal point, so there is scope for some flexibility around whether it is located at an actual cross roads or some other form of roads junction. The retention of an informal siting / layout and the consolidation / rounding-off of the existing cluster of buildings around the focal point will be critical in terms of retaining its small-scale and rural character. Suburban- type designs / layouts or the creation or extension of a ribbon will not be acceptable.

5.74 It is recognised that there are some particularly strong, established and recognised rural focal points such as at a long-established football or cricket pitch, church or community hall, that currently have few buildings. They would normally be expected to have at least two buildings i.e. one dwelling and a focal building or changing rooms, spectator stand, etc. However, these are established focal points, the heart of some rural communities and it would be socially and environmentally sustainable to provide a small number of opportunities for rural dwellings, as an exception to the general policy requirement.

5.75 **New Single Dwelling in a Small Gap in Existing Built-up Frontage in the Countryside**

5.76 **Strategic Planning Policy Statement:** The SPPS is similar but less detailed than Policy CTY 8, the SPPS suggests provision should be made for the development of a small gap site in an otherwise substantial and continuously built up frontage. Planning permission will be refused for a building which creates or adds to a ribbon of development. The SPPS does not, define the size of an acceptable gap, nor provide a definition of a substantial and continuously built up frontage unlike Policy CTY 8. The SPPS does not make provision for the infilling of a gap site with an economic development proposal.

5.77 **Planning Policy Statement 21: CTY8:** This policy resists ribbon development in the countryside but allows for the development of a small gap site, sufficient only to accommodate up to a maximum of 2 houses within a built up frontage and provided this respects existing development patterns. Built up frontages are defined as a line of 3 or more buildings along a road frontage (including footpaths or private lanes) without accompanying development to the rear. In relation to economic development, provision is also made for infilling a small gap with an appropriate economic development proposal, including light industry. Such proposals must meet 4 criteria - be in keeping with the scale of adjoining development, be of a high density standard, not impact on the amenity of neighbours, and meet other planning and environmental requirements.

5.78 There were no specific responses from the POP or the Consultees to this policy.

5.79 **Development Management:** DM officers have particular concerns with the interpretation of policy CTY 8 in its current wording. The issue of ribboning and infill housing along such ribbon development has been contentious.

5.80 **Member’s Response:** In certain parts of our rural area, we have a landscape of long, steep sided narrow river valleys with roads positioned mid-profile in the valley section. Due to the particular topographical landscape, development in such cases has been restricted to the level ground immediately adjacent to the roadside, either above or below the road. Historically, in such landscapes, ribbon–style development has been the only sustainable option. Some members had

5.81 **Local Context:** Based on the data gathered from 2017/18 to 2018/19 a total of 49 applications were approved for infill dwellings.

5.82 Overall Policy Direction:

This policy and accompanying J&A has been significantly re-written to differentiate between the issue of contentious planning issue of ‘ribboning’ in our countryside and those opportunities where suitably scaled in-fill development would be appropriate and would not exacerbate the issue of ribboning itself. Ribbon development is detrimental to the character, appearance and amenity of the countryside. It can also make access to farmland difficult and cause road safety problems. Ribbon development has consistently been opposed and will continue to be unacceptable.

5.83 This policy and J&A has been re-worded into more positive wording at the start of the policy than PPS21, CTY 8: Ribbon Development, however the general thrust of the policy is the same. Sizeable small gaps (that could accommodate 2 or more dwellings) within a ribbon can assist to break up the elongation effect of such linear development. Their spacing will therefore be protected and a minimum of 1 dwelling will be now be permitted under this policy, simultaneously providing a dwelling opportunity, while safeguarding a degree of separation and break up the ribbon effect.

5.84 The policy states that planning permission will be refused for a building which creates or adds to ribbon development which is in line with our rural design policies relating to Integration and Design of Buildings in the Countryside (CY 1) and Rural Character (CY 2). Enhanced clarification has also been added to the definition of *substantial and built up frontage*. This has also been raised from 3 to 5 or more buildings along a road frontage.

5.85 An exception to the policy has been written for those parts of the Sperrin AONB, where it can be demonstrated that there are very few opportunities for dwellings other than in linear road-front sites. It states that planning permission will be granted for a single dwelling within a larger infill or gap site that is sufficient only to accommodate up to a maximum of two houses. Such an infill or gap site will need to be within an otherwise substantial and continuously built-up frontage and respect the existing development pattern along the frontage in terms of size, scale, siting and plot size and meet other Planning and environmental requirements. . It is not envisaged that such landscape situations will be widespread across the AONB, and as such the policy will operate a more-relaxed interpretation of a substantial and continuously built-up frontage i.e. 3 or more dwellings within 100 metres. Within the Green Belt, it is proposed not to permit infill development opportunities.

5.86 The policy also makes a provision for economic development infilling of a small gap within an appropriate economic development proposal, including light industry. Such proposals must meet four criteria, these include; be in keeping with the scale of adjoining development, be of a high design standard, not impact on the amenity of neighbours, and meet other planning and environmental requirements.

5.87 Personal and Domestic Circumstances in the Countryside

5.88 **Strategic Planning Policy Statement:** The SPPS is less prescriptive than Policy CTY 6. The SPPS makes a provision for a dwelling to meet the long-term needs of a person where there are compelling and site specific reasons related to the persons personal or domestic

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

circumstances, and where there are no alternative solutions to meet the particular circumstances of the case. Whilst the SPPS requires the applicant to demonstrate compelling and site specific reasons for a dwelling as well as demonstrating there are no alternative solutions, it does not go on to refer to the level / type of detail required.

5.89 **Planning Policy Statement 21:** Policy CTY 6 is centered on permitting dwellings in the countryside for those who may have special personal or domestic circumstances. The policy includes criteria which requires the applicant to demonstrate compelling and site specific reasons as to why they need a dwelling in a particular rural location.

5.90 **POP Responses:** There were no specific issues raised regarding this policy.

5.91 **Member's Response:** No issues were raised regarding not carrying forward the existing policy CTY 6.

5.92 **Local Context:**

From 2017/18 to 2018/19 only 1 application was received during the 2 year period. The majority of the applications are in relation to an associated farm/agricultural use, infill developments or replacement dwellings.

5.93 **Overall Policy Direction:**

This policy has been largely carried forward from PPS 21, CTY 6. There may be cases where personal or domestic circumstances require a new house in the countryside. Applicants will be expected to provide sufficient information to allow a proper assessment of each specific case. This policy and J&A has largely been carried over from CTY 6. Reference to the Green Belt Policy has been included to allow dwellings for personal and domestic circumstances where there are compelling and site specific reasons for this related to the applicants personal and domestic circumstances. The use of occupancy conditions is referenced in the policy and is proposed at 5 years generally for such policy application.

5.94 **Affordable Housing in the Countryside**

5.95 **Strategic Planning Policy Statement:** The SPPS makes a provision for social and affordable housing in the countryside where a need has been identified by the Northern Ireland Housing Executive (NIHE), or the relevant housing authority, plan policies should support the development of a small group of social / affordable dwellings permissible will depend upon the identified need and the requirement to ensure the development is sited and designed to integrate sympathetically with its surroundings. Unlike Policy CTY5 in PPS21, the SPPS does not state that application must be made by registered Housing Associations, nor does it set out a sequential test in terms of locating an acceptable site. The SPPS also does not limit such proposals to only one group in close proximity to any particular rural settlement.

5.96 **Planning Policy Statement 21:** Policy CTY5 provides opportunities for registered Housing Associations for up to 14 dwellings in the countryside. Normally groups of dwellings in the countryside would be resisted, but this policy is an exception. This policy is subject to a specific social / affordable housing need being demonstrated by NIHE which cannot be met

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

within an existing settlement. Proposals have to be adjacent to or near to a small settlement and a sequential test will be applied in terms of location. Under Policy CTY5 proposals must be sited and designed to integrate with their surroundings and meet other planning criteria and policy requirements.

5.97 POP Responses:

- Would like to see planned development through strategic policy / LPP allocation for affordable housing in rural areas;
- Those instances of unforeseen circumstances of social housing in the countryside need to be catered for by exception policies (similar to CTY 5 – PPS 21).

5.98 Key Consultees:

NIHE: Sought the retention of CTY5: Social & Affordable Housing (PPS 21) and as directed within the SPPS – pg 54) to allow for the exceptional development of a group of no more than 14 dwellings adjacent to or near a small settlement to provide social and affordable housing where it can be clearly evidenced that no suitable sites are available within the settlement limits. They considered it was important to have this specific policy flexibility within the LDP for such scenarios where a demonstrable need has been identified to ensure the LDP can react to and deliver for such need across the LDP period. A further response from NIHE, suggested that in some settlements such as Eglinton, there may be a specific zoning or Key Site Requirements for an adequate amount of social housing to meet need over the plan period.

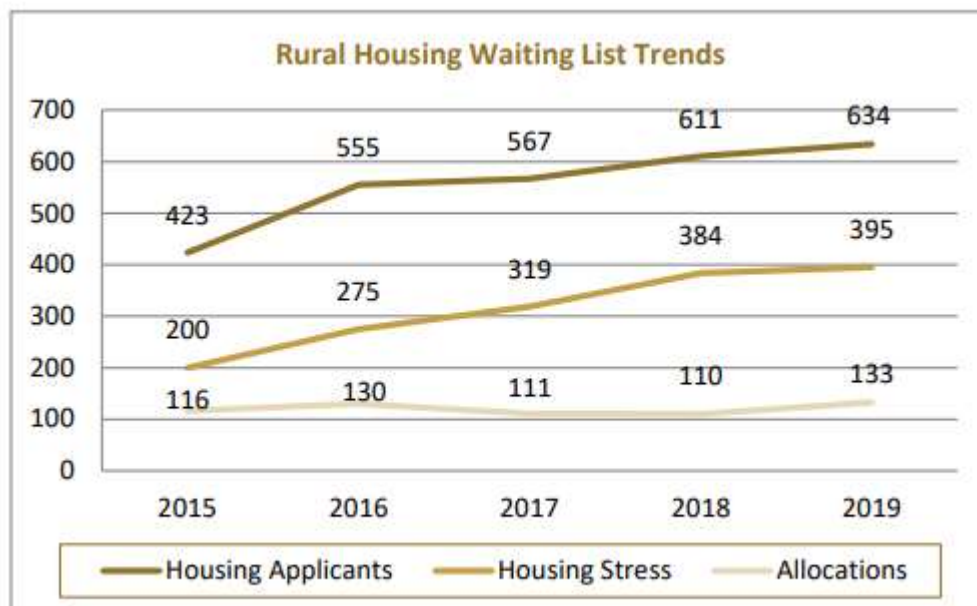
5.99 Member's Response: Members have welcomed the provision of affordable housing across all the District and have requested appropriate policies to facilitate this.

5.100 Local Context:

NIHE Housing Investment Plan 2019- 2023:

Some rural areas that are particularly popular among social housing applicants are along the main A2, A5 and A6 arterial routes where relatively good transport links to the main urban centres are enjoyed. These housing areas include Sion Mills, Eglinton and Claudy. For this reason demand for rural housing generally exceeds supply.

Table 23: Rural Housing Waiting List Trends 2015 - 2019



Source: NIHE

5.101 There are a number of housing issues unique to rural areas across Northern Ireland. While average house prices tend to be higher in rural areas average wages for people who work in rural areas tend to be lower than for urban workers. Therefore, affordability is an issue due to house prices being driven up by commuters and in some areas retirees and second home owners. In Derry City & Strabane private rental opportunities are also lacking with just 12 properties being advertised on the market at June 2019 across the council’s entire rural area. During 2018/19 a Rural Housing Needs tests took place in Clady, Erganagh and Tamnaherin. Only the test for Tamnaherin identified a requirement for additional social housing. A test is due to take place in Magheramason during 2019/20.

5.102 Since the transfer of Planning to Council in 2015, there have been a number of approvals for social housing in the countryside, namely an outline approval outside Eglinton (reserved matters application for 13 units under consideration), 14 social housing units approved outside Eglinton, 54 dwellings approved at Springtown Road, Derry (with an application under consideration on the Springtown for approx. 295 dwellings). There is a full application for 14 units outside the limits of Tamnaherin currently under consideration.

5.103 Overall Policy Direction:

This policy and J&A has been carried over from PPS21, CTY 5: Social and Affordable Housing. While planning policy resists groups of dwellings in the countryside, an exception may be made where a specific need for social and affordable housing has been established through local Housing Needs Assessment (HNA) undertaken by the NIHE, and where the need has not been foreseen and provided for through the LDP.

5.104 The policy and J&A has been updated to remove the population threshold (PPS 21, CTY5 – population of 2,250) and instead is based upon our settlement hierarchy to include all small settlements and villages, the majority of which have current populations well beneath this

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

threshold and are located throughout the countryside. Culmore, Eglinton and Newbuildings while classified as villages, each have respective populations in excess of 2,250 and are located in close proximity to Derry City. In addition these settlements are located in the proposed Green Belt where such development for such groups of affordable housing adjacent to / or near to villages and small settlements will not be permitted.

5.105 Residential Caravans and Mobile Homes

5.106 Strategic Planning Policy Statement: The SPPS makes a provision for a residential caravan or mobile home for a temporary period in exceptional circumstances. These may include the provision of temporary residential accommodation pending the development of a permanent dwelling, or where there are compelling and sites specific reasons related to personal or domestic circumstances. Whilst the SPPS uses similar wording to Policy CTY 9 it does not specify that permissions will be subject to a three year time limit nor does it include siting, integration, planning or environmental criteria.

5.107 Planning Policy Statement 21: Policy CTY9 sets out two circumstances when a temporary residential caravan or mobile home may be acceptable in the countryside; when it is for provision of temporary accommodation pending development of a permanent dwelling or there are compelling and site specific reasons related to personal or domestic circumstances. Planning permission granted under this policy are normally subject to a three year time limit and the same planning and environmental considerations as a permanent dwelling. Siting and integration policy also have to be met.

5.108 Local Context:

No applications were received from 2017/18 to 2018/19. There were no comments received from statutory consultees or public responses to this policy.

5.109 Overall Policy Direction:

This policy has been largely carried forward from PPS 21 CTY 9, Residential Caravans and Mobile Homes. It is considered to be working effectively and is necessary to assist those seeking temporary accommodation during the building of a permanent dwelling or other compelling personal or domestic circumstances. All permissions will normally be for three years, this however will be considered on a case by case basis. The design and finishes of a residential caravan or mobile home limits its potential for integration into the landscape. For this reason, planning permission will not be granted for a permanently sited residential caravan or mobile home in the countryside. No Green Belt policy restrictions are proposed.

5.110 Overall Policy Direction for Houses in the Countryside

5.111 Our countryside remains the home and livelihood for a considerable part of our population, farmers and non-farming families, living in our many rural communities. Outside the settlement limits, the pattern of development has traditionally been a dispersed rural community, on isolated sites but also in clusters of buildings often around a focal point. There will be a range of housing development which in principle will be considered acceptable in the countryside and that will contribute to the aims of sustainable development. The thrust of the rural housing policies are focussed on the appropriate housing allocation to be made to

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

the countryside and the policies to be applied to ensure a ‘managed growth’ which will deliver a vibrant and sustainable rural community. It is considered that the indicative allocation 1,100 – 1,440 will be kept under review and monitored, and the policies will deliver these requirements – as part of the wider requirement for houses across the District.

- 5.112 Housing in the countryside, however raises a number of challenges. Whilst there have been calls for a ‘relaxed’ version of PPS 21, the proposed countryside housing policies meet the objectives of both the RDS and SPPS, as well as the strategic direction of the LDP. Evidence and trends suggest that any significant relaxation may result in ‘unsustainable’ levels of houses in the countryside, which impacts on the amount of housing development in the settlements especially Derry and Strabane.
- 5.113 All relevant policy and guidance has been considered in the development of the countryside housing section for the LDP PS. Planning officers have taken account of the POP representations, Member’s inputs and consultee responses in reaching these recommendations for the strategy and policy wording. The operational policies for housing in the countryside have been carefully considered to ensure they deliver enhanced and sustainable opportunities for those choosing to live and work there, while simultaneously protecting those intrinsic qualities of our countryside.

5.114 Sustainability Appraisal

Throughout their formulation, the policies contained within the Housing in the Settlements and Countryside Chapter have been subject to an ongoing internal sustainability appraisal (SA). This is in addition to the wider external SA, conducted by Shared Environmental Service as part of the wider suite of impact assessments/appraisals required under the Planning Act (Northern Ireland) 2011. The internal appraisal was carried out with the fourteen objectives of the external appraisal in mind (refer to the full wider SA for more information). The process of sustainability appraisal aims to ensure that a council's approach towards policy is the most sustainable of all reasonable options available i.e. having considered any reasonable alternatives. In the case of the Housing policies, it is not considered that there were any reasonable alternatives as any other options would not be in accordance with the RDS 2035 of the SPPS and as such would be considered to be unsound. With regard to the degree of sustainability of each the resulting proposed policies, this is outlined below:

5.115 HOU 18 Dwellings on Farms

By facilitating dwellings on farms where the policy criteria are met, this policy delivers a minor positive effect on all of the social sustainability objectives. It will deliver housing which meets locally identified needs and will help to reduce isolation in rural farming families and to strengthen rural society. The effect on education and sustainable economic growth is negligible, although the appraisal has identified some potential positive influences. The preference to clustering development supports the objective to manage material assets sustainably, however the appraisal acknowledges that the provision of infrastructure and services is more difficult in rural areas and there may be less choice and the overall effect on this objective is uncertain. Dispersed development in the countryside is typically a less efficient use of land and sustains a reliance on private cars and other private vehicles as the opportunities to access alternative modes of transport are limited. This approach is generally not compatible with the objectives to protect physical resources and use sustainably, to encourage active and sustainable travel and to improve air quality and a minor negative impact is identified for these objectives. For the remainder of the environmental sustainability objectives, while some potential influences are noted, negative effects should be constrained by the policy and the associated application of GDPOL2 and the overall effects are negligible. This policy is considered to be a sustainable policy.

5.116 HOU 19 Dwellings for Established Non-Agricultural Business Enterprises, HOU 24 Personal and Domestic Circumstances in the Countryside and HOU 26 Residential Caravans and Mobile Homes

By facilitating dwellings where there domestic or business circumstances merit their development, the option will have a positive impact on the objective to improve health and well-being. This approach, including the provision of temporary accommodation, can benefit mental health through peace of mind and helps to sustain social and intergenerational contact. The option will enable caring requirements to be met, however it is also recognised that dwellings in the countryside will be less accessible to health care facilities. Although a number of positive and negative influences are identified, the effect on the majority of the other suitability objectives is negligible as only a low number of applications relying on these policies is likely occur over the life of the plan and, in the case of caravans and mobile homes, would not result in permanent development. The restricted quantity of development in conjunction with policy emphasis on clustering and integration with other surrounding

development delivers a minor positive effect on the objectives to maintain and enhance landscape character and to protect, conserve and enhance the historic environment. This policy is considered to be a sustainable policy.

5.117 HOU 20 Restored and Replacement Rural Dwellings and HOU 21 The Conversion and Re-use of Other Rural Buildings

As these policies are constrained to developing a site where a building already exists, the effects on the social sustainability objectives are generally negligible as any benefits in terms of family cohesion or strengthening society are incidental. It is noted that dwellings in the countryside are generally less accessible to health care facilities and other facilities and services. A minor positive impact is identified for housing, in that the policy will reduce the number of unfit homes and may help to meet some rural housing need, however in general the housing is only likely to provide for the specific needs of the developer. The policies encourage the reuse of existing sites or buildings in preference to new development and as such act positively on the objectives to protect physical resources, to maintain and enhance landscape character and to protect, conserve and enhance the historic environment and cultural heritage with significant positive effects on the latter. Minor negative impacts are identified for managing material assets sustainably and encouraging active and sustainable travel, as development in the countryside will not have access to same range of infrastructure and utilities or active and sustainable transport as development in settlements. Impacts on the remaining sustainability objectives are generally negligible, however the appraisal has identified that there does exist some potential for adverse impacts on water and natural resources. It is considered that these risks will be satisfactorily controlled through policy. This option is considered to be a sustainable option.

5.118 HOU 22 New Dwelling in Existing Cluster in the Countryside and HOU 23 New Single Dwelling in a Small Gap in Existing Built-up Frontage in the Countryside

As these policies are constrained to developing a site where development already exists, the effects on the social sustainability objectives are generally imperceptible in scale as any benefits in terms of family cohesion or strengthening society are incidental. However, the principle of locating dwellings in a cluster or in association with other dwellings helps to promote social interaction and reduce isolation. It is further noted that dwellings in the countryside are generally less accessible to health care facilities and other facilities and services. A minor positive impact is identified for housing, in that the policy may help to meet some rural housing need, however in general the housing is only likely to provide for the specific needs of the developer. The policies have a negligible effect on all of the economic sustainability objectives. In respect of the environmental sustainability objectives the overall approach of clustering development where development already exists helps to reduce the scale of any negative effects and a negligible effect is identified for many of the objectives. A minor positive impact is identified for the objectives to maintain and enhance landscape character and to protect, conserve and enhance the historic environment and cultural heritage as these policies will specifically work towards maintaining rural character and traditional settlement patterns. A minor negative impact is identified for the objectives to encourage active and sustainable travel and to reduce causes of and adapt to climate change as dwellings in the countryside are less likely to have access to active and sustainable travel and may result in a proportionately higher carbon footprint than housing of an equivalent

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

nature in settlements. However, the overall strategic approach of constraining this type of development supports these objectives. This option is considered to be a sustainable option.

5.119 HOU 25 Affordable Housing in the Countryside

Positive impacts are identified for all of the social sustainability objectives. The appraisal benefits the objectives to improve health and well-being and to strengthen society by supporting family cohesion and intergenerational contact and allowing people on lower incomes to live / stay in the area that they are from, which may benefit mental health. It also helps to reduce inequality. The policy would support the objective to provide good quality, sustainable housing by providing for new housing in areas where an identified need has been established. The scope and scale of new homes that are likely to be delivered through this specific policy may be significant positive in the context of the district's baseline. For the remainder of the sustainability objectives, some positive and negative influences were identified, however the impacts are negligible in the majority of cases. A minor positive effect is identified for the objective to maintain and enhance landscape character as the policy includes criteria on integration and applies an additional constraint in the Green Belt policy areas. This option is considered to be a sustainable option.

6.0 Equality Impact Assessment

- 6.1 Section 75 of the Northern Ireland Act 1998 requires that public authorities have due regard to the need to promote equality of opportunity and good relations between persons of a particular religion, political opinion, race, age, marital status, sexual orientation or gender. It also includes people with disabilities or those with primary responsibility for the care of a dependant, such as an elderly person. These are known as 'Section 75' groups. The policies contained within the housing in settlements and countryside chapter have been subject to an equality impact assessment (EQIA) to ensure no adverse impact on these groups.
- 6.2 Certain policies, particularly housing policies have the potential, through the promotion of inclusive growth and targeting special housing needs, to address social and economic inequalities in disadvantaged neighbourhoods. This ultimately helps to create safe shared spaces and builds a sense of belonging for everyone, where relationships between people from different backgrounds are valued and respected.

7.0 **Rural Needs Impact Assessment**

The Rural Needs Act 2016, requires District Councils and other Public Authorities to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans and when designing and delivering public services.

- 7.1 To 'have due regard' means that a public authority must consciously consider the needs of people in rural areas. How much 'due regard' will depend on the circumstances and, in particular, on the relevance of rural needs to the decision or function in question. The greater the relevance and potential impact for people in rural areas, the greater the regard required by the duty.
- 7.2 Throughout the formulation of the draft Plan Strategy there has been consideration of the impact of each policy approach on the rural area, relative to the urban area and policies have been amended where it was deemed appropriate to do so. In the case of housing settlements and countryside policies it was necessary to consider the rural impacts, in particular the strategic allocation of housing and the houses in the countryside policies.
- 7.3 The Housing in Settlements and in the Countryside Chapter recognises that there are areas in and outside settlements where housing is required. This is balanced against sustainability, accessible locations and the locational context of a proposal which has been recognised in specific criteria in the policies.
- 7.4 Housing in the countryside can help sustain our vibrant rural communities and by its very nature will have a differential impact in the rural area as there is the strategic directive to locate housing in centres and more accessible locations. Rural housing has been considered extensively through the development of the strategic allocation and the drafting of rural policies as there is a large rural population in Derry City and Strabane District Council. Opportunities have been afforded within each of our rural settlements and in the countryside and there are policies for a number of opportunities to get a house in the countryside, provided the relevant planning criteria have been met.
- 7.5 The housing needs of other rural dwellers that are not farmers or associated with a non-farming business, has also been considered. Policies must be flexible enough to allow those who have grown up in the countryside to remain in the countryside, provided housing can be facilitated through one of the other policies provided in the LDP dPS by clustering, replacing, infilling, reusing or conversion.

Appendix

HOUSING ALLOCATION TABLES

Appendix Table 1 – Allocation of Housing over LDP Period 2017 – 2032, for DC&SDC’s Settlements, based on crude size

Settlement Tier	Settlement	Approx. No. of Households ⁹	% Share of all Households	Population (150,497) ¹⁰	% Share of Population	Share of Housing Requirement (9,000) by % Households	Share of Housing Requirement (9,000) by % Population	Approximate Current Housing Capacity ¹¹
City	Derry City	35,501	66.6%	83,163	55.3%	5,212	4,973	15,923
Main Town	Strabane	5,661	10.6%	13,172	8.8%	831	788	2,197
Local Town	Castledearg	1,367	2.6%	2,976	2.0%	201	178	784
	Claudy	531	1.0%	1,340	0.9%	78	80	348
	Newtownstewart	689	1.3%	1,551	1.0%	101	93	519

⁹ The figures denoting the number of households in each settlement are based on the NISRA statistics. For those settlements that NISRA did not have data for, a count was carried out for individual settlements using Pointer data.

¹⁰ Population data for settlements has been taken from NINIS where the information was available. Where settlement data was not available, a population was calculated based on the number of households (2017 Pointer) x 2.5 persons per house.

¹¹ ‘Approximate Current Housing Capacity’ include planning approvals, land zoned in the DAP and SAP, plus Urban Capacity sites, Whiteland and Windfall Allocation.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

Settlement	Approx. No. of Households	% Share of all Households	Population (150,497)	% Share of Population	Share of Housing Requirement (9,000) by % Households	Share of Housing Requirement (9,000) by % Population	Approximate Current Housing Capacity	
Villages	Ardstraw	87	0.2%	218	0.1%	13	13	148
	Artigarvan	310	0.6%	730	0.5%	46	44	300
	Ballymagorry	274	0.5%	608	0.4%	41	36	247
	Clady	242	0.5%	538	0.4%	35	32	185
	Cranagh	32	0.1%	80	0.1%	5	5	98
	Culmore	1,161	2.2%	3,465	2.3%	170	207	256
	Donemana	271	0.5%	586	0.4%	40	35	271
	Eglinton	1,365	2.6%	3,679	2.4%	201	220	187
	Erganagh	206	0.4%	515	0.3%	31	31	45
	Glebe	273	0.5%	734	0.5%	41	44	147
	Glenmoran	63	0.1%	158	0.1%	9	9	85
	Killea (part in NI)	53	0.1%	133	0.09%	8	8	2
	Killen	115	0.2%	288	0.2%	17	17	143
	Killeter	46	0.1%	115	0.1%	7	7	45
	Lettershendoney	186	0.3%	510	0.3%	27	31	67
	Magheramason	215	0.4%	538	0.4%	32	32	192
	Newbuildings	1,109	2.1%	2,611	1.7%	163	156	324
	Park	184	0.3%	460	0.3%	27	28	40
	Plumbridge	124	0.2%	310	0.2%	18	19	148
	Sion Mills	871	1.6%	1,907	1.3%	128	114	174
Spamount	98	0.2%	245	0.2%	14	14	321	



Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

Strathfoyle	988	1.9%	2,419	1.6%	145	145	104
Victoria Bridge	152	0.3%	380	0.3%	23	23	445

	Settlement	Approx. No. of Households	% Share of all Households	Population (150,497)	% Share of Population	Share of Housing Requirement (9,000) by % Households	Share of Housing Requirement (9,000) by % Population	Approximate Current Housing Capacity
Small Settlements	Aghabrack	16	0.03%	40	0.03%	3	3	119
	Aghyaran	6	0.01%	15	0.01%	1	1	141
	Ardmore	165	0.31%	413	0.27%	24	24	85
	Ballyrory	31	0.06%	78	0.05%	5	5	43
	Bready	79	0.15%	198	0.13%	12	12	54
	Campsey	56	0.11%	140	0.09%	8	8	44
	Cloghcor	5	0.01%	13	0.01%	1	1	60
	Craigbane	7	0.01%	18	0.01%	1	1	41
	Donagheady	50	0.09%	125	0.08%	7	7	35
	Douglas Bridge	60	0.11%	150	0.10%	9	9	96
	Drumlegagh	33	0.06%	83	0.05%	5	5	87
	Garvetagh	18	0.03%	45	0.03%	3	3	88
	Goshaden	32	0.06%	80	0.05%	5	5	0
	Killaloo	31	0.06%	78	0.05%	5	5	18
	Maydown	182	0.34%	455	0.30%	27	27	4
	Nixon's Corner	86	0.16%	215	0.14%	13	13	8
	Straidarren	169	0.32%	423	0.28%	25	25	9
Tamnaherin	69	0.13%	173	0.11%	10	10	42	
Tullintrain	9	0.02%	23	0.01%	1	1	45	

Appendix Table 2 – Allocation of Housing over LDP Period 2017 – 2032, for DC&SDC’s Settlements, based on Settlement Evaluation and Plan Spatial Strategy

Settlement Tier	Settlement	Share of Housing Requirement (9,000) by % Households	Services Level	WWTW	Spatial Strategy Status ¹²	Indicative Potential for more Housing post-April 2017	Indicative Share of District’s Housing 2017 - 2032	Approximate Current Housing Capacity ¹³
City	Derry City	5,212	High	Good	Top Priority for Growth	High	5,375	15,923
Main Town	Strabane	831	High	Good	2 nd Priority for Growth	High	796	2,197
Local Towns	Castledearg	201	High	Good	Remote Rural ¹⁴	High	227	784
	Claudy	78	High	Good	Close to A6 ¹⁵	High	102	348
	Newtownstewart	101	High	Good	Close to A5	High	128	519

¹² Settlements ‘Close to Derry / Strabane’ growth will be restricted to encourage growth in both Derry City and Strabane Town rather than surrounding Settlements.

¹³ ‘Approximate Current Housing Capacity’ include planning approvals, land zoned in the DAP and SAP, plus Urban Capacity sites, Whiteland and Windfall Allocation.

¹⁴ ‘Remote Rural’ it is considered we should be supporting settlements in remote rural locations as the serve a wide rural area and sustain vibrant rural communities.

¹⁵ Settlements ‘Close to A2/A5/A6’ growth will be restricted as to deter the growth of such settlements as commuter settlements.

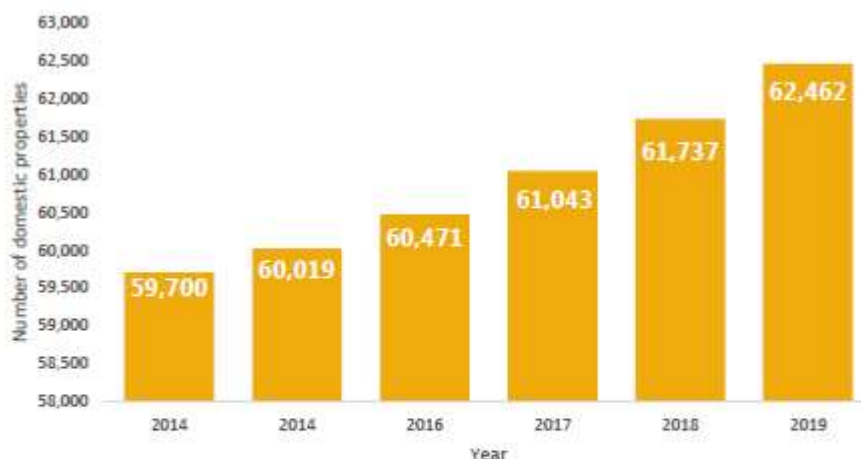
Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

	Settlement	Share of Housing Requirement (9,000) by % Households	Service Level	WWTW	Spatial Strategy Status	Indicative Potential for more Housing post-April 2017	Indicative Share of District's Housing 2017 - 2032	Approximate Current Housing Capacity
Villages	Ardstraw	13	Medium	Problems	Close to A5	Low	15	148
	Artigarvan	46	High	Good	Close to A5 & Strabane	Low	35	300
	Ballymagorry	41	High	Good	Close to A5 & Strabane	Low	30	247
	Clady	35	High	Good	Close to A5 & Strabane	Low	30	185
	Cranagh	5	Low	Limitations	Remote Rural	Medium	15	98
	Culmore	170	High	Good	Close to Derry	Low	130	256
	Donemana	40	High	Problems	Remote Rural	Low	30	271
	Eglinton	201	High	Good	Close to A2 & Derry	Low	154	187
	Erganagh	31	Medium	Good	Remote Rural	Medium	32	45
	Glebe	41	Medium	Good	Close to A5 & Strabane	Low	30	147
	Glenmoran	9	Medium	Good	Remote Rural	Medium	15	85
	Killea (part in NI)	8	High	Good	Close to Derry	Medium	15	2
	Killen	17	High	Good	Remote Rural	Medium	18	143
	Killeter	7	High	Limitations	Remote Rural	Medium	15	45
	Lettershendoney	27	Low	Good	Close to A6 & Derry	Medium	27	67
	Magheramason	32	High	Good	Close to A5 & Derry	Low	23	192
	Newbuildings	163	High	Good	Close to Derry	Low	125	324
	Park	27	High	Good	Remote Rural	Medium	27	40
	Plumbridge	18	High	Good	Remote Rural	Medium	18	148
	Sion Mills	128	High	Good	Close to A5 & Strabane	Low	95	174
Spamount	14	Low	Good	Remote Rural	Medium	18	321	
Strathfoyle	145	High	Good	Close to A2/A6 & Derry	Low	112	104	
Victoria Bridge	23	High	Limitations	Close to A5 & Strabane	Low	15	445	

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

	Settlement	Share of Housing Requirement (9,000) by % Households	Service Level	WWTW	Spatial Strategy Status	Indicative Potential for more Housing Post-April 2017	Indicative Share of District's Housing 2017 - 2032	Approximate Current Housing Capacity
Small Settlements	Aghabrack	3	Medium	N/A	Remote Rural	Medium	5	119
	Aghyaran	1	Low	N/A	Remote Rural	Medium	5	141
	Ardmore	24	Medium	Good	Close to A6 & Derry	Low	19	85
	Ballyrory	5	Medium	Limitations	Remote Rural	Medium	5	43
	Bready	12	Medium	Limitations	Close to A5	Low	9	54
	Campsey	8	Low	Good	Close to A2 & Derry	Low	7	44
	Cloghcor	1	Medium	N/A	Close to A5 & Strabane	Medium	5	60
	Craigbane	1	Medium	N/A	Remote Rural	Medium	5	41
	Donagheady	7	Medium	Good	Close to A5	Medium	8	35
	Douglas Bridge	9	Medium	Problems	Remote Rural	Medium	10	96
	Drumlegagh	5	Medium	Problems	Remote Rural	Low	5	87
	Garvetagh	3	Medium	Limitations	Remote Rural	Low	5	88
	Goshaden	5	Low	Limitations	Close to A6 & Derry	Low		0
	Killaloo	5	Low	Limitations	Close to A6	Low	5	18
	Maydown	27	Low	Good	Close to A2/A6 & Derry	Low	20	4
	Nixon's Corner	13	Low	Good	Close to Derry	Low	9	8
Straidarren	25	Low	Good	Remote Rural	Medium	29	9	
Tamnaherin	10	Low	Good	Close to Derry	Low	8	42	
Tullintrain	1	Low	N/A	Remote Rural	Medium	5	45	

Appendix Table 3: Number of domestic properties (housing stock in DCSDC between 2014 and 2019



Source: NISRA, Land and Property Services

- In 2019, the housing stock in DCSDC was 62,462. This is an increase of 4.6% from 2014 (59,700).

Appendix Table 4: Number of domestic properties (housing stock) by type in DCSDC between 2014 and 2019

Property type	2014	2015	2016	2017	2018	2019
Apartment	6,079	6,115	6,210	6,288	6,508	6,654
Detached	17,748	17,800	17,875	17,988	18,180	18,361
Semi-detached	15,028	15,177	15,323	15,556	15,772	16,077
Terraced	20,845	20,927	21,063	21,211	21,277	21,370
Total	59,700	60,019	60,471	61,043	61,737	62,462

Source: NISRA, Land and Property Services

- Terraced houses have made up approximately 35% of the domestic properties in DCSDC between 2014 and 2019.
- Detached properties have made up approximately 30% of the domestic properties in DCSDC between 2014 and 2019.
- Apartments, however, only make up approximately 10% of domestic properties in DCSDC between 2014 and 2019.

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

Appendix Table 5: Household Tenure 2017 – 18

Region	Percentages					
	Owned outright	Owned with mortgage	Rented-Northern Ireland Housing Executive	Rented-Housing Association	Rented-privately	Rent free ³
DCSDC	33	27	17	7	15	2
NI	45	33	9	3	9	2

Source: NISRA, Continuous Household Survey

Appendix Table 6: Homelessness in Derry and Strabane District 2017/2018

The number of households presenting as homeless has increased from 1,996 at March 2018 to 2,079 at March 2019. There has also been an increase in applicants being awarded 'Full Duty Applicant' status (statutorily homeless) over the same period.

Year	No. of homeless presenters	No. of homeless acceptances	Households placed in temporary accommodation
2014/15	2,107	1,291	525
2015/16	1,920	1,209	436
2016/17	1,936	1,223	358
2017/18	1,996	1,203	529
2018/19	2,079	1,315	642

Source: NIHE

Derry City and Strabane District Council Draft Plan Strategy – Housing in Settlements and the Countryside

Appendix Table 7: Derry City Housing Sites Potential Output, Derry Area Plan 2011.

Ref	Location	Allocated Area (ha)	Site Area (ha)	Assumed Density Range (Dwellings per ha)	Potential Output*	Comments
H1a	Glengalliagh	31.0	31.0	10-15	387	
H1b	Upper Galliagh	51.0	48.0	15-30	1,080	3 ha for Local Centre
H1c	Lower Galliagh	37.5	37.5	15-30	843	
H2	Buncrana West	118.0	114.0	15-30	2,565	4 ha for Local Centre. Includes lands previously zoned for industry
H3	Groarty Road / Creggan Road	42.0	42.0	15-20	742	
H4	Hazelbank	1.5	1.5	Approved	56	Complete
H5	Fairview Road	5.0	3.5	Approved	100	1.5 ha for Local Centre. Planning consent for 100 houses.
H6	Lr Galliagh Rd	4.0	4.0	Approved	120	Complete
H7	Beragh Hill	5.5	5.5	Approved	119	Complete
H8	Ballyarnet Farm	1.5	1.5	15-25	20	Site partially occupied by Listed Building
H9	Lenamore Road	13.5	13.5	15-25	213	Under construction
H10	Fir Road	4.5	4.5	Approved	60	Under construction
H11	Ballyarnet	11.0	11.0	Approved	55	Under construction
H12	Skeoge	2.0	2.0	15-25	40	
H13	Sandbank	1.5	1.5	15-25	30	
H14	Steelstown	13.5	10.0	20-30	250	
H15	Creggan Heights	4.5	3.0	Approved	87	Complete
H16	Southway	2.0	2.0	15-30	45	
H17	Springtown Road	3.5	3.5	15-25	70	New Site
	CITYSIDE	353.0	339.5		6,882	
H18	Prehen	0.8	0.8		3	
H19	Woodside Rd West	18.0	18.0	15-20	315	
H20	Tamneymore	13.5	13.5	Approved	175	Under construction
H21	Lisaghmore	3.0	3.0	15-25	60	
H22	Trench Road East	27.0	27.0	15-25	550	
H23	Tullyally Rd West	11.5	11.5	15-30	258	
H24	Tullyally Rd East	10.5	10.5	15-30	236	
H25	Drumahoe	40.0	40.0	15-25	800	
H26	Fincairn Road	2.5	2.5	20-30	58	Complete
H27	Crescent Link	55.5	45.5	15-20	796	Includes Local Centre and other commercial uses
H28	Rosstown Road	2.0	2.0	Approved	74	Under construction
H29	Kilfennan	7.0	7.0	Approved	153	Under construction
H30	Ballyoan	37.5	37.5	10-20	562	
H31	Waterfoot	7.0	7.0	10-20	105	
H32	Gransha	31.5	28.5	10-20	428	
H33	Hillview	1.5	1.2	10	10	
	WATERSIDE	268.8	255.5		4,583	