Response to Derry City & Strabane District Council

Local development plan (LDP) 2032 – draft plan strategy

By the Chartered Institute of Housing Northern Ireland

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How are response is formed

The Chartered Institute of Housing (CIH) is the independent voice for housing with a mission to act in the public interest rather than any one part of the housing industry. CIH has expertise in analysing housing policy and practice and in developing professional standards for housing practitioners. CIH uses evidence and research to develop its views, including by drawing on experiences of housing professionals. We have a diverse membership of over 500 individuals in Northern Ireland and 18,000 worldwide who work cross public, private and voluntary housing sectors.

Consultation response

Q. Do you consider the plan strategy to be sound or unsound?

Sound

Q. If you consider the Plan Strategy to be Sound and wish to support the LDP Plan Strategy, please set out your comments below.

CIH Northern Ireland welcomes the opportunity to comment on the council’s local development plan (LDP) draft plan strategy. We support council’s ambitious approach in addressing affordable housing in settlements within the strategy and its strong vision for the future of housing policy across Derry City and Strabane District Council (DCSDC). We particularly welcome the focus on the integration of affordable housing in any future residential development.

We are currently finalising a research project on the future of social housing policy, Rethinking social housing Northern Ireland. The first phase of the project was principally sponsored by Department for Communities, and involved interviews with over 230 housing and associated stakeholders, 35 per cent of whom were tenants or residents.

The research participants valued social housing and what it offers. At the same time, they did not want to see large, single-tenure social housing estates being built. Instead mixed-tenure developments were valued as they were seen to support sustainable communities. They can also facilitate a mix of people from different community and income backgrounds. We are pleased to see that the LDP reflects these recommendations like that of other local councils across Northern Ireland.

The report recommends that local government facilitate mixed-tenure schemes through the planning system, a policy which the LDP has included, as well as implementing systems of planning obligations which the strategy has introduced into its plan.
CIH welcomes proposals within the plan that on a site of 0.5 ha or more, that 10 per cent of units in any residential development constitute affordable housing. Not only would this minimum requirement contribute to an increase in provision of housing that is affordable, but it would also contribute to mixed-tenure neighbourhoods.

However, we recognise that given the varying levels of housing stress across DCSDC area this may be low in some areas; therefore, we welcome the inclusion of an ad hoc approach that includes provisions for increasing this threshold where the Northern Ireland Housing Executive (NIHE) can demonstrate acute need. We recommend that given the increasingly high need for affordable housing council show flexibility around increasing the quota where and when needed.

CIH supports the recognition of the strategic role of NIHE in determining housing need, whose methodology includes latent demand testing as a proactive tool to identify hidden demand for social housing, which is a stronger factor in rural areas.

We welcome that planning permission will be withheld where proposals purposely containing less than 10 residential units are submitted in order to circumvent policy requirements to avoid the inclusion of affordable housing. CIH considers this approach to be just and in line with meeting the housing needs of more people.

CIH is pleased to see the inclusion of 'tenure-blindness' within the strategy; this approach will serve to make the area more inclusive and sustainable. We are pleased to see that affordable housing in any residential development will be indistinguishable in terms of external design. It is our belief that mixed-tenure developments will work to tackle stigma around social housing and the mistaken perception that the presence of social housing impacts on the sales prices of private homes. More than that, it provides a guarantee to tenants that affordable housing and high-quality homes are mutually inclusive.

We welcome that the LDP recognises the need for viability in rural areas with a minimum number of two in 10 units in a residential development to include affordable housing; this is particularly important given the urban/rural makeup of the DCSDC. This policy provides choice for tenants who wish to live in rural areas.

The inclusion of advice from housing associations on the layout and design of the affordable housing units will assist the applicant in submitting a residential scheme that meets need. CIH welcomes this practical partnership working between council and providers.
As such, we recommend that council be proactive and regular in its engagement with the housing sector early in the planning process with cognisance of the current ways that affordable housing is delivered. This will help to ensure a smooth experience for all parties involved in the delivery of these sites, in what is a new and welcome opportunity for partnership working between council and providers to deliver the right homes in the right places for people who need them.