



**Causeway  
Coast & Glens  
Borough Council**

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Date: 30<sup>th</sup> September 2021

Tel: 028 7034 7137

Dear Sir/Madam,

**Re: Reaching Rural – Draft Rural Strategy 2021-2025.**

Thank you for your e-mail dated 20<sup>th</sup> September 2021 related to the above public consultation.

I write on behalf of the Council's Planning Department and, in particular, in response to question 5 of the consultation form, as follows:

**Q5. Do you agree with the emphasis on facilitating the development of both social and intermediate housing within mixed-tenure environments to promote cohesion and sustainability in rural areas?**

This policy approach applies to settlements of less than 5,000 population. It is considered that this size of settlement is such that the settlement overall can be considered in the context of an individual 15-minute neighbourhood which has recently been promoted by DfI in 'Planning for the Future of Transport – Time for Change'. Therefore, the concept of mixed-tenure environments may be applied to a settlement overall, rather than to individual developments in these rural settlements.

There appears to be an assumption that, in settlements of this size, the scale of development is generally sufficient to accommodate mixed tenure housing on each site. Our evidence indicates that small-scale schemes by private small-scale house builders are commonplace across all of the Borough's settlements.

The following information was presented in the Council's LDP Preferred Options Paper, indicating the nature of housing developments in the Borough's settlements:

**Table 15: Planning Permissions for Housing Development in the Borough's Settlements 2012-2017**

Planning Permission by Type	%
Sites of 25 units or more	27%
Sites for 24 units or less*	73%
*Of which:	
Sites for 5 or less units	23%
Sites for 10 or less units	36%
Sites for 11 – 24 units	36%

While this table is not limited to the definition of 'Rural Settlements' in the consultation document, and it does not provide information on the nature of the housing developments, an analysis of the applicants for sites of 5 units and less indicates many are small-scale local builders, rather than building firms or housing developers. These larger builders tend to focus on larger settlements (although not exclusively), which would not fall under this definition of 'Rural' as the settlement populations are over 5000.

The pattern in the Borough's smaller settlements appears to be multiple small sites, with 5 units or less commonplace, which are submitted by small, independent local builders. It appears larger developers tend to submit applications of 6 units and above.

Therefore, there may be practical issues that the approach outlined in the document needs to consider.

As a consequence, while the proposed policy approach appears reasonable, it is probable that it will not deliver the numbers of units that the NIHE may anticipate in this Borough. The application of a percentage on sites at or beyond a certain threshold can present difficulties with regard to applicants deliberately submitting schemes of one unit less than the threshold, which would be in keeping with the prevailing character of an area, thereby making a refusal on the grounds of lack of affordable housing provision difficult.

The approach of the Northern Area Plan where sites were zoned specifically for social housing purposes (to be widened to affordable housing) appears to be more appropriate given our Borough's large number of rural settlements and our circumstances in the nature of housing provision outlined here.

Our information indicates that the suggested approach is unlikely to deliver any significant affordable housing provision via the planning intervention process. As an example, the Northern Area Plan has land zoned in Greysteel for social housing provision, and this is a settlement identified in the consultation document as 'Having Consistent Unmet Demand', but no planning applications have been submitted on the zoned site.

The success of any approach is dependent on the affordable housing provider being able to compete in the settlement's housing market for which adequate Government funds have to be made available.

Yours faithfully,

P.P.



Denise Dickson  
Head of Planning

