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Submitted to Rural Strategy Consultation
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Personal and Organisation Details

1 What sector is your organisation in?

sector:

Statutory

othersector:

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Sharon Mulhern

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Introduction

7 Strategic Themes

Yes

Yes

Yes

comments:

The principle of Theme 2 and its 3 parts are supported. However, the consideration of the provision of affordable rural housing must be in a structured manner, in accordance with the relevant council's Local Development Plan (LDP) Settlement Hierarchy. This is particularly true in predominantly rural council areas where development is promoted in towns and villages which have associated facilities and services to meet residents' day to day needs, and where the development is of an appropriate scale for that settlement, and where the zoning of sites can assist in the achievement of mixed tenure. Sites that come forward in an opportunist or speculative manner in lower order settlements (under Policy CTY 5 of PPS 21) that are for more units than the identified need in the host settlement should not be contemplated.

otherthemes:

No

8 High Impact Priorities

Yes

whyno:

The Strategy should clarify what is meant by 'very small settlements', which does not appear to be referenced in the consultation document. Given the limited resources available, and the economies of scale involved that affect viability, it may be that undertaking this annual testing will raise expectations that cannot reasonably be delivered in very small settlements. A better focus would be in providing housing in higher order settlements nearby that will assist in meeting wider sustainable development objectives. This would also help provide a critical mass of development in a location that should make it more likely to be viable and provide a better probability of the scheme coming forward and being built.

Yes

whyno:

Involving a wider range of organisations, both public and private, might help identify the structural barriers and possible ways to address them more effectively, particularly as the intermediate housing product is now available.

Yes

whyno:

Yes

whyno:

Yes

whyno:

Top3:

Rural Housing Needs Tests
Rural Housing Steering Group
Community Planning Engagement

otherpriorities:

9 Annual Action Plans

No

whyno:

It is not clear in the document that, presumably, pages 42-49 inclusive relate to this year's action plan.

Re Action 4: this suggests that NIHE will seek all homes to be designed to these standards, while the text refers to new social housing only. This should be clarified.

Re Action 12: Support each LPA to develop planning policies and zone land that will facilitate the development of affordable housing within mixed-tenure environments promoting cohesion and sustainability.

Comment: our existing Northern Area Plan 2016 includes these mechanisms of planning policies and zone land that will facilitate the development of affordable housing within mixed-tenure environments promoting cohesion and sustainability.

It is noted that LDPs in other council areas have a much lower threshold. This council is conscious of the issues raised regarding viability of small schemes in the research that accompanies this report, and consider our plan approach, along with existing Rural policy presents a measured approach to the issue of affordable housing provision for this area.

The council intends to zone land in its towns and villages, many of which are below the threshold (population of 2,250 or less) outlined in Policy CTY 5 of PPS21. It is considered the council's approach to zone land is more suitable for these settlements than the CTY 5 route. As noted by the NIHE, the size of an affordable scheme can be crucial to its delivery, and the council has experience of schemes for 14 units (as permitted under the policy) and justified on the basis of the scheme's economics, coming forward in settlements where this scale of development would be disproportionately large, and where basis day-to-day facilities are not available. The council would prefer land to be zoned for mixed tenure housing in settlements that have an appropriate range of services and facilities, as determined by its Settlement Hierarchy.

Re Action 16: Regarding NIHE using its role as statutory consultee in LDP to promote the need for policies that support sustainable development, increased energy efficiency and a reduction in carbon emissions, is this in relation to all forms of development, or only where NIHE has an interest, eg affordable housing provision? These are overarching principles that the council would seek to apply in its Settlement Hierarchy, and we would encourage the NIHE to consider would also apply to the distribution of affordable housing schemes that it may wish to bring forward.

specificactivities:

No

10 Additional Comments

furthercomments:

The associated research by the University of Liverpool and UCL highlights a number of issues that should be taken into account in developing the strategy further. The comments above regarding the scale of developments, their associated viability, and their location in a council's settlement hierarchy should be taken into consideration at the preliminary stages of site assessments, to ensure the best use of public monies in bringing forward new housing. Other infrastructure constraints, such as electricity, are also a factor in the location of future provision. The Borough's rural area generally is inadequately

served by public transport, as is the case in most of Northern Ireland, and it may be helpful to acknowledge that the provision of affordable housing is unlikely to improve this situation.

No further comments:

No