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To: DevelopmentPlan@midulstercouncil.org
Subject: NIFHA response to MUDC Draft Plan Strategy consultation
Attachments: NIFHA response to Mid Ulster Draft Plan Strategy.pdf

Please see attached response by NIFHA.

Kind regards

Ben Collins



Great Homes, Thriving Communities

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Mid Ulster Draft Plan Strategy

Response to Consultation

18 April 2019



Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) is the representative body for Northern Ireland's 20 registered housing associations. Collectively our members provide more than 50,000 homes comprising general needs, specialist and supported accommodation, as well as shared ownership.

Housing associations are not-for-profit social businesses that increasingly borrow significant amounts of private finance to deliver public benefit in meeting housing need, supporting their tenants and investing in communities.

NIFHA welcomes the opportunity to comment on Mid Ulster's Draft Plan Strategy.

The housing association sector is keen to deliver the much-needed new homes in the Mid Ulster District Council area. Over the last forty years housing associations have been a key developer of new homes across Northern Ireland and the sector has invested significant amounts of money. We are a key stakeholder and it is important that our voice is heard on this crucial issue. An effective partnership between the Council and the housing association sector is key.

In the NIFHA draft thinkpiece *Mainstreaming Mixed-Tenure in Northern Ireland*¹ we stated that: "One policy lever which is absent in Northern Ireland, but which is used across Great Britain and the Republic of Ireland to create mixed-tenure communities and increase housing supply, is Developer Contributions Schemes."

NIFHA and our housing association members are committed to mixed tenure development.

Executive Summary

1. NIFHA and the housing association sector are passionate about good design and place shaping that supports the ambition of MUDC of promoting mixed tenure neighbourhoods that are safe and welcoming for all.
2. We appreciate that this draft Plan Strategy is the first, Local Development Plan prepared by MUDC. NIFHA is keen to see the smooth progression of the draft Plan Strategy from a consultation document to an adopted Plan Strategy.
3. We support the ambition and drive of MUDC in terms of its vision for the Council area but having reviewed and considered the Local Development Plan as issued, we consider the Plan to be unsound. The legal compliance tests have not been met, and the following policies contained within the Draft Plan Strategy are unsound.
4. The table below summarises the changes sought.

¹ <https://www.nifha.org/wp-content/uploads/MTR-FINAL-Hi-Res-single-page-070618.pdf>

Policy	Comment	Cross ref.
GP1	<p><i>General Principles Planning Policy</i></p> <p>Change required:</p> <p><i>Redraft criterion (c) of GP1 in tandem with deleting Policy UD1. Text should explicitly request the submission of a Design Concept Statement for residential planning applications and a Design & Access Statements for major development proposals. References to a height restriction within supporting text should be deleted</i></p>	<p><i>Section 3 paragraphs 3.1 – 3.9</i></p>
HOU2	<p><i>Quality Residential Developments</i></p> <p>Change required:</p> <p><i>The policy should be redrafted (in parts) and supported by robust evidence to underpin proposed thresholds. Further evidence should be prepared to demonstrate the coherence of the overall strategy and how HOU2 emanates from it</i></p>	<p><i>Section 4 paragraphs 4.1 to 4.29</i></p>

1. Introduction

NIFHA submits this representation on behalf of the Housing Association sector and welcomes the opportunity to return comments on the Mid Ulster District Council Draft Plan Strategy.

In line with Council's procedures, each representation is set out on a separate page within each of the Chapter headings with the policy clearly identified.

The structure of the submission is as follows:

- **Chapter 2:** Provides an assessment of how the draft Plan Strategy addresses the legislative compliance tests;
- **Chapter 3:** Details our representations to General Principles Planning Policy;
- **Chapter 4:** Details our representations to Social Policies – Accommodating Growth); and
- **Chapter 5:** Sets out our conclusions.

2. Legislative Compliance

In preparing their Draft Plan Strategy (dPS), Mid Ulster District Council (MUDC) is required to adhere to the provisions of the Planning Act (Northern Ireland) 2011 ('Act') and the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 ('Regulations').

This section identifies weaknesses in the compliance of the draft Plan Strategy (dPS) with the Act and the Regulations.

Planning Act (Northern Ireland) 2011

- Under Part 2 (8) of the Act the Plan Strategy must set out:
- the council's objectives in relation to the development and use of land in its district;
- its strategic policies for the implementation of those objectives; and
- such other matters as may be prescribed.
- The Act also stipulates that the Plan Strategy should be prepared in accordance with the Council's Timetable, as approved by the Department and in accordance with Council's Statement of Community Involvement. The publication of the dPS is in accordance with Council's timeline which had estimated Spring 2019, however we note that the period allowed for consideration of counter representations is likely to fall beyond that previously agreed with the Department of Infrastructure and the timetable may require modification.
- In preparing a plan strategy, the council must take account of:
- "the regional development strategy;
- the council's current community plan
- any policy or advice contained in guidance issued by the Department;.
- such other matters as the Department may prescribe or, in a particular case, direct, and may have regard to such other information and considerations as appear to the council to be relevant."
- This representation identifies specific instances where, in particular, policy issued by the Department has not been taken in to account.
- The Act also requires that the Council:
"(a) carry out an appraisal of the sustainability of the plan strategy; and
(b) prepare a report of the findings of the appraisal."

The Planning (Local Development Plan) Regulations (Northern Ireland) 2015

- Regulation 15 identifies a schedule of the information that should be made available alongside the publication of the dPS. This includes:

“such documents as in the opinion of the council are relevant to the preparation of the local development plan.”

- We acknowledge that Council has prepared and made available its Preferred Options Public Consultation report which provides an insight as to how comments made to the Preferred Option Paper have been considered in the preparation of the dPS.
- Notwithstanding this there is insufficient supporting evidence to support a number of the proposed policies within the dPS and therefore the requirements of Regulation 15 have not been met. We identify the specific concerns within the remainder of this representation.

3. General Principles Planning Policy

POLICY GP1 – GENERAL PRINCIPLES PLANNING POLICY

Policy GP1 is unsound as the policy fails the tests of CE1 and CE4

The policy is incoherent and has the potential to give rise to confusion as design policies are referenced within both GP1 and UD 1 : Urban Design, with a restriction on height noted within the policy justification and amplification of UD 1 and not in the main policy or GP1

We respectfully seek that design policies are contained within one overarching policy in order that the plan strategy can be read and interpreted in a logical manner

GP1 is a criterion based policy which applies to all future planning applications, irrespective of type. The policy sets out a positive presumption to granting planning permission for development proposals which accord with the Local Development Plan and can demonstrate that there is no demonstrable harm to 10 criteria.

NIFHA welcomes this positive planning policy; however we consider criterion (c) to be unsound.

Criterion (c) Siting, Design and External Appearance sets out prescriptive requirements to be met which largely mirror that presented in UD1. An extract of criterion (c) is presented below together with our assessment of the policy against the wording of UD1.

(c) Siting, Design and External Appearance

New development should respect its surroundings and be of an appropriate design for the site and its locality. It should be sited having regard to its relationship with existing buildings and the visual effects of the development on the surrounding area and where applicable, the landscape. *[This largely reflects the wording within the first bullet of UD1].*

Development should:

- in the urban setting have regard to the street scene and pattern of development *[Largely reflects the wording and spirit of the first bullet point in UD1]*
- in the countryside, have regard to the character of the area, the local landscape and not rely primarily on new landscaping for integration. *[Not applicable]*

Where relevant, consideration will be given to:

- the size, scale, form, massing, height, and density of the development and
- the external appearance which should have regard to the locality in terms of style, fenestration, materials and colours. *[These two aspects reflect the wording of the third bullet point in UD1].*

The starting premise of UD1 is that developers will be expected to demonstrate through a Design and Access Statement how a development proposal meets the policy requirements. There is no reference to this within GP1 nor does UD1 acknowledge that within the Planning Act (Northern

Ireland) 2011 the requirement to provide a Design & Access only applies to major development proposals, or applications within designation or sensitive locations.

Within the policy justification and amplification to UD1 (on page 101) reference is made that new development *must* respect the prevailing building height within the settlement which is mainly 2- 3 storey. The text references that exceptionally consideration may be given to taller buildings if this is demonstrated through the provision of a Design & Access Statement.

Recommendation

NIFHA fully supports the intent behind the GP1 and how it seeks to embrace the core planning principles set out in the Strategy Planning Policy Statement (SPPS).

We support the deletion of UD 1 on the basis that criterion (c) of GP1 is redrafted to improve the coherence of the draft plan strategy; inserted text has been underlined to assist the reader.

New development should respect its surroundings and be of an appropriate design for the site and its locality. It should be sited having regard to its relationship with existing buildings and the visual effects of the development on the surrounding area and where applicable, the landscape.

Development should:

- in the urban setting have regard to the street scene and pattern of development*
- in the countryside, have regard to the character of the area, the local landscape and not rely primarily on new landscaping for integration.*

Where relevant, consideration will be given to;

- the size, scale, form, massing, height, and density of the development and*
- the external appearance which should have regard to the locality in terms of style, fenestration, materials and colours.*

All planning applications for residential development should be accompanied by a Design Concept Statement unless the proposal is a major development proposal. All major development proposals must be accompanied by a Design & Access Statement

This text should be detailed within the text box and any reference to the building height of new developments being limited to 2- 3 removed from the policy justification. Council has provided no evidence of a building height assessment within the Council area to support this.

All application should be assessed on their individual merits, and the removal of such wording provides flexibility to respond to any change in circumstances in accordance with soundness test CE4.

4. Social Policies

POLICY HOU 2 – QUALITY RESIDENTIAL DEVELOPMENT

Policy HOU2 is unsound as the policy fails the tests of C3, CE1, CE2, and CE4

The policy is not founded on a robust evidence basis which explains the rationale behind the first 3 criterion and the policy triggers associated with criterion 3. There is a tension between the policy criterion and the text detailed within the justification and amplification

NIFHA requests that Council reconsiders its evidence basis to support HOU 2 and its associated criterion.

POLICY SUMMARY

HOU2 is a criterion based policy which encompasses 6 criterions to be addressed in respect of planning applications for residential development.

CRITERION (I) & (II)

These criterions relate to density levels within new developments and the separation distance between residential properties.

Both criterions read as single statements with no details provided on the policy requirements or test to be met; this information is set out within the supporting justification and amplification text. The lack of substantive detail within the policy text box gives raise to confusion and tension regarding the weight to be afforded to the information contained in the justification and amplification text.

Planning case law directs that policy should be clearly set out within the policy text box. The text detailed under the justification and amplification is a narrative to support the operation of the principal policy. In its current format the policy is unsound and fails soundness test CE1.

Criterion (i) is not founded on evidence which demonstrates that the density range set out in paragraph 7.20 is realistic and achievable having taking account of criterion (ii). We note the absence of evidence such as an urban capacity assessment which would have assisted in informing these two criterions. Criterion (i) and (ii) fail soundness test CE2.

Spatial Planning Framework (SPF) Policy 2 seeks to focus growth within the 3 main hubs. Paragraph 4.15 outlines Council's intention to double the % of households living within Cookstown, Dungannon and Magherafelt from 30% of the District households to 60%. In order to achieve this ambition, increasing housing density levels will be key. In the absence of evidence to support the proposed density figures it is unclear how coherent the plan strategy is and policies which flow from it, accordingly criterion 1 fails soundness test CE1.

Recommendation

NIFHA fully supports the intent behind criterion (i) and (ii) and acknowledges that the Strategic Planning Policy Statement (SPPS) advocates the need for a housing strategy which provides for increased housing density without cramming in town and city centres and in other locations that benefit from high accessibility to public transport facilities (paragraph 6.137).

We would support criterion (i) being reworded to read:

'An increase in the density of housing and mixed use developments will be promoted within town centres and other locations which benefit from high accessibility to public transport facilities'.

In the absence of evidence to support the density bands the supporting text for criterion (i) – paragraph 7.20 should be moved to the Local Policies Plan (LPP) and clearly identified as a guide.

Criterion (ii) should be deleted and associated text at paragraph 7.24 moved to the Local Policies Plan (LPP) and clearly identified as a guide.

CRITERION (III)

This criterion relates to the provision of a mixture of house types and tenures. No policy requirements or thresholds are set out within the criterion; this detail is noted in the policy justification and amplification.

Planning case law directs that policy should be clearly set out within the policy text box. The text detailed under the justification and amplification is a narrative to support the operation of the principal policy. In its current format the policy is unsound and fails soundness test CE1.

Further analysis and commentary on both aspects of this criterion are addressed separately under the respective titles of Mixture of House Types and Tenure.

Mixture of House Types

The supporting justification and amplification sets out a threshold requiring that on sites of 25 units of more or on sites of 1 hectare and over, that a mix of residential units should be provided.

NIFHA fully supports the intent of this policy which flows from the Regional Development Strategy 2035 and the SPPS. However, in its current format the policy does not meet the tests of Soundness for the following reasons:

- Reference is made within criterion (iii) to providing a mixture of housing types and paragraph 7.27 refers to *'catering for the needs of all families and small households, providing access for all'*. We note that no evidence base has been provided to support this criterion in the form of an assessment which analysed future household size and type (i.e age group) across the District; accordingly the policy fails soundness test CE2.
- It has not been demonstrated that the policy is coherent with aspects of the Spatial Strategy (policy SPF 2) and other proposed residential and design policies; the policy fails soundness test CE1.
- The policy is not founded on evidence which demonstrates how Council has tested the viability implications arising from the policy; the policy fails soundness test CE2.

Tenure

The supporting justification and amplification sets out thresholds relating to the provision of social housing requiring that any development of 50 units or more or on sites of 2 hectares and over that social housing should be provided at a rate not less than 25% of the total number of units.

The requirements apply in locations where there is an identified social housing need identified by the relevant strategic housing authority until such times that the LLP bring forward sites with key site requirements addressing social housing needs.

NIFHA fully supports and welcomes the intent of the policy which flows from the Regional Development Strategy 2035 and the SPPS. However, in its current format the policy does not meet the tests of Soundness for the following reasons:

- We note from the Public Consultation Report that discussions were held with the Northern Ireland Housing Executive (NIHE), however, Council has no evidence base to support the proposed threshold of 25% - the policy fails soundness test CE2;
- There is a tension between the header within the justification and amplification and the associated text. The header associated with paragraphs 7.26 and 7.27 references '*Meeting the Needs of All – Provision of a Mixture of House Types and Tenures*' (underlining our emphasis), yet the paragraph only refers to social housing. This is at odds with the definition within the SPPS of affordable housing which pertains to social rented housing and intermediate housing – the policy fails soundness test C3;
- No information has been provided to demonstrate how this criterion can respond to changing circumstances – the policy fails soundness test CE4 ;
- It has not been demonstrated that the policy is coherent with other policies proposed, principally the other aspect of criterion (iii) and criteria (i) and (ii) – the policy fails the soundness test CE1.

Recommendation

NIFHA fully supports the intent behind criterion (iii) and acknowledges that the Strategic Planning Policy Statement (SPPS) advocates the need for a variety of house types and sizes and tenure to meet different needs in order to support balanced communities (page 70, SPPS).

We disagree however with Council's approach on this aspect and contend that the issue of housing type and size should only apply to affordable housing (as defined within the SPPS).

Criterion (iii) should be redrafted on this basis and focus solely on the promotion of a variety of housing tenures across the District, underpinned by a robust evidence base.

Criterion (v)

Relates to the provision of open space within residential developments of 25 units or more. As with other criterion the requirements or test to be met are not detailed in the policy criterion rather in the supporting justification. In its current format the policy is unsound and fails soundness test CE1.

We would recommend that Criterion (v) is redrafted that the policy test is contained within the criterion and information which is intended to be a guide moved to the Local Policies Plan (LPP) and clearly identified as such.

5. Conclusion

We support the ambition and drive of MUDC in terms of its vision for the Council area but having reviewed and considered the Local Development Plan as issued, we consider the Plan to be unsound. The legal compliance tests have not been met, and policies GP1 and HOU2 should be supported with robust up to date evidence in order to address the tests of Soundness.

NIFHA thanks Council for this opportunity to respond and contribute to the draft Plan Strategy, and welcomes the chance to discuss our response with the Local Development Plan team. Included below is the NIFHA Local Development Plan Position Statement.

Local Development Plan-Making NIFHA Position Statement



Introduction

This position statement has been prepared on behalf of the Northern Ireland Federation of Housing Associations (NIFHA) to assist the Local Councils in the preparation of their Local Development Plans (LDP) with the assistance of Turleys planning consultancy.

As you are aware, a key component of the emerging local development plans is the need to make provision for housing delivery across the plan period. The Strategic Planning Policy Statement (SPPS) specifically sets out that the LDP should bring forward a strategy for housing and amongst others things must deliver balanced communities:

“Achieving balanced communities and strengthening community cohesions is one of the major themes underpinning the RDS. The provision of good quality housing offering a variety of house types, sizes and tenures to meet different needs, and development that provides opportunities for the community to share in local employment, shopping, leisure and social facilities is fundamental to the building of more balanced communities.”

In particular the SPPS sets out that the LDPs should:

“Identify settlements where the HNA has found there to be an affordability pressure.”

The SPPS sets out that:

“The HNA/HMA (Housing Market Assessment) undertaken by the Northern Ireland Housing Executive (NIHE), or the relevant housing authority will identify the range of specific housing needs, including social/affordable housing requirements.”

Affordable housing is currently defined as social or intermediate housing. As the key provider of social and intermediate housing in Northern Ireland housing associations should be a key stakeholder in the local development plan making process. Disappointingly the associations have been given limited opportunity to be involved in the process or to assist with evidence gathering and this position statement is prepared in response to the lack of engagement with the sector.

Member Survey

As the representative body for housing associations NIFHA has undertaken a survey of all its member associations to understand their members' thoughts on the future provision of affordable housing. Housing Associations are the key provider of affordable housing in Northern Ireland and as such should be considered as a key stakeholder in the local plan making process.

A survey of housing associations was undertaken between 31 October 2018 and 7 November 2018. The survey sought clarity of four key areas, as follows:

- What is your preference for the provision of social and intermediate housing?
- Should planning policy prescribe the mix of housing to be provided within future planning applications?
- Is it appropriate for local Councils to prescribe design requirements for residential development which exceed those currently set out in planning policy?; and
- Are there any aspects of residential development where you would wish to see more flexibility applied?

Out of the thirteen associations invited to take part in the survey, eight responded, equating to two thirds of the NIFHA membership.

The feedback provided has been used to inform the contents of this paper, however it does not prevent individual member associations from making further submissions to the LDP plan-making process.

The remainder of this report will consider the feedback revised from the member survey and summarise the key recommendations for your consideration in preparing housing policies for your Council's LDP.

Feedback from Member Associations

Provision of social and intermediate housing

Collectively there is recognition that all housing developments should provide a mix of type, tenure and size to contribute towards sustainable communities and meet the objectives of the SPPS.

The majority of housing associations consider that Council should provide for affordable housing to be provided on site either via a threshold approach that applies to all sites or as a key site requirement where a clear evidence of need has been provided. The survey found that the key site requirement was the most supported approach.

It was recognised that a threshold approach would secure a more flexible approach to the provision of affordable housing, however:

- The threshold should not be overly onerous on the viability of developments; and
- The requirement for the quantum and type of affordable housing should be based on an evidential need at the time.

This would assist in ensuring the right type of affordable housing it provided for within the right locations and will create opportunities for the provision of affordable housing where land has previously been unavailable to housing associations.

Caution should however be taken in setting a threshold approach as it will need to be reflective of the different affordable products. For example social housing is not needed in all locations and therefore policies should avoid affordable housing policies which require both social and intermediate housing to be provided on each site. On the other hand site specific zonings for affordable housing will not be flexible to provide for changes in need, particularly social housing need, over time.

We would recommend that the type of affordable provisions should be provided based on the need in the location at that time. It is therefore important that the Council's evidence base for proposed affordable housing policies is founded in a robust evidence base and must consider:

- That social housing need is defined by the Northern Ireland Housing Executive and housing needs assessments prepared by the NIHE only consider social housing need;
- The location of social housing need cannot be determined across a 15 year plan period as those in need of social housing can change their locational preference at any time; and
- Religious and political divisions in the provision of social housing and how the Council proposes to overcome these issues to ensure that housing is delivered.

Affordable housing is currently defined as social and intermediate housing that is provided by housing associations, however other products such as Co-Ownership and FairShare are available as intermediate housing products through some housing associations. There are numerous other affordable housing products that could become available and as such policies should be flexible enough to respond to other products that already exist or may come to the market in the future.

Should planning policy prescribe the mix of housing to be provided within future planning applications?

It was clear that there was a preference for a more flexible approach to policies relating to the mix of housing to be provided on sites, particularly in relation to the provision of social housing where the mix is determined on the need calculate by the NIHE. Councils should therefore work closely with the NIHE in formulating housing mix policies to ensure that they would not prejudice the future delivery of social housing however further consideration should also be given to the wider housing need to ensure that sustainable communities are delivered.

It will be important that the Councils have a robust baseline understanding of the existing social housing provision within their area and the proposed future social housing need to understand what quantum of land is needed and likely future infrastructure requirements for the area. Any assessment of need should also factor in the quality of existing stock to determine whether replacement stock should be planned for within the plan period. However, recognising the locational issues facing social housing delivery and that housing need can change over a 15 year plan period, the council should ensure sufficient flexibility within the proposed policy wording.

Policy wording should be able to adapt should the Councils' annual monitoring of the delivery of social housing show that locational need and the type of housing required has changed.

In relation to intermediate housing provision it will be important to consider that whilst the HNA or a HMA may show a need for a range of type and size of properties, those who are seeking intermediate housing may wish to have access to a different type of housing and that this will be a

more market driven approach. Housing need for intermediate products is better understood within the local markets for sale and the private rental market.

Is it appropriate for local Councils to prescribe design requirements for residential development which exceed those currently set out in planning policy?

The overwhelming feedback from the associations was that Councils should not use the LDP as an opportunity to prescribe overly onerous design requirements for residential development. The preference is that existing policies within the SPPS and planning policy statements (PPS') should be carried forward to ensure a consistent approach to policies across Northern Ireland. This will provide better clarity for both housing associations and private developers.

Housing associations currently work to design criteria set out in planning policy and standards required by the NIHE, which are often more onerous than planning policy.

In order to support additional design standards being introduced, such as lifetime homes and wheelchair accessible home requirements, local councils should undertake a robust assessment of the need for such homes and should engage directly with housing associations to understand the necessity for such standards. They should also clearly define what is meant by lifetime homes and wheelchair accessible homes and take account of the costs associated with such development when considering the deliverability of planning policies.

Aspects of residential development where more flexibility should be applied?

Following on the theme of requirements for residential developments, feedback was sought on those areas where a more flexible approach to policy should be considered to assist in the delivery and operation of housing sites.

Across the associations a more flexible approach to the provision of car parking would be welcomed. This is based on the operation of existing schemes where car ownership levels within some social housing schemes results in car parking being under used in some schemes. Policies for the provision of car parking should also consider the locational characteristics of individual sites, recognising that some sites will be located within city/town centres or areas well served by public transport or other sustainable modes of transport.

Open space is also identified as an area where a more flexible approach could be applied. Open space requirements for residential development can sometimes provide anti-social behaviour issues within schemes, leading to maintenance issues. In preparing policies for the provision of open space, councils should assess the existing quantity of provision and should consider what is required to meet future need, however an assessment of quality should also be undertaken. Policy provision for offsite provision or the maintenance of existing provision should be considered as a reasonable alternative.

Policies relating to density levels on sites should only be applied on a site by site basis and should be well informed by site assessments to fully understand the constraints associated within the development and the locational opportunities of some sites.

Overall it is considered that the requirements applied to residential development will vary on a site by site basis and a suitable level of flexibility should be incorporated in to proposed policies to allow for this.

Recommendations

Based on the feedback received from NIFHA member associations the following recommendations are made to assist local councils' in the preparation of their LDP:

- Caution should be taken when applying an affordable housing requirement across all residential sites as not all locations will have a social housing need;
- When applying a threshold approach to affordable housing provision the council should consider carefully the existing mechanisms for the delivery of social housing;
- Key site requirements seeking social or intermediate housing should be based on detailed and up to date housing need;
- The Council should ensure that their evidence base has assessed the need for both social and intermediate housing, both of which are currently provided by housing associations;
- Policy proposals should be flexible to adopt to site specific characteristics and ensure deliverability of housing;
- Policy wording should be flexible to adapt to changes over time, particularly in relation to the delivery of different affordable housing products; and
- Policy requirements for the design of residential development should be based on a robust assessment of need.

Finally, Councils should pro-actively engage, early in the plan-making process, with the housing sector and in particular the housing associations and developers responsible for the delivery of housing in order to better understand the operational realities of delivering development and the unintended consequences flowing from proposed policies.

Submitted on behalf of NIFHA by:

Ben Collins

Chief Executive

