



Local Development Plan 2030

draft Plan Strategy Response Form

September 2019

www.midandeantrim.gov.uk/planning



**Mid & East
Antrim**
Borough Council

Mid and East Antrim draft Plan Strategy 2030

Overview

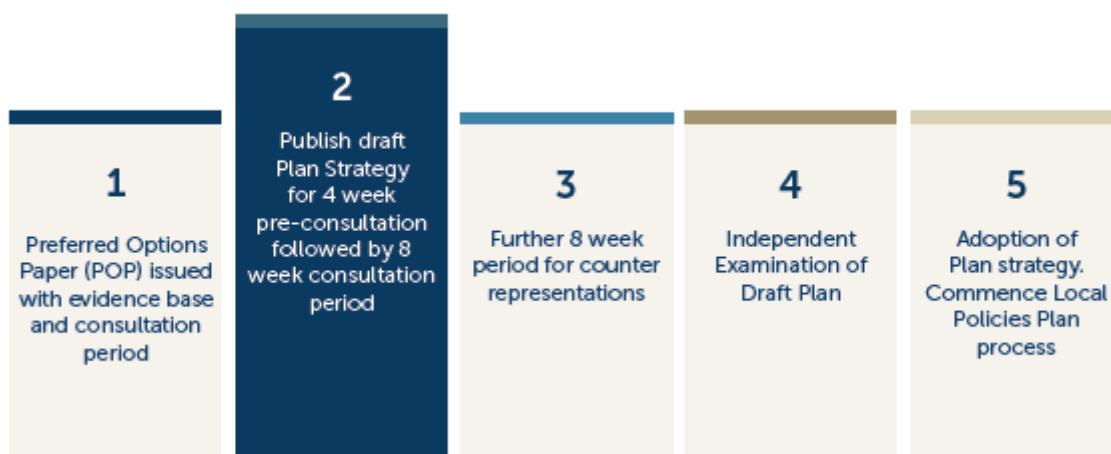
The Local Development Plan is primarily about delivering sustainable development and improving the quality of life and wellbeing of communities in Mid and East Antrim. It sets out a Spatial Growth Strategy underpinned by other strategic policies and proposals as a means of ensuring that development is high quality, meets local needs and is located in the appropriate places convenient to jobs and public services.

The Local Development Plan will also balance competing demands ensuring that new development respects our quality landscapes and our precious natural and historic environment, all of which expresses the unique identity of our Borough and underpins our growing tourism sector. Through guiding future development and use of land in our towns, villages and rural areas, the Local Development Plan will provide certainty as, under the new Plan-led system, it will be the first thing to be taken into account by Council when taking planning decisions. The Local Development Plan is a powerful tool for place-shaping and will assist in the delivery of our Community Plan 'Putting People First'.

The draft Plan Strategy sets out how our Borough will grow and change up to the year 2030. It puts forward our Plan vision and strategic objectives for the future. It also contains a Spatial Growth Strategy and supporting Strategic Spatial Proposals indicating where growth should be directed in the Borough. It also sets out a range of Strategic Subject Policies under the five key themes of Sustainable Economic Growth; Building Sustainable Communities; Transportation, Infrastructure and Connectivity; Stewardship of our Built Environment and Creating Places and Safeguarding our Natural Environment, which together will support the Spatial Growth Strategy and inform future planning decisions.

How we got here

The draft Plan Strategy is the first of two documents, which comprise the Local Development Plan. Once adopted, it will be followed by the Local Policies Plan which will set out our detailed site-specific proposals such as land use zonings and local designations such as settlement limits and town centre boundaries. The draft Plan Strategy has been developed following extensive engagement with the public, stakeholders and our elected Members and follows on from the publication of our Preferred Options Paper in June 2017. The key stages in this phase of the plan making process are shown below



How We Are Consulting

The easiest and quickest way to comment is by completing our online response form:
consult.midandeastantrim.gov.uk

Alternatively, complete this draft Plan Strategy Response Form and either return by email to planning@midandeastantrim.gov.uk or download a copy and post to:

Local Development Plan
Team, County Hall, 182
Galgorm Road,
Ballymena,
BT42 1QF.

The draft Plan Strategy is published for formal public consultation for a period of eight weeks beginning on **Wednesday 16 October and closing at 5pm on Wednesday 11 December 2019**. Please note that in order for comments to be considered valid you must include your contact details. We will use these details to confirm receipt of comments and to seek clarification or request further information. Anonymous comments or comments which do not directly relate to the draft Plan Strategy will not be considered as part of the consultation process. For further details of how we handle representations, please refer to our Polices Notice which can be accessed here https://www.midandeastantrim.gov.uk/downloads/privacy_notice_ldp.pdf.

Section A. Data Protection

Local Development Plan Privacy Notice

Mid and East Antrim Borough Council is a registered data controller (ZA076984) with the Information Commissioner's Office and we process your information in accordance with the General Data Protection Regulation and Data Protection Act 2018.

Mid and East Antrim Borough Council collects and processes personal information about you in order to fulfil our statutory obligations, to provide you and service users with services and to improve those services.

Our Privacy Notice relates to the personal information processed to develop the Council's Local Development Plan (LDP) and can be viewed at https://www.midandeastantrim.gov.uk/downloads/privacy_notice_ldp.pdf. It contains the standards you can expect when we ask for, or hold, your personal information and an explanation of our information management security policy. All representations received will be published on our website and made available at our Local Planning Office, County Hall, 182 Galgorm Road, Ballymena, for public inspection and will be forwarded to the Department of Infrastructure in advance of Independent Examination.

If you wish to find out more about how the Council processes personal data and protect your privacy, our corporate privacy notice is available at www.midandeastantrim.gov.uk/privacy-notice.

Why are we processing your personal information?

- To enable the preparation of the Council's Local Development Plan;
- To consult your opinion on the Local Development Plan through the public consultation process as well as other section functions;
- To ensure compliance with applicable legislation;
- To update you and/or notify you about changes; and
- To answer your questions.

If you wish to find out more information on how your personal information is being processed, you can contact the Council's Data Protection Officer:

Data Protection Officer
Mid and East Antrim Borough Council
The Braid
1-29 Bridge Street
Ballymena
BT43 5EJ

Section B. Your Details

Q1. Are you responding as individual, as an organisation or as an agent acting on behalf of individual, group or organisation? (Required)

Please only tick one

- ☐ Individual *(Please fill in the remaining questions in the section, then proceed to Section F.)*
- ☐ Organisation *(Please fill in the remaining questions in the section, then proceed to Section D.)*
- ☐ Agent *(Please fill in the remaining questions in the section, then proceed to Section E.)*

Q2. What is your name?

Title

Miss

First Name **(Required)**

Emma

Last Name **(Required)**

Walker

Email

emma.walker@turley.co.uk

Q3. Did you respond to the previous Preferred Options Paper?

- ☐ Yes ☒ No ☐ Unsure

Section C. Individuals

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

Section D. Organisation

If you have selected that you are responding as an organisation, there are a number of details that we are legally required to obtain from you.

If you are responding on behalf of a group or organisation, please complete this section, then proceed to Section F.

Organisation / Group Name **(Required)**

Your Job Title / Position **(Required)**

Organisation / Group Address (if different from above)

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

Section E. Agents

If you have selected that you are responding on behalf of another individual, organisation or group there are a number of details that we are legally required to obtain from you.

Please provide details of the individual, organisation or group that you are representing.

NIFHA

Client Contact Details

Title

First Name (Required)

Last Name (Required)

Address Line 1 (Required)

6c Citylink Business Park

Line 2

Albert Street

Line 3

Town (Required)

Belfast

Postcode (Required)

BT12 4HQ

Q4. Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP?

Please only select one.

☐ Agent ☐ Client ☒ Both

Section F. Soundness

The draft Plan Strategy will be examined at Independent Examination in regard to its soundness. Accordingly, your responses should be based on soundness and directed at specific strategic policies or proposals that you consider to be unsound, along with your reasons. The tests of soundness are set out below in Section M.

Those wishing to make representations seeking to change the draft Plan Strategy should clearly state why they consider the document to be **unsound** having regard to the **soundness tests** in Section M. It is very important that when you are submitting your representation that your response reflects the most appropriate soundness test(s) which you believe the draft Plan Strategy fails to meet. There will be no further opportunity to submit information once the consultation period has closed unless the Independent Examiner requests it.

Those who make a representation seeking to change the draft Plan Strategy should also state whether they wish to be heard orally.

Section J. Type of Procedure

Q5. Please indicate if you would like your representation to be dealt with by:
(Required)

Please select one item only

- ☐ Written (Choose this procedure to have your representation considered in written form only)
- ☒ Oral Hearing (Choose this procedure to present your representation orally at the public hearing)

Unless you specifically request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Section K. Is the draft Plan Strategy Sound?

Your comments should be set out in full. This will assist the Independent Examiner understand the issues you raise. You will only be able to submit further additional information if the Independent Examiner invites you to do so.

Sound

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

(Required)

Section L. Unsound

In this section we will be asking you to specify which part(s) of the draft Plan Strategy you consider to be unsound.

Note: If you wish to inform us that more than one part of the draft Plan Strategy is unsound each part should be listed separately. Complete this page in relation to one part of the draft Plan Strategy only.

Q6. If you consider that the draft Plan Strategy is unsound and does not meet one or more of the tests of soundness below, you must indicate which test(s) you consider it does not meet, having regard to Development Plan Practice Note 6 available at:

https://www.planningni.gov.uk/index/news/dfi_planning_news/news_releases_2015_onwards/development_plan_practice_note_06_soundness_version_2_may_2017.pdf

Please note if you do not identify a test(s) your comments may not be considered by the Independent Examiner.

Continued on next page.

Section M. Tests of Soundness (Required)

Procedural tests

- ☒ P1. Has the plan been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
- ☐ P2. Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- ☐ P3. Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?
- ☒ P4. Did the Council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?

Consistency tests

- ☐ C1. Did the Council take account of the Regional Development Strategy?
- ☐ C2. Did the Council take account of its Community Plan?
- ☒ C3. Did the Council take account of policy and guidance issued by the Department?

Coherence and effectiveness tests

- ☒ CE1. The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans of neighbouring Councils.
- ☒ CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
- ☒ CE3. There are clear mechanisms for implementation and monitoring.
- ☒ CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.

Section N. Which part(s) of the draft Plan Strategy are you commenting on?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to inform us that you consider more than one part of the draft Plan Strategy is unsound, you can submit further representations by completing and submitting additional copies of this section.

Relevant Policy number(s)

See Enclosed Representation

(and/or)

Relevant Paragraph number(s)

See Enclosed Representation

(and/or)

District Proposals Map

See Enclosed Representation

Please give full details of why you consider the draft Plan Strategy to be unsound having regard to the tests(s) you have identified above. Please be as clear and concise as possible.

See Enclosed Representation

MEA-DPS-075

If you consider the draft Plan Strategy to be unsound, please provide details of what changes(s) you consider necessary to make the draft Plan Strategy sound.

See Enclosed Representation



**Mid & East
Antrim**
Borough Council

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182 Galgorm Road
Ballymena
BT42 1QF

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Representations to Mid and East Antrim Borough Council Draft Plan Strategy

On behalf of NIFHA

December 2019

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Contact

Emma Walker

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Client

Northern Ireland Federation of Housing

Our reference

NIFB3001

9 December 2019

Executive Summary

1. This representation is submitted on behalf of the Northern Ireland Federation of Housing Associations (NIFHA) who welcomes the opportunity to submit comments on the draft plan strategy issued by Mid & East Antrim Borough Council (MEA).
2. We appreciate that this draft Plan Strategy is the first, Local Development Plan prepared by MEA and offer these comments as a 'critical friend' who 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 MEA in terms of its vision for the Council area however, having reviewed and considered the Local Development Plan, 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.

Schedule of Key Comments

Policy	Comment	Cross ref.
Draft Policy HOU5	<p>The draft policy is not supported by a robust evidence base and in its current form would conflict with the SPPS.</p> <p>The Council has failed to consider the implementation of the policy and the potential implications on viability and provision of particular housing types.</p> <p>The Council should undertake further work to ensure that the final adopted policy is supported by robust evidence and that the delivery of the plan will not be jeopardised.</p> <p>Draft Policy HOU5 is unsound as the policy fails soundness tests C3, CE1, CE2, CE3 and CE4.</p>	Section 3

1. Introduction

- 1.1 Turley submits this representation on behalf of NIFHA and welcomes the opportunity to return comments on to the Mid and East Antrim Draft Plan Strategy (dPS).
- 1.2 This representation focuses on NIFHA's position in relation to the provision for affordable housing that is proposed in the dPS. In preparation for the publication of the dPS by each of the eleven council's NIFHA has previously undertaken a survey of members in to the provision of affordable housing. The results of this survey are included at Appendix 1 of this representation.
- 1.3 NIFHA are also aware of the requirement for the development plan to have regard to the Council's Community Plan. As such we also include a review of the Mid and East Antrim Community Plan – Putting People First 2017-2032 (see Appendix 2). This review establishes that there is a role for NIFHA and its members and we would encourage the council to engage with NIFHA in the delivery of the community plan.
- 1.4 In line with the requirement for representations to focus on the soundness of the draft Plan Strategy, the structure of this 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 draft Policy HOU5
 - **Chapter 5:** Sets out our conclusions.

2. Legislative Compliance

The draft Plan Strategy is unsound as Procedural Tests P1 and P4 have not been met:

- The draft Plan Strategy has not been prepared in accordance with Council's timetable (P1)
- There is insufficient supporting information to support proposed policies (P4)

2.1 In preparing their draft Plan Strategy (dPS), Mid & East Antrim Borough Council ('the Council') 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').

2.2 This section identifies issues in the compliance of the dPS with the Act and the Regulations.

Planning Act (Northern Ireland) 2011

2.3 Part 2 of the Act stipulates that the Plan Strategy should be prepared in accordance with the Council's timetable, as approved by the Department for Infrastructure ('DfI') and in accordance with the Council's Statement of Community Involvement.

2.4 The Council's Timetable, as approved and published on the Council's website is dated 2019. We note that the Council did publish the dPS within the 3rd Quarter of 2019 as indicated in the approved timetable as it is made public on 17 September. However, we would highlight that the timetable shows that this timeframe will include:

- An 8 week statutory public consultation period; and
- An 8 week statutory consultation on counter representations.

2.5 We note that the formal consultation period on the dPS did not commence until the 16 October 2019 and therefore falls outside of the broad timeframe set out in the timetable. This also means that the counter-representation stage falls out with the agreed timeframe and could result in further conflict with the timetable.

2.6 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."

2.7 This representation identifies specific instances where, in particular, policy issued by the Department has not been adequately assessed.

2.8 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

2.9 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.”

2.10 Our reading of this Regulation is that supporting evidence used to inform or support a draft policy should be provided alongside the draft plan strategy. We have identified where there is a gap in the information base and accordingly contend that the Plan has failed to address procedural test 4.

3. Draft Policy HOU5 – Affordable Housing in Settlements

The draft policy is not supported by a robust evidence base and in its current form would conflict with the SPPS.

The Council has failed to consider the implementation of the policy and the potential implications on viability and provision of particular housing types.

Draft Policy HOU5 is unsound as the policy fails soundness tests C3, CE1, CE2, CE3 and CE4.

- 3.1 Draft Policy HOU5 sets out the Council draft policy position on the provision of affordable housing. Essentially it seeks to secured 20% affordable housing within main and small towns and 10% affordable housing with other defined settlements where the development will comprise of 10 or more dwellings or a site size of 0.2ha or more.
- 3.2 It is acknowledged that the Housing Strategy presented within the draft Plan Strategy aligns with regional policy objectives as set out in the Regional Development Strategy (RDS), specifically the inclusion of policy mechanisms to provide for the needs of everyone and the provision of mixed tenure housing developments.
- 3.3 Whilst the principle of securing a mix of tenure provision is supported we are concerned that there is insufficient evidence provided to support the Council's draft policy.
- 3.4 Technical Supplement 3 on Housing expands upon the provisions of draft Policy HOU5. It sets out that the policy has been prepared in consultation with NIHE. Paragraph 8.1.37 of the dPS sets out that:

"in applying this policy, the up to date Housing Needs Assessment (HNA) for Mid and East Antrim, currently carried out annually by the NIHE will be a material consideration."

- 3.5 The supporting information provided in Technical Supplement 3 indicates that the 2018 assessment was used in defining the draft policy, however this information is not provided in support of the dPS. It would be expected that the Council would publish all relevant supporting information which it is reliant upon to inform policy alongside the dPS which is out for consultation. This significant void in evidence to support the draft policy is worrying and would result in the plan failing against soundness test CE2. The SPPS sets out at Paragraph 6.139 that:

"Housing Needs Assessment/Housing Market Analysis – provides an evidence base that must be taken in to 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 the LDPs facilitate a reasonable mix and balance of housing tenures and types. The Northern Ireland Housing Executive, or the relevant housing authority, will carry out the HNA/HMA.”

3.6 The SPPS is therefore clear that the HNA should inform the LDP. Whilst the Council has referenced the HNA, it is not specifically included within the supporting evidence base for the draft Plan Strategy and therefore it could not be demonstrated that the plan would comply with soundness test C3.

3.7 Technical Supplement 3 seeks to summarise the assessment by NIHE in various sections and it is acknowledged in paragraph 7.39 of the supplement that the social housing need varies within settlements. The same paragraph goes on to state:

“Examining this need alongside the notional housing allocation figure for each settlement, uncovers a number of settlements where completions and live planning permissions would already meet the allocation figure but would not meet the social rented housing need. For all these settlements, save for Broughshane, the social rented housing need could potentially be met by urban capacity and/or windfall potential.”

3.8 The Council is reliant upon land identified in the Urban Capacity Study (Technical Supplement 3) to secure the delivery of affordable housing; however, we consider that there are a number of weaknesses within the council’s assessment of urban capacity. These are summarised as follows:

- Lead-in times included within the assumptions do not accurately reflect the time taken to zone land within the local development plan; secure planning permission in accordance with the draft Policy and discharge pre-commencement conditions to allow a lawful start;
- Lead-in times do not accurately reflect site preparation works for the commencement of development or annual build rates;
- The Council is reliant on the delivery of long-standing zoned/undeveloped housing sites; and
- The Council assumes an unconstrained yield for sites.

3.9 Based on these weaknesses, the conclusions reached on the ability for social housing to be secured on such sites could be flawed. Without undertaking a detailed site assessment of the proposed sites we are concerned that the Council cannot robustly demonstrate that this is the case and therefore the policy conflicts with soundness test CE2.

3.10 The council has acknowledged in the supporting evidence that there are variations in need for social and intermediate housing across the borough. However, the policy approach proposed in the draft Plan Strategy does not adequately reflect the variances. Furthermore the borough wide approach is a departure from the approach endorsed in the SPPS (Paragraph 6.143). There is no evidential case for a departure from the SPPS in this case and as such fails soundness test C3.

- 3.11 The draft Policy is seeking to set a threshold of 10 or more units or 0.2 hectares or more, however we can find no evidence of how this threshold has been determined and whether any alternatives were considered. On this basis, there is a conflict with soundness test CE3.
- 3.12 Technical Supplement 3 sets out that the approach set out in the POP¹ has evolved as a result of further analysis and discussions with NIHE.
- 3.13 It was initially proposed that for Main Towns the requirement would be for 25% and for Small Towns it would 15%, however NIHE raised potential concerns about the viability of development at that level and that 20% would be more appropriate. The 20% applies also to Small Towns given the substantive need for provision in those locations. No substantive evidence is provided with the dPS to support this view and therefore there is a conflict with soundness test CE3. It is also noted that the policy as drafted does not facilitate flexibility to ensure viability or exceptions to the provision of affordable housing. As such the draft policy conflicts with soundness test CE4.
- 3.14 The supporting text to draft Policy HOU5 defines affordable housing as including social rented and intermediate housing. Intermediate housing is defined in the dPS Glossary as consisting of:
- “shared ownership housing provided through a registered 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. The NI definition of intermediate housing may change over time to incorporate other forms of housing tenure below market rates. Where this is the case, such additional products will be considered suitable to help meet the affordable housing obligations of the policies in the LDP.”*
- 3.15 The flexible approach alluded to above is welcomed, however this should be expressed within the main policy section of the dPS to ensure that the policy is considered flexible enough to respond to future changes in the definition of affordable housing. This flexibility will assist in ensuring that the policy complies with soundness test CE4.
- 3.16 At the time of preparing this representation, the Department for Communities (DfC) had launched a consultation paper on proposed changes to the definition of Affordable Housing. While the proposed change would have no direct impact upon social housing, it would provide an opportunity for the private sector to provide intermediate housing products alongside registered housing associations.
- 3.17 As currently worded the policy is reliant upon the Housing Needs Assessment to identify the need for affordable housing. We would urge the council to ensure that the HNA is able to provide evidence of need for all future forms of affordable housing, should the definition change.

¹ Every 10th Unit in a housing scheme to be social

- 3.18 Paragraph 8.1.39 of the dPS provides further supporting text for the draft Policy. We are concerned that this paragraph suggests that a higher affordable housing provision requirement may be identified in some locations through the Local Policies Plan (LPP). This would not be consistent with the dPS and therefore the LPP could be unsound. The same paragraph also reinforces the view a site specific approach may be more appropriate if evidence suggests that the current draft policy would be insufficient in some locations. Such an approach would align with paragraph 6.143 of the SPPS.

Soundness Test

- 3.19 Draft policy HOU5 fails to satisfy the following soundness test:

- P3 – Has the Council prepared its Preferred Options Paper and taken in to account any representations made?
- C3 – Did the council take account of policy and guidance issued by the Department?
- CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;
- CE3 - There are clear mechanisms for implementation and monitoring; and
- CE4 - It is reasonably flexible to enable it to deal with changing circumstances

Recommendation

- 3.20 To ensure that the dPS can be considered a ‘sound’ plan, we respectfully request that the Council:

- Undertakes a robust and coherent assessment of the effectiveness of the policy by:
 - Identifying a sample of sites of varying scales and types across the housing markets within the borough;
 - Undertaking a feasibility appraisal to understand the residential capacity of the sites;
 - Identifying the other policy requirements and developer contributions that would be applied to the development.
 - Identifying a series of affordable housing requirements (e.g. 5, 10 and 20% - ‘reasonable alternatives’).
 - Undertaking a strategic viability appraisal of each requirement level for each site to understand the threshold for viability; and
 - Applying the findings of the viability assessment to inform a proposed policy approach.

- 3.21 This approach is well established within other jurisdictions.

- 3.22 The Council should also consider any potential exceptions to the provision of affordable housing, for example the provision of elderly housing or development which would facility the reuse of heritage assets.

4. Conclusion

- 4.1 We support the ambition set out in the draft Plan Strategy, however, having reviewed and considered the document, we consider the Plan to be unsound. The legal compliance tests have not been met, and draft policy HOU5 should be supported with robust up to date evidence in order to address the tests of Soundness.
- 4.2 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.

**Appendix 1: NIFHA – Members Survey on
Affordable Housing**

Local Development Plan-Making

NIFHA Position Statement

November 2018

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Emma Walker
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Client
Turley

Our reference
NIFB3001

11 Nov 2018

Introduction

This position statement has been prepared on behalf of the Northern Ireland Federation of Housing Associations (NIFHA) to assist the Local Council's in the preparation of their Local Development Plans (LDP).

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 balances 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:

- (a) What is your preference for the provision of social and intermediate housing?
- (b) Should planning policy prescribe the mix of housing to be provided within future planning applications?

- (c) Is it appropriate for local Councils to prescribe design requirements for residential development which exceed those currently set out in planning policy?; and
- (d) 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:

- (a) The threshold should not be overly onerous on the viability of developments; and
- (b) 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:

- (c) 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;
- (d) 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
- (e) 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 off-site 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:

- (a) Caution should be taken when applying an affordable housing requirement across all residential sites as not all locations will have a social housing need;

- (b) When applying a threshold approach to affordable housing provision the council should consider carefully the existing mechanisms for the delivery of social housing;
- (c) Key site requirements seeking social or intermediate housing should be based on detailed and up to date housing need;
- (d) 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;
- (e) Policy proposals should be flexible to adopt to site specific characteristics and ensure deliverability of housing;
- (f) Policy wording should be flexible to adapt to changes over time, particularly in relation to the delivery of different affordable housing products; and
- (g) 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.

Appendix 2: Review Mid & East Antrim Community Plan

Mid and East Antrim Borough Council – Putting People First 2017-2032

Overview and key themes

Published in March 2017, the plan covers the period up to 2032. The vision for 2032 is:

“Mid and East Antrim will be a strong, vibrant, safe and inclusive community, where people work together to improve the quality of life for all.”

The Plan has been prepared by the community partnership, which includes the Housing Executive and has been based on five priority themes²:

- (i) Sustainable jobs and developing our tourism potential;
- (ii) Good health and wellbeing;
- (iii) Progress in education and improving aspirations for all;
- (iv) Improving community safety and cohesion; and
- (v) Our environment.

Areas where Plan recognises the role of housing and housing associations

Under each priority theme the Plan identifies a series of strategic themes, actions and indicators³. Those strategic themes, actions towards which NIFHA and its members can contribute are summarised below.

MEA – Strategic themes with housing related actions/indicators

Strategic Theme	Actions/Indicators
Our borough has a culture of entrepreneurship, skills development and vocational training.	We have built and developed the environment for the benefit of all who live and work in Mid and East Antrim.
Our borough provides opportunities for all to enable and support people to reach their potential.	
Our people are able to enjoy longer, healthier lives.	Creating greenways/pathways between areas, and reclaiming existing outdoor spaces including the development of an Urban/Community Growing Strategy to include the development of allotments. Housing developments and supported living to support the needs of older people and those with disabilities. Open space developments and recreational developments to support more active lifestyles. Integrated public open space and housing
Our people are physically active more often.	
Our older people are active, respected and supported in their community.	

²Putting People First 2017-2032, Page 6

³ Putting People First 2017-2032, Page 10-19

	development.
Our borough has structured arrangements to support and deter those most at risk of becoming involved in crime.	Affordable and social housing developments Public shared space developments
Our people feel safe in their community and have a sense of belonging to the area.	Reimaging projects Those with responsibility for particular spaces take due care and attention to ensure these can be accessed safely by the whole community.
Our borough has vibrant, shared and cohesive communities.	
The natural environment and built heritage of our borough in protected and sustainably managed.	Connect existing walking and cycling routes to encourage less dependency on cars.
People value our boroughs natural environment and built heritage and behave responsibly towards it.	Extend the scope of the planned audit of green space across the borough to include brownfield sites in conjunction with the Local Development Plan.
People enjoy easy access to our boroughs natural environment and built heritage.	Manage development so as to avoid building in areas prone to flooding, coastal erosion and land instability. All citizens in the borough have access to good quality green space within walking distance.

Areas where further emphasis should be placed on the role of housing associations

There are other outcomes identified in the Plan, however they do not directly relate housing and are not relevant to the services that NIFHA and its members could provide.

Next Steps

Whilst a number of the indicators/actions identified in the Plan are related to housing and the services provided by housing associations, it is unclear who will be responsible for the delivery these actions.

The Council's Community Plan Team should engage with NIFHA to explore how NIFHA members can contribute towards the delivery of specific actions.

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