

Hannah Flynn

From: Blease, Catherine <Catherine.Blease@NIHE.GOV.UK>
Sent: 03 February 2022 12:42
To: Local Development Plan
Cc: Proinsias McCaughey; McCollam, Joanne; McLaughlin, Maria; Reid, Paul
Subject: NIHE response to dPS proposed changes
Attachments: Letter to Proinsias McCaughey.pdf; NIHE DS Response dPS schedule of changes.docx

Proinsias,
Please see the Housing Executives response to the draft PS proposed changes attached. we would be grateful for a receipt of our response
Many thanks,
Catherine
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***** IMPORTANT MESSAGE *****
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Proposed Change Ref	Pg	Policy/ Paragraph/ Table Number etc	Support / Objection / Representation	Comments
PART D – Social Development Strategy, Designation & Policies				
16. Housing in Settlements and the Countryside				
PC 126	225	Policy HOU 1 Strategic Allocation and Management of Housing Land	Support	<p>The Housing Executive supports measures that will help address non-development and land-banking to encourage land to come forward for house building and therefore welcomes the additional text to the end of the 3rd bullet point.</p> <p>Article 64 of the Planning Act refers to “termination of planning permission by reference to a time limit” in reference to completion times. This option could also be investigated in order to prevent land banking/or to provide support for the de-zoning of land, where development has only been nominally started to keep planning permission live.</p> <p>The Housing Executive generally supports the strategic allocation of housing land. In particular, we welcome the exception to allow Phase 2 land to be released at an earlier opportunity where it provides affordable housing (social and intermediate) according to a need identified by the Housing Executive. Phasing land will provide flexibility, to allow an appropriate quantity of zoned land to meet housing need, as need is met, or increases, over the Plan period. It will allow for planned development and will provide additional certainty to affordable housing providers.</p> <p>We support the proposed addition to Plan Strategy of a Phase 3 Strategic Housing Land Reserve. This presents an opportunity to bring forward land to address affordable housing need in exceptional circumstances.</p> <p>An allocation policy can only deliver sites once the LPP is adopted and this could take several years after the Plan Strategy adoption. Therefore, given there is high housing need within the Plan Area, we also support the inclusion</p>

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			<p>proportion/threshold policy for affordable housing within the Plan Strategy, as this can deliver affordable housing units earlier.</p> <p>We welcome the addition of a footnote to explain that where the term 'registered housing association' is used, this can generally also mean NIHE. However, we suggest that this could be changed to 'registered housing association and the Housing Executive'. NIHE may be able to start borrowing and bring forward residential schemes again in the future.</p>
<p>PC 133</p>	<p>233</p> <p>Policy HOU 4 Protection of Existing Residential Accommodation Paragraph 16.44</p>	<p>Support</p>	<p>As there is increasing demand for short-term let accommodation, which can be detrimental on established residential areas, we welcome clarification of the policy intent to include the control of short-term residential lets.</p>
<p>PC 134</p>	<p>233</p> <p>Policy Box HOU 5 – Affordable and Private Balanced – Tenure Housing in Settlements</p>	<p>Support</p>	<p>The Housing Executive welcomes the proposed amendments to this policy and therefore we withdraw our objection.</p> <p>The Housing Executive supports the threshold of 10 or more dwelling units and that the minimum requirement for affordable housing has been uplifted to 20%, given the high levels of housing need in the Plan Area. This higher proportion of affordable housing will better meet housing need and provide more affordable housing within a mixed tenure context, limiting the need for affordable housing exceptions, contained within HOU 1 to be applied. In addition, this policy will also mean that windfall sites will contribute to meeting housing need and mixed tenure development. We believe mixed tenure development leads to more inclusive neighbourhoods and avoids area-based deprivation.</p> <p>We welcome the requirement that all housing schemes under HOU 5 will be required to deliver balanced and mixed communities and applicants will be required to demonstrate how they intend to deliver an appropriate affordable/private housing mix to meet any identified acute localised need.</p>

				<p>We welcome that the reference to 'no more than a maximum of 70% of either private or affordable houses' has been removed as we believe that this did not align with the previously proposed 10% requirement of affordable housing on private sites.</p> <p>We believe that this policy should currently be a material consideration in the determination of planning applications, to help meet the housing needs of households in housing stress.</p>
PC 135	234	Policy HOU 5 Affordable and Private Balanced – Tenure Housing in Settlements Paragraphs 16.46 & 16.49	Support	<p>We support the amended text in paragraphs 16.46 and 16.49, which is consistent with the minimum 20% affordable housing requirement provided by Policy HOU 5.</p> <p>We support that it is for the Council, rather than the developer, to demonstrate that the proportion of affordable housing required may be uplifted on an individual site.</p>
PC 137	235 & 236	Policy HOU 5 Affordable and Private Balanced – Tenure Housing in Settlements Paragraphs 16.52 – 16.55	Support	<p>We welcome that the text has been updated to reflect the amended DfC definition of affordable housing.</p>
PC 141	242	Policy HOU 8 Quality in New Residential Developments	Support	<p>The Housing Executive welcomes that a new criteria has been added to ensure there is no net loss of biodiversity and preferably, there is a contribution to biodiversity net gain.</p> <p>The Housing Executive believes there is an opportunity for the Policy to promote energy efficient homes and buildings that can easily incorporate renewable</p>

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				energy technology such as heat pumps and solar panels. We note that in England, fossil fuel boilers in new homes are being phased out by 2025, so we would like to see renewable heating sources and carbon neutral homes encouraged within the dPS.
PC 143	245	Policy HOU 10 Residential Extensions and Alterations - New Criteria e) to be added to policy box	Support	We welcome that the Policy has been enhanced with an additional requirement to achieve no Net loss of biodiversity.
Chapter 16 Housing; Rural p255 to 276				
PC 156	275	Policy HOU 25 Affordable Housing in the Countryside Paragraph 16.181	Support	We continue to support the retention of a rural exceptions policy where a need has been identified by the Housing Executive. While the Housing Executive prefers affordable housing to be delivered through planned development, the inclusion of policy HOU 25 will provide flexibility should need rise over the Plan period. We support the restriction that planning permission will only be given where applications are submitted by a Housing Association or the Housing Executive. We welcome the clarity provided by the additional text for when more than one development is required by the exception.
PC 157	275	Policy HOU 25 Affordable Housing in the Countryside Paragraph 16.180	Support	The clarification that balanced community split of Policy HOU 5 does not apply to rural exceptions within Policy HOU 25 is welcomed.

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34. Developer Contributions and Community Benefits

PC 248	456	Developer Contributions and Community Benefits - New paragraph 34.8	Support	<p>The Housing Executives welcomes the inclusion of text to encourage the use of social clauses, for larger developments to deliver positive social benefits. These clauses can secure employment opportunities, and training and skills development for local unemployed to underemployed residents. The use of social clauses is often practiced in Great Britain to provide employment or training opportunities for young people or the long-term unemployed.</p>
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