

# Lisburn & Castlereagh City Council Draft Plan Strategy

Representations on behalf of NIFHA

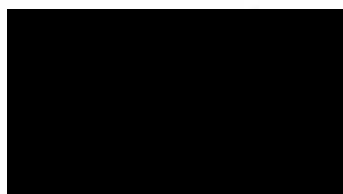
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## Executive Summary

1. This representation is submitted behalf of NIFHA in response to consultation on the Lisburn & Castlereagh City Council (LCCC) draft Plan Strategy (dPS)
2. We appreciate that this draft Plan Strategy is the first, Local Development Plan prepared by LCCC 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 LCCC 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 draft Policy Comments

Policy	Comment	Cross ref.
Draft Strategic Policy HOU8	<p>The Council has failed to provide sufficient evidence or clarification on the affordable housing need for the plan period.</p> <p>The Council has failed to demonstrate how the affordable housing can be provided within sites with remaining capacity.</p> <p><b>The draft policy therefore fails against soundness tests C3, CE1 and CE2.</b></p>	Paragraphs 3.1 to 3.11
Draft Policy HOU10	<p>The Council has failed to provide sufficient evidence to justify the proposed policy requirement and thresholds.</p> <p>The Council has failed to consider any reasonable alternatives with the supporting SA and elements of the policy lack clarity.</p> <p>No consideration has been given to the delivery of the policy and its implementation.</p> <p><b>The draft policy therefore fails against soundness tests P3, CE2, CE3 and CE4.</b></p>	Paragraphs 3.12 to 3.27
Draft Policy HOU11	<p>The Council has failed to adequately consider the implementation of the policy.</p> <p><b>The draft policy therefore fails against soundness test CE3.</b></p>	Paragraphs 3.28 to 3.34
Draft Policy COU5	<p>The draft policy is a departure from the policy wording of PPS21.</p> <p><b>The draft policy therefore fails against soundness test C3.</b></p>	Paragraphs 3.35 to 3.37

# 1. Introduction

- 1.1 Turley submits this representation on behalf of NIFHA and welcomes the opportunity to return comments on to the Lisburn & Castlereagh City Council (LCCC) 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 Lisburn and Castlereagh City Council Community Plan 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;
  - **Chapter 5:** Sets out our conclusions.

## 2. Legislative Compliance

2.1 In preparing their draft Plan Strategy (dPS), Lisburn and Castlereagh City 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 Local Development Plan (LDP) Timetable, as approved and published on their website is dated November 2018. We note that the Council did publish the dPS within the timeframes indicated (Q3 2019 to Q2 2020), and that this timeframe is also to include for the review of representations received and the consultation period for site specific counter-representations. The Council should carefully monitor future progress against the timetable to ensure no future conflict.

2.5 In preparing a Plan Strategy, legislation sets out that 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."

2.6 This representation identifies specific instances where policy issued by the Department has not been adequately assessed.

2.7 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."*

2.8 We have identified significant flaws with the Council's Sustainability Assessment and identify them in this representation.

### 3. A Quality Place – Enabling Sustainable Communities and Delivery of New Homes

#### Draft Strategic Policy 08 –Housing in Settlements

- 3.1 The draft Plan Strategy (dPS) identifies 6 Strategic Policies which will shape the draft Plan. Plan Objective A: A Quality Place relates to enabling sustainable communities and the delivery of new homes. It is under this objective that housing is considered.
- 3.2 There are 8 actions associated with Plan Objective A, action point number 5 states to:
- “provide appropriate opportunities for housing in settlements with a range of types and tenures, including affordable housing.”*
- 3.3 This action is welcomed as the delivery of sustainable communities is a key objective of the Regional Development Strategy 2035 (RDS) and Strategic Planning Policy Statement (SPPS).
- 3.4 Draft Strategic Policy 08 goes on to state:
- “The plan will support development proposals that:*
- (a) Are in accordance with the Strategic Housing Allocation provided in Table 3;*
  - (b) Facilitate new residential development which respects the surrounding context and promotes high quality design within settlements;*
  - (c) Promote balanced local communities with a mixture of house types of different size and tenure including affordable and specialised housing;*
  - (d) Encourage compact urban forms and appropriate densities while protecting the quality of the urban environment.”*

3.5 It is recognised within the ‘*justification and amplification*’ text that affordable and specialist accommodation provision should be met where need is identified. This approach is welcomed, however the Council has not published any evidence to indicate how need is identified. Reference is made in Technical Supplement 1<sup>1</sup> to a need for 2,490 affordable units which has been derived from the Northern Ireland Housing Executive Housing Market Analysis Update (HMA) dated April 2018, however this is not provided within the supporting papers. If the Council is to rely upon this evidence as justification for a policy-led approach to affordable housing then the relevant information should be provided in support in order to allow for a robust assessment to be undertaken by the Planning Appeals Commission (PAC).

3.6 In the absence of the original data set from NIHE the approach could be unsound under soundness test CE2.

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<sup>1</sup> Technical Supplement 1 Housing Growth Study, October 2019 (Section 7).

3.7 The SPPS also 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.”*

3.8 The SPPS is therefore clear that the HMA should inform the LDP. Whilst the Council has referenced the HMA, 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.

3.9 We also note that Housing Need Assessment/Housing Market Analysis is considered at Page 61 of dPS Part 1. Here it is stated:

*“The Northern Ireland Housing Executive (NIHE) are responsible for carrying out a Housing Needs Assessment (HNA) to assist the Council in the preparation of the Local Development Plan. The HNA seeks to provide a reasonable mix and balance of house types to cater for a range of housing needs. The total affordable housing requirement for the plan period is 6,240 units, of which 2,400 are social housing units. The deliverability of affordable housing and in particular the social housing element will largely depend on the zoned sites remaining to be developed and other sites lying outside these zonings (urban capacity and windfall).”*

3.10 We wish to highlight that the Council’s Technical Supplement 1 sets an affordable housing requirement for the plan period of 2,490 dwellings which would appear to conflict with the dPS figure of 6,240 units. The Housing Growth Strategy<sup>2</sup>, which forms Chapter 6 of Technical Supplement 1, identifies a social housing need of 2,490 new homes but does mention intermediary housing. It is unclear whether the figure of 6,240 units comprises both social rented housing and intermediary housing. On this basis the plan would be unsound as it conflicts with the evidence and would therefore fail against soundness test CE2. There is also a lack of clarity within the papers and the dPS on the actual affordable housing need for the plan period.

3.11 Technical Supplement 1, Table 6 shows that remaining zoned land without planning permission could accommodate c1, 099 units. Add to this the potential yield for the proposed Strategic Mixed Use site at West Lisburn identified in Table 6 and the potential yield could be c2, 599 units.

3.12 Given that the Council’s proposed policy for the provision of affordable housing could only be applied to future planning applications it is difficult to understand how an affordable need of 6,240 units could be met within zoned land which could only yield 2,599 units. We acknowledge that urban capacity sites and windfall sites could also contribute to the provision of affordable housing, however the Council’s own evidence

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<sup>2</sup> Lisburn & Castlereagh Housing Growth Study, Lichfields, 24 September 2019

provided in Technical Supplement 1<sup>3</sup> indicates that such sites could yield c.1, 318 units. Even with a provision of 100% affordable housing the need identified at page 61 of dPS Part 1 could not be adequately met. As such the dPS would fail soundness tests CE1 and CE2.

3.13 In order to ensure that a that the dPS can meet the soundness tests, we recommend that the Council:

- Makes all relevant evidence/data available for consultation and for the PAC to inform their assessment of the Plan;
- Provides clarification on why evidence provided in Technical Supplement 1 shows a different affordable housing need than that presented in Part 1 of the dPS; and
- Ensures that there is sufficient land available for development within the plan period which would be able to support the delivery of the relevant affordable housing requirement and if necessary identify additional lands through the expansion of settlement limits at the Plan Strategy stage.

#### **Draft Policy HOU10 – Affordable Housing in Settlements**

3.14 Part 2 of the dPS sets out the Council’s proposed operational planning policies for the plan period. Those draft operational policies relating to housing are also considered under the heading ‘A Quality Place’ and seek to expand upon the relevant draft strategic policies set out in Part 1.

3.15 Draft Policy HOU10 states:

*“Where the need for affordable housing is identified, through the Housing Needs Assessment, on sites of more than 0.5 hectares or comprising of 5 residential units or more, proposals will only be permitted where provision is made for a minimum 20% of all units to be affordable. This provision will be secured and agreed through a Section 76 Planning Agreement.”*

3.16 Whilst the intention to secure affordable housing contributions is welcomed the Council has provided no evidence to justify the application of a threshold of 0.5 hectares or 5 units. It would have been prudent to consider a range of thresholds in determining the most appropriate option.

3.17 The Council also fails to adequately justify the application of a 20% requirement. It is noted that the assessment of requirement is considered at paragraphs 4.35 and 4.36 of Technical Supplement 1. This appears to indicate that a 20% requirement was preferred on the basis that it was closer to the affordable housing requirement set out in the same paper. The same paragraphs reference a more detailed study that has been undertaken, however this is not available as part of the consultation process and therefore there is a gap in evidence. As such the draft policy could fail against soundness test CE2. In any event it is unclear whether any consideration has been

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<sup>3</sup> Tables 8 & 9



given to the impact of such a requirement on the viability of development and therefore no real degree of certainty can be provided to demonstrate that the policy is deliverable. As such it could fail against soundness test CE2.

3.18 From a management perspective, it is widely accepted that social housing will be provided by a housing association. In the case of sites of 5 units, this would equate to one affordable unit which would require management by a housing association. The management of single units across a settlement could cause management inefficiencies.

3.19 We note that the Sustainability Appraisal which accompanies the draft Plan Strategy does not consider any alternatives for the provision of affordable housing. No alternative thresholds or requirements have been considered. As such we find the SA to be flawed and therefore the dPS could fail soundness test P3.

3.20 The third part of draft Policy HOU10 states:

*“In exceptional circumstances where it can be demonstrated that the affordable housing requirement cannot be met, alternative provision must be made by the applicant, or an appropriate financial contribution in lieu must be agreed through a Section 76 Planning Agreement.”*

3.21 We are concerned with the use of the phrase ‘in exceptional circumstances’ for two reasons. Firstly, it is unclear what is meant by ‘exceptional circumstances’ and therefore the draft policy lacks clarity and would fail sound test CE3. Secondly, and most importantly for the delivery of the objectives of the draft policy, we consider that the use of the phrase ‘in exceptional circumstances’ is unnecessary. In reality, where an applicant can reasonably demonstrate that the requirement cannot be met on site they should be able to consider an alternative form of provision.

3.22 The implications of the term ‘exceptional circumstances’ could be overly onerous and could have the reverse effect of stalling the delivery of sites. As such the draft policy could fail soundness test CE2. For example where other key site requirements render a scheme financially unviable if it has to provide affordable units but the applicant is willing to provide an off-site contribution for affordable housing elsewhere through the delivery of 100% market housing on the application site then this should be considered.

3.23 Whilst the consideration of alternative forms of provision is welcomed, we have concerns regarding the implementation and delivery of Section 76 Planning Agreements securing financial contributions. These concerns are summarised below:

- The recipient of the financial contribution (and therefore signatory to the agreement) must have the powers within their gift to spend the money on the provision of affordable housing. It is unclear from the draft policy who a contribution would be payable to;
- If a financial contribution is payable to the Council, they do not have it within their powers to deliver housing and therefore could not meet the terms of any obligation within the Section 76 Planning Agreement;

- If a financial contribution is payable to a Housing Association the Council should assure itself that the associations can receive such payments for the provision of social or intermediate housing. In the case of intermediate housing this would also require the association to be a willing signatory to a Planning Agreement for a site that they do not control.
- 3.24 The Council should also clarify the intention of the financial contribution which would be sought and ensure that there is clarity regarding who can receive such payments. We would recommend that engagement on this matter is undertaken with the Department for Communities, NIHE and NIFHA to ensure that the policy can be implemented and does not fail soundness test CE3.
- 3.25 Based on the comments set out in relation to part 3 of draft Policy HOU10, we recommend that this element of the draft policy is reworded as follows:
- “In circumstances where it can be robustly demonstrated that the affordable housing requirement cannot be met on site, alternative provision must be made by the applicant and where relevant agreed through a Section 76 Agreement.”*
- 3.26 We welcome the identification within the policy that Specialist Accommodation defined under draft Policy HOU11 will be exempt from the terms of the policy. Please see our comments on draft Policy HOU11 for further details.
- 3.27 NIFHA also welcomes the exception within the draft policy which relates to the provision of affordable housing on land identified as open space. This approach recognises the locational needs for affordable housing and in particular social housing.
- 3.28 We note that the supporting documents for the dPS refer to affordable housing as defined within the SPPS. This approach is welcomed however the definition may be subject to change in the future as the Department for Communities (DfC) has 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.
- 3.29 The draft policy should be 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.

#### **Draft Policy HOU11 – Specialist Accommodation**

- 3.30 Draft Policy HOU11 sets out the Council’s policy considerations for the provision of ‘specialist accommodation’. The supporting text for the draft policy suggests that this relates to accommodation for the older people and people with disabilities.
- 3.31 We note that two policy criteria are to be met when considering planning application for specialist accommodation. The first being:

*“The homes and/or bed spaces to be provided meet an identified need demonstrated through a statement for specialist housing need.”*

- 3.32 In the case of specialist housing provided a social housing, e.g. Category A housing, this test should not apply. Given that the locational need for social housing is already determined by NIHE prior to the allocation to a housing association this test is already met and the planning application for the proposed development should not have to demonstrate this again.
- 3.33 We would also highlight that locational need for such developments may mean that development will be needed where all parts of criterion B cannot be met. For example where there is a high need for or care housing but limited access to leisure facilities a balanced approach should be applied to the decision making process.
- 3.34 We would therefore raise concerns about the implementation of the draft policy as currently worded as it could fail soundness test CE3.
- 3.35 The final part of draft Policy HOU11 states:
- “All proposals, including extensions/alterations/additions to existing residential facilities for sheltered housing, extra-care homes, nursing homes and residential care homes will be considered in accordance with this policy.”*
- 3.36 Where an extension to an existing facility is proposed careful consideration should be given to whether all of the criterion under draft Policy HOU11 should be rigidly applied as in some instances it may be more efficient use of land to extend and existing facility rather than build a further facility elsewhere.

#### **Draft Policy COU5 – Affordable Housing**

- 3.37 Draft Policy COU5 relates specifically to affordable housing within the countryside. This policy seeks to carry over the policy currently contained within extant Policy CTY 5 of Planning Policy Statement 21 (PPS21).
- 3.38 We would raise concerns that some elements contained within the policy wording of the current Policy CTYS have been removed from the policy wording of draft Policy COU5 and are instead provided within the supporting text. NIFHA is concerned that policy wording requiring the need for housing in this case to be identified by NIHE and for the applicant to be a housing association has been removed from the policy wording within the dPS. Given that this is a key element of the existing policy provision it should be retained to ensure that the dPS does not conflict with soundness test C3.

## 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. Further clarification is required in relation to the affordable housing requirement for the plan period and certainty that the council has sufficient land to deliver the need. There are also concerns relating to the implementation of draft Policy HOU10 which will require further engagement with NIHE and DfC as well as NIFHA.
- 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.

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

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# **Local Development Plan-Making**

## NIFHA Position Statement

November 2018

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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 is 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.

## Lisburn and Castlereagh City Council – Community Plan 2017 – 2032

### Overview & key themes

The Plan has been prepared alongside statutory and supporting partners, including the Housing Executive.

The vision in the plan is for:

*“An empowered, prosperous, healthy, safe and inclusive community.”*

This vision is supported by a mission of “working together to deliver better lives for all” and is informed by three core principles of:

- Sustainable Development
- Equality; and
- Participation.

The plan identifies five themes:

- Children and Young People;
- The Economy;
- Health and Well-being;
- Where we live; and
- Our Community.

### Areas where Plan recognises the role of housing and housing associations

The Plan goes on to identify a series of outcomes and supporting outcomes that will measure the success of the plan. Those which are relevant to NIFHA have been considered and the outcomes that NIFHA and its members can support are identified below:

**Table 4.1: LCC – Outcomes with housing related supporting outcomes identified**

Outcome	Supporting Outcomes
Our children and young people have the best start in life.	Children and young people are physically active and enjoy good mental health.
	Children and young people live in a society that respects their rights.
We live healthy and fulfilling and long lives	Good health will no longer be dependent on where we live or what income we have.
	Older people age actively and more independently to stay well and connected.
	People of all ages are more physically active more

	often.
	There is good access to countryside and other green spaces for everyone.
	Substance abuse including hazardous drinking and smoking are reduced.
	We enjoy good mental health.
	Our home environments are safe and healthy.
We live and work in attractive, resilient and environmentally friendly places	The built and natural environment is protected and enhanced.
	Neighbourhoods are designed and regenerated to promote well-being.
	Everyone lives in an affordable home that meets their needs.
	We have access to essential services, shops, leisure and workplaces.
	There is a modal shift to sustainable and healthy transport options.
	We produce less waste and reuse and recycle the waste that we do produce.
	Greenhouse gas emissions are reduced.
We live in empowered, harmonious, safe and welcoming communities	There is community ownership and management of local assets and facilities.
	We feel a sense of belonging in our local neighbourhoods: urban, suburban and rural.
	Crime and anti-social behaviour is reduced.

The Plan goes on to identify key actions relating to the outcomes. One action identified under the theme of 'Where we live' is to work with local communities to develop and deliver proposals for mixed tenure housing. This action is welcomed by NIFHA.

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

The economic outputs identified in the Plan do not consider the role that housing providers can play in supporting local employment and training opportunities. This should be considered further.

As set out above the Plan goes on to also identify a series of actions against the supporting outcomes. Whilst one housing related actions is identified, there are a number of actions identified that NIFHA and its members could also contribute towards, namely:

- Explore the use of social clauses and local sourcing in contracts issued by community planning partners to support the Community Plan's outcomes;
- Implement a programme of home energy insulation to reduce fuel poverty;

- Develop new green spaces and improve existing ones, improve access and deliver programmes to ensure physical activity, healthy weight and positive mental health;
- Develop and implement home and business energy efficiency and renewable energy measures;
- Promote waste awareness and provide arrangements across the entire council area so as to increase recycling and reduce landfilling of waste materials and
- Develop a series of Community Hubs located in schools or libraries, for example, as a focus for community support, local volunteering and civic activity.

#### **Next Steps**

Further engagement between NIFHA and the Council's Community Plan Team should be undertaken to better understand the role that NIFHA and its members can play in the delivery of the key actions identified in the Plan.

In particular NIFHA should also highlight those actions which are not directly related to the delivery of housing but are related to the services provided by housing associations, as set out at paragraph 10.8 above.

The Plan sets out that the Council will prepare series of action plans for the delivery of the key outcomes. NIFHA should engage with the Council to understand what these actions plans will cover and explore opportunities for involvement by NIFHA and its members as key stakeholders.

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3 Joy Street  
Belfast  
BT2 8LE

T 028 9072 3900

**Turley**

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**Appendix 2: Review of Lisburn & Castlereagh  
City Council Community Plan**

**Form for the Submission of a Representation to the Development Plan Document**

**Local Development Plan  
Representation Form  
(Plan Strategy)**

Ref:

Date Received:

(for official use only)

**Name of the Development Plan Document (DPD) to which this representation relates**

Lisburn and Castlereagh City Council Draft Plan Strategy

**Please complete separate form for each representation**

**SECTION A**

**1. Client Details**

**2. Agent Details (if applicable)**

Title	<input type="text" value=""/>	<input type="text" value=""/>
First Name	<input type="text" value=""/>	<input type="text" value=""/>
Last Name	<input type="text" value=""/>	<input type="text" value=""/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>
Organisation (where relevant)	<input type="text" value="NIFHA"/>	<input type="text" value="Turley"/>
Address Line 1	<input type="text" value="6c Citylink Business Park"/>	<input type="text" value="Hamilton House"/>
Line 2	<input type="text" value="Albert Street"/>	<input type="text" value="3 Joy Street"/>
Line 3	<input type="text" value="Belfast"/>	<input type="text" value="Belfast"/>
Line 4	<input type="text" value=""/>	<input type="text" value=""/>
Post Code	<input type="text" value="BT12 4HQ"/>	<input type="text" value=""/>
Telephone Number	<input type="text" value=""/>	<input type="text" value="028 9072 3900"/>
E-mail Address	<input type="text" value=""/>	

**SECTION B**

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

3. To which part of the DPD does your representation relate?

- (i) Paragraph \_\_\_\_\_
- (ii) Policy See enclosed representation
- (iii) Proposals Map \_\_\_\_\_
- (iv) Site Location \_\_\_\_\_

4(a). Do you consider the development plan document (DPD) is:

Sound                       Unsound

4(b). If you consider the DPD to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

Soundness Test No.

5. Please give details of why you consider the DPD to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

If you consider the DPD to be sound and wish to support the DPD, please set out your comments below:

*(Continue on a separate sheet if necessary)*

6. If you consider the DPD to be unsound, please provide details of what change(s) you consider necessary to make the DPD sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make a further submission based on your original representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

See enclosed representation

(Continue on a separate sheet if necessary)

- 7 If you are seeking a change to the DPD, please indicate if you would like your representation to be dealt with by:

Written Representation  Oral Hearing

Please note that the Department will expect the independent examiner to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Signature:

Date: