

FW: CXBC Action Note 01 September

Blease, Catherine <Catherine.Blease@NIHE.GOV.UK>

Wed 14/10/2020 09:48

To: Development Plan <developmentplan@fermanaghomagh.com>

Cc: [REDACTED]
[REDACTED]

📎 2 attachments (122 KB)

Response.docx; Letter to Hilda Clements.pdf;

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Hilda,

Please see our response to the "Schedule of Proposed Changes", which withdraws a number of our objections to the draft Plan Strategy. As you can see below we sent this to you earlier for information, but we would like to submit this now, as the Housing Executive's formal response. A hard copy, dated 2/9/20 and signed by our Chief Executive, should also be with you.

Many thanks,
Catherine

Catherine Blease | Central Planning and Policy Manager | Northern Ireland Housing Executive | 2 Adelaide Street, Belfast, BT2 8PB | email: Catherine.Blease@nihe.gov.uk | Phone: [REDACTED] | www.nihe.gov.uk

Housing
Executive

From: Blease, Catherine
Sent: 08 September 2020 10:46
To: 'Hilda Clements'; 'Sinead.McEvoy@fermanaghomagh.com'
Cc: [REDACTED]
Subject: FW: CXBC Action Note 01 September

Hilda / Sinead,

I noticed the proposed changes consultation for the dPS has been paused. We noticed this after we had prepared a response which has been sent out by our Chief Executive (an electronic version is attached FYI). We were supportive of the proposed changes and it has allowed us to withdraw objections. I am just wondering if the consultation was paused to do the content of the changes or if it was due to another issue. I.e. if the changes are not pursued our objections would need to remain and the above response would need to be ignored. Any information you are allowed to provide would be appreciated.

Many Thanks,
Catherine

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Housing Executive Response to the Fermanagh and Omagh Local Development Plan Draft Plan Strategy Proposed Changes



Proposed Change Ref	Policy/ Paragraph/ Table Number etc	Support / Objection / Representation	Comments
SP03: Strategic Allocation and Management of Housing Supply			
10	Policy SPO3	Support	<p>The Housing Executive welcomes the proposed amendments to this policy and therefore we withdraw our objection.</p> <p>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.</p> <p>We welcome that a criteria-based approach is being proposed to select sites for phases 1 and 2 of zoning within main and local towns and that ‘the ability to deliver affordable housing where a need exists’ has been identified as a selection criteria for this. This will allow for planned development and will provide additional certainty to affordable housing providers. We would like this policy to clarify that affordable housing need will be identified by the Housing Executive’s Housing Needs Assessment.</p> <p>As reflected in Table 4, we acknowledge that the existing commitments significantly exceed the general housing need identified for the Council area. We therefore support that Policy SP03 has been amended to propose that once committed housing sites with extant planning permissions or sites, which are under development, have been taken into account; Phase 1 sites will be identified.</p> <p>We note that the policy proposes that the exact criteria and mechanism for how phase 2 sites could be released will be outlined in the Local Policies Plan (LPP). We would like to see affordable housing need, as one of the criteria to allow for the release of Phase 2 land, prior to the Plan end date. The release of a second phase of land, based on criteria, including affordable housing need would negate the need for a Plan Review and associated public examination. This second phase of land can be set to meet remaining affordable housing need, and, or general housing need for the remaining Plan period.</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 in certain locations within the Plan Area, we continue to support the inclusion of a development management policy within the Plan Strategy, as this can deliver affordable housing units once the Plan Strategy is adopted. However, we would also believe that</p>

			<p>the draft Plan Strategy Affordable Housing Policy, HOU3, should currently be a material consideration in the determination of planning applications, to help meet the housing needs of households in housing stress.</p> <p>For some rural settlements (villages and small settlements), it is unlikely that a development management policy approach can meet affordable housing need. Therefore, for villages and small settlements, which have an affordable housing need of 10 units or more, we would like sites within the settlement development limit (SDL), or sites brought into the SDL, that have a Key Site Requirement (KSR) for affordable housing, which could meet need. This KSR may be set at up to 100% affordable housing.</p>
HOU01: Housing in Settlements Towns			
20	Policy HOU1	Support	<p>The Housing Executive welcomes confirmation that this policy has been amended to relate to the consideration of applications on windfall sites in settlements only. The Housing Executive supports a policy, which prioritises new housing development on zoned brownfield land. Prioritising development on brownfield land will help achieve the RDS 60% target.</p> <p>The Housing Executive generally supports locating affordable housing within urban footprints due to the likely proximity of facilities and services. However, we welcome the exception that the Council can permit housing on unzoned greenfield land within the settlement limits, where it is demonstrated within the Housing Need Assessment that there is an unmet need for Affordable Housing that cannot be met through any existing commitments or on sites zoned for housing.</p> <p>We note the revised Policy states:</p> <p style="padding-left: 40px;">“The Council and will only permit proposals for housing on unzoned greenfield land within the settlement limits of a main or local town where either:</p> <p style="padding-left: 80px;">(i) the future housing need and demand exceeds the number of existing permissions (commitments) and there is no evidence of this housing need being met through sites zoned for housing”.</p> <p>We believe the new Local Development Plan provides an opportunity to review existing zonings to confirm that they are capable of meeting need, that they support the sequential test and that they will support the achievement of sustainable development. Zoned housing sites, which are not delivering housing to meet need, may need to be released for an alternative use, and replaced with another site zoned for housing.</p> <p>The Housing Executive has a statutory duty to assess all housing need including affordable housing need. Therefore, we continue to request that the Plan should state that the Housing Executive has a role in the</p>

			identification of need.
21	New paragraph after 3.7	Representation	The Housing Executive welcomes the clarification on the definition of existing commitments.
HOU03: Affordable Housing in Settlements			
22	Para 3.12	Representation	<p>On-site provision of affordable housing is important to meet the policy objectives of balanced communities and mixed tenure development. However, we acknowledge that in exceptional circumstances it may be possible that viability of affordable housing will be an issue, and therefore alternative options could be considered. Our first preferred option is a lower proportion of affordable housing on site and secondly off-site provision could be considered. Off-site provision will only be acceptable if it does not undermine the policy objective of balanced communities.</p> <p>Off-site contributions may only work if the two sites are within the same local area in order the address the affordable housing need for the same area. Off-site provision would have to be able to provide its own affordable housing requirement as well as the primary site's requirement. Off-site provision would rarely be accepted where the primary development is major, of 50 or more units; major sites should always provide the affordable housing requirement on-site.</p>
23	Para 3.14	Support	As requested in our original response, we support the amendment to the text to reflect that the retention of affordable housing in perpetuity cannot be implemented.
HOU05: Shaping Our Houses and Homes			
24	Policy HOU05	Support	<p>The Housing Executive withdraws an element of our objection in relation to the provision of wheelchair standard homes, but we maintain the component of our objection that all housing should be to accessible Lifetime Home standards.</p> <p>For those with mobility problems, who may be more likely to spend a larger proportion of their time at home, it is essential that their home enable them to live as safely, healthily and as independently as possible.</p> <p>We therefore welcome that Policy HOU05 has been amended to include an additional requirement for housing developments to provide wheelchair standard units and we withdraw our original objection. However, we seek clarity on what is defined as a 'smaller settlement', to provide certainty for applicants.</p>

		Objection	<p>Wheelchair standard homes support independent living, promote an inclusive society and reduce the need for costly and disruptive adaptations. This policy can increase accessible housing stock, addressing an undersupply of appropriate housing for all, in the long term.</p> <p>We note that no amendments have been made to the policy to require that all new homes be designed to lifetime homes standards. Therefore, our objection regarding the absence of a lifetime homes policy remains for the reasons set out previously.</p>
HOU17: Affordable Housing			
31	Policy HOU17	Support	<p>The Housing Executive withdraws this objection</p> <p>An exceptions policy is important to provide flexibility within the Plan, due to the difficulty in accurately predicting affordable housing and housing need in the long term/15-year period.</p> <p>We support the amendments to this policy. The increase of the number of affordable housing units permitted to eight will make sites delivered through a rural exceptions policy, more economically viable to develop.</p> <p>We welcome the amendment, that under this policy, applications can only be made by a registered Housing Association.</p>
Draft Policy FLD03: Development Using Sustainable Drainage Systems (SuDs)			
105	Policy FLD03	Representation	<p>We welcome that the policy has been extended to include all development proposals on land which is identified as being at risk to surface water flooding or which would increase the risk of flooding elsewhere.</p> <p>However we request that exception wording, 'where practicable', be removed, this will reduce ambiguity within the Policy.</p>
7.0 Monitoring and Review			
129	Table 7 Monitoring Indicators	Representation	<p>The inclusion of indicators will help demonstrate how well new policies are addressing need, and if any Plan interventions are necessary.</p>

			<p>We welcome that a new indicator has been included to monitor the number of wheelchair accessible homes.</p> <p>However we request that the 'Traveller schemes completions and needs' indicator be reinstated, particularly as Travellers are a Section 75 group.</p>
Glossary			
130	Intermediate Housing	Support	<p>We welcome the additional text added to the glossary entry for Intermediate Housing, which is in line with the SPPS definition.</p>