



**Chartered
Institute of
Housing**
Northern Ireland

Response to Ards and North Down Draft Plan Strategy 2035

By the Chartered Institute of Housing (CIH) Northern Ireland

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General position

CIH Northern Ireland welcomes the opportunity to comment on Ards and North Down Borough Council's Local Development Plan (LDP) draft Plan Strategy.

Northern Ireland is grappling with a profound housing crisis. Nearly 50,000 households are on the social housing waiting list, and 2023-24 saw the lowest house-building rates in a decade with only 5,411 homes completed. The DfC strategy envisions a requirement for at least 100,000 new homes by 2039, with one-third being social homes (at least 33,000). Ards and North Down must ensure its local housing targets are an ambitious contribution to this regional total.

Average rents accelerated by 9.3 per cent in 2023, while high borrowing rates also hindered first-time buyers. We recommend the LDP supports the delivery of intermediate rent, to support 'just about managing' households who have low priority for social housing but whose lower incomes present affordability challenges for private rents.

Our 'Agenda for Change' asserts that housing is a cornerstone of Northern Ireland's social and economic recovery, and we advocate for the 'whole system' approach defined in the DfC strategy, which necessitates deep collaboration between local government, central government and the private/voluntary sectors to transform supply.

We also call for a housing landscape that is equitable, sustainable and resilient. This response addresses how the council's LDP can align with our strategic priorities to ensure everyone has access to a decent, safe and affordable place to call home.

Key recommendations and comments

Housing strategy

We support the strategy's general alignment with the Department for Communities' (DfC) Housing Supply Strategy 2024–2039 vision: that everyone has access to a good quality, affordable and sustainable home appropriate for their needs in a thriving community.

CIH advocates for relaxing regulations that mandate public authorities to seek 'maximum financial value' for land, instead allowing them to prioritise social housing development. In the meantime, we urge the council to digitally map its landholdings to identify sites suited for adaptive reuse and affordable new builds, promoting social purpose.

HOU 1 – Housing development in settlements

HOU 1 states that any proposal for residential development that results in 'unsatisfactory piecemeal development' will not be permitted, even on land that has been identified for residential use.

Although CIH supports this, we would recommend this not be used as a barrier to building, but as a possible lever to ensure that infrastructure, such as NI Water capacity, is upgraded strategically to support long-term, inclusive growth of sustainable developments.

HOU 3 – Affordable housing

CIH commends the council for the robust provisions within Policy HOU 3, which is a key mechanism for tackling housing need.

On-site affordable housing

We welcome this affordable housing policy as it is well aligned with the Strategic Planning Policy Statement (SPPS) and has an ambitious nature with a 20 per cent affordable housing requirement. We would strongly encourage the council to satisfy itself of viability with respect to local housing markets to ensure developments are delivered in good time.

We welcome the general expectation of on-site provision. This approach is key to achieving mixed-tenure communities and is consistent with the principle of integrating affordable homes within private developments. We recognise that the Social Housing Development Programme (SHDP) remains the primary delivery vehicle for new social housing, but the provision of opportunities for social housing in private developments is a supplementary mechanism that can significantly contribute to addressing housing need and supporting a balanced housing market.

Commuted sums

While on-site provision should be the default, in certain cases off-site provision or commuted sums will be more desirable to best meet a specific housing need, ensure value for money and/or reflect local market characteristics.

Should commuted sums be accepted, it is critical that there is a clear and transparent framework for how these funds will be calculated and used, with outcomes effectively monitored to ensure they are reinvested locally. Given the delivery of affordable housing through commuted sums will be secured by Section 76 planning agreements, CIH strongly advises that the council formalise the involvement of the central housing authorities.

DfC and the Northern Ireland Housing Executive (NIHE) should be mandatory signatories to all relevant Section 76 Agreements involving commuted sums, to help ensure robust governance and effective delivery. This acknowledges that the council

cannot directly deliver social housing and central government holds the primary powers for significant regeneration.

This process will also require the council to drive early discussion and clearly identify all stakeholders to ensure a shared understanding and commitment to the project outcomes.

To further assist with viability calculations and provide developers with greater certainty from the outset, we recommend that Ards and North Down work with other councils to explore the potential for a clear, standardised contribution methodology, rather than overly relying on case-by-case negotiation. Our experience with planning obligations for affordable housing across Great Britain and Ireland has shown that policies with less ambiguous requirements generally lead to more successful results.

Tenure-blind design

To build cohesive neighbourhoods, the LDP must successfully integrate social, affordable and market-rate housing. HOU 3 (7.79 in particular) incorporates these themes, though while this appears to offer welcome flexibility to developers, we feel it remains too broad on the specific 'tenure-blind' execution, by simply requiring interspersed units and 'effective' integration.

We recommend the policy – or alternatively the forthcoming supplementary planning guidance – include reference to explicit 'tenure-blind design' making affordable units indistinguishable from private ones as far as is practicable, to foster a sustainable development.

WM2 – Waste collection and treatment facilities

The DfC housing supply strategy identifies water infrastructure constraints as a critical whole-system failure. We would draw attention to 24.37 and recommend that developers engage with NI Water early in the design process to assess and explore solutions to wastewater capacity limits that currently restrict development.

RE 2 – Reduced energy consumption and use of low/zero-carbon energy

Northern Ireland faces a major hurdle as 68 per cent of domestic heating is still provided by oil-fired boilers.

CIH welcomes the commitment to reducing energy consumption and incorporating low/zero-carbon solutions in new developments, as referenced in Policy RE 2 and integrated into the design principles for new homes. This signals the Council's intent to align with DfC Housing Supply Strategy Objective 5 (A Fair Path to Low Carbon Housing) and the statutory requirements of the Climate Change Act (NI) 2022. We also acknowledge and advocate for ongoing updates to building regulations to reflect new emissions reduction requirements.

We do however acknowledge, based on the scale of the climate challenge and the principles of our Agenda for Change, that current regional policy commitment lacks the necessary ambition, measurable targets and detail required to retrofit homes at the pace and scale required.

The LDP focuses primarily on new development, but the vast majority of carbon emissions come from the existing, inefficient housing stock (much of which is oil-heated). CIH identifies the poor fabric performance and carbonised heating of existing homes as the greatest housing challenges facing Northern Ireland in the emissions context, both in terms of scale and cost.

This inefficiency directly correlates with high rates of fuel poverty, where households must spend a disproportionate amount of income on keeping their homes warm. Tackling emissions in existing homes is therefore not just an environmental imperative but a social justice issue. We recommend the council consider the feasibility of an area-based retrofit programme like Belfast City Council's retrofit hub.

Additionally, we suggest for large-scale developments, the LDP should require developers to collaborate on the feasibility of shared heat networks and energy storage, moving beyond individual house solutions toward a community-wide energy strategy.

In conclusion, we welcome the principle of Policy RE 2 and its intent to decarbonise new housing but stress that effective climate action must extend beyond new development to address the critical challenge of existing housing stock, advocating for the consideration of area-based retrofit programmes to tackle fuel poverty and meet statutory emissions targets for all residents.