

Date: 12 December 2008

Consultation: RSPPG Car Parking Facilities in Housing Estates

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents 40 housing associations. This includes 33 of the associations registered and regulated by the Department for Social Development (DSD). Collectively, these associations provide 30,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org

Background

NIFHA's members are responsible for about twenty five percent of all social housing stock in Northern Ireland.

Having given its members the opportunity to review the consultation paper, as well as holding an informal meeting with staff from the Department for Regional Development, NIFHA would like to highlight the following key points.

General Comments

1. Paragraph 1.3.3 still reads in line with the English version of this document, which suggests the transfer of land to Roads Service. As charitable organisations, it is not the case that Housing Associations give away land unless its use remains restricted to housing use. This is an important principle that underpins the DSD compensation for sales discount. Furthermore there are restrictions on Associations paying for work on land that it does not own. Therefore for a housing association to agree to pay 50% of costs after giving the land away may prove difficult. The alternate is for the land to remain in the ownership of the housing association, but to be adopted by Roads Service which is what happens in a new development. On behalf of its members, NIFHA would recommend the use of this method.
2. The document acknowledges that NIHE stock has not been transferred to housing associations, although in section 1.33 it suggests that this is the case. We would recommend that this section is amended accordingly.
3. With reference to Para 1.5, it would appear that it is normal practice in Great Britain to share construction costs 50:50. However, our members would be keen to negotiate a better deal. For example, would Roads Service pay 50% of both land and construction costs?
4. If Housing Associations are expected to pay half the construction cost, it is imperative that they have the right to be informed of the procurement process for the work and have any queries answered. It is probable that the DSD Regulation and Inspection team would expect this.

I trust that these observations and recommendations are helpful in progressing a final draft document.

Submitted on behalf of NIFHA by:

A handwritten signature in black ink that reads "Donall Henderson". The signature is written in a cursive style with a large, stylized initial "D".

Donall Henderson
Housing Policy and Research Manager