

**Democratic Services Section  
Legal and Civic Services Department  
Belfast City Council  
City Hall  
Belfast  
BT1 5GS**



**Belfast  
City Council**

3rd December, 2021

**MEETING OF CITY GROWTH AND REGENERATION COMMITTEE**

Dear Alderman/Councillor,

The above-named Committee will be a hybrid meeting (both remote and in person) in the Council Chamber on Wednesday, 8th December, 2021 at 5.15 pm, for the transaction of the business noted below.

You are requested to attend.

Yours faithfully,

SUZANNE WYLIE

Chief Executive

**AGENDA:**

1. **Routine Matters**
  - (a) Apologies
  - (b) Minutes
  - (c) Declarations of Interest
  - (d) Correspondence Received - Public Realm Projects (report to follow)
2. **Restricted Presentation**
  - (a) Belfast Destination Hub
3. **Restricted Items**
  - (a) Belfast Destination Hub Update (Pages 1 - 4)
  - (b) Housing Led Regeneration (Pages 5 - 22)
  - (c) Quarter 2 Finance (Pages 23 - 32)

(d) European Social Fund (ESF) Match Funding Requests - Proposed Council Contributions (Pages 33 - 38)

(e) City Centre Meanwhile Uses (Pages 39 - 62)

4. **Regenerating Places & Improving Infrastructure**

(a) TEO High Street Task Force - Call for Evidence (Pages 63 - 142)

(b) Just Eat Belfast Bikes Strategic Review - Screening Update (Pages 143 - 154)

(c) Department for Communities Consultation: Intermediate Rent Development of Policy and Model (Pages 155 - 218)

5. **Growing Business & the Economy**

(a) Jobs and Skills Update (Pages 219 - 226)

By virtue of paragraph(s) 1, 2, 3, 5 of Part 1 of Schedule 6 of the Local Government Act (Northern Ireland) 2014.

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| Subject:           | TEO High Street Task Force – Call for Evidence            |
| Date:              | 8 <sup>th</sup> December 2021                             |
| Reporting Officer: | Cathy Reynolds, Director, City Regeneration & Development |
| Contact Officer:   | Deirdre Kelly, Programme Manager                          |

|   |   |
|---|---|
| <b>Restricted Reports</b>                         |   |
| Is this report restricted?                        | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| If Yes, when will the report become unrestricted? |   |
| After Committee Decision                          | <input type="checkbox"/>  |
| After Council Decision                            | <input type="checkbox"/>  |
| Some time in the future                           | <input type="checkbox"/>  |
| Never   | <input type="checkbox"/>  |

|                                       |   |
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| <b>Call-in</b>                        |   |
| Is the decision eligible for Call-in? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

|            |   |
|------------|---|
| <b>1.0</b> | <b>Purpose of Report or Summary of main Issues</b>  |
| 1.1        | The purpose of this report is to update Members on the TEO High Street Task Force ‘Call for Evidence’ exercise.   |
| <b>2.0</b> | <b>Recommendations</b>  |
| 2.1        | <p>The Members of the Committee are asked to:</p> <ul style="list-style-type: none"> <li>• Note that the final draft response to the TEO High Street Task Force Call for Evidence will be submitted to DfC as the secretariat for the High Street Task Force in line with the closing date on 6<sup>th</sup> December 2021.</li> <li>• Note that as part of the Call for Evidence process a workshop is being held in Belfast on 6<sup>th</sup> December 2021.</li> </ul> |

|            |  |
|------------|--|
|            | <ul style="list-style-type: none"> <li>• Agree the final draft consultation response of the 6<sup>th</sup> December (as enclosed at Appendix 1) as the Council's final response pending Council ratification.</li> </ul>   |
| <b>3.0</b> | <b>Main report</b>   |
| 3.1        | At the meeting of the City Growth & Regeneration Committee on 10 <sup>th</sup> November 2021 Members were updated on the then recently launched High Street Task Force Call for Evidence which is the first stage of an ongoing public engagement process, and forms part of the work of the Task Force in identifying the challenges and issues that our high streets face.   |
| 3.2        | The report presented to Members in November highlighted that The Executive Office launched the High Street Task Force 'Call for Evidence' on 25 <sup>th</sup> October 2021. The Committee subsequently agreed that <i>officers prepare a draft response which would be brought via Party Leaders Forum on 25th November, with the final response brought back retrospectively to the Committee, at its meeting in December.</i>  |
| 3.3        | As agreed by Committee, the draft response to the Call for Evidence was presented at Party Leaders Forum on 25 <sup>th</sup> November 2021. Party Leaders were largely content with the response although requested a small number of additions This involved the need for relevant legislation to address vacancy and dereliction such as the Dilapidations Bill, as well as ensuring adequate reference to meeting accessibility needs and working with IMTAC. In addition, it was highlighted that whilst we direct efforts to diversify the high street retail should be supported to ensure its sustainability especially in the context of Belfast as a capital city. Other issues were discussed in terms of car parking and accessibility. The additional points agreed by Party Leaders have been incorporated in the final draft response as enclosed at Appendix 1. |
| 3.4        | As part of the Call for Evidence, a series of six workshops were conducted to allow in-person views to be heard and discussed. A workshop was held in Belfast on 3 <sup>rd</sup> November at the Hilton Hotel. Due to issues, including attendance a rescheduled workshop is taking place on 6 <sup>th</sup> December. At the time of writing this report a number of Council officers have registered to attend this event, as well as promoting and encouraging attendance with a wide group of stakeholders. Due to the timing of publishing this report, officers will provide a verbal update of key discussion points at the Committee meeting.  |
| 3.5        | In keeping with the timetable set out by TEO, the final draft response will be submitted by the 6 <sup>th</sup> December 2021 attached at Appendix 1.  |

Members should note that the 14 themes identified within the Call for Evidence document, along with 46 associated questions are reflected across the ongoing programme of work aligned to the focus of this Committee including its priorities and Committee Plan, as well as alignment to other Council led programmes and priorities. In drafting responses officers drew on a number of plans, projects, programmes and strategies for example:

- Belfast City Centre Regeneration and Investment Strategy (BCCRIS) and associated Masterplans
- Future City Centre Programme and the key pillars within that focusing on:
  - Regeneration and Connectivity
  - Business and Investment
  - City Centre Vibrancy
  - Position the City to Compete
  - Digital Innovation
  - Clean, Green and Safe underpinned by Policy Legislation and Market Intelligence
- A Bolder Vision and Connectivity Programme
- 10 Year Tourism Strategy
- Cultural Strategy - A City Reimagining
- Vacancies Programme
- Tactics, Regeneration, eg, Entries Project
- Revitalisation Programme
- Strategic Acquisitions
- City Centre Living
- BRCD Including Belfast Stories
- Belfast Innovation City / SMART
- Business and Community Cluster Grants
- Supporting Vibrant Business Destinations

3.6

Although the above mentioned programmes, projects and strategies are not an exhaustive list in terms of where officers drew evidence from, it demonstrates that Council has an extensive intelligence base from strategy development through to programme and project implementation on areas which have a direct impact on the vitality and sustainability of our high streets.

3.7

It is also relevant to highlight the synergies of the work of the Community Planning Partnership: City Development Board, which has a priority theme of the Future City Centre

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|            | <p>Programme as well as citywide regeneration and development including arterial routes / neighbourhood centres. Aligned to the approach which Council has taken, officers are now coalescing with CPP partners to develop a robust and strong collaborative delivery focused action plan which could help address themes coming from this Call for Evidence and as mentioned above priority areas of this Committee and Council.</p> |
| <b>3.8</b> | <p><u>Financial &amp; Resource Implications</u><br/>None associated with this report.</p>   |
| <b>3.9</b> | <p><u>Equality or Good Relations Implications/Rural Needs Assessment</u><br/>None associated with this report.</p>  |
| <b>4.0</b> | <p><b>Appendices – Documents attached</b></p>   |
|            | <p><b>Appendix 1</b> – Final Draft BCC Response to TEO High Street Task Force Call for Evidence<br/><b>Appendix 2</b> – Future City Centre Programme: Priority Workstreams overview</p>   |

**Belfast City Council  
Response to The Executive Office  
High Street Task Force, Call for Evidence 2021**

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## Contents

- **Call for Evidence Considerations, Questions and Responses**
- **Bibliography**

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## Theme 1: Partnerships

**The HSTF will seek to encourage partnerships with public, private and third sector partners, locally, regionally and nationally. This could require the consideration of:**

- Government, local authorities, the wider public sector, businesses and communities must put the health of village, town and city centres at the heart of decision making and deliver the best local outcomes, align policies and target available resources to prioritise town centre sites, encouraging vibrancy, equality and diversity.
- Champions are needed to lead the way forward and to involve those who live and work in our town centres in the decision making.
- More coordination and joined-up working, partnership and reorganisation of the key statutory functions is needed to bring about effective change more quickly.
- Correct powers, appropriately devolved, need to be in place to deliver interventions.
- A recognition that this a long-term approach.
- Our councils have a key role in the localism agenda and the Executive need to consider the devolution of regeneration and other powers to them so that they can play a fuller role in the recovery process.
- We need interim solutions.
- We need to determine what has worked well and has not worked.

## Theme 1: Questions and Responses

### 1. What are the key issues for partnerships?

High Streets and city centres are complex places, with the multiplicity of ownership, the multifunctionality of activity, their connections to surrounding communities. Whilst many of the challenges and opportunities facing our high streets will be similar, we cannot forget the uniqueness of place and a one-size-fits-all approach would not be appropriate. There needs to be a focus on **placed-based leadership** which has the flexibility to develop specific solutions to their unique circumstances, but with **the necessary powers, authority and resources to bring about transformational and sustained change.**

It is important that we take caution against setting up additional mechanisms or structures but rather utilise existing ones that are deemed appropriate, and consider the effectiveness of existing structures. The Council would highlight that under community planning, we have brought together inclusive and delivery focused partnership(s) to drive forward collaborative work on specific city priorities and challenges including 'City Development'. The future vitality, vibrancy and sustainability of the city centre and its connection to communities is a key priority area of focus (e.g. Belfast Future City Centre Programme), and on a wider city basis there is a focus on neighbourhood centres / arterial routes via targeted programmes such as supporting vibrant business destination programme.

A big problem is still the **fragmented nature of ownership of the high street**. Private and public partnerships are key and local authorities have a leadership and convening role around place. In this context, we would highlight the impact and agility of the partnership approach adopted to co-designing and implementing the Covid-19 Recovery Revitalisation Programme within Belfast. We worked collaboratively across the public, private and community sectors, bringing together existing city centre groups and stakeholders (e.g. Belfast Chamber, Belfast Centre Management, BIDs and other business interests) with a shared focus and strategic intent. It is a network rather than a hierarchy whereby place leaders act together and have the ability to evolve and adapt as circumstances change.

Going forward we may draw upon the **Ministerial Advisory Group (MAG) High Street Craft Kit** to ensure existing or future partnerships remain focused, co-produces its approach to revitalising the High Street and delivering place based specific interventions. However, we feel that this Craft Kit has more applicability for neighbourhood centres / arterial routes rather than the city centre. It will also be **imperative** that the High Street Craft Kit approach is **aligned to funding streams and a commitment by all partners to agile partnership working to deliver on the action plan and outcomes**.

We work closely alongside global and local experts, through the Belfast Innovation and Inclusive Growth Commission chaired by Michael Lyons former chairman of the BCC, to co-design pragmatic proposals to press the reset button on how prosperity

and growth can be delivered within Belfast across wider region. The Commission has called for bold leadership and energetic efforts by the various agencies and governments who share an interest in the future prosperity of Northern Ireland. The Commission in its recently published report “**Reset for Growth**” has called for a focus on a renewed city centre, with a resurgent connected and animated city core.

Notwithstanding, key issues which need to be considered:

- **Better coordination between central and local government** is needed, together with a recognition that local government can be best placed to deliver and support local interventions.
- Need for **place-based leadership** which brings together key partners, interests and stakeholders with a focus on high street and how it connects to surrounding communities.
- **Alignment of policies/strategies and target available resources to prioritise the high street.**
- Whilst immediate and interim solutions is needed, important to recognise that a **long-term and sustained approach is required.**
- Ensuring the **necessary powers, appropriately devolved**, are in place to bring about effective change in a timely way.
- Consideration of **good practice and assessing how this may relate to Northern Ireland** and, in particular, Belfast city centre and the arterial routes / neighbourhood centres.

## 2. What powers should local partnerships have to make them more effective?

The Council asserts that this question is more about partnerships having the authority, adequate and sustained funding as well as access to the portfolio of place-making powers and functions necessary to enable immediate and sustained action to be taken and encourage a collaborative and co-designed approach to planning. The scope of the place-shaping powers which need to be available to council, and local partnerships, is covered in the next section.

### 3. What changes to legislation, policies, processes or procedures could transform partnerships on the high street?

There is no doubt that councils, and local partnerships, need legislative and policy changes to enhance their ability to address the immediate challenges and opportunities facing our high streets as well as to prepare long-term strategies to revitalise and transform city and town centres. The following sets out a number of key areas which need to be considered:

#### **i. Funding**

The Council would highlight the scale of commitment demonstrated through the £820 million 'Future High Streets Fund' and the £1.6 billion 'Stronger Towns Fund' put in place to support the high streets of over 200 towns within England, via councils. Similar investment programmes of scale, centrally funded, have been brought forward in the last 18 months in Wales and Scotland.

**A similar level of investment or commitment is currently absent in Northern Ireland. Consideration needs to be urgently given to create a dedicated fund of scale which brings together multi departmental, council and other sources of funding into an aggregate multi-annual fund. Such a fund could be allocated and administered through councils and subject to all partners (including government departments) working to deliver an agreed solutions / action plans. This would enable emerging investment plans to be developed in accordance with local community planning, development planning and growth planning priorities for Belfast. Each place will require different solutions to their unique circumstances.**

#### **ii. Green financing**

The Council would highlight the opportunities presented through adopting a green route to recovery and the transition to create a zero-carbon, smart city (and high street). There is a positive economic case for investing rapidly in the decarbonisation of the city centre as well as within our neighbourhoods, which will contribute to levelling up through significant investment in place-making. Unlocking this potential will require new models of co-ordinated delivery and combined financing from multiple sources. A range of new 'green finance' opportunities are

now becoming available to support green growth; with many cities seeking to innovate and support growth of our indigenous green tech sector as well as seeking to maximise foreign direct investment.

As part of the integrated solution / investment package government needs to accelerate our thinking around green finances and the integration of potential private finance into supporting Net Zero ambitions; creating local jobs, deliver clean and inclusive places to live, shop and visit (including our high streets). Adopting a place-based approach and encouraging a strong public and private sector partnering approach will require policy change and consideration given to new delivery models (e.g. special purpose vehicles, joint ventures etc).

### **iii. Increased financial powers for local government**

Local political and business leadership will need to be at the heart of any transformation and revitalisation of the high street. It will be important that cities have the right fiscal powers to enable them to better align local, regional and national efforts to get better results. The Council believes that the work of the High Street Taskforce provides an opportunity for central government to work alongside local government, community and business partners, to bring forward a package of proposals including, for example, new borrowing powers; simplified loan and borrowing regimes; government incentives for business start-up and a common delivery framework for emerging funding programmes (e.g. Shared Prosperity Fund).

The Council would commend that consideration be given to **alternative taxation options** to complement the current funding model and provide new revenue raising powers for councils, such as: Tourism tax; vacant site levy; derelict land levy; internet transaction levy; and green policy related levies and taxes.

### **iv. Rates Reform**

Councils want to see a rates system that is modernised, responsive to local needs, fair for all and promotes growth through incentives. We are calling for councils to have greater flexibility in the support they can offer local business and the local rate setting. This would give councils a more secure revenue stream which will keep up with demands and the financial pressures local government is facing.

It is important that taxation should be fair for both high street and online businesses. We therefore welcome the proposed digital services tax as a first step to taking measures on retailers who may not pay business rates on retail premises. The funds raised could then be used to fund local services.

#### **v. Important place-shaping powers**

The Council would contend that the 2015 reform programme did not go far enough and would call for a second tranche of reform to be brought forward including consideration given to accelerating the following.

- **Community planning:** Enhancing powers to require community-planning partners, across both tiers of government and other city partners to collaborate to deliver the outcomes and priorities articulated in community plans, will further promote well-being across the city. There should also be a duty on central government partners to support community planning and encouraging and enabling sharing resources. We would refer the High Street Task Force to build upon and accelerate best practice and learn from recent reports (e.g. Carnegie Trust's Embedding Well-being in Northern Ireland report) which has identified areas to further enhance the effectiveness of community planning. We would call upon departmental colleagues to work together to examine how important recommendations contained within the Embedding Well-being can be brought forward at pace.
- **Regeneration:** including the transfer of regeneration powers to local government. This would enable alignment with other council functions to encourage positive and sustainable development of the high street and communities across Belfast. **Compulsory purchase powers** are an essential tool for local authorities acquiring and assembling land as part of high street regeneration.
- **Planning:** Extended planning powers, particularly around spatial planning, would unlock more effective place shaping and sustained delivery of the physical aspects of any high street revitalisation programme. This would also support more effective approaches to statutory masterplanning and development partnerships with the potential to harness the full benefits of regeneration for local communities often blighted by inequalities. Broader responsibility in relation to built heritage should also be considered to provide for more efficient

consideration of both heritage and conservation as part of the planning processes.

- **Transportation** - Increased functions in relation to roads and transport in order to support place-making and regeneration would greatly enhance the role of the councils as custodian of place and local communities. While recognising that there is a strategic regional role in these areas for central government departments, we believe that there is scope for local government and departments to work together to ensure that these top level strategic plans can be tailored and varied to suit local issues within each council area.

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## Theme 2: Follow Best Practice

The HSTF approach to developing best practice is to assess good practice from other places and adapt this so that 'best practice' becomes a unique 'right practice' for our local high streets. This could require the consideration of:

- Looking at best practice locally, nationally and internationally.
- The importance of community planning, in which public sector organisations work in partnership with the private sector, local communities and the community and voluntary sector to identify and solve local problems, improve services and implement a shared vision for promoting the well-being of an area.

## Theme 2: Questions and Responses

4. What is best practice for the management of the high street?

- **A definition of High Streets needs to be applied to an NI context.** While there are commonly accepted definitions of the components of a high street, city or town centre, no two high streets are the same. They are characterised on their diversity and complexity, in terms of scale, size, geography and catchment, function and form. **There is not a one size fits all approach for the management of the High Streets across villages to capital cities.** A **hierarchy of town centres** from cities to district towns to small villages should be considered. City centres have a significant regional role as investment attractors and hubs for employment. In particular the role of the **city centre in terms of an investment and employment hub, the benefits realised from city centre can be felt across the region in terms of contributing to growth ambitious, and within local neighbourhoods in relation to employment opportunities.**
- Whilst the global issues are largely similar, promoting localism, green spaces and adopted approaches as being developed through the joint BCC / DfI / DfC 'Bolder Vision', connectivity study can help to supplement a new sense of placemaking within Belfast City Centre and connecting to surrounding neighbourhoods. This approach is not exclusive to the city centre but its rather how the approach is to start with the city centre and ripple out, addressing severance to communities etc.



- 21st Century will require places and cities to change, to move from a car borne culture to places where people live closer to their main centres of work, supported by effective and efficient active and sustainable transportation links and a mobile technology culture. Communities must be engaged in a different way, including young and old people to create an inclusive, safe and welcoming environment. Young people will inherit the city and will make decisions for the older people living in it – especially with the projected demographics of an aging city.
- According to the UK High St's Taskforce, high streets and town centres have to be both vital (full of reasons for people to visit) and viable (attractive to both visitors and investors in the longer term as well as surrounding communities). **The Institute of Place Management identified the Top 25 Priorities that local place leaders should focus to enhance the vitality, viability and sustainability of the high streets and ensure it meets the needs of their catchment communities.** These factors include:

| Priority             | Component Factors  |
|----------------------|--|
| 1. ACTIVITY          | Opening hours; footfall; shopping hours; evening economy   |
| 2. RETAIL OFFER      | Retailer offer; retailer representation  |
| 3. VISION & STRATEGY | Leadership; collaboration; area development strategies   |
| 4. EXPERIENCE        | Centre image; service quality; visitor satisfaction; familiarity; atmosphere   |
| 5. APPEARANCE        | Visual appearance; cleanliness; ground floor frontages   |
| 6. PLACE MANAGEMENT  | Centre management; shopping centre management; Town Centre Management (TCM); place management; Business Improvement Districts (BIDs) |
| 7. NECESSITIES       | Car-parking; amenities; general facilities   |
| 8. ANCHORS           | Presence of anchors - which give locations their basic character and signify importance  |
| 9. NON-RETAIL OFFER  | Attractions; entertainment; non-retail offer; leisure offer  |
| 10. MERCHANDISE      | Range/Quality of goods; assortments; merchandising   |
| 11. WALKING          | Walkability; pedestrianisation/flow; cross-shopping; linked trips; connectivity  |
| 12. PLACE MARKETING  | Centre marketing; marketing; orientation/flow  |

|  |   |
|--|---|
| 13. NETWORKS & PARTNERSHIPS WITH COUNCIL | Networking; partnerships; community leadership; retail/tenant trust; tenant/manager relations; strategic alliances; centre empowerment; stakeholder power; engagement   |
| 14. ACCESSIBLE                           | Convenience; accessibility  |
| 15. DIVERSITY                            | Range/quality of shops; tenant mix; tenant variety; availability of alternative formats; store characteristics; comparison/convenience; chain vs independent; supermarket impact; retail diversity; retail choice |
| 16. ATTRACTIVENESS                       | Sales/turnover; place attractiveness; vacancy rates; attractiveness; retail spend; customer/catchment views; Construction of out-of-town centre   |
| 17. MARKETS                              | Traditional markets; street trading   |
| 18. RECREATIONAL SPACE                   | Recreational areas; public space; open space  |
| 19. BARRIERS TO ENTRY                    | Barriers to entry; landlords  |
| 20. SAFETY/CRIME                         | A centre KPI measuring perceptions or actual crime including shoplifting  |
| 21. ADAPTABILITY                         | Retail flexibility; retail fragmentation; flexibility; store/centre design; retail unit size; store development; rents turnover   |
| 22. LIVEABLE                             | Multi/mono-functional; liveability; personal services; mixed use  |
| 23. REDEVELOPMENT PLANS*                 | Planning blight; regeneration   |
| 24. FUNCTIONALITY                        | The degree to which a centre fulfils a role – e.g. service centre, employment centre, residential centre, tourist centre  |
| 25. INNOVATION                           | Opportunities to experiment; retail Innovation  |

Source: IPM

- The scale of the challenge the economy and society faces is unparalleled in recent times, and requires a wholly different approach and ambition. Large urban areas have been hit hardest by Covid-19 pandemic but are also the key catalyst to support recovery and renewal of place. There is no doubt of the impact of the pandemic on people's day-to-day lives, demonstrating that those living in cities and large towns had been hit hardest. The introduction of lockdowns saw a dramatic fall in mobility and public transport use, with office workers quickly shifted to working from home and a substantial move to online shopping. This adversely impacted upon the vitality and sustainability of the city centre; a legacy which will take significant collaborative focus and planning to overcome.
- Local leadership must be supported to play its full role in bringing centres back into activity and adapting to these longer term trends (NB. we would refer to the [‘The Future of Urban Centres’ report available @ corecities.com](#)). The public

sector maintains a key role in this in terms of the work based population of the larger urban centres, providing flexibility for workforce but also in providing centres for collaborative work space supported by the promotion of active and sustainable transportation to remove the trend of returning via private vehicles.

- As city and town centres reopen, it is clear that COVID-19 has accelerated change in the high street by almost 10 years. Trends in retail that were already present (i.e. transition to online, convenience based shopping) had intensified with multiple retailers no longer being the dominant attraction in most city centres and so we have to redefine the high street. **For the city centre and local neighbourhood centres, in Belfast to survive post COVID, local leaders working in partnership with key stakeholders / businesses will collectively and collaboratively need to consider and redefine/diversify their purpose and is uniqueness. Council have identified the need to accelerate this through our Belfast Future City Centre Programme, and emerging Vibrant Business Destinations programme.** There is a need to make the arterial routes / neighbourhood centres, and the city centre be destinations of choice through promoting and enhancing their USPs for people and will require behavioural change. Consideration should be given to supporting local independents and first to market brands to fill the voids within the city centre and to provide unique visitor and experiential destinations in the city centre and arterial routes / local neighbourhood centres. Whilst we have a concerted drive to diversify our high streets, we must also ensure that existing retail is supported, and diversified uses complement the retail offer, to ensure its sustainability.
- COVID has aggravated the question of working from home. While there has been some return to the office as restrictions have eased, it is likely it will not return to pre-COVID levels with many businesses assessing the options now available to them with a range of jobs demonstrating they can be done as effectively from home (e.g. ICT sector) *NB. source UUEPC research on future remote working.* Most companies understand now that fixed costs can be reduced in a dramatic including, for example, potential reduction in required office space required, reduction in utility costs etc. Creating a wholly exclusive environment and eco systems including liveability and workability will support the success of our high streets and city centre.

- The recovery and renewal of the high street needs strong place-led leadership and collaborative action. There is a need to bring city stakeholders, business interests, communities and government together to transform the high street. Cities, High Street's and towns should have a clear definition of roles and responsibilities and shared vision to create a strong city centre and high street which is at the heart of their communities, with a unique sense of place and a strong identity. **This should be supported with targeted financial support to address the short / medium- and long-term interventions to address the issues that are prevalent within the city centres.** Council would propose that its Future City centre Programme forms a strong basis for a joint action plan that could be taken forward by key partners and the Community Planning Partnership (City development Board) could act as a key oversight mechanism for this partnership approach.

| Regeneration & Connectivity   | Business & Investment   | City Centre Vibrancy   | Position the City to Compete  | Digital Innovation  | Clean, Green & Safe (Multi-Agency)   |
|---|---|--|---|---|--|
| <ul style="list-style-type: none"> <li>Creating the physical built environment to create vibrancy; sustain our economic recovery and support an inclusive, accessible and connected city centre.</li> <li><b>Examples:</b></li> <li>Major Regeneration Developments</li> <li>City Centre Living</li> <li>Connected Spaces &amp; Places</li> <li>Lighting &amp; Tactical Regeneration</li> <li>Connectivity &amp; Active Travel</li> <li>Culture &amp; Built Heritage</li> </ul> | <ul style="list-style-type: none"> <li>To support and sustain existing and new businesses, and attract new businesses.</li> <li><b>Examples:</b></li> <li>Business Support Programmes</li> <li>City Investment Service</li> </ul> | <ul style="list-style-type: none"> <li>To encourage vitality, vibrancy and increased footfall; maximising our cultural and tourism offering.</li> <li><b>Examples:</b></li> <li>Animation &amp; events, pop up activities.</li> <li>Enhanced use of public realm &amp; environmental improvements to encourage footfall and increased dwell time</li> <li>Meanwhile use</li> </ul> | <ul style="list-style-type: none"> <li>To build on our reputation as a unique destination for investment, tourism and development.</li> <li><b>Examples:</b></li> <li>Renewed Ambition – public private partnership</li> <li>Vacancy interventions</li> </ul> | <ul style="list-style-type: none"> <li>Maximising and deploying digital technology and innovation solutions to position the city as a key location for innovation and support indigenous and new businesses to thrive and grow.</li> <li><b>Examples:</b></li> <li>Smart District</li> <li>5G and Wireless opportunities</li> </ul> | <ul style="list-style-type: none"> <li>To enhance the city centre experience through a clean, accessible, safe and pleasant environment.</li> <li><b>Examples:</b></li> <li>Providing enhanced city cleansing regimes</li> <li>Imaginative use of open &amp; civic spaces particularly to support retail / hospitality sectors</li> <li>Support the provision of parklets and greening the city initiatives</li> </ul> |

(Belfast Future City Centre Programme, Key Pillars)

- Belfast City Council's Future City Centre Programme aims to create a dynamic, vibrant and shared city centre where people will want to live, work and invest. It seeks to develop a 'City Centre Proposition' that provides "something different" to stand the best opportunity of future-proofing the city centre based on six pillars of work and underpinned by a sound evidence base to prioritise and track progress:
  - 1. Regeneration & Connectivity:** Using the physical built environment to create vibrancy; sustain our economic recovery and support an inclusive, accessible and connected city centre.

2. **Business & Development:** To support and sustain existing and new businesses and attract new businesses.
  3. **City Centre Vibrancy:** To encourage vitality, vibrancy and increased footfall; maximising our cultural and tourism offering.
  4. **Position the City to Compete:** To build on our reputation as a unique destination for investment, tourism and development.
  5. **Digital Innovation:** Maximising and deploying digital technology and innovation solutions to position the city as a key location for innovation and support indigenous and new businesses to thrive and grow.
  6. **Clean, Green & Safer City:** To enhance the city centre experience through a clean, accessible, safe and pleasant environment.
- The FCC programme provides a holistic approach to addressing the challenges facing the HSTF, including Clean, Green and Safe, Connectivity, targeted acquisition and addressing vacancy, vibrancy, positioning the city to compete and digital innovation. While no one aspect of the FCC will provide a long lasting and sustainable impact on its own, it will be the collective benefit of each of the strands, delivered under a combined programme that will see effective change in the City Centre. Within the FCC programme there is a targeted addressing vacant premises initiative which will seek to address challenges facing High Street regarding vacancies and well as city resilience issues when full impact of Covid19 is realised.
  - Council commissioned a “*Strategic Stakeholder Engagement Study and Action Plan for Belfast City Centre Clean, Green, Inclusive and Safe Initiative*’.” The resulting Clean, Green, Inclusive and Safe (CGIS) City Centre strategy and action plan will be embedded within an overall approach to the re-opening of the City Centre and the longer-term priorities within the Council’s Future City Centre Programme. It will also contribute to ‘A Bolder Vision for Belfast: Reimagining the Centre’, with an emphasis on ensuring there is a clean and safe lens applied to green and shared space projects and infrastructure.
  - Public/private investors and stakeholders must become more engaged and have ownership of the vision. There are key roles within this for city partners spanning across local government, with anchor institutions and engaging the private sector.

Belfast City Council has sought to harness this engagement via Community Planning, particularly through the City Development Board which has representation from across government departments, VCSE, anchor institutions and local development community. This structure provides a key vehicle for the delivery of a joined up action plan to deliver on outcomes.

- Tailored promotion and marketing addressing local needs as well as wider promotion for investment and development for example aligned to the Council's Future City Centre programme, Supporting Vibrant Business Destinations Programme (focused on arterial routes), Retail and Leisure proposition, Renewed Ambition Programme etc including attracting institutional investment.
- Council recently approved an approach to supporting arterial routes / local neighbourhood centres "Supporting Vibrant Business Destinations" an approach which has been developed to assist and support the delivery of area-based support for neighbourhood centres / arterial routes for local business associations to increase vibrancy and drive footfall.
- The city centre offer must be relevant, and a significant part must be community-led (a new localism), experiential and addressing local needs.
- Key to securing the long-term prosperity of the city's retail core is to ensure the right mix and retail offer is available and recruiting absent retailers within the retail segments which are underrepresented in Northern Ireland and indeed Ireland. In addition Belfast City Council has promoted and assisted in a number of meanwhile uses, in order to ensure this is sustainable we would encourage additional funding to support further interventions.

#### **5. What expert help is needed to develop best practice?**

Belfast City Council has been involved in developing a number of strategic interventions alongside key stakeholders for example as referenced in earlier response the Future City Centre Programme, and A Bolder Vision which seek to build and earn from best practice. A number of expert advisory groups we have been formed, which play a key role in advisory for example Innovation and Inclusive Growth Commission, Climate Commission, Digital Commissioner etc.



The Institute of Place Management at Manchester Metropolitan University was commissioned to undertake a series of workshops to support the development of a high street and town centre policy. Their report, 'The High Street 2030 Achieving Change' took a people and place-based approach to understand why some town centres/high streets thrive and others struggle.

The conclusion of the report was there was not a 'one fits all approach'. However, the report highlighted commonality in some fundamental principles that applied to all of their study areas and are as relevant now as we move forwards from Covid 19:

1. **Places need leadership and partnerships:** Place leadership needs to evolve and adapt as circumstances change. It is a network rather than a hierarchy - place leaders, acting together, achieve change.
2. **Places need to blend local and expert knowledge:** knowledge of local data and performance and working with experts is critical to making informed decisions. In too many cases towns make wrong choices, adapting something that has worked elsewhere when it may not be appropriate for their location. No one size fits all approach.
3. **Places need communication to flow:** Communication underlies and recreates the city brand and the perceptions of visitors, investors and residents. Good place leadership facilitates communication.
4. **Places need the input of their young people:** Our City Centre will soon be theirs. They have an abundance of enthusiasm we need to constructively and actively engage with them, involving them formally and informally.
5. **Places need to be served by place professionals:** place professionals from different backgrounds can provide the vision, leadership and knowledge required to create change.
6. **Collaborative place making** - creating a single voice: provide cross sector support to encourage collaborative place-making. Bring together all stakeholders.

In conclusion it is felt that the Assembly should retain leading specialist in the field to lead an overall project of High Street. This should be structured around a series of "task and finish" groups drawn from the community, business and academia. The

project should be professionally planned with a focus on outcomes within a strict timeline.

6. What changes are needed to legislation, procedures and processes to improve best practice and transform community planning on the high street?

Council understand there are a number of considerations required to legislation, procedures and processes to improve best practice and transform community planning on the high street:

Business rates is the primary source of income for the Council where 78% of our income comes from rates – 65% domestic, 35% non-domestic. In 2019, the Department of Finance via Land & Property Services (LPS) announced plans to undertake a full and comprehensive review of business rates in Northern Ireland. The onslaught on Covid 19 has held up further progress on this review.

The council recognises the importance of minimising the burden on the ratepayer and has set the district rate over the past number of years at below the rate of inflation. The council would welcome progressing further with the review and in particular the key issues highlighted for consideration in their response to the consultation to LPS in 2019:

Notably:

1. Consideration of local authorities being given the power to introduce reliefs to reflect the specific circumstances of their locality and local economy.
2. How the rating system can be aligned to support growing the economy.
3. How the rating system can be used to support city centre living such as relief for build-to-rent properties and purpose-built managed student accommodation.
4. Eliminating any form of tax avoidance or evasion.
5. Improving the collection and administration of rates.
6. The use of technology to maximise the collectable rates.
7. How the rating system can integrate the ability to pay and individual business circumstances as part of rates assessments.



8. Possibility of introducing new revenue raising powers such as:
  - vacant site levy
  - derelict land levy
  - internet transaction levy
  - green policy related levies
  - tourism tax
9. Conducting a fundamental review of reliefs, exemptions, and exclusions.
10. Introducing a business growth accelerator.
11. Reviewing the effectiveness of the rates hardship scheme.
12. How the rating system aligned to support specific sectors such as innovation, retail, and hospitality.

In relation to Community Planning, in Belfast, Council have led the community planning process. We worked with partners, including representatives from the statutory, business, higher education, and community and voluntary sectors, to develop a long-term plan to improve the social, economic and environmental well-being of the city. As highlighted previously, we believe that community planning provides a good platform to bring partners and stakeholders together with a clear focus on place including the High Street. We would recommend, however, that urgent consideration is given to refreshing the legislative basis of community planning in Northern Ireland to bring it more in line with other jurisdictions such as Scotland and Wales. There is a need to strengthen the role of central government in the process and encourage and enable community planning partners to commit shared resources to implement agreed programmes of activity to truly add value and unlock growth potential and ambitions to transform the high street.

### Theme 3: Investment

**The high street needs ways of dealing with investment that will support innovation, help renewal and create thriving high streets. Investment is not only needed for buildings and digital infrastructure, but also for developing people and communities. This could require the consideration of:**

- More specific funding streams and schemes are required to promote and encourage residential living
- Funding streams and workforces should be aligned.
- Specific funding schemes to promote and encourage wider provision of community services.
- A better understanding and clarity on the availability of funding streams.
- Place-based budgeting.
- The residential Urban Development Grant scheme should be revived.
- More focused funding for village, town and city centre promotions.
- Incentives to deal with long-term vacancies.
- Clarity on priority investment area(s) is needed.

### Theme 3: Questions and Responses

7. What are the key issues for investment?

The challenges facing city centres and high streets are complex, interacting with consumer demand and behaviours, therefore investment needs to focus on delivering outcomes and the vision for the place that stakeholders buy-in to.

Out of town retail investment has not been significantly adversely impacted by Covid and has continued to be popular with investors and occupiers. The below comments relate to intown retail, high street and shopping centres:

- The **reduction in rates** during Covid has assisted many businesses through a difficult time, however there continues to be long term issues with the costs of rates compared to rents and overall occupancy costs for retailers. The revaluation date of Oct 2021 may go some way to assist a rebalancing of rateable values.

- Occupier demand for many locations remains low, although some sectors of the market are showing good levels of interest, there remain some locations and unit sizes which experience low demand or an oversupply of space.
- **Diversification of the high street** looks to provide a wider offer to attract customers and increase footfall however restrictions on licensing and planning uses can sometimes mean that occupier demand cannot be satisfied and a more flexible system, while ensuring effective regulation, is required for High Streets to trial and embed the diversification of uses.
- **Footfall** numbers have not recovered to precovid levels. Belfast Bid One Footfall figures for 25<sup>th</sup>-31<sup>st</sup> Oct 2021 are 16% down on 2019 year on year figures.
- CVA and retail administrations have affected the returns for retail investors and fund managers, causing many to disinvest in the sector.
- Some parts of the Investment Market have lost confidence in the retail sector as assets have depreciated. This effects the owner's ability to raise capital or direct funds towards capital improvements. Valuations for retail have moved out with yields weakening.
- Changing trends in tenant leasing poses difficulties for retail investment and financing, i.e. increased demand for turnover rent and shorter leases. Flexibility in lease terms is welcome and can work well within a shopping centre or in large retail blocks under single ownership, however it is unaffordable and unfinanceable for individual asset owners who require a guaranteed, secure income stream to meet liabilities.
- Areas with high numbers of **long term vacancies** require significant infrastructure investment and structural change in order to reposition them. Investors who own in these areas may struggle with viability, financing, and funding. On this point Council would advocate for the accelerating of the introduction of the Dilapidation Bill to consolidate and enhance existing legislation to better allow Council to safely deal with dilapidated buildings and neglected sites in their areas.
- Delayed **Infrastructure improvements** can affect property owner's ability to let units and the confidence in the regeneration of these areas. Further intervention from the public sector may be required to address long-term vacancy and dereliction.

8. Is information on funding easy to find?

This depends on whether you are looking for private or public sector funding. The NI Grant Funding Hub provides an overview of grants available through Belfast City Council <https://www.belfastcity-grants.com/> and DFC publish updates on various grants through their website. Information is available to businesses across the region at: <https://www.nibusinessinfo.co.uk/>. It should be noted however, that these are not specifically targeted or developed for “High Streets” they offer a wide range of support, and there is merit in looking at a holistic and integrated funding mechanism. Belfast City Council Economic Development Unit provide a range of support tailored to the start up and growth side. Invest NI provide tailored support to assist private sector companies with advice, mentoring and finance, but **overall there is a lack of funding.**

9. Which of the following funds would support the development of the high street?

Pick as many or as few as you wish.

- a. High Street Transformation
- b. Residential Living
- c. Urban Development Grant
- d. Other (Please comment below)

The Council would recommend that given the scale and complexity of challenges facing the high street, that a package of funding streams, and supported by the necessary enabling powers – as referred to previously - should be brought forward.

- A. **High Street Transformation** – High Street Renewal Funding – targeted larger scale funding to make significant infrastructure and structural change and help assist viability for stalled city centre development schemes, with merit given in UK High Street Fund. City centre regeneration schemes, provide the basis and catalyst for mixed use development including city centre living for example Tribeca Belfast.
- B. **Residential Living** - Assistance to cover development viability and funding requirements and de-risk investment. The refocus of existing funds such as the Northern Ireland Investment Fund on residential could assist with gaps in affordable finance products in the market and viability. An increase in total funds

available could also assist large scale stalled development projects which will act as catalyst for other city centre regeneration. Dedicated Housing Investment Funds will be funds that provide financing through a range of innovative vehicles aimed specifically at bringing forward housing development at pace and addressing market challenges. The reintroduction of grants or tax incentives for LOTS and Heritage in Housing could assist with retail investment stabilisation through providing options to counter retail rental decline whilst increasing the city centre population and potential consumer numbers. Lessons learnt from the previous scheme should be considered.

- C. **Urban Development Grant** – Consideration to reopening this Grant scheme which can act as an enabler for private sector development with viability issues. This has the potential to enhance existing Belfast City Council programmes of work for example Vacant Premises Programme within the city centre, and sustaining the Vibrant Business Destinations programme directed at arterial routes / local neighbourhood centres.
- D. **Other-** the following section outlines additional areas for consideration.
- **Cultural & Events support fund** – important that we have the capability to make our High Streets more attractive and diversified in terms of the people's experience. Need to consider that funding or legislative changes may be required to help enhance the cultural mix and diversity of our High Streets (e.g. rates incentives, funding to deliver at scale),
  - **Business incentive schemes** - such as rates incentives as per earlier questions and themes. Specifically that these are tapered off as the business is established, and done so in a manageable and measurable approach for example ring-fence to small businesses – means of supporting additional start-ups.
  - **Enterprise Zones** - being designated with rates reductions and other financial incentives in order to assist with viability of development and attract inward investment. Reopening and providing additional financing to existing programmes may assist with moving this investment forward more quickly and productively.
  - **High Street Fund** - Northern Ireland was expected a Barnett Consequential relating to the Chancellor's announcement of £675M for High Streets. This could be in the region of £25m over 5 years. As this was unhypothecated funding and

other priorities may have taken precedence. Clarification on how this money was distributed and what projects benefited from it would be welcome.

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## **Theme 4: Planning**

**In addressing planning for the high street, our challenge will be to contribute to the delivery of a fair and inclusive planning system for people, communities and businesses. This could require a review of the planning system, its impact on the high street and the consideration of:**

- Village, town and city centre masterplans.
- Promoting a “Town Centre First” principle to encourage the public sector to continue to invest in town centres and help communities thrive.
- More flexible planning policies are required to enable repurposing.
- Strong diversification of town centres is needed to include, but not limited to: housing, community uses, leisure, offices and outdoor spaces.
- Actions are needed to address vacancy and dereliction on the High Street.
- A five-year moratorium on major out-of-town retail applications should be considered.
- A stricter “town centre first” approach, more Business Improvement Districts (BIDs) and a joined-up approach to regeneration.
- An approach to increase population living and working in our high street.

### **Theme 4: Questions and Responses**

10. Are you aware of village, town and city centre masterplans?

Yes, Belfast City Council have developed a number of Masterplans aligned to the Belfast City Centre Regeneration and Investment Strategy (Regeneration Policy for Belfast City Centre), to shape the development of our city centre eco system to create a more dynamic place to live, work, visit and invest which includes:

- Inner North West Masterplan – adopted by Department for Communities
- Belfast East Bank Development Strategy
- Linen Quarter Vision and Guidance

In addition to this the Department for Communities has developed the Greater Clarendon and Sailortown Masterplan and the Shaftesbury Square Masterplan. In addition to the city centre, and its masterplans with areas for targeted intervention there is a need to consider the arterial routes in cities to connect community

hubs/centres to the city centre to take a placemaking approach to creating vibrant and sustainable areas. These combined with significant masterplans from large scale development Masterplans including, City Quays, Waterside, Tribeca and Weavers Cross lay out a transformational package of regeneration and investment, however the appetite and support must remain to transform these masterplans into action plans with allocated funding/investment and realistic timeframes. The said schemes have the potential to create a catalytic impact on the city as a whole, creating conditions for the region's growth ambition to succeed.

#### 11. What are the key planning issues?

- Planning issues are largely focused around the **vitality and viability** of our centres and ensuring that their evolving role is appropriately managed and supported within a clear hierarchy that addresses local needs.
- The biggest challenge for our city / large town centres is the **changing nature of retailing** (and, indeed, office / commercial space) alongside the need to find alternative complementary uses in centres, both as a focus / destination and to support ongoing demand / footfall.
- Planning can provide a **long-term approach to enable change through the Local Development Plan (LDP)** which incorporates local policies plans and masterplans that can help to rebalance the role of centres and the mix of uses appropriate to the role and function of the centre.
- Planning has an important role in **placemaking** including the shaping of public spaces and buildings through appropriate design.
- The LDP can help identify safe communal spaces that create healthier, safer and more cohesive communities.
- Long term planning through the application of sustainable principles can help address congestion and promote enhanced connectivity /accessibility.
- It can help achieve more sustainable development patterns including by promoting a broader residential offer within and adjacent to our centres with a mix of tenures and forms of accommodation.



- Planning can help to protect, support and enhance the economic role of centres by ensuring the critical mass of appropriate uses at accessible locations.
- Planning can help to **increase the role of the evening and night-time economy** which will contribute to the vibrancy of centres.
- **Out of town shopping / retailing i.e. outside the existing urban area should not be confused with out of centre i.e. outside of existing centres.** In a general sense retailing outside of the urban area including the open countryside is unsustainable and should be discouraged.

12. Would you support a temporary ban on out-of-town retail developments?

a. Yes

b. No

If yes, for how long?

This is **not a binary issue** and it is not as simple as introducing all out bans that do not take account of the different forms of retail provision. Such an approach or proposition is overly simplistic. Large cities like **Belfast have a variety of centres. Belfast has a retail hierarchy which includes the city centre, district centres and local centres which all contribute to the wider retail and service offer.** The city centre itself has subcentres including the primary retail core and frontage areas. Each centre needs to be afforded an appropriate level of recognition and protection.

The emerging Local Development Plan will help to ensure that proposals for main town centres uses, including retail, are directed to the appropriate level of centre based on size, function and catchment.

There is a general issue around the ability of centres to compete equitably. Many out of centre and out of town shopping centres can offer free car parking at or near motorways or highly accessible location for cars. Charging for car parking at out of town locations either directly or through the taxation (rating) of parking spaces would help to redress this imbalance.

13. What changes to legislation, policies, processes or procedures could transform high street planning for the better?

The Belfast LDP is the primary policy mechanism available to Councils to protect and enhance the role and function of our centres. The Belfast draft Plan Strategy is at an advanced stage. The PAC completed the hearing sessions and a report from the Commission on that was sent to the Department on 29 September 2021. The expeditious adoption of this plan will have significant benefits in helping to protect our centres.

The draft Plan policies seek to:-

- Provide a range of uses appropriate to the role and function of a city centre which can realise ambitions for growth.
- Acknowledge the distinctive role of Belfast City Centre as the primary location for retailing in the region.
- Adopt a sequential approach to the identification of a hierarchy for retail and other town centre uses in decision making.
- Maintain and improve accessibility to and within the city centre by supporting connectivity and the consideration of accessibility to these and other services.
- Provide for an appropriate scale of retail and town centres uses in accordance with their scale, role and function.
- Support local economies by ensuring continued vibrancy and vitality alongside the scope to expand within defined areas.
- Develop a compact urban form that maximises opportunities in the city centre and wider urban area; and
- Provide a focus for economic development.

## Theme 5: Public Realm

**The Public Realm is defined as the space around, between and within buildings that are publicly accessible, including streets, squares, parks and open spaces. These are the everyday spaces that we move through and socialise within and the places where we live, work and play. This could require the consideration of:**

- Creating better ways of delivering Public Realm that are cleaner and greener.
- Public Realm “smart” towns with green spaces that are decluttered, eco-friendly, sustainable and better connected.
- Promoting high-quality design to ensure that our town centres provide sustainable, attractive, accessible and safe environments.
- Town centres should be clean, vibrant and attractive if visitors are to be encouraged to visit and stay.

### Theme 5: Questions and Responses

14. What are your views on the high street environment?

A quality urban environment is a critical component of a successful high street, that can make a tangible contribution to the ‘health’ of a place, by enabling safe and easy access and providing an environment that tangibly supports a range of activities and uses, while contributing to character and intangible qualities that simply make a place attractive and pleasant for people to live and visit.

While interventions in the public realm should adhere to common principles and objectives, a high street environment should reflect local character, and a bespoke approach to the design of public realm should be taken that creates a genuine sense of place, avoiding a ‘design by numbers’ approach.

The relationship between the high street environment and the range of uses in a city centre is more important the ever, with growing understanding of the value of quality streets and spaces that create a point of difference and reflect both form and function of a place. There are opportunities to reimagine the relationship between internal and external space, including through business spill-out activating and animating streets

and spaces. While the pandemic has forced this agenda, there is potential long term benefit for businesses and other city stakeholders, but a considered placemaking approach will be required across local government and central government departments. That responsibility for the high street environment is shared across multiple agencies has a significant impact on both design/delivery and maintenance/stewardship of public realm in Belfast.

#### 15. What could be done to change the perception of the Public Realm?

The public realm in Belfast is perceived by many as generally tired, very poor in some parts of the city, and in need of investment. While improvements have been delivered via the BSA programme and other individual schemes, many streets are in poor condition, reflecting a lack of investment in Belfast, particularly given the extent of public realm schemes delivered across large and small towns throughout Northern Ireland during the last 10-15 years. However, there is perhaps an **opportunity to deliver more transformational change across the city centre than may have been possible even 5 years ago, given the appetite for change among city stakeholders regarding issues such as pedestrianisation, active travel, greening, and the value of external space from both a civic and commercial perspective.**

In terms of changing perceptions, there is a need to ensure high standards of maintenance and stewardship of existing public realm, alongside the development of new schemes. Recent surveys and engagement with stakeholders indicate a need to review resource allocation to maintenance, which also suffers due to fragmented responsibility across local and central government bodies. In addition, with a number of major public realm schemes currently in development (BSA 3 & 5), there is a need for agreement between Belfast City Council, DfI and DfC regarding future maintenance requirements, which represent significant costs to the public purse. **With a major issue in Belfast being a shortage of quality open space, and an ambition to 'green' the city through the introduction of landscaping to soften otherwise hard urban spaces and streets, long term maintenance is a critical city issue to be resolved.**

There remains a need for the high streets environment to be designed with the changing user of the city centre to be incorporated. High streets should no longer be designed and serviced as large retail destinations but rather places that incorporate city centre living, tourism, education, workers and retail. The Bolder Vision for Belfast is currently out to consultation and the responses received to date are providing significant support for people based public realm design supporting the FCC. Responses are also showing that there is a need to have the correct legislation, control measures and maintenance in place to deliver the ambitions of the emerging designs.

In terms of perceptions of public realm schemes themselves, with an approach to design and delivery that seeks to effect meaningful change in terms of how people experience and move within the city, there is an opportunity to reposition public realm scheme delivery as a critical element of placemaking that, while not a solution in and of itself, is a key component of an integrated approach to development and regeneration.

#### 16. What improvements are needed in your high street?

There is an opportunity to harness the apparent appetite for change in terms of how people access and experience the city, to use public realm design and delivery to challenge existing allocation of space for vehicles and pedestrians, ensuring opportunities are taken to genuinely position pedestrians at the top of the user hierarchy.

**There is a need to fully integrate greening and soft landscaping within schemes, to create attractive and useable spaces for all users (residents and visitors), and encourage innovative approaches to greening within existing streets, (e.g. vertical greening), while exploring solutions to specific issues such as high services and service diversions which often frustrate planting of street trees.**

There is also potential to fully exploit the **value of lighting (street lighting and feature lighting) as a key placemaking tool within public realm schemes that can make a significant contribution to night time safety and vibrancy within the city, supporting the night time economy and city centre living.** Belfast City Council

published a lighting strategy, 'Luminous City', in 2020 that sets out principles that should inform the design and delivery of lighting interventions.

It will also be important that public realm schemes fully embed other themes such as child friendly/play, art and culture, and SMART technology as key elements throughout design development processes, as opposed to 'nice to haves' that have often been considered peripheral or secondary in public realm design.

As noted above, given responsibility is shared across multiple agencies, the issue of maintenance of green spaces and soft landscaping urgently requires a joined up 'city' approach to future ownership and maintenance.

Additionally, maintenance of hard surfaces has historically been an issue in Belfast, with works carried out by utility providers and others leaving prominent 'scars' in the form of temporary reinstatement- effective management and enforcement to ensure satisfactory reinstatement, including by supporting access to materials, is required.

#### **17. What is a priority for Public Realm projects in the high street?**

The priority outcomes for public realm projects are noted above in terms of taking a bespoke placemaking approach and prioritising greening and active travel infrastructure within emerging schemes. Also noted above, there is a critical issue for the city in terms of stewardship and maintenance of existing streets and spaces, and ensuring future maintenance requirements of planned public realm schemes can be met in a manner that reflects established city regeneration, sustainability and green infrastructure ambitions.

In terms of delivery, in addition to DfC led schemes such as BSA 3 and 5, Belfast City Council is also progressing design and delivery of public realm projects utilising developer contributions secured via S76 planning agreements. In addition, schemes will continue to be delivered directly by private sector developers in line with planning agreements. As the adopting authority, DfI have a critical role in all of these schemes. In this context, Belfast will see multiple public realm schemes ranging in value from £100k to c£30m delivered by a mix of central government, local government and the private sector during the next 5-10 years. A joined up 'city' approach will therefore be

required to ensure a coherent approach and a quality outcome. There is now an opportunity for DfC, DfI and Belfast City Council to deliver on **'A Bolder Vision for Belfast'** through both direct delivery, as well as regulation of privately delivered public realm schemes that can have transformational impacts, or can effect incremental change in line with an agreed city ambition.

While delivery of major capital works in busy urban centres requires a significant lead-in due to design, consultation, statutory approvals and procurement, we consider that efficiencies should be sought wherever possible across government to support timely delivery of public realm schemes.

**Additionally, in-year spend requirements can prove prohibitive for projects involving physical works to improve public realm, that often require a mix of both statutory approvals and third party consents.**

**Alongside delivery of public realm projects, there is a need to consider supporting programmes to improve the 'vertical streetscape' (buildings/facades), to promote a holistic approach to regeneration that also addresses long term vacancy, dereliction and urban decay, alongside public realm improvements.**

18. What would make town-centre living more attractive?

**Development and maintenance of a network of safe, accessible and attractive streets linking quality open and green spaces, large and small, that cater to the needs of existing and new city centre communities.**

The city centre needs to be a place of choice, with consistently high standards in design, delivery, maintenance and stewardship of the public realm. Therefore consideration needs to be directed to the necessary attractors e.g. local amenities, shops, community infrastructure.

The city centre needs to be 'clean, green and safe', with potential residents confident in terms of health, safety and wellbeing. This has been demonstrated recently in research undertaken by Belfast City Council around a Clean, Green, Inclusive and Safe city centre

for example the disjoints in city Centre cleansing is somewhat due to public realm being in the ownership of different organisations. This creates disconnect in terms of timing and standard of cleansing. Strong partnership working will result in street cleansing reaching consistent and optimum standard, positively impacting public perception on the suitability of the City Centre as a place to live, work, visit. Managing public perception is important by demonstrating to the public that the Council and key partners have a proactive approach to cleansing to enhance attitudes and behaviours.

Incorporation of family friendly design, whether through dedicated or incidental play, as a component of public realm design that caters for a range of users, promoting active and passive use of spaces that will help to deter longstanding ASB issues.

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## Theme 6: Fiscal - Including Rates

**Fiscal policy is how government taxation and spending policies are used to influence economic conditions. This affects demands on employment, inflation, goods and services, and economic growth. This could require the consideration of:**

- Reform the tax system to ensure that sufficient revenue to pay for public services whilst ensuring that the tax burden is fair.
- A fundamental reform and review of commercial and business rates in village, town and city centres. (NI Reval 2023)
- A targeted approach to rates for small businesses.
- Our high streets have the highest vacancy rates in the UK. We need to develop a policy response to address vacancies and rates.

### Theme 6: Questions and Responses

19. What tax and rating reforms are needed to help stimulate the high street economy?

Business rate is the primary source of income for the Council. 78% of income comes from rates – 65% domestic, 35% non-domestic. Any reduction in the level of this important tax must be replaced with alternative revenue sources. Rather than making overall reduction in the levy targeted approaches should be adopted.

The overall level of taxation must be maintained to ensure service levels are sustained. Any of the proposals suggested in the following paragraphs must be subjected to detailed modelling to ensure a balance of funding is maintained.

20. What actions should be taken to reduce vacancy rates on the high street?

Anecdotally, it is understood that SME's and independents have been capitalising on the current rates concession as an opportune time to test space and trade their concepts in the city centre having a multiplier effect on positively impacting the local economy, reducing vacancies, increasing footfalls and providing new reasons to visit

the city centre. Perhaps there is some learning here in supporting SME's in setting up in prime pitches and locations.

**21. Do you believe that legislation is required to change fiscal policy?**

As referred to in an earlier response, in 2019, the Department of Finance via Land & Property Services (LPS) announced plans to undertake a full and comprehensive review of business rates in Northern Ireland. Covid 19 has held up further progress on this review. The review needs to be restarted.

The council recognises the importance of minimising the burden on the ratepayer and has set the district rate over the past number of years at below the rate of inflation. The council would welcome progressing further with the review and in particular the key issues highlighted for consideration in their response to the consultation to LPS in 2019.

The Rates Order lacks powers that permit local authorities to introduce reliefs to reflect the specific circumstances of their locality and local economy. This is a serious impediment in the development of local policies and strategies.

The rating system needs to be aligned to support growing the local economy and support city and town centre living. Examples of initiatives that could be considered to stimulate local environments are:

- Relief for build-to-rent properties and purpose-built managed student accommodation.
- Integrate the ability to pay and individual business circumstances.
- Introduce a vacant site and a derelict land levy to accelerate development.
- Incentivise city and town centre living with a series of green policy related exemptions and rewards.
- Review all reliefs, exemptions, and exclusions with a bias towards city and town centre living.
- Introducing a business growth accelerator.
- Reviewing the effectiveness of the rates hardship scheme.

- Align the rating system to support specific sectors such as innovation, retail, and hospitality.
- Create “Retail Action Zones” which would exempt individual properties or specific areas.

Assembly should review the current tax; funding and development systems to rebalancing taxation to better encompass and reflect the rapid rise of online activities and the growth of retail parks and out of town shopping precincts. Potential suggestions for actions could include amendments to VAT, the introduction of digital taxes or transaction levies and the introduction of an Out-of-Town Car Parking Space Levy.

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## Theme 7: Capacity

**Capacity refers to the built, social, spatial, and infrastructural strengths and opportunities to transform to produce significant and measurable change. This could require the consideration of:**

- A capacity mapping and pilots exercise similar to that undertaken by the HSTF in England should be developed for our region, utilising Ministerial Advisory Group data and knowledge, and resourced and contemporised by HSTF funds. This should be council area coordinated and community led.
- Greater High Street inclusion for Community Wealth Building Pilots, community planning, with greater formal and allocated cross-departmental investment in each. Community Wealth Building Pilots are an investment model to enable local communities to increase co-operative asset ownership, anchor jobs and resources locally, and ensure local community economic stability and democratic control.
- Develop HSTF capacity by investment in hubs by location, and, if desired at community level.

## Theme 7: Questions and Responses

22. What is the priority for capacity mapping and pilot exercises?

Capacity mapping should be considered as part of any investment – not as a separate or stand-alone exercise. The MAG living High Street Craft Kit template is a helpful starting point. The leadership should be reflective of the High Street/locality composition – so the definition of “community” may change from area to area (e.g. the business community may well lead in many cases, in those locations where they dominate the High Street).

23. What capacity skills need to be developed?

The key capacity skills that need to be developed include:

- Governance
- Financial management
- Evaluation and/or impact measurement
- Some technical skills (although these can be acquired or commissioned).
- Place-making

Groups also need to build an understanding of the local/regional government environment with clarity of areas of responsibility and shared knowledge on the required processes to progress priority interventions. NOTE – it would be helpful to create “how to”/process notes for these key work areas e.g. requests for parklets.

24. What should be created to support the development of high street capacity?

- a. Community funds
- b. Locality budgets
- c. Sector schemes
- d. Expert advice
- e. Workshops
- f. Collaborative approach
- g. Other (Please comment below)

We suggest that a combination of ring-fenced budgets accompanied by access to technical assistance and expert advice and support will be required. Facilitation and workshop design support would be beneficial (which don't necessarily just have to relate to one specific area) in ensuring an inclusive and co-design approach is adopted. We would advise against the creation of numerous parallel strands of activity.

## **Theme 8: Energy, Climate Change and Sustainability**

**Our environment is our most important asset and is crucial to each and every one of us. It is one of the main reasons that people from other countries and regions visit, bringing money into the local economy. It affects our economy, our health and well-being, and it facilitates social interaction. Building, through construction, renovation and repurposing, also plays a key role in emissions reduction. This could require the consideration of:**

- The carbon impact of interventions during design, to reduce the carbon footprint and increase sustainable development.
- Carbon reduction measures in existing and future infrastructures in our high streets should be dynamically addressed.
- Blue-green infrastructures, which are strategically planned networks of natural and semi-natural areas to enhance the biodiversity designed and managed to support a wide range of ecosystem services, could assist with the greening of our urban environments, facilitate better water management and support safer, cleaner, sustainable spaces. This will allow interconnectivity, provide recreation spaces and help communities to connect and to thrive economically and socially.
- Examine incentives for repurposing existing buildings to address embodied energy, increase energy efficiency and use of renewable energy.

### **Theme 8: Questions and Responses**

25. What actions should be adopted to provide greener urban environments?

[Belfast Resilience Strategy sets out the ambition to address both climate adaptation and mitigation. Adaptation measures include the creation of sustainable urban drainage, and integration of tree planting through the Belfast Million Trees programme. Such measures address multiple issues such as flooding, carbon sequestration, urban cooling and physical/mental health. Climate considerations should be undertaken on all investment, both public and private, and the correct levers and controls incorporated within the business case, viability, design approval and adoption processes. Effective decision making is critical to ensuring that policy and direction is provided to incorporate control measures to reduce the impact of](#)

climate change and to ensure delivery of the commitments made through the Climate Emergency Declarations.

26. What incentives should there be for repurposing buildings? (Tick as many or as few as you wish)

- a. Environmental grants
- b. Loans
- c. Reduced rates
- d. Other (if you pick "Other" please expand on your answer)

we believe all incentives should be properly considered and resourced. The Belfast Net Zero Carbon Roadmap sets out recommendations for the retrofit of buildings to support our decarbonisation goals. Retrofitting, has an important role in repurposing existing buildings in major developments to reduce the carbon footprint.

27. Should existing buildings, including our heritage assets, play an enhanced role in transforming the High Street?

- a. Yes
- b. No

Yes, heritage assets play an essential role in the high street and the revitalisation of the high street should consider the sustainable reuse and retention of heritage buildings as key priority. we should examine opportunities to support and showcase actions to decarbonise, use of renewable energy, incorporating green infrastructure, and embedding principles such as play, which we have addressed through the Urban Childhood Report and our membership of the Real Play Coalition, all of which enhance the resilience of the city.

## **Theme 9: Housing and Other Infrastructure**

**Good quality, affordable and sustainable housing is central to reducing housing stress, homelessness and improving housing solutions for the most vulnerable. This could require the consideration of:**

- Policies and strategies to address quality, quantity and availability of housing to encourage people to live in and around high streets.
- We should ensure that these are not just transient communities but that they are attractive to families.
- We should consider space standards, access to services and the living over the shops scheme.

## **Theme 9: Questions and Responses**

28. What strategies are needed to encourage people to live in and around the High Street?

Although Belfast is seeing an increase in both investor interest and planning approvals for housing developments, and so an increase in the city centre population, this trend has been identified within the Belfast Agenda which set out an ambitious objective to grow the population of the city by 66,000 people. As its spatial articulation, the draft Local Development Plan (LDP) seeks to provide for 31,000 additional homes by 2035, with an estimated 8,000 units anticipated within the city centre thereby increasing the city centre population. Population density is now considered crucial to the success and sustainability of city centres.

Council understands that to **grow and sustain a strong and vibrant residential presence within the city centre requires a suite of strategic measures which will create a city which attracts more individuals and families as well as the services that communities need to thrive.** City centre living is central to the Councils long term vision and ambitions for growth; to create a city with a thriving economy and excellent job opportunities for all, where the right mix of homes is surrounded by great public spaces with easy access to nature, culture, high quality schools and learning opportunities.



To better understand the needs and aspirations of new and existing residents across the City, Council have commissioned a City Centre Living Vision 2035 (CCLV). This will help identify what Belfast can do to attract a variety of new tenures to reside within the heart of the city as well as identifying what the successes are that has retained residents within the city and which has helped establish important city centre communities. It is important that Council recognises the strategic ambitions for the growth of the city against the aspirations and concerns of these existing communities.

This CCLV is also looking at national best practices in which Belfast can learn from as we seek to revitalise and repopulate our city centre. We have seen how medium to higher density residential developments in mixed-use neighbourhoods can flourish, and how high-quality public realm, supported by efficient transport infrastructure not only lessons car dependency but supports the delivery of our low carbon ambitions. This CCLV will support the commitments of the Belfast City Centre Regeneration Investment Strategy by capitalising on the change in landscape, and help create a Vision for the city to help it deliver on its growth ambitions. This strategy set out a road map of policies to guide city centre decision making and a series of potential projects that translate the policies into action. Housing growth was a clear intervention considered essential to Belfast's success addressing the universal elements of a thriving city centre as well as challenges and conditions that are unique to Belfast.

There are a number of key ambitions to support a mixed-use city centre that can deliver investment opportunity and amenity provision to encourage and enable a significant increase in its residential population within the next 15 years. These include:

i. Enable and encourage higher density mixed tenure residential developments

A range of benefits can be achieved through development of compact, accessible urban forms, clean and efficient urban transportation options, efficient building energy use and local clean energy solutions, climate change adaptation interventions and efficient waste management etc.

ii. Social Infrastructure

This is crucial to the building of healthy communities and sustainable places. It responds to the basic needs of communities to enhance the quality of life, equity, stability and social well-being.

iii. Tackling the climate emergency

This vision for a low carbon city is critical with the need to look at new and ambitious ways to address the emerging climate crisis.

iv. Transport

Belfast is relatively car dominated, a high amount of its space is currently devoted to roads and parking. This should be rebalanced to allow for a more favourable pedestrian experience. The emerging Bolder Vision will be key to supporting the City's liveability ambitions which is needed to provide a quality city centre environment, responsive to climate change emergency., greener, safer, more sustainable and better connected.

v. Place good design at the heart of a liveable city

Architecture and places play a fundamental role in the creation of liveable, sustainable communities, enhancing health and well-being outcomes. Good design will help deliver aesthetic value by enhancing a setting, functional value by meeting and adapting to the long terms needs of its people, economic value by providing good value for money and social value by contributing to a positive sense of identity and community.

Given the challenges facing our city centre, the need to reimagine and inject new life into the city core is more critical now than ever. A thriving and Inclusive residential population will be integral to a reimagined city centre, brought forward from a place-making perspective, enhancing connectivity between the centre and surrounding communities and providing connected and welcoming spaces. However it is clear that subvention maybe required to underpin and kickstart housing at scale in the city centre. this was highlighted in the Reset for Growth Report (IIGC June 2021), which highlighted the need for significant housing investment funds.

29. What key services should be available for high street residents?

- a. Health ✓
- b. Housing ✓
- c. Education ✓
- d. Leisure ✓
- e. Other (if you pick “Other” please expand on your answer)

To address the needs of high street residents the high street needs to ensure that it provides a level of offer that matches the demands for all its residents. A successful high street will then retain those existing residents as well as attract new and emerging tenures across the city centre. A modern vibrant city centre community is typically mixed use, densely populated and incorporates layers of use that complement each other. **City centre living is indeed a major part of regenerating an area, but not on its own. People are looking at lifestyle choices; not just living, but working, playing, socialising, and learning, not to mentions staying healthy. Council recognised through the Belfast City Centre Regeneration and Investment Strategy that city centre living was not a simple case of “build it and they will come”.**

A compelling, attractive, and secure environment, with shopping, open space and other amenities is essential. The overall strategy to improve the public realm, food and entertainment offerings, connectivity and general vibrancy of the city centre is all important in increasing and sustaining the residential population of the city.

**Commitment to a broad range of housing tenure is encouraged by Council to create balanced local communities through appropriate mix of house types, sizes, and tenures.** Mixed tenure developments that reflect a privately owned, privately let, affordable and social accommodation can help to avoid the creation or the negative perception of an area by increasing the diversity of people living there. Strong neighbourhoods are also encouraged through active street frontages, buildings that provide public services, including education, healthcare and recreational facilities, public pathways and cycleways, and passive spaces such as civic squares and public paths. The modern high street does need traffic free areas with space for seats, displays, street markets and events. People like to be able to get out of their areas and get to places in their towns and cities without having to

drive. Having walkable and bikeable streets that are safe and easy to manoeuvre are important. Combined with creating opportunities for communities to access local employment, shopping, leisure and social facilities ensuring that they can live full independent lives within inclusive, cohesive, and sustainable communities.

Commitment to sustainable transport is important and indeed the City Centre Regeneration and Investment Strategy outlines a bold vision for a green, walkable, cyclable city centre attractive to all ages. The future vision of the city centre should prioritise people and place-making to ensure the delivery of a vibrant and sustainable City. It should be based on the emerging diversification of land uses where we are seeing employment, tourism, leisure, retail, family living and learning becoming the pillars of growth for the city centre. This involves not only shaping our residential development but shaping our tourism offer; developing a city imagining through the cultural transformation strategy, serving the culturally curious, creating events and festivals which serve the city's shared cultural identity, and future proofing our retail sector with experiential offerings. Creating a people centric city means we have our citizens at the centre of our plans; to ensure that they have the best life chances and living experience with access to endless opportunities.

Council have a leading role in helping create well designed places that are prosperous and welcoming and benefit the residents and all who use the high street. Places to gather and recreate are important to staying healthy and connected to others. Healthy cities encourage better urban planning to prioritise increased access to safe transport systems, green and public spaces which together reduce road traffic deaths, improve air quality and promotes physical activity. Where we grow up, live and work impacts how healthy we are. Interaction with other people through leisure and cultural activities are some of the many reasons why people locate and remain residing within the city centre.

### **30. How do we engage communities more effectively?**

The Council is committed to early engagement with local communities and stakeholders and has sought to encourage inclusive discussions on the Belfast Agenda, LDP and key planning policies that will guide future development to deliver the tangible social, economic and environmental benefits for the city.

The Planning Act (Northern Ireland) 2011 (Planning Act), introduced a Statement of Community Involvement (SCI), to be developed by Councils, setting out how they intend to involve the community in carrying out their respective functions. Belfast City Council published its SCI 1 in March 2018, which set out the method and timeframe for engagement on the draft Plan Strategy and POP which states when stakeholders and the community could contribute to preparation of the LDP, its Sustainability Appraisal (SA) and decisions around planning applications. It promotes a more meaningful and effective approach to enable interested parties and the local community to engage early in the plan process and throughout its preparation. Council recognises that encouraging people to live in the city centre will need a place making approach that is people focused and that planning and designing future developments and areas will require effective collaborative engagement between applicants and stakeholders in advance of a full planning submission. Pre-Application Discussions (PAD) provide an opportunity for early consideration and engagement on design considerations and will generally produce better outcomes, as it provides the opportunity to work through issues such as design and access, transport, parking including green travel measures, heritage and conservation issues, and environmental issues.

Council recognises the importance of providing a clear, transparent and accessible planning system so that different user groups have the opportunity to participate and are not disadvantaged by the planning process. Finding and maintaining effective means of communication is unquestionably central to the collaborative process of place making. Through providing the opportunity for active participation from early onset instils ownership and pride in the outcome, which will greatly encourage its ongoing success and contribute to vibrancy, adaptability, and diversity thus creating sustainable and safe places.

Council has also led on various non statutory Masterplans and regeneration plans with community engagement being integral to this process. The Council believes a

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collaborative approach involving community, landowners and other stakeholders is essential to realise the potential of an area.

The preparation of the LDP and the process by which individual planning proposals are now determined are key to furthering sustainable development, implementing the SPPS, and realising the vision and aspirations of local communities.

Council believes comprehensive and inclusive community engagement is fundamental to shaping our city at all levels. This has been at the forefront in the development of all Council plans, strategies, and planning processes to date. Council have demonstrated this through the development of various channels to improve how we listen and engage with our residents and other stakeholders. The Council's consultation and engagement platform, [Your Say Belfast](#) gives people the opportunity to share their thoughts and ideas through comments, surveys, online forums and much more.

The recently published City Centre Living Housing Survey, (September 2021), identified key components and services required for a city centre living population and attributes to the creation of a city centre living vision.

Council feels that we can continue to develop and improve our means of engagement through strategic partnerships we have forged across the city and utilising the structures that are there to support these for example the Community Planning Partnership and associated boards. These partnerships will go some way to enabling the delivery of new and regenerated inclusive, healthy, sustainable, resilient, and liveable city centre neighbourhoods.

31. How will housing developments improve areas of deprivation in high streets, rural villages, town and city centres?

- Encouraging sustainable residential use into and near centres will increase footfall and their ability to increase spend in shops and services located at those which can stimulate a multiplier effect.
- Policies or initiatives to support the use of vacant or underused spaces within centres could support the delivery of residential accommodation and

contribute to a more sustainable mix of uses that increases the utilisation of existing assets.

- Consider initiatives to support vitality, vibrancy and increase options for people through initiatives such as LOTs.
- Key to this will be ensuring effective sustainable and active travel provision from areas of high deprivation into areas of learning of learning and employment, and addressing and overcoming the long standing issues of severance created through historical infrastructure provision.

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## Theme 10: Getting To and From the High Street

**Getting to and within villages, towns and cities is at the heart of urban regeneration and positively impacts local and regional economies. It unlocks development potential and as a result, many places and communities have seen increased regeneration, investment and employment. This could require the consideration of:**

- Ensure that our town centres are well served with public transport provision and supporting infrastructure.
- Promote policies to encourage walking, cycling and the accessibility and quality of environment. This could link to the 15-minute neighbourhood concept.
- Maintain and improve accessibility to, and within, village, town and city centres.
- Parking, including issues such as charging, free or time-limited parking, especially in the levelling-up context.
- Reduce the appeal of commuter and out-of-town parking.
- Incentivise employers to promote the use of public transport.

### Theme 10: Questions and Responses

32. How do you get to your high street? (Tick all that apply)

- a. Walk ✓
- b. Car
- c. Bus ✓
- d. Train ✓
- e. Cycle ✓
- f. Taxi
- g. Other (if you pick "Other" please expand on your answer)

The vision as set out in the Belfast Agenda, the city's Community Plan, outlines the City's ambition to promote the development of sustainable transport, including promoting walking and cycling. The Belfast Agenda set a target for the City to achieve 15% increase in the use of sustainable transport. Council would therefore advocate and promote these modes to get to and from the local high streets and city centre.



In our ambition to attract 66,000 new residents to the city it is critical that connectivity considerations and alternative travel options can align with these growth ambitions. For example, the development of housing close to existing services may mean shorter, more localised journeys, allowing higher levels of cycling and walking or public transport, therefore reducing dependence upon the car and mitigating negative impacts such as traffic congestion and air pollution.

The Belfast City Centre Regeneration & Investment Strategy (BCCRIS) identifies creating a green, walkable, cyclable centre and connecting to the city around as two of its eight key policies, recognising that active travel and connectivity are closely aligned to regeneration and development.

Belfast City Council (BCC), the Department for Infrastructure (DfI) and the Department for Communities (DfC) are developing A Bolder Vision for the future of Belfast City Centre. This will inform actions, interventions and a more joined-up approach across planning, transport and regeneration in developing Belfast City Centre as the attractive, accessible, safe and vibrant space central to the partners shared ambitions for Belfast.

A Bolder Vision for Belfast involves a fundamental rethink of how streets and places are used to make them attractive, inclusive, accessible, healthy, and vibrant places. The first Phase of the Vision was agreed by Council and endorsed by the DfC and DfI Ministers in 2020. It is underpinned by four Visioning Principles that will drive and shape the city centre, which includes; fundamentally changing the centre of Belfast to prioritise integrated walking, cycling and public transport and end the dominance of the car.

These Principles have shaped COVID recovery place-making and active travel interventions in Belfast and have supported modal change. However, this requires a collaborative and holistic approach across a number of stakeholders and partners to deliver strategic connections and improved access between, and into local communities and the city centre. Towards this aim, Belfast City Council and the Department for Infrastructure are working together to deliver a package of sustainable travel interventions that support improved connectivity to the city centre, including

cycle parking (covered and secured), active travel hubs that encourage cycling and walking, and have expanded the Belfast Bike Share scheme to link communities to the city centre.

Council recognises that people take different types of transport, depending on their circumstances and at times, these may be multi-modal journeys. The key is that A Bolder Vision is providing safe, sustainable choices for people.

A Bolder Vision Phase 2 is currently out for public consultation and is the overarching framework for this initial work and within it there are four Key Moves that groups short and long term interventions in critical parts of the city to create a green, people focused, connected city centre for current and future users.

Each of these Key Moves supports connectivity to the city centre and introduces a strategic direction of travel accompanied by short, medium- and longer-term interventions to encourage walking, cycling and wheeling.

It is critical that the correct strategy and policy framework, coupled with investment is put in place to deliver on the objectives of the Bolder Vision and other key place-making documents including the DfI Ministers 'Time for Change'. The public sector needs to be more flexible to change and have the correct frameworks and strategic direction in place to ensure effective decision making.

### **33. What would make your journey to and from your high street easier?**

The Belfast Agenda seeks to develop a city that is vibrant, attractive, connected and environmentally sustainable. We have committed to develop a city that is well planned and with the right infrastructure to succeed; to develop the city's infrastructure and improve connectivity locally, nationally, and internationally; to be a city that will encourage walking, cycling and the use of public transport; where the natural and built beauty of Belfast, linked to its hills, parks, rivers, lough, fine buildings and public space is well protected and can be enjoyed by everyone. Key to making the journey to and from our local high streets and city centre easier is the quality of connectivity in terms of public realm, the interface between junctions, adequate and accessible public transport and the vibrancy of the environs and low

air pollution. Council have worked with IMTAC on a range of strategies and would advocate that they are engaged around accessibility to and from the high street.

The Belfast City Centre Regeneration & Investment Strategy (BCCRIS) identifies creating a green, walkable, cyclable centre and connecting to the city around as two of its eight key policies. It specifically references the lack of green space and tree-lined streets, identifies the need for rebalancing the scales between tarmac and soft landscaping and recognises that there is no provision for children in the city centre. these factors are also critical to making journeys to local high streets and in particular the city centre easier. the need to rebalance perceived severance between the city centre and its bounding communities in terms of harsh infrastructure and car dominated carriageways is key to making journeys to and from the neighbourhoods into city centre and vice versa.

As set out in the response to question 32 A Bolder Vision (ABV) and the aligned short, medium- and longer-term interventions including its key moves will be key to making journeys to and from the city centre easier. The four underpinning principles of A Bolder Vision support making journeys to and from the city centre easier:

- Creating a healthy, shared, vibrant and sustainable environment that promotes well-being for all, inclusive growth and innovation;
- Fundamentally changing the centre of Belfast to prioritise integrated walking, cycling and public transport and end the dominance of the car;
- Providing lively, safe, and green streets linking inclusive shared spaces to promote resilience and enhance our built heritage;
- Removing severance and barriers to movement between the centre of Belfast and the surrounding communities to improve access for all.

The key moves as set out in ABV supports connectivity to the city centre and introduces a strategic direction of travel accompanied by short, medium- and longer-term interventions.

The key moves are:

**1. Create a Civic Spine with a focus on people**

Establish a clearly defined and recognisable strategic north-south Civic Spine, connecting the Ulster University and York street Interchange through the heart of the city to Queen's University via Botanic Avenue. The Civic Spine would be reconfigured to prioritise space for people and support effective access by public transport while enabling the introduction of green spaces for a diverse, inclusive, future-proofed and vibrant city centre.

**2. Reimagine the Inner Ring Road and end Car Dominance**

Transform the Inner Ring Road to reduce physical severance for surrounding communities and become a sustainable mobility corridor. To do this, the Inner Ring should be reconfigured to accommodate high priority public transport services (such as BRT2) as well as fully segregated and green infrastructure for walking, wheeling, and cycling.

**3. Promote City Centre Living**

Encourage city centre living by providing greater quality, choice, and affordability of accommodation, to create a shared and inclusive environment. Establish a city-wide network of people friendly routes, community focus streets, incorporating city parks and connections to opportunities for play, interaction, rest, and leisure.

**4. Embrace the River Lagan and Waterfront**

Capitalise on one of the city's most defining, but underused assets, the River Lagan, by strengthening connections from the city centre to the east and its surrounding communities – enhancing connectivity across and around the River Lagan.

34. What changes to legislation, policies, processes or procedures would encourage walking and cycling?

The implementation of legislation, policies, processes or procedures which encourage and make walking and cycling more attractive should be welcomed. It is key to take these aspects forward in an integrated and holistic approach, providing a broader understanding of what is required to support walking and cycling.

However, it is recognised that the implementation of the three pillar approach as set in the Northern Ireland Changing Gear Strategy will encourage walking and cycling:

- Build – a comprehensive network for the bicycle
- Support – people who choose to travel by bicycle
- Promote – the bicycle as a mode of transport for every day journeys

There is an opportunity to encourage walking and cycling through improved strategic project planning and implementation. For example, a number of interrelated projects have been strategically identified as “Active Travel Enablers” and collectively they could form a compelling programme of small-scale catalytic interventions to support citizens to have the freedom and confidence to travel by bicycle for every day journeys. This could directly contribute to the “Build” pillar of the Northern Ireland Changing Gear Strategy in that it will provide appropriate infrastructure, design, cycle parking and safety. Initiatives such as the following could enhance the Active Travel Network within the city through:

- Expansion of the first phase of cycle stands delivered through the Revitalisation Programme with a further city-wide roll out of covered cycle stands.
- Seeking collaborative opportunities to partner with multi-storey car park operators and other city partners to provide secured cycle parking units within their facilities providing multi-modal change centres and encouraging active travel through secure cycling provision. Cycle theft is a deterrent to cycling and the 2019 Bike Life reported that only 16% of residents reported that the security of public cycle parking was good, with concern in relation to bike storage at the workplace and home.
- In addition further value can be added to the existing Active Travel Network through the introduction and installation of bicycle repair stations.

Making effective changes to policy, legislation, processes and procedures to maximise funding available for Blue and Green Infrastructure projects and the extension of the Belfast Bike Network will encourage walking and cycling.

The implementation of the Belfast Cycling Network and incorporation of effective cycling infrastructure within the planned capital works programme including BRT2, SA3 & 5 and the BRCD will also encourage walking and cycling.

The outworking's of A Bolder Vision, and any required changes to legislation, policy, processes and procedures aligned to the identified and consulted on key moves and any additional interventions will be intrinsic to encouraging walking and cycling.

Funding for the delivery of all such interventions remains key. Importantly agile partnership working with agreed outcomes across all partners including DfI, DfC, Council and others will be critical. It is felt that the Community Planning partnership could provide a good mechanism for bringing forward an agreed action plan to deliver on increased active travel. The City Development Board of Belfast Community Planning Partnership has identified active travel and connectivity as a key priority and partners are being asked to commit to actions to deliver on an action plan.

### 35. What are your views on high street parking?

The Belfast City Centre Regeneration & Investment Strategy (BCCRIS) identified the need for a parking strategy and action plan to ensure appropriate provision and location of parking to support the vitality of the city centre. A Car Park Strategy (CPS) and Action Plan was published by Council in May 2018. Public consultation took place between August and November 2016. The CPS included a comprehensive baseline review of parking, focused largely within the city centre and surrounding neighbourhoods, which identified parking issues, challenges and opportunities, and outlined a number of objectives and actions to support the Strategy's vision; *'Belfast is a city offering sufficient, high quality and appropriately located parking which supports economic development and regeneration within the city by balancing the requirements of residents, businesses, commuters and visitors'*.

The baseline review generally concluded that there is sufficient overall public parking supply within the city centre; a significant proportion of all day commuter parking takes place in the city centre; the quality of car parking facilities and payment technology varies greatly; and better management of parking demand and supply is

needed to provide an integrated parking information system. The report also noted the impact of commuters who park in mainly residential areas, which prevents local residents from parking, adding to the cluttered feel of individual streets, decreasing perceived safety levels and reducing access for emergency service vehicles. In conclusion the CPS 2018 and associated engagement found that the focus should be directed at demand management and effective management of the oversupply of car parking space aligned to active and sustainable transport priorities. However it should be noted that a review of the 2018 CPS is to take place in 2022.

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## Theme 11: Tourism

**Tourism is a major contributor to the economic well-being of our villages, towns and cities. Its development could include:**

- A review of policy and regulations including support for hotels.
- Recognising the importance of sustainable town centres to meet the expectations of the tourist of the future. This will mean being able to provide a critical mass of services for accommodation, hospitality outlets and a thriving night-time economy.
- Develop the unique and visitor attractiveness of our high streets and remodel their marketing to reflect that.

### Theme 11: Questions and Responses

36. How do we engage with communities to promote tourism?

There is a strong symbiotic relationship between the health and success of our City and that of the tourism sector. To attract tourists in what is an increasingly competitive marketplace it is critical that our city is clean, attractive, vibrant and can offer the experiences and services expected by today's tourist. This includes good quality accommodation, great restaurants offering local food and drink, a local and distinct retail offering, vibrant cultural facilities, events and festivals. The flip side of this coin is that tourists can add to that vitality and the money they spend helps sustain those businesses and services that meet the needs of not just the tourist but those of local communities as well.

The Regenerative Impact of Tourism - In the decade prior to the COVID pandemic the growth of our tourism industry had a huge regenerative impact on Belfast which is the gateway to Northern Ireland, and in turn NI's other cities, towns and rural communities. Tourism led regeneration has revitalised redundant industrial areas of our city and region. Public/private investment in the Odyssey Pavilion and Titanic Belfast spearheaded the regeneration of the former shipyard into a new city quarter which has become a centre for tourism, recreation, learning, an innovation hub, home to the creative industries and an attractive place to live.

Tourism and hospitality have also driven the regeneration of the Cathedral Quarter, revitalising its built heritage and has made it a vibrant destination for both the tourist



and the creative industries sector. This was a significant factor in the relocation of Ulster University into the city. Tourism has had a similar impact in Derry-Londonderry becoming an attractive place not just to visit but also to live, study, work and invest.

The work being undertaken under A City Exploring Theme in Belfast's Cultural Strategy: A City Imagining and Council's draft ten year Tourism Plan: Make yourself at Home, currently out for consultation, are effectively focused on engaging with communities to develop and promote tourism. Regenerative tourism is driven by the relationship between people and place and the strategic themes of our Tourism Plan, uplift the importance of community in the context of tourism and in particular the relationship between visitor and the host.

Our Tourism Plan seeks to build on the success of tourism to date acknowledging both the investment of the public sector and the significant contribution of business, local enterprise and communities in taking risks and establishing, in a relatively short period of time, a city offer of culture, heritage and hospitality to be celebrated. The next phase of development is committed to an inclusive approach that recognises the importance of tourism and global connectivity to our economic and social wellbeing, but to do so under the principles of being people-centred, responsible and sustainable. Our plan places community at its heart with respect for the local context, to ensure tourism-derived benefits are shared and inclusive, which is evident in all four of the strategic themes - Grow, Position, Experience and Sustain. We are working with our communities to co-create and package authentic visitor experiences through opportunities for local people to tell their stories.

**37. What changes to legislation, policies, processes or procedures should be made to develop tourism on the high street?**

- The issues that the tourism sector had with the legislation pertaining to alcohol licensing and closing times has recently been amended so this is a positive move.
- Legislation relating to for example café culture and dining on street spaces needs to be examined and revised to become fit for purpose and to deliver for the recovery of our city and provide visitors with the experience that they expect to find in cities when visiting

- An effective Sunday offering to provide vibrancy and footfall within the city centre during times of limited animation
- Coach parking is an issue right now with poor provision and policies in place to accommodate coach parking for those coaches that bring groups of tourists to Belfast for day trips and overnight – in recent times Belfast has been losing out on this valuable tourism sector due to lack of parking and coach operators choosing to go elsewhere.
- Active and sustainable and integrated transport is important including cycling opportunities
- Simplification of certification of accommodation is needed
- The recently approved Belfast City Council Vacant Premises Programme aims to tackle vacancy within the city centre bringing vacant spaces back into use – some of these uses could be directed at tourism and visitor experiences.

**38. Are you aware of an innovative tourism project that could help your high street?**

The tourism-led regeneration projects within the City and Growth Deal programmes are central to the survival of the high street in Belfast. In making Belfast attractive to the tourist it will also help make it a place which is attractive as a place to work, learn and visit, and help retain and attract the talent needed to drive the innovation led economy of the future.

Of equal importance, tourism will also provide employment opportunities for those for whom employment in the knowledge economy is beyond their reach and contribute to a more balanced, inclusive and productive regional economy which contributes to a greater quality of life for all our citizens.

The plans for the new Belfast visitor destination, Belfast Stories will provide the platform for communities to tell their story which in turn provides an authentic visitor experience, and will result in tourism providing spend in communities thereby economic benefits and employment opportunities. It is essential that the investment in this visitor attraction is made available without delay as it will take time for it to be delivered. It will be important that the investment in Belfast Stories is made alongside the smaller City and Growth Deal programmes that are being planned and NOT left until the end.

Infrastructure is needed to support tourism and enables year round tourism rather than just at peak periods, which is essential to ensure that high streets remain viable.

In the meantime whilst the work on the new visitor destination is underway, there are opportunities for temporary use of buildings in Belfast City Centre to pilot and deliver cultural tourism visitor experiences. Investment in these cultural tourism visitor experiences will help to ensure that the reputation of Belfast as a cultural tourism destination will be secured and visitors will still choose Belfast as their city of choice.

Other innovative tourism projects that could help Belfast's high street include – Festival 2022; Urban Forest 2023; Year of Culture 2024; and UNESCO City of Music programme.

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## **Theme 12: Digital High Streets Online shopping has impacted our high streets.**

**Online shopping has impacted our high streets. As well as the opportunities, consideration of the concerns and issues could include:**

- Complementing existing business models to allow additional flexibility and resilience to react and survive during what are still uncertain times. Going online will also open up opportunities to reach new markets and new consumer demand.
- In addition to online innovation and diversification, the high street needs to be offering something different that cannot be delivered or experienced online.
- We need data-driven insights into the social media conversations that matter with ways to understand the audience and how to make better connections to reach them, such as their preferences.
- Promoting local products, services and trades.
- Considering the potential for strategies such as data and IT training

### **Theme 12: Questions and Responses**

39. What aspects of a digital high street are important?

The impact of digital innovation on the high street is not just the trend towards more online retail at the expense of bricks and mortar. The impact has been much broader and more profound and need to be recognised and co-opted. Our experiences of the high street (and city in general) are now almost entirely mediated through a digital experience. Mobile and cloud technologies offer shoppers, residents and visitors discovery and decision-making support, recommendations, way-finding, shared social experiences, leading increasingly to an inter-connected, curated experience. Any action plan needs to recognise this holistic experience and not focus narrowly on online retail opportunities for individual companies for example click and collect, also using technology to “view” products out of hours e.g. enhancing sizing guides; ensuring all stock is posted online; online stock management/control.

- **Good wireless connectivity** is assumed. However, as the sophistication of the mobile offering grows (eg AR or rea-time AI) the need for next generation

advanced wireless will grow – not just for individual consumers, but for companies particularly business to business. Belfast needs to be offering a range of wireless options from comprehensive free WiFi through to 5G small cell.

- **Policy makers and businesses need access to data.** The city and its residents generate large quantities of rich data. But this is usually collected by third party digital companies – and can be difficult and expensive to access and harder to utilise. The city can create opportunities to work with businesses, citizens and policy makers to generate, collect, manage and utilise locally generated data for local data. This needs investment in shared data infrastructure, investment in data science, and data informed decision-making.

#### 40. What digital innovations would help your high street?

As part of its Smart Belfast programme, Belfast City Council is collaborating with innovative companies, university researchers and public bodies to develop a Belfast Smart District commencing in 2022.

Co-terminous with the city centre, one of the aims of this smart district is to foster an environment in which partners are encouraged to exploit digital innovation to address major urban challenges such as the transformation of the high street. Belfast City Council would welcome engagement with the HSTF to co-design digital innovation opportunities.

What is the Smart District offering Belfast city centre?

- A £30m investment in state-of-the-art wireless networks – specifically designed to support innovation by SMEs, MNOs, end-user companies, innovators, researchers.
- A £20 million Innovation for Societal Impact challenge fund – specifically designed to encourage SMEs, researchers, and public bodies to innovate together on urban challenges such as the changing nature of the high street. This fund is planned to open for the first time in 2022/23.
- A £5 million urban data platform designed to provide a safe, trusted environment for the collection, management and utilisation of city-generated

data to allow SMEs, universities, public bodies to innovate on the city's key challenges.

- A curated urban innovation environment – A council-based team who will work to support innovation the city centre – by supporting access to locations, technologies, data, funding, partnership delivery, etc.

What are the kind of digital innovations need to be considered?

- The development of digital twins to support modelling of behaviours, urban mobility, logistics, impact of public policy interventions, etc. Digital twins have the potential to allow businesses and public policy makers to better understand the impact of fine-grain decisions and to model alternatives.
- Support for companies to innovate – creating a real-world environment (such as that on offer through the smart district) for companies to innovate, experiment, take risks, and learn.
- Local shared data – building local data pools about the high street and making them work for Belfast. This needs tech, expertise, and a trusted relationship between consumers, businesses, researchers and public policy makers. (Loyalty cards have explored this in a disconnected fashion – but there is no over-arching strategy for retaining local data with a trusted environment.)
- Related – creating a nuanced shared economic model of the high street that allows for scenario planning, data-informed decision making, A/B testing, trend analysis, etc. (Smart Belfast is currently working on a pilot of such a model with Land and Property Services).
- The role of digital in support last mile logistics, supply, active travel, multi-modal travel. The success of this is dependent on a rich data environment, digital twins, IoT infrastructure, and the expertise to exploit the data. (Smart Belfast is currently developing a pilot with Amazon Web Services on modelling multi-modal travel)
- The role of digital innovation to enhance alternative use of the high street – eg, supporting healthy urban residential living. Supporting city centre advanced manufacturing. (Both of which are being explored by the universities and/or Smart Belfast).

- It is still in an early phase – but the use of immersive technologies (AR, VR) to enhance the high street experience. Opportunities here to work with Smart Belfast and the two local universities.
- Support for new forms of transport – e-bikes, scooters, cargo-bikes, electric delivery vans. Drone delivery.

#### 41. What more needs to be done to improve digital skills?

- Building skills to allow companies to adopt new ways of working that support innovation – eg, user-led co-design, living labs methodologies, agile as an iterative approach to innovative solutions, etc.
- Capacity building to support policy makers and companies to better utilise data to inform decision making. Our experience is that there are numerous data tools available on the market but that the ability of local partners to understand and exploit these tools remains limited. There is little evidence that new data opportunities (eg big data or real-time IoT data) is actually having an impact on plans and strategies.
- Capacity building for the citizen. Data as a tool for policy is only going to grow– however, there are concerns about trust, privacy, security and transparency. Engagement directly with the citizen on the exploitation of data and/or the use of AI technologies in the public realm is needed – or there will be growing distrust in the role of such tech in the city.
- Better awareness and adoption of the latest innovative practice from other places. Many cities are already experimenting with digital innovation in the high street. Opportunity here to link in with the many Smart City programmes across the world.
- There needs to be more specific digital marketing training provided to independent businesses who cannot afford to employ advertising and marketing agencies to provide these services. Although existing training courses are available, they are usually not specific enough and cover more general digital marketing topics.
- More targeted training is needed in areas such as search engine optimisation for their website and products, Google maps (listing your business, managing

reviews and feedback), Facebook and Google paid advertising (how to set up an advert, advertising budgeting, how to optimise adverts etc), proactive engagement with potential customers on social media, using tools to monitor their brand (reputation management), ecommerce (click and collect) etc.

- Businesses need to better understand the customer journey and how people find out about their business and products so they can optimise their marketing activity.

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## Theme 13: Rural Settlements

**Rural development is vital not just for individuals in rural areas but also for economic growth. Rural development will help improve productivity and stability in social and economic development. It enhances the quality of life and financial well-being of individuals, specifically those living in rural areas, but it also has major impacts on those in urban environments. This could require the consideration of:**

- Providing support for rural settlements, including consideration of the social, environmental and economic role of settlements in a new era of connected working.
- Maximising the opportunities of the Department for the Economy-led Project Stratum that will bring high-speed broadband and connectivity to rural settlements.
- Invest in and provide a tailored and seamless approach.
- Village high street development

### Theme 13: Questions and Responses

42. What changes to legislation, process and procedures are needed for village developments?

The planning approach focuses on stimulating economic and residential growth primarily within the city although an appropriate level of protection and growth will be directed towards our small settlements.

43. How could funding for rural settlements be made easier?

The introduction of Rural Needs Act 2016 aimed to demonstrate that sufficient evidence is considered to make effective policies which provide for equitable treatment of both rural and urban areas. As a result, any plan or programme being developed by Council is screened for Rural Proofing to determine whether they have a differential impact on rural areas and, where appropriate, adjustments are made to take account of particular rural circumstances.

In terms of funding rural settlements within Belfast, a small number have developed bids for funding through residents and community based organisations such as residents committees, sports clubs etc. Settlements have benefitted from the Rural

Development Programme and Belfast City Council Local Investment Fund. The Council has also worked with these groups to build capacity and consult on various policies, plans and strategies.

**44. What innovative initiatives would improve village economies?**

Innovative initiatives to address loss of banking presence in rural communities – e.g. cash back schemes. Also in terms of circular flow of the economy, improve village economies with better public transport links be developed in order to enable residents to avail of job opportunities and improve access to the City Centre and in return spend in local vilages.

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## **Theme 14: People, Localism and Well-being**

**Places need to be compelling, to encourage communities to support economies, products and services that promote and improve the health and well-being of residents and the wider community. People need to feel connected, and community networks can support these links. This could include:**

- The High Streets Task Force in England describes this regeneration framework as four Rs: repositioning, reinventing, rebranding and restructuring. These 'four Rs' require a new vision, a changed offer to consumers, better stakeholder communication and changing the governance of our high streets.
- Part of the solution to this challenge lies in fully developing and implementing the concept of 'localism' to repurpose our village, town and city centres as unique hubs at the heart of our community.
- Localism is not just about supporting independent retailers; it is also about empowering people and communities to reshape and repurpose their local villages, towns and city centres and reinvigorate the leadership model.
- Considering the impact of the Living Wage on equality and on people wanting to work on the high street.

### **Theme 14: Questions and Responses**

45. Are you aware of any initiatives that would improve localism in your community?

Local government reforms that came into effect in April 2015 significantly shifted the role of local government towards one of active place-shaping. These arrangements provided councils with greater responsibility for important powers such as spatial and land-use planning, off-street car parks, local economic development and tourism. However, a residual sense exists across local government that the powers which transferred to councils did not go far enough. Effective place making starts within the community, engaging on the ground and bringing forward to delivery.

Community Planning is the most effective mechanism to support the integration of public services for the benefit of local communities. Particularly important though is work in Belfast City Council to develop a smaller "area" based planning and delivery

approach to integrating public services. This recognises that community planning at a local authority level still needs to connect more meaningfully to local places.

“Area” based planning and delivery in Belfast brings together people (communities/public service staff), services and place (physical environment/assets) in a holistic way and a current demonstrator is well underway in the form of the “Holylands Intervention” and the Multi-Agency Support Hub in the Botanic District Electoral Area.

The planned Review of People and Place (DfC) seeks to examine place based deprivation in a similar way to area based planning and that important relationship between NI Executive policy and local Council planning/service delivery needs continued investment

Further devolution of core place-shaping functions will allow for a more responsive approach to communities’ needs, aspirations and true feeling of localism. Councils have a greater understanding of, and engagement with, their local communities enabling the tailoring of services, improved decision-making and the delivery of local outcomes.

However, given the previous experience of the 2015 reform programme, we must emphasise the importance that if there is to be any further devolution of powers to local government this must be supported by greater resource, clarity of purpose and occur in a planned and phased manner to ensure continuity and certainty for all stakeholders.

In summary the main issues relating to the future role of local government that the Council wish to highlight include:

- Central government commitment to work in partnership with local councils, by providing the necessary funding and policy backdrop, from which councils can play a leading role in the sustainable recovery of their local areas;
- enhanced devolution to local government including regeneration, planning, skills investment and planning, and local transport planning;

- greater powers regarding local taxation measures and enhanced local investment powers, to ensure that that councils have the fiscal levers to tackle issues at community and city level; and
- the introduction of legislation/measures that strengthen the relationship between central and local government, including a duty to collaborate to provide for responsive and integrated service delivery at regional, city and community level.

46. What is the most important aspect for creating well-being in the community?

Core to effective community planning and area planning is empowered communities who feel confident in lobbying for and participating in public policy and implementation. It is recognised that capacity in most communities in Belfast is excellent, but that there are parts of the city where capacity needs further investment. Often these areas do not fall into existing government place based programmes (Neighbourhood Renewal, Urban Villages, Building Successful Communities etc). A strategic exercise is needed to ensure capacity is developed in all communities.

The participation of communities in planning and implementation is core to their well-being and the Belfast Voluntary, Community, Social Enterprise Panel (advisors to the Community Planning Partnership) are an excellent example of the role of this sector in shaping effective public sector service delivery. However, that principle of genuine and equal partnership between the public sector and the third sector is core to all public sector service delivery and should be embraced across government.

Currently, the Council works in partnership with each of the 9 government departments and their respective Ministers (who make up the NI Executive) in the delivery of policy and services to the citizens of Belfast. Such co-operation takes place across many policy areas including local planning, waste, environmental health, public safety, building control, community planning, and economic and cultural development.

The Council recognises the need to further strengthen the relationship between central and local government on a clear legislative and policy basis, in order to effectively

deliver for the citizen. This strengthened relationship should be underpinned by a shared commitment to delivering outcomes for our citizens and improve quality of life in a measurable way, such as health and well being. This approach can be tailored to local area interventions.

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- Belfast City Council LDP Draft Plan Strategy 2021
- Belfast City Centre Regeneration and Investment Strategy
- Inner North West Masterplan
- Belfast East Bank Development Strategy
- Linen Quarter Vision and Guidance
- Northern Ireland Changing Gear Strategy
- The Institute of Place Management 25 Factors
- A City Exploring Theme in Belfast's Cultural Strategy: A City Imagining and Council's draft ten year Tourism Plan: Make yourself at Home
- Belfast City Council Tourism Plan
- MAG Living High Street Craft Kit
- Smart Belfast
- Towns Fund
- The Entrepreneur
- The Great British High Street – The Digital High Street Report 2020

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# Future City Centre Programme

## Regeneration & Connectivity

- Creating the physical built environment to create vibrancy; sustain our economic recovery and support an inclusive, accessible and connected city centre.

### Examples:

- Major Regeneration Developments
- City Centre Living
- Connected Spaces & Places
- Lighting & Tactical Regeneration
- Connectivity & Active Travel
- Culture & Built Heritage

## Business & Investment

- To support and sustain existing and new businesses, and attract new businesses.
- **Examples:**
- Business Support Programmes
- City Investment Service

## City Centre Vibrancy

- To encourage vitality, vibrancy and increased footfall; maximising our cultural and tourism offering, building on the ten year cultural strategy, A City Imagining
- **Examples:**
- 2023 Year of Culture projects
- Animation & events, pop up activities.
- Enhanced use of public realm & environmental improvements to encourage footfall and increased dwell time
- Meanwhile use

## Position the City to Compete

- To build on our reputation as a unique destination for investment, tourism and development.
- **Examples:**
- Renewed Ambition – public private partnership
- Vacancy interventions

## Digital Innovation

- Maximising and deploying digital technology and innovation solutions to position the city as a key location for innovation and support indigenous and new businesses to thrive and grow.
- **Examples:**
- Smart District
- 5G and Wireless opportunities

## Clean, Green & Safe (Multi-Agency)

- To enhance the city centre experience through a clean, accessible, safe and pleasant environment.
- **Examples:**
- Providing enhanced city cleansing regimes
- Imaginative use of open & civic spaces particularly to support retail / hospitality sectors
- Support the provision of parklets and greening the city initiatives

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|                    |  |
|--------------------|--|
| Subject:           | Update on Just Eat Belfast Bikes Strategic Review –Screening |
| Date:              | 8 <sup>th</sup> December, 2021                               |
| Reporting Officer: | John Greer, Director of Economic Development                 |
| Contact Officer:   | Eimear Henry, Senior Manager – Culture and Tourism           |

|   |   |
|---|---|
| <b>Restricted Reports</b>                         |   |
| Is this report restricted?                        | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| If Yes, when will the report become unrestricted? |   |
| After Committee Decision                          | <input type="checkbox"/>  |
| After Council Decision                            | <input type="checkbox"/>  |
| Some time in the future                           | <input type="checkbox"/>  |
| Never   | <input type="checkbox"/>  |

|                                       |   |
|---------------------------------------|---|
| <b>Call-in</b>                        |   |
| Is the decision eligible for Call-in? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

|            |   |
|------------|---|
| <b>1.0</b> | <b>Purpose of Report or Summary of main Issues</b>  |
| 1.1        | To update Members on the equality screening of the delivery of Belfast Bikes and make recommendations for a way forward.  |
| <b>2.0</b> | <b>Recommendations</b>  |
| 2.1        | <p>The Committee is asked to:</p> <ul style="list-style-type: none"> <li>- To proceed with the four stations to be funded by the Department for Infrastructure outlined at 3.5, and the 15 stations as outlined in appendix 1.</li> <li>- Agree to the phased Equality Screening and that additional criteria are included the scoring matrix.</li> </ul> |

|            |   |
|------------|---|
| <b>3.0</b> | <b>Main report</b>  |
| 3.1        | <b>Background</b>   |
|            | <p>The Belfast Bikes scheme was launched in 2015 as part Belfast City Council's physical investment programme. The Department for Regional Development provided initial capital funding for the scheme as part of their Active Travel Demonstration Projects budget. The scheme launched with a network of 30 docking stations and 300 bikes. The scheme has been operated by NSL continually since inception using bikes and supporting infrastructure from Nextbike GmbH. The scheme currently operates with 400 bikes and 48 docking stations.</p>   |
| 3.2        | <u>Strategic Review</u>   |
|            | <p>It was agreed to undertake a comprehensive strategic review of the Just Eat Belfast Bikes scheme and make recommendations for the future management, operation and potential expansion of the scheme at CG&amp;R committee in January 2019. Intelligent Transport Services were commissioned in May 2019 to carry out the strategic review of the scheme. Stakeholder engagement and a public survey was carried out in August/September 2019 and an elected member's workshop was held on the 27<sup>th</sup> August 2019.</p> <p>The scope of the review considered the following steps:</p> <ul style="list-style-type: none"> <li>- Assessment of the current network;</li> <li>- Review of scheme objectives;</li> <li>- Review of operations;</li> <li>- Future expansion; and</li> <li>- Financial sustainability.</li> </ul> |
| 3.3        | <b>Future expansion</b>   |
|            | <p>Included in the Strategic Review were recommendations in relation to the future expansion of the scheme. These findings were the result of extensive stakeholder engagement, public survey and engagement with elected members. A summary of findings is included below.</p> <ul style="list-style-type: none"> <li>- There are gaps in the network along arterial routes and local centres in the North, West, South and East of the city. Investment in new stations should be carried out to increase network coverage and ensure social inclusion.</li> <li>- Additional capacity is needed in the northern section of the city centre to service the new Belfast UU campus and the Tribeca development and in the east to service the Sirocco development. This should be funded through developer contributions.</li> </ul>    |

|     |   |
|-----|---|
|     | <ul style="list-style-type: none"> <li>- An assessment of the current network identified a number of existing stations which are under used and should be either relocated or reduced in size and used for expansion of new stations.</li> <li>- Requests have been made from neighbouring councils and expansion into adjoining areas should be considered through partnership funding.</li> </ul>   |
| 3.4 | <p>A summary of future expansion as presented to June Committee including potential relocations and complementary measures are outlined by area and included at Appendix 1. Areas for expansion had been selected by identifying gaps in the network along with feedback from the public survey and elected member/stakeholder consultation. It was acknowledged that further work would be needed to determine exact locations and consider those against the Site Expansion Matrix and it was proposed that this should be discussed and agreed through the Area Working Groups meetings. These proposals were phased over a two-year period to take account of the significant lead time and resource requirement required for an expansion. The costs were based on analogous estimates from our previous expansions of the network. In some instances, site specific conditions can result in savings or additional expense.</p>   |
| 3.5 | <p>Members agreed at the CG&amp;R Special Meeting in November 2020 to allocate £330k of £749k of DfI Blue and Green Infrastructure funding allocation to replenishing the Belfast Bikes fleet. Members also agreed to carry out feasibility work to inform the allocation of £310k of this element of the fund for additional citywide infrastructure to support the cycling network with proposed measures to include covered cycle stands (to be provided within existing programmes of work or within existing Council assets); an electric bike trial; expansion of the Belfast Bike Infrastructure and Active /Sustainable Travel Hubs. At CG&amp;R on 12<sup>th</sup> May 2021 it was agreed that an additional four Belfast bikes docking stations would be deployed using DFI Active Travel funding. This expansion highlighted the following four sites</p> <ul style="list-style-type: none"> <li>- Antrim Road, Waterworks</li> <li>- Lisnasharragh Leisure Centre</li> <li>- Olympia Leisure Centre</li> <li>- Kennedy Shopping Centre</li> </ul> |
| 3.6 | <p>A recommendation was also made within the report relating to a matrix for the selection of new docking stations. The criteria contained within the Site Expansion Matrix are detailed below.</p>   |

- Employment Destinations
- Residential
- Public Transport
- Public Amenities
- Resident Requests
- Existing Usage at nearby stations
- Gaps in Network
- Survey Feedback
- Cycle Infrastructure
- Land that is either owned or managed by Belfast City Council or where express permission to situate a biking dock in already in place.

3.7 During discussion at CG&R in June a number of proposals were made and debated by elected members. These are listed below

- Agree to add both levels of air pollution and access to car/van as per census data 2011/21 when updated to the Expansion Criteria.
- Agree to add additional criteria including Health Inequalities as part of the scoring matrix on expansion.

3.8 **Call-in**

As members will be aware, the decision was subject to call-in and was referred to Counsel for opinion. Subsequently the call-in was found to have merit on both procedural and community impact grounds.

An opinion was received with regard to the inclusion of existing cycle infrastructure within the Site Expansion Matrix which is detailed below.

*‘Given the clear evidence that the current cycle infrastructure is poor in North and West of the City, the inclusion does have the result that decisions taken on that basis will have an adverse impact on those inhabitants of those sections of the district.*

*The next question is whether any adverse effect is disproportionate. In assessing this matter, I note the evidence that the infrastructure in north and west Belfast is particularly poor. Whilst I appreciate that the matrix applies equally to all locations, the practical effect of the decision would be that the areas of north and west Belfast would score lower than*

*other areas because of the poor existing infrastructure. That would have a disproportionate effect as it would result in those inhabitants being less likely to be able to benefit from the expansion of the Scheme.'*

3.9 In summary this directs that the inclusion of the criteria of existing cycling infrastructure must be removed from the site expansion criteria.

3.10 Following the call-in it was agreed at CG&R in September 2021 that an equality screening would take place with initial findings reported back to Committee to allow a decision to be made on future investment in the scheme.

### **Equality Screening**

3.11 A staged equality screening is progressing and builds on the equality screening of the Belfast Bike Scheme carried out in 2013/14. This original equality screening identified the potential to improve equality of opportunity in relation to those with a disability, those with dependants and women. The following mitigations and actions were taken:

- As one of four Active Travel Demonstration Projects of the DfI (previously, DRD) Active Travel Initiative, an important element of the Active Travel Strategy is to encourage local authorities to promote more walking and cycling in the communities they serve and to recognise the need to include people of all abilities.
- The design and the colour of the bikes are subject to the potential sponsor of the scheme. However, the design and colour of the bikes must take into consideration the symbolism of political opinions and have a 'neutral' appearance. This has been actioned through the sponsorship and bike provider specifications. The decision about sponsorship is taken in line with Council's policies regarding specific products.
- Members of IMTAC and Disability Action were consulted in the stakeholder workshops. They attended site visits and influenced the locations for the docking stations.
- During the development and extension phase, consultation took place with representatives from communities and groups directly affected by the scheme i.e. in areas of potential locations of docking stations

|      |   |
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|      | <ul style="list-style-type: none"> <li>- Considerations such as mobility issues and the potential of introducing special bikes such as trikes/e-bikes will continuously influence the development of the scheme.</li> <li>- Within the action plans for the scheme 'try it' events have been hosted including some targeted at underrepresented groups such as people with a disability and women</li> <li>- Tied in with Sustrans events such as Women in Cycling, cycle proficiency training and bike club programmes; also had a number of separate events in schools.</li> <li>- Users have to sign up to the Terms &amp; Conditions of using the Public Bike Share Scheme and Health &amp; Safety Regulations are paramount using the scheme. It is noted that this may result in some limitations in usage, such as in terms of age.</li> </ul> |
| 3.12 | <p>As this is an existing programme we have taken an approach to screen at appropriate stages of delivery based on the information available. The current draft screening takes into account the strategic review of the Belfast Bikes in 2019 and new policy developments, for example, A Bolder Vision for Belfast, Sustrans Policy on Public Bike Hire Schemes (2019) and the Belfast Cycle Network (June 2021). While the objectives of the scheme remain unchanged; it is noted that the primary objective of the Belfast Bike Scheme in 2013 was described as: to achieve a sustainable low cost transport system to service key locations in Belfast City Centre, and the scheme has expanded to include additional areas surrounding and outside the city centre where funding and demand have supported such expansion.</p>                  |
| 3.13 | <p>Work to date on the draft equality screening indicates the potential differential impacts on women, those with disabilities, those with dependents and those who are older. Given the diversity of issues experienced, it also notes the need to further investigate the potential impact on those from different racial groups in Belfast, as well as those with disabilities in order to better understand the potential impacts. This information and health data will be considered to inform future development of the scheme subject to feasibility. Further analysis is also being undertaken into the incorporation of the additional location assessment criteria to ensure clarity of definition and application of assessment.</p>  |
| 3.14 | <p><u>Financial &amp; Resource Implications</u></p>   |



|      |  |
|------|--|
|      | <p>As set out to Committee in June 2021, based on the historic revenue from bike hire and the expected revenue from sponsors it is estimated for the financial year 21/22 that the Belfast Bikes scheme will require a subvention of £244,280 to cover its cost of operation. This subvention was included in Place &amp; Economy departmental estimates for the financial year 21/22.</p> |
| 3.15 | <p>An investment of approximately £525,000 is required to fund the recommended expansion of the network in this phase with further investment required for subsequent phases. This funding has been secured via in year underspend.</p>  |
| 3.16 | <p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p> <p>We have taken an approach to screen at appropriate stages of delivery based on the information available.</p>  |
| 4.0  | <p><b>Appendices – Documents attached</b></p>  |
|      | <p>Appendix 1 – Expansion Proposals</p>  |

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## Appendix 1 Expansion – Timetable & Costs

### North

There are currently four stations servicing the area located at Carlisle Circus, Mater Hospital, Girdwood community hub and Duncairn Centre.

New stations - It is proposed to expand the scheme to locate new stations along the Antrim Road, Shore Road, York Gate shopping Centre and the Duncrue estate. Translink have also been asked to include a new station as part of the York Street station redevelopment.

#### Phasing

- 2022 Yorkgate, Shore Road
- 2023 Antrim Road, Duncrue

#### Costing (North)

| Year | Capital | Revenue | Total   |
|------|---------|---------|---------|
| 2022 | £60,000 | £10,000 | £70,000 |
| 2023 | £60,000 | £10,000 | £70,000 |

Relocation of station - The station at Girdwood Hub has very low usage and high levels of vandalism. It is proposed that the station is relocated to one of the main arterial routes in the area.

Complementary Measures - There are also a number of stations in the area which have relatively low use therefore it is essential to develop safe, convenient and coherent cycling infrastructure as a priority such as Route 8 (identified in the draft Belfast Bicycle Network Plan) along with cycle promotion activities in these areas.

### West

There are currently four stations serving the west located at Servia Street, Twin Spires, Royal Hospital (Broadway entrance) and the Shankill Leisure Centre.

New Stations - It is proposed to expand the scheme to locate new stations along the Falls Road (St Marys College/Culturlann), Andersonstown Road, Springfield Road, Whiterock road and Shankill Road/Woodstock road.

#### Phasing

- 2022 – St. Mary’s College, Shankill Road
- 2023 – Springfield Riad, WhiteRock Road

#### Costing (West)

| Year | Capital | Revenue | Total   |
|------|---------|---------|---------|
| 2022 | £60,000 | £10,000 | £70,000 |
| 2023 | £60,000 | £10,000 | £70,000 |

Relocation - The station located at the Royal Victoria Hospital, Broadway entrance experiences very low usage. It is proposed to relocate this station within the hospital grounds to the entrance at Grosvenor Road. This was originally the preferred location, however it was ruled out as this entrance closes between 10pm to 6am daily and would prevent customers from returning the bikes securely to the docking station during these hours. There is now a close alternative in the area to return the bikes at Twin Spires. The station at Servia Street also experiences very low use and high vandalism. It is proposed to move this station to the main arterial route along the Falls Road.

Complementary Measures - it is essential to develop safe, convenient and coherent cycling infrastructure as a priority such as Route 6 & 7 (identified in the draft Belfast Bicycle Network Plan) along with cycle promotion activities. The Glider route and the temporary cycle route on the Grosvenor have provided some initial improvements.

### **South**

There are currently 5 stations located along main arterial routes at the City Hospital, Lisburn Road, Stranmillis Roundabout, Ormeau Park, mid Ormeau and Rosetta roundabout.

New Stations - Gaps in the network exist and there is a strong demand indicated through the public survey. New stations are proposed for the following roads Lisburn Road, Malone Road, and upper Ormeau Road.

#### Phasing

2022 – Lisburn Road, Malone Road

2023 – Upper Ormeau Road

#### Costing (South)

| Year | Capital | Revenue | Total   |
|------|---------|---------|---------|
| 2022 | £60,000 | £10,000 | £70,000 |
| 2023 | £30,000 | £5,000  | £35,000 |

Complementary Measures – The river provides good cycle infrastructure but linkages to the outer areas are required such as the Gasworks Bridge and Route 4. The draft Belfast Bicycle Network Plan ignores the main arterial routes in the south, however consideration should be given to dedicated cycling infrastructure along the main arterial routes to build on the cycling culture in these areas.

### **East**

There are currently 4 stations located Connswater Shopping centre, CS Lewis Square, Skainos, and Fraser Pass.

New Stations - Gaps in the network exist and there is a strong demand indicated through the public survey. New stations are proposed for the following areas Ravenhill road, Cregagh

road, Ulster Rugby grounds, Castlereagh Road, Hollywood Road, Belmont Road and Upper N'Ards Road.

Phasing

2022 – Castlereagh Road, Upper Newtownards Road

2023 – Creagh Road, Hollywood Road

Costing (East)

| Year | Capital | Revenue | Total   |
|------|---------|---------|---------|
| 2022 | £60,000 | £10,000 | £70,000 |
| 2023 | £60,000 | £10,000 | £70,000 |

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|                           |   |
|---------------------------|---|
| <b>Subject:</b>           | Intermediate Rent Development of Policy and Model: Consultation |
| <b>Date:</b>              | 8 <sup>th</sup> December 2021                                   |
| <b>Reporting Officer:</b> | Kate Bentley, Director of Planning and Building Control         |
| <b>Contact Officer:</b>   | Martyn Smithson, Senior Planning Officer                        |

|  |   |
|--|---|
| <b>Restricted Reports</b>                                |   |
| <b>Is this report restricted?</b>                        | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| <b>If Yes, when will the report become unrestricted?</b> |   |
| After Committee Decision                                 | <input type="checkbox"/>  |
| After Council Decision                                   | <input type="checkbox"/>  |
| Some time in the future                                  | <input type="checkbox"/>  |
| Never  | <input type="checkbox"/>  |

|  |   |
|--|---|
| <b>Call-in</b>                               |   |
| <b>Is the decision eligible for Call-in?</b> | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

|            |   |
|------------|---|
| <b>1.0</b> | <b>Purpose of Report or Summary of Main Issues</b>  |
| 1.1        | The purpose of this report is to consider the Council’s response to the public consultation by the Department for Communities (DfC) in relation to the introduction of an Intermediate Rent model for the housing market. The closing date for this response is 14 January 2022.  |
| 1.2        | In summary, the important potential role for an intermediate rent product would be supported to help meet affordable housing need and that the proposals within this consultation are a significant step in the right direction. However, it is considered that a number of key questions need to be carefully considered before it can be fully determined if the product proposed is truly deliverable in a Northern Ireland context. |

|            |   |
|------------|---|
| <b>2.0</b> | <b>Recommendation</b>   |
| 2.1        | <p>The Committee is asked to:</p> <ul style="list-style-type: none"> <li>• note the Intermediate Rent Development of Policy and Model: Consultation document (Appendix 1); and</li> <li>• consider and if appropriate approve the appended draft response to the consultation for submission to the DfC in advance of 14 January deadline (Appendix 2).</li> </ul>  |
| <b>3.0</b> | <b>Main Report</b>  |
| 3.1        | <p><b><u>Background</u></b></p> <p>The Regional Development Strategy 2035 recognises that the provision of more affordable housing helps to build strong balanced communities. Additionally, the Strategic Planning Policy Statement acknowledges the role of the development plan as the primary vehicle for facilitating identified need by zoning land for housing and indicating where a proportion of site may be required for affordable housing.</p>   |
| 3.2        | <p>The Belfast Local Development Plan (LDP) draft Plan Strategy (dPS) contains an ambitious policy approach to the provision of a minimum of 20% affordable housing as a proportion of all housing schemes of 5 units or more.</p>  |
| 3.3        | <p>The definition of affordable housing has recently been expanded to include the category of intermediate housing for rent alongside social housing and intermediate housing for sale. This represents an important aspect in facilitating the development and delivery of new affordable housing models, such as Intermediate Rent, into the housing market here. It is acknowledged that increasing social housing alone is not the only solution, and that growing the supply of other affordable products can help address housing need in its broadest sense.</p> |
| 3.4        | <p>Northern Ireland presently supports social renting through both the housing association sector and the Housing Executive. It also has a long established shared ownership model, where the primary provider, the Co-Ownership Housing Association, also provides a market rental model which returns rent to the tenant in the form of equity to support access to home ownership – Rent to Own.</p>   |
| 3.5        | <p>There is however no affordable rent provision at present aimed at tenants who cannot or do not wish to access home ownership but would be unlikely to attain sufficient points on the Common Waiting List to have a realistic chance of accessing social housing in an area of choice.</p>   |
| 3.6        | <p><b><u>Intermediate Rent Development of Policy and Model: Consultation</u></b></p>  |



|      |  |
|------|--|
|      | <p>In a statement to the NI Assembly in November 2020, the Communities Minister set out an ambitious housing programme and introduced new housing options including Intermediate Rent. This new product supports the SPPS aim of assisting eligible households into affordable housing and will help meet the affordable housing obligations of Policy HOU5 set out in the draft Belfast Local Development Plan 2035.</p>  |
| 3.7  | <p>The consultation on an Intermediate Rent policy and model was launched by the DfC on 18<sup>th</sup> October and is attached at Appendix 1. Although, the Council are extremely supportive of the delivery of this new product, it is not possible to provide a definitive view on the specific product proposed until there is better understanding on how the model will be delivered in practice.</p>  |
| 3.8  | <p>Therefore, the draft response at Appendix 2 sets out a number of aspects of the proposals that we believe merit further considerations, including:</p> <ul style="list-style-type: none"> <li>• The need for new affordable housing product(s);</li> <li>• The need for a single programme operator;</li> <li>• Funding mechanisms;</li> <li>• Construction and quality standards;</li> <li>• Setting the appropriate rent level; and</li> <li>• Deliverability.</li> </ul> |
| 3.9  | <p>In summary, the important potential role for an intermediate rent product would be supported to help meet affordable housing need and that the proposals as set out within the consultation documentation represent a significant move in the right direction. However, it is considered that a number of key questions need to be carefully considered before it can be fully determined if the product proposed is truly deliverable in a Northern Ireland context.</p>   |
| 3.10 | <p>Officer's from across Council are due to meet with DfC officials on Friday, 10<sup>th</sup> December 2021 to discuss the consultation proposals. Should anything arise from that meeting that would require amendments to the response as proposed at Appendix 2, an updated report will be brought to the CG&amp;R Committee meeting in January for approval, in advance of the response being submitted to DfC by 14<sup>th</sup> January.</p>                            |
| 3.11 | <p><u>Financial and resource implications</u></p> <p>There are no resource implications associated with this report.</p>   |
| 3.12 | <p><u>Equality implications or Good Relations implications/Rural needs assessment</u></p>  |

|     |  |
|-----|--|
|     | The DoC have published an accompanying Section 75 Equality Screening document on their website and a Rural Needs impact assessment has also been produced and is available on request. |
| 4.0 | <b>Appendices - Document attached</b>  |
|     | Appendix 1: Intermediate Rent Development of Policy and Model: Consultation, Department for Communities<br>Appendix 2: Draft Council consultation response                             |



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[www.communities-ni.gov.uk](http://www.communities-ni.gov.uk)

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## Intermediate Rent Development of Policy and Model: Consultation

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| <b>SCOPE OF CONSULTATION</b>       |   |
|------------------------------------|---|
| <b>Topic of this consultation:</b> | This consultation seeks views on policy proposals for the introduction of an Intermediate Rent model for the housing market here.   |
| <b>Scope of this consultation:</b> | We are keen to hear the views of all parties with an interest in the proposals so that relevant views and evidence can be taken into account in deciding the way forward.   |
| <b>Geographical scope:</b>         | These proposals relate across Northern Ireland.   |
| <b>Impact Assessment:</b>          | A summary of evidence to support the proposed changes is included in this consultation document, and we have also published an accompanying Section 75 Equality Screening document. A Rural Needs impact assessment and Data Protection screening have also been produced and are available on request. We are keen to receive feedback and to receive any other relevant evidence that should be considered. |

## BASIC INFORMATION

|  |   |
|--|---|
| <b>To:</b>   | This is a public consultation about plans to introduce new Intermediate Rent housing policy and model into the housing market here, and anyone with an interest in the proposals can respond.   |
| <b>Body/bodies responsible for the consultation:</b> | This consultation is being run by Housing Division in the Department for Communities.   |
| <b>Duration:</b>                                     | The consultation will be open for responses from 18 October 2021 - 14 January 2022  |
| <b>Enquiries:</b>                                    | <p>For any enquiries about the consultation please email the Department at:<br/><b>AffordableRentBranch@communities-ni.gov.uk</b></p> <p>or write to:<br/>Intermediate Rent Consultation<br/>Affordable Rent Branch<br/>Department for Communities<br/>Housing Division,<br/>Level 3, Causeway Exchange,<br/>1-7 Bedford Street,<br/>Belfast<br/>BT2 7EG.</p> |

**How to respond:**

You can respond using the Citizen Space link on the consultation page at **<https://www.communities-ni.gov.uk/consultations>**

If you would prefer not to use Citizen Space, the consultation questions can be accessed in a Microsoft Word document on the consultation website. Responses prepared in this format should be sent to the email or postal address below.

**In responding to this consultation please do not submit any sensitive personal data or information.**

**You are under no obligation to provide personal details in responding to this consultation.**

In line with good practice and sustainable development this document has been published electronically. Responses are accordingly requested, where possible, in electronic format.

You can email your response to the questions in this consultation to:

**[AffordableRentBranch@communities-ni.gov.uk](mailto:AffordableRentBranch@communities-ni.gov.uk)**

Written responses should be sent to:

Intermediate Rent Consultation  
Department for Communities  
Housing Division  
Level 3, Causeway Exchange  
1-7 Bedford Street, Belfast  
BT2 7EG

When you reply it would be very useful if you could confirm whether you are replying as an individual or submitting an official response on behalf of an organisation/group and include:

- Your name
- Your position in the organisation (if applicable)
- The name of your organisation (if applicable)
- An email address

We will only use your information for the purposes of analysis of feedback to this consultation, and to contact you at your request to follow up on matters raised if required. Whether you are responding on behalf of an organisation or as an individual, please indicate if you consent for your identity to be made public, or otherwise.

|                               |   |
|-------------------------------|---|
| <b>Consultation Response:</b> | <p>We will consider the responses received and, following that, publish a consultation report on the Departmental website, which will outline feedback received (including the identity of respondents) and the Department's next steps.</p> <p>If at a future time you wish to withdraw your consent to your identity being published please contact the Department using the email/postal address details provided.</p> |
| <b>Accessibility:</b>         | <p>A range of alternative formats are available upon request from this Department.</p> <p>Please email the Department at:<br/><b>AffordableRentBranch@communities-ni.gov.uk</b></p> <p>or write to:<br/>Intermediate Rent Consultation<br/>Department for Communities<br/>Housing Division,<br/>Level 3, Causeway Exchange,<br/>1-7 Bedford Street,<br/>Belfast<br/>BT2 7EG.</p>  |



| <b>HOW WE CONSULT</b>                        |  |
|--|--|
| <b>Consultation Principles:</b>              | This consultation is being conducted in line with the Fresh Start Agreement – <b>(Appendix F6 - Eight Steps to Good Practice in Public Consultation-Engagement)</b> . These eight steps give clear guidance to departments on conducting consultations.  |
| <b>Feedback on the consultation process:</b> | <p>We value your feedback on how well we consult. If you have any comments about the consultation process (as opposed to comments about the issues which are the subject of the consultation), including if you feel that the consultation does not adhere to the values expressed in the <b>Eight Steps to Good Practice in Public Consultation-Engagement</b> or that the process could be improved, please address them to:</p> <p>Email: <b>AffordableRentBranch@communities-ni.gov.uk</b></p> <p>Or write to:<br/>Intermediate Rent Consultation<br/>Department for Communities<br/>Housing Division,<br/>Level 3, Causeway Exchange,<br/>1-7 Bedford Street,<br/>Belfast<br/>BT2 7EG</p> |

**Freedom of Information:**

The Department intends to publish a summary of responses on its website following analysis of the consultation responses. Any contact details that will identify a respondent as a private individual will be removed prior to publication.

All information will be handled in accordance with the UK General Data Protection Regulations (UKGDPR). Respondents should be aware that the Department's obligations under the Freedom of Information Act 2000 may require that any responses, not subject to specific exemptions under the Act, be disclosed to other parties on request.

For further information about Freedom of Information and UKGDPR please contact the Information Commissioner's Office at <https://ico.org.uk/>

After the consultation a summary of the responses to this consultation will be published and placed on the Government website at <https://www.communities-ni.gov.uk/consultations>

The summary will include a list of names and organisations that responded but not personal names, addresses or other contact details. However, information provided in response to this consultation document, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes e.g. Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018.

When you are responding if you want information, including personal data that you provide, to be treated as confidential please say so clearly in writing and explain why you need these details to be kept confidential.

If we receive a request for disclosure under the FOIA, we will take full account of your explanation, but due to the law we cannot provide an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as a confidentiality request.

DfC is the data controller in respect of any personal data that you provide, and DfC's privacy notice, which gives details of your rights in respect of the handling of your personal data, can be found at: <https://www.communities-ni.gov.uk/dfc-privacy-notice>

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## 1. Introduction

- 1.1 The Department for Communities has begun to develop new policy around the introduction of an Intermediate Rent model for the housing market here. This paper has been produced to set out proposals around the shape of the model, including detail on funding, delivery and tenant eligibility, and to seek the views of interested parties. The feedback obtained as part of this consultation, alongside focused engagement with potential end users, will assist the Department in taking the final decisions on the shape and rollout of the Intermediate Rent model.
- 1.2 Intermediate Rent is a private rental product, situated in terms of tenancy duration and rent cost between social and market private rentals. It is variously referred to as 'affordable rent', 'Mid-Market rent', and 'cost rental' in other neighbouring jurisdictions, and seeks to provide high quality, well managed, affordable homes for rent for tenants who cannot or do not wish to access home ownership and would be unlikely to attain sufficient points to have a realistic chance of accessing social housing in an area of choice. Models of this kind have been operational across the UK and Ireland for some time, but have yet to be provided in any formal way in the housing market here.
- 1.3 Following a period of research, evidence gathering, and informal engagement, the Department has now developed an outline framework of proposals for the introduction of an Intermediate Rent model. The purpose of this consultation document is to set out these proposals and to seek your views on the proposed Intermediate Rent model framework. The Department intends to supplement this document with structured engagement with potential tenants and delivery partners to seek their specific views on the benefits or barriers for them with the proposed model.
- 1.4 Accompanying this document are questions aimed at helping the Department gather key information. Your views in response to the paper and to the questions posed, alongside any additional material you supply, will help inform the final decisions to be taken by the Department, and we would seek your agreement to engage directly with you to further discuss your comments, as necessary.

## 2. Executive Summary

- 2.1 At present, those wishing to access housing here are limited to the established models: social rented, private rented, and home ownership (either through a shared ownership product or directly from the market). The local housing market supports social renting through both the housing association sector and the Northern Ireland Housing Executive (the Housing Executive). It also has a long-established shared ownership model (where the major provider, the NI Co-Ownership Housing Association, also provides a market rental model: Rent to Own). There is, however, no formal provision aimed at tenants who cannot or do not wish to access home ownership and who would be unlikely to have a realistic chance of accessing social housing in an area of choice, but who can afford to pay higher than social rents.
- 2.2 In a statement to the NI Assembly in November 2020, the Communities Minister set out an ambitious housing programme, including the development of a Housing Supply Strategy and the introduction of new housing options to ensure every household has access to a good quality, affordable and sustainable home that is appropriate for its needs. Chapter 3 sets out the Executive's commitment to increase housing supply and housing options to meet the needs of people and families. Intermediate Rent

is one such option under development. This document sets out the issues and evidence explored by the Department to date, and aims to gain the views of a wide range of interested parties to help finalise the Intermediate Rent model in terms of the housing offering and the delivery and funding mechanisms.

### What is Intermediate Rent?

- 2.3 Intermediate Rent, a product available under various titles within other neighbouring jurisdictions, seeks to offer an additional housing option aimed at lower income households who will struggle to attain a home which is affordable and suited to their needs. Intermediate Rent sits between social and private (market) rents in terms of cost, quality, security of tenancy, and support services. It allows eligible households the breathing space to more comfortably meet housing costs while providing a good quality home, at a more affordable price (when compared to some market rents) and offers tenancies for longer than the sectoral "norm" of 12 months. An Intermediate Rent model will also connect tenants with a network of support services to help them maintain their tenancy effectively. Arrangements in other jurisdictions are explored in more detail in Chapter 4 of this paper.
- 2.4 The Department has conducted and commissioned research and analysis which has concluded that there is a need

and potential demand for a product of this kind in the housing market here. Examining the levels of market and housing association rents, indications are that setting and maintaining rents at up to 80% of market prices would be a suitable starting point in Intermediate Rent setting, to make an evident benefit to households' housing costs. Analysis indicates that over 50,000 households are paying in excess of 25% of their income on housing costs, and could experience real benefits from access to an Intermediate Rent home.

- 2.5 Offering a standard Intermediate Rent tenancy of up to five years can allow people and families to feel a part of local communities, allow them to plan for future education and employment needs, and relieve the worry of having to frequently seek new accommodation. Chapter 5 of this paper explores the detailed proposals under consideration which relate to Intermediate Rent from the perspective of those who may choose to live there.

### **Delivering Intermediate Rent Homes**

- 2.6 Introducing this new housing model here represents something of a departure from established practice, but builds on a wealth of experience in constructing, acquiring, renovating, and managing homes across tenures. Research indicates that a scheme could best be operated by a single entity, established

for and focused on that purpose. Delivering a supply of Intermediate Rent homes into the housing market will be a new endeavour, and will need to be provided by an organisation with relevant experience in housing supply and management. The Department intends to procure a suitably experienced partner organisation which will act as the dedicated Intermediate Rent programme operator.

- 2.7 It is critical to the achievement of a successful Intermediate Rent programme that the programme is based on a robust and viable funding model. In parallel it is important that, in developing a new housing option, this does not detrimentally impact the funding of new social homes. Detailed analysis conducted by a number of independent researchers has confirmed that a funding model based on a mix of long-term low-interest Government loan coupled with private finance can produce a supply of homes which, at scale, can be an attractive proposition to deliver and can produce a modest return. Chapter 6 explores the proposals around how an Intermediate Rent programme can be delivered, introducing a new affordable supply of homes for rent.

## **Monitoring, Evaluation and Impacts**

2.8 Chapters 7 to 9 examine the monitoring and evaluation arrangements which will be put in place, and looks at the ways in which the Department will work with stakeholders in producing a final model for implementation. To support this proposal document some supplementary papers have been produced, namely:

- Equality Screening
- Rural Proofing
- Data Protection Screening

These documents are available for your review, and your comments on equality, rural need, and data protection impacts are also welcome.

## **How to Respond to these Proposals**

2.9 The Department wishes to hear from a broad base of viewpoints regarding the proposals contained in this document, and any evidence or information which you believe could be helpful in developing the policy, model and implementation of an Intermediate Rent programme. The opening sections of this document describe the ways in which you can respond, and you are encouraged to use the online questionnaire to submit your views.



### 3. Increasing the Supply of Affordable Homes

#### Executive Priorities

- 3.1 Providing publicly funded homes contributes not just to the bricks and mortar, but puts the needs of those people and families who live there at its core, providing options which are appropriate to their needs at various times in their lives. Feeling a sense of “home” in a dwelling that is secure, good quality, affordable, and meets your needs can set people up towards better physical and mental health, improved quality of life, and better educational attainment and employment prospects.
- 3.2 At present, those wishing to access housing here are constrained in their choices to the established models: social rent, private rent, and home ownership (either through a shared ownership product or directly from the market). The local housing market supports social renting through both the housing association sector and the Housing Executive. In terms of accessible low cost home ownership, the established shared ownership model is also available. There is, however, no formal provision aimed at tenants who cannot or do not wish to access home ownership and who would be unlikely to have a realistic chance of

accessing social housing in an area of choice, but who can afford to pay higher than social rents.

- 3.3 The Executive has been clear in its intention to increase housing supply, and the draft Programme for Government (PfG) Outcomes Framework 2016-22 includes explicit outcomes and indicators aimed at growing housing supply to meet demand, and reducing housing stress.<sup>1</sup> The contribution to achieving the PfG outcomes is explicitly referenced in relation to indicator 8 – **‘the number of households in housing stress’** and indicator 48 – **‘gap between the number of houses we need and the number of houses we have’**. Among the delivery plan actions is the development of new affordable housing products. The recent Executive consultation<sup>2</sup> on a PfG Outcomes Framework supports extending the original housing commitments, explicitly prioritising investment in new social and affordable homes. The 2020 “New Decade New Approach” agreement further cements the Executive’s commitment to **“ensuring every household has access to a good quality, affordable and sustainable home that is appropriate for its needs”**. Supporting a diverse range of people to access the right type of housing for them can also contribute to the creation and maintenance of

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1 Households in housing stress are those whose application has 30 or more points under the Housing Selection Scheme.

2 <https://www.northernireland.gov.uk/programme-government-pfg-2021#toc-2>

diverse communities because it can enable lower income households to live in communities where they have strong family or employment ties but could otherwise be excluded from the market without intervention.

3.4 The Communities Minister signaled, in a statement to the Assembly in November 2020<sup>3</sup>, that work is underway around a range of strategic and policy activities aimed at addressing some of the biggest challenges facing the housing system. The expansion of the Social Housing Development Programme is a key element, however, it is recognised that other mechanisms are needed to provide the housing choices that our modern society needs and expects. Accordingly, a commitment was made to expand the rental options available by the introduction of an Intermediate Rent model here, maximising the potential of novel funding streams, such as Financial Transactions Capital (FTC) loan funding, to deliver on additional housing options of this kind. Ensuring that a new model is not reliant on grant aid reinforces the Executive and Department's commitment to support and expand the development of more social homes.

3.5 The development of a Housing Supply Strategy has begun, drawing together the strands which should be addressed to increase the supply of homes across all tenures, and to increase access to more suitable types of homes to meet households' needs. The development of new products, such as Intermediate Rent, is an integral element of this developing Housing Supply Strategy.

### **Definition of Affordable Housing**

3.6 For planning purposes the definition of "affordable housing" had previously been limited to social rented and intermediate housing (comprising shared ownership housing provided through a Registered Housing Association). In revising the definition of affordable housing, the Department sought to put in place the policy levers with which to expand affordable housing options. Following a period of consultation<sup>4</sup>, a revised definition has been established is as follows:

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3 <https://www.communities-ni.gov.uk/news/housing-statement-communities-minister-caral-ni-chuilin-3-november-2020>

4 <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-consultation-paper-affordable-housing-summary-of-responses.pdf> DfC Consultation on the definition of Affordable Housing and DfC response

**“Affordable housing is:**

- a) Social rented housing**
- b) Intermediate housing for sale**
- c) Intermediate housing for rent that is provided outside of the general market, for those whose needs are not met by the market.**

**Affordable housing which is funded by Government must remain affordable or alternatively there must be provision for the public subsidy to be repaid or recycled in the provision of new affordable housing.”**

3.7 Broadening the definition of affordable housing to include the category of Intermediate Rent represents an important aspect in facilitating the development and delivery of new affordable rental models such as Intermediate Rent into the housing market here.

### **Targeting Resources**

3.8 In the current funding environment, with pressures on both revenue and capital funding, it is imperative that Government carefully considers how resources can be targeted to greatest effect. In seeking to develop and deliver a new affordable Intermediate Rent model the Department has undertaken several pieces of bespoke

research, examining arrangements elsewhere in the UK and Ireland, and looking in depth at the housing market here, and the needs of those seeking to access affordable rented homes here. While it is clear from research that, for some people and families, social rental or home ownership are the optimal housing options, for others the supply of a good quality, secure, and affordable private rental home is an attractive option.

3.9 The Minister for Communities has been clear and consistent that the development of social rented homes is a key priority, and there is an aspiration to increase output and associated grant funding to increase social housing supply. It is acknowledged that increasing social housing alone is not the only solution, and that growing the supply of other affordable products can help address issues around the numbers of households experiencing housing stress. Reflecting the importance of not competing for the funding available for social housing development, alternative novel funding models have been considered. The most promising funding solution lies in the use of Financial Transactions Capital, and independent research undertaken on behalf of the Department corroborates the effectiveness of loan funding of this kind in delivering Intermediate Rent housing at scale.

3.10 Financial Transactions Capital (FTC) is a form of capital financing that was introduced by the UK Government in 2012/13 to encourage private investment in the delivery of public objectives and stimulate the economy. It is administered locally by the Department of Finance (DoF) and its key feature is that it can only be deployed by the public sector as a loan to, or equity investment in, private sector “non-government” entities. Therefore, it must be repaid to DoF under the conditions of a loan / equity agreement. The NI Executive is granted an annual allowance of FTC by HM Treasury which is in addition to the NI Block Grant. Therefore, whilst it is provided over and above the Capital DEL budget available to sponsoring Departments, it has its own ring-fenced budget and so any loan will be subject to the application process managed by DoF and will depend on other priorities and commitments for FTC in NI.

3.11 FTC can only be provided to those capital projects that will deliver the policy objectives of the sponsoring NI Executive Department and which are suitable for delivery by the private sector. The provision of the loan or equity investment must comply with the new rules as set out in the new EU-UK Trade and Cooperation Agreement. Initial indications are that the outline proposals contained in this document are likely to comply with the revised rules contained in the UK-EU Trade and Cooperation Agreement principles (often referred to as the TCA). Use of FTC may also require compliance with EU rules on State Aid that could, for example, involve the application of a market interest rate to any loans made under a programme. Departmental officials will continue to be mindful of the new arrangements which have emerged from the Trade and Cooperation Agreement in developing the final arrangements, and will complete the necessary assessments to ensure compliance.

## 4. Why Develop and Deliver an Intermediate Rent Model?

### Intermediate Rent in other jurisdictions

4.1 For over a decade the housing markets in other parts of these islands have offered some form of affordable intermediate rental product, sitting between social and private rental products in terms of cost, security, quality, and affordability. Intermediate Rent products are aimed at households who either cannot afford home ownership, or who wish to live in the rented sector and who would struggle to afford market rents but may be able to pay above social housing rents. A brief table (Appendix A) sets out some of the detail of the approach to delivering affordable/intermediate rented dwellings adopted elsewhere.

### Scotland

4.2 This section focuses on Mid-Market Rent (MMR), the product which has greatest commonality with Intermediate Rent. MMR is a type of affordable rented housing, introduced in the mid-2000s, which aims to provide quality affordable homes for low to moderate income households. It aims to help households

on modest incomes, who have difficulty accessing social rented housing, buying their own home, or renting privately. MMR property rents are pitched at a level between social and private rents (usually around 80% of private market rent or capped at Local Housing Allowance (LHA) level in some cases), targeted towards lower income singles/couples/small families whose income usually sits at bands between £15k and £40k. Rent levels are set within the overall parameters established by the Scottish Government. Typical MMR tenants in Scotland are single people or couples.

4.3 The Scottish Government has made available grant<sup>5</sup> and loan<sup>6</sup> based funding to assist in developing more than 7,000 Mid-Market Rent (MMR) homes across Scotland since the mid-2000s<sup>7</sup>. One MMR provider, Places for People, has successfully secured Scottish Government loan funding of £47.5m, for which it will deliver 1,000 affordable mid-market rent homes. Tenants can both be on the social housing waiting list and apply for an MMR home, and can choose to remain on the social housing waiting list if they successfully apply for a MMR home. For loan funded MMR the target tenant group are those who would be in financial hardship if they were to rent in the private

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5 <https://www.gov.scot/publications/affordable-housing-supply-programme-process-and-procedures-mhdgn-2019-03/>

6 <https://www.gov.scot/policies/more-homes/innovative-financing/>

7 Scottish Government Housing to 2040 Strategy <https://www.gov.scot/publications/housing-2040-2/pages/3/>

sector and are defined through the use of a 25% affordability test and upper / lower income bands.

That is:

- if they were to spend more than 25% of their gross household income on the annual median private rent for the same property in the relevant Broad Market Rental Area and
- that their annual gross household income doesn't exceed the most recent 7th decile of household income for that relevant LA area

4.4 Another example of a successful loan-financed MMR programme is LAR Housing Trust<sup>8</sup> which was set up in 2016/17 as a charity from an initial concept devised by the Scottish Futures Trust (an arm's length body of the Scottish Government). LAR Housing Trust began with an initial target of 1,000 homes to be delivered using partial Government loan funding with the aim of attracting additional private finance. LAR has obtained a £55m FTC loan (over a term of 25 years repayable at 0.1% interest) from Government which has been used to attract £65m private finance. The latest annual review from LAR indicates that it has so far developed over 530 properties with 350 homes under construction or in planning.

4.5 LAR MMR homes are available to help people who are in work (or retired) on low to moderate incomes and who are spending a disproportionate amount of their monthly income on rent. This allows people who do not have a realistic chance of accessing social housing, or are unable to afford the rents charged in the private sector, to live affordably in an area of their choosing, offering security, stability, and a chance to plan for the future. Research has found that most people accessing MMR properties:

- Are young single adults between the age of 20 to 35 with modest earnings
- Have moved from the private rented sector to find more affordable accommodation, better quality or size of flat
- Are on the waiting list for social renting
- Are social housing tenants looking for a different size accommodation or a different location<sup>9</sup>

4.6 This list has much in common with those on the NI Common Waiting List with low points who are unlikely to be allocated a social rented home within a reasonable timeframe. MMR homes have not only provided much need housing supply, but have provided a real choice for people, like Sheena, who unexpectedly found herself in need of a new housing solution:

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8 <https://larhousingtrust.co.uk/>

9 <https://www.gov.scot/publications/rent-affordability-affordable-housing-sector-literature-review/pages/6/>

## SHEENA'S STORY<sup>10</sup>

**For all that the housing sector is about bricks and mortar, the story behind LAR is a human one and 70-year old Sheena epitomises that more than most.**

In fact, her situation was one of the key reasons and driving forces behind the formation of LAR in the first place. The organisation was set up to fill a gap in the mid-market rental sector offering long-term security and stability to those who fall between the twin hurdles of not being able to access social housing and not being able to afford rents in the private sector.

Sheena was a former psychiatric nurse at Edinburgh Royal Infirmary. After the tragic deaths of her son and husband within a short time period she was living alone in Edinburgh without family support. Her family wanted her to move back to Aberdeen but she would have too few points to qualify for a social home there and the cost of renting in the private rented sector was out of reach.

After searching for months for a home in Aberdeen without success, Sheena was finally offered a property in the city through the National Housing Trust Initiative, providing a five year tenancy.

Worried about the prospect of again losing a home and having to move again, it was a relief for Sheena when LAR stepped in purchasing the NHT properties in her area, and offering a mid-market rent tenancy without time limits.

Sheena says, "It sounds a bit dramatic, but first NHT and now LAR were my saving and I've been given a new lease of life. I can now look to the future and plan without a cloud of uncertainty hanging over me".

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<sup>10</sup> Sheena's name has been changed for privacy reasons. Other MMR tenant stories are available to view in the Annual Review papers on LAR Housing Trust's website <https://larhousingtrust.co.uk/page/publications>



## England

4.7 In England, Registered Social Providers have been funded, under the auspices of the Affordable Rent Programme, to deliver a supply of homes for rent within specified eligibility criteria. Some bespoke models for specific markets, such as London Living Rent, have been developed in an attempt to meet the specific supply needs in highest value/demand locations. Homes for Affordable Rent are offered, normally, at up to 80% of market rent value, with lower rates set in areas of highest rent/demand. Some affordable rent models in England cap rent affordability at a maximum of 40% of the prospective tenant's overall income. Most tenancies are offered under the Assured Shorthold Tenancy arrangements for a term of five years, with the option to renew. In some cases the affordable rent provider will re-assess tenants' eligibility and offer move-on services where tenants no longer meet eligibility rules.

## Wales

4.8 The Rent First model in Wales provides an Intermediate Rent solution designed for people unable to access home ownership but who can afford more than a social rent, at least in the short term. Rent First was established as a new capital grant funded housing (maximum of 25% grant) product by the Welsh Government in

2011. Rent First is targeted at households with annual incomes of between £16,000 and £30,000 and allows for the future purchase of their rented home by the occupier. It can also be provided as an Intermediate Rent product without the purchase option.

- 4.9 Rent First providers include Registered Social Landlords, Local Housing Authorities (including local authority owned companies) and private sector providers. The Welsh Government sees Intermediate Rent being targeted at a range of people in housing need who:
- Are on the waiting list/would be eligible to be on the waiting list for local authority or housing association social rented housing
  - Are on local authority or housing association waiting lists for Low Cost Home Ownership or Homebuy properties
  - Are re-entering the property market and in the same financial position as first-time buyers (such as former owner occupiers who are going through relationship breakdown)
  - Cannot currently meet their housing needs in the market in their local area
  - They are service or ex-service personnel and their partners (provided they meet the other eligibility criteria)



## Ireland

4.10 The Cost Rental model is the primary intermediate/affordable rent product available in the Irish housing market, however, Cost Rental varies somewhat in its design and delivery from the models in England, Scotland, and Wales. Cost Rental is intended to be a not-for-profit housing tenure offering affordable, high-quality rental accommodation, provided by the State or local authorities, is independent of the private rental market, but operates as a Private Rented Sector (PRS) tenancy in line with the Residential Tenancies Act 2004<sup>11</sup>. The key objective of Cost Rental is to make renting more affordable for moderate-income households. It intends to complement, not replace, social housing provision. Rents in a cost rental situation are expected to be generally lower than market rents.

4.11 It is anticipated that Approved Housing Bodies would be the main providers of Cost Rental Properties. The legislature has passed the Affordable Housing Act 2021<sup>12</sup> which allows for the extension of the Cost Rental programme beyond the current Government funded pilots which are underway. Typically there is some form of subsidy such as a provision of low cost finance, loan guarantees, or preferential access to land. Cost Rental aspires to ensure rents are made more affordable by:

- Provision of low-cost publicly owned sites
- Design with long-term maintenance in mind
- State contribution to development costs (Serviced Sites Fund)
- Availability of low-cost, stable finance that is paid back over a long-period of time

## The NI Housing Market

4.12 The NI housing market has traditionally comprised social rent, private rent, and home ownership, with little to no deviation from these established housing options. Each model is quite clearly defined with social rented housing provided by the Housing Executive and housing associations, and private rented homes delivered mostly through people or organisations operating as landlords. Both of these rental models are subject to their own unique regulatory arrangements, with social rent development part-funded by Government grant. The only established “intermediate” housing option comes in the form of the shared ownership model (delivered predominantly but not exclusively through the Co-Ownership model), funded through Government loan and matched by private finance.

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11 <http://www.irishstatutebook.ie/eli/2004/act/27/enacted/en/html>

12 <http://www.irishstatutebook.ie/eli/2021/act/25/enacted/en/html?q=affordable+housing+act&years=2021>

4.13 Unlike other parts of the UK and Ireland, there is no ‘intermediate for rent’ provision aimed at tenants. Fluctuations in the housing market over the past two decades, combined with the “right to buy” for social renters, has eroded the social rented sector in spite of significant grant subsidy, while the private rented

market has continued to grow year on year becoming effectively the second largest tenure after ownership. The table below provides a snapshot of the recent evolution in housing stock here, demonstrating the growth in the private rented sector from just over 60,000 homes in 2004, to just below 136,000 in 2016. The private rented sector, in growing its market share, is now estimated to be on a par with, or even exceed social homes.

| TABLE 1: Northern Ireland Housing Stock Profile between 2004 and 2016 |                |              |                |              |                |              |                |              |                |              |
|---|----------------|--------------|----------------|--------------|----------------|--------------|----------------|--------------|----------------|--------------|
|   | 2004           |              | 2006           |              | 2009           |              | 2011           |              | 2016           |              |
|   | No.            | %            | No.            | %            | No.            | %            | No.            | %            | No.            | %            |
| Owner Occupied  | 462,180        | 68           | 468,900        | 66.5         | 461,800        | 62.4         | 469,100        | 61.7         | 494,660        | 63.4         |
| Private Rented and Others   | 62,510         | 9.2          | 80,900         | 11.5         | 124,600        | 16.8         | 125,500        | 16.5         | 135,980        | 17.4         |
| Housing Executive   | 99,580         | 14.6         | 93,400         | 13.3         | 85,650         | 11.6         | 85,900         | 11.3         | 85,340         | 10.9         |
| Housing Association   | 19,450         | 2.9          | 21,500         | 3.1          | 24,550         | 3.3          | 24,800         | 3.3          | 35,550         | 4.6          |
| Vacant  | 36,280         | 5.3          | 40,300         | 5.7          | 43,400         | 5.9          | 54,700         | 7.2          | 28,470         | 3.7          |
| <b>Total</b>  | <b>680,000</b> | <b>100.0</b> | <b>705,000</b> | <b>100.0</b> | <b>740,000</b> | <b>100.0</b> | <b>760,000</b> | <b>100.0</b> | <b>780,000</b> | <b>100.0</b> |

Source: NIHE, House Condition Surveys between 2004 and 2016

4.14 Those households who wish to secure a social home must make an application to the Housing Executive and may be awarded points based on their circumstances and placed on the Common Waiting List while awaiting an allocation. A growing number of applicants await allocation of a social home<sup>13</sup> with some 42,665 on the Common Waiting List (at Dec 2020). Of these, some 29,918 households are deemed to be in housing stress.<sup>14</sup> Some 12,747 households on the Common Waiting List are in receipt of the lowest number of points (fewer than 30 points) and may struggle to attain affordable, good quality, well managed private rented accommodation. While developing more social rented homes will help address some housing supply and housing stress issues, social housing will not be the preferred or best option for every household. The introduction of new products, including Intermediate Rent, can help address some of the issues experienced by those awaiting the allocation of a social home, looking for a sound rental option outside the public housing realm, or those who are intent in future on seeking to enter home ownership but are not yet purchase-ready.

## Issues in the NI Housing Market the Need for Intermediate Rent

4.15 The Department has produced and commissioned several pieces of research and analysis (including DfC desk research on arrangements elsewhere, initial need, demand and viability research conducted by CBRE<sup>15</sup> and most recently a detailed examination by the UK Collaborative Centre for Housing Evidence (CaCHE) around the need for a product of this kind in the NI housing market, the potential demand, and the mechanisms required to make a product viable to develop, deliver and live in. It is recommended that you read this paper in conjunction with the CaCHE report, **“Establishing an evidence base for the development of a viable intermediate rent model for the Northern Ireland housing market”**. The report is published on the DfC website alongside this consultation.

4.16 This combination of evidence sources points to a need and potential demand for an Intermediate Rent model arising naturally as a consequence of local housing market conditions including a large private rented sector, concerns about rental affordability in relation to income (which can be more pronounced among specific segments of society

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13 According to figures supplied by the Housing Executive at December 2020

14 Meaning that they have applied for social housing and have been awarded 30 or more points on the Housing Selection Scheme

15 CBRE (2020) “Affordable Housing Market – establishing the need for Affordable rent providers for the Northern Ireland housing market”, May 2020. Copies available on request.

who are on low to moderate incomes in specific high-cost locations), as well as a recognition that many such people do not have sufficient points on the Common Waiting List to have a realistic chance of accessing social housing in an area of choice.

4.17 Over recent years (particularly prior to the Covid-19 pandemic) new housebuilding has been increasing, with house prices rising and sales growing steadily. Despite this, homeownership remains beyond reach for many, with amassing a deposit being the most significant barrier. Social housing development has continued, but has not matched the growth of private development, meanwhile applicants for homes in the social sector continue to grow. Homelessness levels in NI remain high, with the numbers of Full Duty Applicant<sup>16</sup> households continuing to rise steadily.

4.18 The private rented sector has experienced rapid growth over the past decade, and continues to make a significant contribution as a realistic housing option for many.

The growth of the private rented sector, in combination with limited available alternatives, has led to a significant number of lower-income families living in the sector. It is estimated that 38% of those living in the private rented sector are in poverty, with over half of private renters relying on Housing Benefit to meet their rent.<sup>17</sup>

### **The Shape of an Intermediate Rent Model in NI**

4.19 The Department has explored models elsewhere, and has examined the output of the series of commissioned analytical reports to provide an evidence basis to tailor an appropriate Intermediate Rent model for our housing market. Among the key considerations in developing an appropriate model are estimating the scale of need (those households who are expending an unaffordable amount of their income on housing costs), identifying the locations where market rents and demand are highest (where a product of this kind will have greatest impact), and identifying the appropriate rent levels to allow a viable product to roll out. The following sections examine the Department's findings around these three key elements.

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16 Full Duty Applicant relates to any households which meets the four statutory homelessness "tests", and is owed a full housing duty. The Department, in conjunction with the Housing Executive, regularly publishes homelessness data available at <https://www.communities-ni.gov.uk/topics/housing-statistics>

17 <https://www.housingrights.org.uk/sites/default/files/Housing%20Rights%20Impact%20Report%202020%20low%20res.pdf>

## Estimating the Scale of Need

4.20 The Department considers that households expending in excess of 25 to 30 per cent of their income on housing costs are likely to experience issues with affordability. As such, the evidence gathered examines and models the numbers of households who are currently estimated to be spending in excess of twenty five per cent of their income on housing costs. Modelling indicates that over 50,000 households living in the private rented sector are currently paying 25% or more of their income as rent and could stand to benefit from access to an Intermediate Rent home. These details can also help guide the setting of rental bands for Intermediate Rent homes.

## Setting Rent Levels for Intermediate Rent homes

4.21 Evidence available to the Department also explores the relative affordability of rents in order to identify the broad parameters which will aid in setting a reasonable rent cost for Intermediate Rent homes provided through any Government intervention. The setting of an initial rent profile for Intermediate Rent homes will seek, as a starting point, to offer homes at up to 80% of the local market rent in the development locality, using an affordability assessment to ensure an incoming tenant will be able

to maintain the tenancy. The careful setting of reasonable rent levels can help alleviate some of the issues experienced, in particular by some households relying on housing-related benefits in reducing the shortfall between their benefits and their rent costs. Provision will be made to uprate rents over time.

## Identifying Optimal Locations

4.22 The evidence gathered has suggested that in certain geographies, particularly in specific locations where demand is highest and rents more expensive, some households are spending significantly more than 25% of their income on rent costs. In some instances, market rents are in excess of 40% of some households' income. The CaCHE report provides a comprehensive analysis of the rental prices in the housing market here, and demonstrates the varying gaps across Local Government Districts (LGD) between housing association rents (at the higher end of social rents in many cases) and market rents. In four<sup>18</sup> of the eleven Local Government Districts here the gap between housing association and market rents for two bedroom properties is greater than 25%, and across the same four LGDs the gap for three bedroom properties is greater than 24%. Again, this offers a reliable starting point to begin to deliver a product on the ground.

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18 Ards & North Down Borough Council, Belfast City Council, Derry City & Strabane District Council, and Lisburn & Castlereagh City Council.

## **Making an Intermediate Rent Product Attractive**

4.23 Having identified a need for a rental product of this kind, and indicators of primary development locations and indicative rental bands, it is critical that the detail of the model is attractive both to deliver and to live in. In addition to the core considerations around scale, location, and rental costs, it is critical that Intermediate Rent homes are accessible to lower income households, reducing barriers such as deposits. Similarly, these homes should be offered with enhanced security, offering longer-term tenancies than the private rental “norm” of 12 months. It is envisaged that Intermediate Rent homes will be retained for rent, and will not be available for purchase.

4.24 The Department expects to work with a Programme Operator experienced in housing provision and management when it comes to delivering new Intermediate Rent homes. A simple core product, providing funding for the development of homes around a core model, must be attractive to deliver. An important dimension for consideration is that the rental income from Intermediate Rent homes will assist the provider in servicing the associated financing and must therefore be set at an affordable

level while taking account of the need for viability. Where there is demonstrated need and where viability cannot be achieved due to other factors, the Department will also look for opportunities to apply flexibilities, such as the provision of public land on favourable terms.

## **Proposals for an Intermediate Rent model**

4.25 As outlined in earlier sections of this document, there is an identified need for proactive measures to increase housing supply and choice of tenure here. Social housing alone will not address unmet housing need, as many households struggling with affordability in the private rented sector are unlikely to be able to access a social home in an area of choice. The Department for Communities intends to introduce an Intermediate Rent product for the housing market here, with this section outlining key considerations of the proposed model.

4.26 The development of an Intermediate Rent model intends to:

- create a new supply of homes in locations where Intermediate Rent is viable and attractive to deliver and live in
- provide much needed affordable quality housing for lower income individuals and families

- provide homes in areas where people wish to live
- set rent at a level which is more affordable for eligible households
- put in place an increased security of tenure meaning that tenants can remain in their Intermediate Rent home for the medium to longer term
- require the Intermediate Rent programme operator to make available a network of management and support services
- ensure rollout of the intermediate rented model where it can be viable for the programme operator, subject to approvals and funding

4.27 The specific details of the Intermediate Rent model remain to be finalised, although the model development will draw on experience elsewhere and research commissioned by the Department. **Your views on the shape of an Intermediate Rent model are welcome, and will contribute to the Department's considerations in developing the detail of the product.** The proposals have been grouped into two broad areas for your consideration and comment as follows:

Chapter 5: Intermediate Rent for Tenants  
Chapter 6: Delivery, Funding and Regulation of Intermediate Rent



## 5. Intermediate Rent for Tenants

5.1 In developing a new housing option the perspective of the tenants who will make these buildings their homes is crucial. This chapter looks at the elements of Intermediate Rent that will have the most impact on potential tenants.

### Would an Intermediate Rent home be suitable for me?

**The Department proposes that: It will work with interested parties to develop a programme to supply Intermediate Rent homes offering secure, affordable, good quality, well managed homes to lower income households, at below market rents, in areas of choice. Prospective tenants will apply for an Intermediate Rent home in a similar way to other private rentals.**

5.2 The availability of Intermediate Rent homes may be a suitable and attractive housing option for many households, including some who are on the Common Waiting List for social housing and with few points and limited prospect of attaining a secure social tenancy. Although unlike a social home, an Intermediate Rent tenancy will not be a “secure” tenancy, it should offer more

security of tenure than many market rented tenancies, potentially making it an attractive option for some households. It is expected that tenants can both be on the social housing waiting list and apply for an Intermediate Rent home, and can choose to remain on the social housing waiting list if they successfully apply for an Intermediate Rent home.<sup>19</sup>

5.3. Unlike the process for accessing a social home, Intermediate Rent homes would not be “allocated” from a points-based waiting list. Initial engagement has indicated that a completely separate model, clearly distinguished from the process for securing a social home would be best. Experience of rental products like this elsewhere has shown an application process based on a “first come, first served” basis (subject to meeting any relevant eligibility criteria) to be an effective method of matching tenants with properties. This would also mirror the arrangements commonly used to access other private rented homes.

5.4 The programme operator will conduct an affordability assessment for the applicant tenant and determine whether the applicant meets the eligibility criteria before offering a tenancy. This allows a prospective tenant to receive the information they need to decide whether an Intermediate Rent home is appropriate

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19 Households on the Common Waiting List would be expected to advise the Housing Executive that their housing circumstances have changed in this case.



for them. This will help target those homes to households who may benefit most from a tenancy of this kind. The application process and eligibility criteria will be refined in conjunction with the appointed programme operator, based on the proposals outlined here, to ensure those who will benefit most from the affordability offered by an Intermediate Rent home will be eligible.

### Who could benefit from an Intermediate Rent home?

**The Department proposes that: Intermediate Rents will be normally set at up to 80% of local market rents. Rents will be reviewed regularly. This aims to assist lower income households who are currently paying in excess of 30% of their income on housing costs.**

5.5 Analysis detailed in the research undertaken by CaCHE<sup>20</sup> for the Department estimates there are around 135,000 households currently renting in the private rented sector (PRS) and around 50,400 of these households are paying 25% or more of their income on rent, with 20,000 of these spending more than 40% of their household income on housing costs. This modelling illustrates the affordability difficulties experienced

by many private renters, for whom Intermediate Rent could be a more sustainable renting option. This is likely to continue to be a problem with modelling estimating around a further 2,000 new households seeking to access private rented homes year on year, of which 800-900 are estimated to experience these significant affordability issues.

5.6 It is anticipated that those who are most likely to benefit from, or to be interested in, renting an Intermediate Rent home are likely to come from the following groups, many of whom will already be spending more than 25-30% of their income on housing costs:

- People who are currently private renters
  - who are in receipt of housing-related benefits
  - who are on the social housing waiting list
- who have not applied for social housing (this potentially could include people who believe they may not have sufficient points to obtain a social home in a 'reasonable' timeline or people who feel social homes aren't available in their area of choice)
- People who are currently living with family members or who have had a change in circumstances

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20 "Establishing an evidence base for the development of a viable intermediate rent model for the Northern Ireland housing market", UK Collaborative Centre for Housing Evidence (CaCHE), March 2021

Additional interest may come from:

- Social housing tenants moving to an Intermediate Rent home (where the driver may be location, quality or change in personal circumstances)
- Older people who currently rent and want to change property or location.

### How will Intermediate Rent levels be set and reviewed?

**The Department proposes that: Intermediate Rents will initially be set at up to 80% of market rent for the same type and size of property within the same geographical area. Regular rent reviews will operate, and an agreed uprating formula will be used to determine rent increases.**

- 5.7 Setting affordable and sustainable levels of rent is key to Intermediate Rent providing an affordable rental level for lower income households. It is similarly important that rents are set at a level that makes delivering these homes a viable prospect for a programme operator. It is also essential to plan for uprating to inform tenants of approximate rental obligations for the duration of their tenancy.
- 5.8 Extensive analysis of the costs of private rents here, compared to housing association rents, and analysis of housing cost expenditure of households in receipt

of Housing Benefit has indicated that a significant proportion of households currently struggling to meet unaffordable rents could benefit immediately from a rent set at 80% of market rents. While the use of LHA rates in setting MMR rent levels may have operated well in Scotland, research indicates that there are challenges in applying this to a model for the purpose of rent setting, and that the application of a rent rate with reference to market prices would be most appropriate.

- 5.9 In locations where the differential between market and housing association rents is more pronounced, there may be merit in applying rent setting flexibilities to allow rent rates at less than 80% of market rents. The Department intends to work closely with the appointed programme operator around the detail of how and where such flexibilities might be applied.
- 5.10 Rents must also be reviewed and revised periodically. In terms of the uprating of rent it is proposed that a formula of CPI + 0 to 1% is used, again giving flexibility to the programme operator each year to determine the appropriate level for the area in which the property is situated and reassuring tenants of how potential rent increases will be applied. Rents may also remain unchanged or increase at a lesser rate than the agreed uprating formula with the agreement of the Department.

5.11 Rent costs should also be set to cover ancillary costs such as any service charges and domestic property rates where applicable. This can provide clarity and confidence for tenants, in understanding how their rent is calculated. In setting rents the programme operator will work with the Department and ensure consideration is given to maximise opportunities to ensure affordability of the rent for tenants.

earned income, interest on savings and eg private pension income as well as housing related benefits. The Department is also considering whether any savings should be included as part of eligibility and / or an affordability assessment. Intermediate Rent also gives those on lower incomes an opportunity to pay lower rents in order to better make ends meet or to save for a deposit to access market rent or low cost home ownership.

### **What will the Eligibility Criteria be for an Intermediate Rent tenancy?**

**The Department proposes that: Targeting Intermediate Rent homes to lower income households is central to the programme. There will therefore be an income eligibility criterion.**

5.12 As there will be a limited supply of Intermediate Rent homes, it is important that these be directed towards households which can best benefit from access to a product of this kind. The calculation methodology for income-related criteria elsewhere is devised by the calculation of a lowest income value at which the rent on the property is deemed affordable to a highest ceiling value, at which point it would be expected the prospective tenant could afford market rents or access home ownership. Income can come both from

5.13 The Department therefore proposes that an Intermediate Rent product will have core income-related eligibility criteria. This will include an upper household gross annual income cap and a lower gross income floor to ensure affordability of the rent. It is proposed that the income band for Intermediate Rent eligibility in NI will be £18k to £30k for an individual application household and £20k to £40k for a joint application household.<sup>21</sup> There may be scope for some variation on the income threshold criteria applied to properties, subject to the housing market in the area the property is located in to ensure affordability for tenants.

5.14 An Intermediate Rent tenant should not pay more than 30% of their gross income on rent, unless in exceptional circumstances e.g. they are currently paying a greater proportion of their income on rent and accepting an

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21 Individual household refers to a 1 adult tenancy which may or may not include children and joint application household refers to a 2 adult tenancy which may or may not include children and other adults.

Intermediate Rent home will improve their housing affordability. It is proposed that these income bands would be reviewed at regular intervals (say on a five yearly basis) to consider uplifting the levels in line with any rise in household incomes.

5.15 Affordable rent schemes elsewhere variously include eligibility or prioritisation criteria which can help focus offers of tenancies. These can include family connections living in the neighbourhood, work or educational links to the local area. Several providers in the UK require that tenants' income includes some element of earned income, while others will accept tenants in receipt of solely benefits or pensions. Some providers also operate additional criteria giving priority to those living in expensive private rented accommodation, lack security in their current home or on the waiting list for social housing. There is therefore potential for providers to apply additional criteria to some properties in high demand, such as those relating to geographic links or giving priority to tenants in housing stress or insecure housing.

### **Would I need to provide references, a deposit or a guarantor?**

**The Department proposes that:  
In line with other private tenancies, Intermediate Rent tenants will provide references and can build up a deposit.**

5.16 The need for tenants to provide references from previous landlords (where available), a deposit (normally one month's rent in advance), and the nomination of an agreed guarantor are common requirements for most market private rental tenancies. The payment of a deposit can encourage tenants to take personal responsibility for keeping their home in good order and meeting rent costs. Research has cited the need to provide an upfront deposit as a major barrier for many in accessing a rented home. An alternative model may be to permit the programme operator to allow a tenant to build up a deposit gradually over the first 6-12 months of their tenancy. Not only would this provide a source of funds to meet repairs or arrears when a tenancy ends, all being well it can allow for a cash sum to assist in the future should tenants move on from the Intermediate Rent property. All deposits collected would be required to be secured in a registered tenancy deposit scheme.

5.17 Many private landlords require a nominated guarantor who will, for example, cover the tenants' rent costs if they are unable to pay. In other cases the provision of a larger deposit is deemed adequate and a guarantor is not required. The requirement for Intermediate Rent tenants to provide a deposit (which may be, for example, the equivalent of one month's rent), whether upfront or through a gradual contribution, may be sufficient to negate the requirement for a guarantor. References also provide comfort for landlords in the private rented sector, and an Intermediate Rent programme operator would benefit from similar arrangements. Ideally, any such references would come from the most recent landlord, however, there may be a need for certain exceptions (e.g. where the tenant is a first-time renter) where a personal reference could be acceptable.

### **How long would an Intermediate Rent Tenancy Last for?**

**The Department proposes that: Intermediate Rent tenancies would be offered for a duration of (up to) 5 years. Tenancies will be reviewed and may be renewed. Where a tenant moves on, the programme operator will work with them as they transition to a new home.**

5.18 Intermediate Rent seeks to offer greater security to tenants by making available tenancies which are longer than those commonly offered in market rentals. The ability to offer an initial tenancy of up to five years can provide people and families with the ability to make their dwelling feel like home and allow them to plan for their educational and employment needs, as well as fostering a sense of belonging and community. Securing the rental of a home for a longer period can allow tenants to plan for the future, knowing that they can stay in their home for a number of years.

5.19 Intermediate Rent tenants could be offered initial multi-year tenancies, however, as with any tenancy, they would not be compelled to stay for the full tenancy duration and, if their circumstances change, the statutory notice to quit period would apply. Intermediate Rent homes will be regulated in the same way as other private rentals. At present, under the auspices of the review of the role and regulation of the PRS, consideration is being given to further extending Notice to Quit periods and any amendment will also apply to any Intermediate Rent product.

5.20 Research indicates there is strong support from housing stakeholders regarding longer tenancy lengths, however, the issue of what happens at the end of

a tenancy and the potential to renew the tenancy remains to be settled. The Department intends to work closely with the future programme operator to refine the detail and it is proposed that if a tenant requests to renew their tenancy after the initial 5 years, and still meets the eligibility criteria, this extension is granted. An assessment of the household's income will help determine whether the home remains an affordable option, and the programme operator will work with tenants to transition to another home where this is needed. It is anticipated that the programme operator will work with the tenant from the early part of the final year of their tenancy in considering options for renewal or to help the tenant move on to other accommodation as required.

### **What Tenancy Support and Management Services will be available?**

**The Department proposes that: Intermediate Rent tenants will have available a network of support services, provided either directly through the programme operator or through other organisations, to help support them to maintain their tenancy.**

5.21 It is clear from research<sup>22</sup> that many tenants, including those moving into the rented sector for the first time, could benefit from having a more effective relationship with their landlord and receiving advice on how to manage their tenancy and their new home. Effective tenant engagement can enrich the relationship between the tenant and the programme operator, assist both in better understanding each other's needs, and can provide advice directly or signpost tenants to advisory services. This can help build trust which can in turn allow a more open discussion around difficult issues, such as antisocial behaviour and rent arrears, allowing prompt, effective and early action.

5.22 Support services may be drawn from existing services provided through (for example) Housing Rights, Councils, etc. Routine support e.g. to minimise arrears and general tenancy guidance may be supplied directly by the programme operator. The programme operator can also help direct tenants to other useful services, such as benefits advice, money advice, health and social care services and so on.

5.23 It is anticipated that the majority of potential Intermediate Rent tenants will mainly have general tenancy needs, with

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<sup>22</sup> <https://housingevidence.ac.uk/publications/understanding-approaches-to-tenant-participation-in-the-private-rented-sector-in-northern-ireland/>

many already having had experience living within the PRS. It is not intended that Intermediate Rent would be best suited to provide the support services that the most vulnerable will require and it is not proposed that, for example, those who need supported housing services would be offered an Intermediate Rent home. It may be that Intermediate Rent is a good fit for those who are transitioning from supported housing into more general needs housing, as applicable.

## 6. Delivering, Regulating and Funding of an Intermediate Rent Model

### Delivering an Intermediate Rent Model

6.1 An Intermediate Rent model can have a distinct and positive impact on the housing market, making available a supply of affordable homes for rent to supplement and complement existing provision. As outlined in the previous chapter, initial analysis has indicated that some 50,000 households could achieve an affordability benefit from being able to access to an Intermediate Rent home. The purpose of this section is to set out the Department's views on the delivery, implementation and management of Intermediate Rent homes.

### Intermediate Rent Programme Operator

**The Department proposes that: The Intermediate Rent programme should be delivered by a single programme operator. This could be a standalone charity established for this purpose or a housing association subsidiary, with housing experience, and dedicated to Intermediate Rent delivery.**

6.2 An Intermediate Rent model can work effectively across different locations, settings, and solutions: for example standalone homes, as part of a mixed tenure development, through existing or new build, refurbishment and off the shelf, and delivered on greenfield or brownfield sites. In order to give effect to the spectrum of development options, it is proposed that a single entity should lead on the delivery, focused on providing Intermediate Rent homes. In order for this to succeed, partnership working between the programme operator, housing providers, developers, Councils, and lenders/investors will be critical to success. Evidence confirms that a model, based on assumptions set out in Chapter 5, can work in delivering sub-market rents on longer than standard private rental tenancies.



- 6.3 The Department recognises that, in order to make delivering Intermediate Rent homes attractive and viable, there will need to be a scaling up from a low base towards a scale that will generate a return (albeit a modest return) over the term of the FTC loan. To deliver these homes through multiple operators will reduce the scale within each, making the offering less attractive to private finance and less likely to achieve the desired economies that create the cheaper overall financing that makes the sub-market rent possible.
- 6.4 In order to maximise the supply and the impact of Intermediate Rent homes, whether as standalone properties, or within mixed tenure developments, it will be important that there is a single programme operator responsible for delivery of Intermediate Rent homes which is fully focussed on delivery of Intermediate Rent homes. This can underpin the delivery of good quality, well maintained homes which meet tenants needs in terms of security, cost, and access to any supplementary support services to help maintain their tenancy or, where appropriate, to transition to another home which best suits their needs. A single operator can also act as a single point of contact for developers, other housing providers, Councils, and other interested parties to engage with in providing a strategic and focussed product, and develop and deliver Intermediate Rent homes in a co-ordinated partnership approach. It will also provide clarity for tenants, in dealing with a single organisation in accessing a home, managing a tenancy, and engaging maintenance and support services.
- 6.5 Embarking on the delivery of this new type of private rented product will represent a new departure for housing providers here. While some will have experience in offering homes within the traditional private rented market, there will be some aspects which set Intermediate Rent apart from the rest of the private rent market. The expectation is that the model would be provided by a private or social enterprise organisation with housing delivery experience, or through a charitable trust. This is a requirement, in part due to the use of FTC funding to underpin the programme, which is limited in its use to private undertakings only.
- 6.6 The Intermediate Rent programme operator will need minimum scale, a good covenant in terms of the financial strength, and track record and reputation of the provider of the homes or their parent organisation (in the case of group structures) in order to attract the necessary private long-term debt finance. The programme operator will also need to possess a team of suitably experienced staff with knowledge of the housing market here, and the ability to secure



deals both in terms of private finance (equity and/or debt finance) and work with other housing providers (including developers, social housing providers, and other housing management organisations) to plan for and deliver a robust and sustainable supply of homes and match these to eligible tenants.

- 6.7 While pilot programmes can offer a useful tool in testing a new approach, the evidence supports a single dedicated programme operator, and the scaling up of delivering supply from a low base can help introduce the model with a test and learn approach via a single operator. Accordingly, in due course, the Department expects to procure an Intermediate Rent programme operator who will work with relevant housing market organisations including DfC, the Housing Executive, housing associations, private developers and others around the preparation and planning for and delivery and implementation of Intermediate Rent homes across identified areas of need.

## **Regulating an Intermediate Rent Programme Operator**

**The Department proposes that: Specific regulatory arrangements, complementing the Private Rented Sector regulatory regime, should be applicable to the Intermediate Rent programme operator to provide appropriate governance, and to provide confidence to attract private finance.**

- 6.8 A robust system of regulation has been an important aspect of the funding and development of social housing in terms of good governance, financial risk management, comfort to private lenders and commercial third parties and, potentially, for quality of service provision and protection of tenants and the public interest. These measures have led to a reliable housing association sector here, which has the confidence of decision making authorities and commercial lenders, on whom they rely for much of the private investment required for social housing development. Some similar arrangements are expected to be necessary for the delivery of an Intermediate Rent programme, albeit as an arrangement delivered as a private rental product.

6.9 It is noted that if the programme operator appointed is a subsidiary of a Registered Housing Association (RHA) the social housing regulator would have an interest in their operations in respect of the implications for the finances, governance and service performance of the parent in the group structure. Initial engagement with the social housing regulator has begun to explore what may be possible to apply, in terms of regulatory scrutiny, to a housing entity which is not an RHA. An alternative approach may be to appoint an entity established as a non-profit charity to operate the Intermediate Rent programme. In such a circumstance, regulatory assurance could be attained through charitable regulation.

## Delivering a Core Intermediate Rent Framework

**The Department proposes that:  
A core framework model, informed by input from key statutory bodies, will provide an effective model for the delivery of much needed Intermediate Rent homes of good design and quality in areas of identified need.**

6.10 Research has concluded that a core framework delivery model, underpinned by long-term loan-based funding, with certain supplementary flexibilities deployed when necessary for difficult to develop sites, could provide a clear

and well understood regime. The Mid-Market Rent model operating in Scotland for over a decade now can provide a broad framework model upon which to construct a bespoke model suited to our housing market and the needs of tenants here, and the proposed model is detailed in the preceding chapter.

6.11 In addition to developing a close working relationship with the Department, the Intermediate Rent programme operator would be expected to work closely with a range of statutory bodies in developing and delivering homes. These include, but are not limited to, the Housing Executive, Planning authorities, Building Regulation/ Building Control authorities, and other relevant statutory authorities:

6.11.1 **The Housing Executive.** Among the Housing Executive's statutory roles is the assessment of housing need across tenures and the Department would expect close liaison between the programme operator and the Housing Executive in identifying locations for Intermediate Rent Homes. It will be important that these homes are well integrated within communities, with access to services including public transport connections, schools and medical services as well as other key services within a reasonable and accessible distance.

6.11.2 The Place Shaping teams within the Housing Executive would expect to have a key role in influencing the location and delivery of these aspects of Intermediate Rent. As it is anticipated that some of these new homes could be delivered as part of mixed tenure/mixed use developments, it will also be crucial for the Social Housing Development Programme Group to have a role in influencing and forming the delivery of an Intermediate Rent housing supply.

6.11.3 Intermediate Rent homes may offer an attractive option to those looking for more secure, affordable, good quality homes. Once homes become available, the Housing Executive's Housing Options team may be able to signpost clients towards Intermediate Rent as a suitable solution for their housing need.

6.11.4 **Planning authorities** – both in the **Department for Infrastructure** and in **Councils**. The development of new build homes, and the re-development or refurbishment of existing dwellings, relies heavily on timely planning decisions and the availability of key utilities (such as water supply, sewerage services, electricity and other energy sources, access via the roads network and so on). Councils are responsible for Local Development Plans, which are required

by regional policy to make provision for affordable housing within the District. The provision of an additional affordable housing product such as Intermediate Rent could improve the ability of developments to address any future policy requirements. Many new mixed tenure developments will be subject to Section 76 Planning Agreements, which may require early engagement between the Programme Operator with the planning authorities.

6.11.5 **Building Regulations and Building Control** officials in the Department of Finance would be a key contributor to the delivery of a programme of good quality homes, with a role for Councils in implementation and enforcement of regulations. The Programme Operator would expect to engage closely with officials to ensure that the design and quality standard of any Intermediate Rent homes (whether Off the Shelf, existing purchase, new build or significant refurbishment proposals) would be compatible with statutory building regulations while remaining viable, sustainable, and achievable to deliver. Sections 6.22 to 6.27 set out the options around the options available around construction, design and quality standards under consideration.

## Designing, Delivering and Funding a Financially Viable Model

### **The Department proposes that:**

**A model based around the established practice (a blended approach between the social development and shared ownership delivery models) should broadly apply to a new Intermediate Rent model.**

6.12 The financial viability of an Intermediate Rent product here will be influenced by a range of factors including projected demand, the level of rents set, the cost to provide the dwellings, and the scope and nature of funding to facilitate this development. It is vital to develop and implement a model which is viable, to ensure that all parties involved can achieve an attractive outcome from the delivery of Intermediate Rent homes. Learning from the experience of other comparable arrangements can help form the basis of a workable model which can deliver sustainable and good quality homes, using a blend of Government funding and private finance. Creating confidence to attract the necessary private finance requires minimum scale and also a capacity to let properties quickly and have a clear plan to scale up.

6.13 Initial engagement with representatives from the housing sector here has underlined the importance that Intermediate Rent must be distinct from other affordable rental products, most notably from social rented housing. The use of loan funding is one way to ensure that Intermediate Rent does not compete with social housing for funding. Research indicates that a combination of long-term low interest government loan and private finance can generate a viable intermediate product, generating a modest return over a longer term (i.e. between 20 and 30 years). Properties developed under an Intermediate Rent programme will fully become the asset of the programme operator at the end of the loan term.

6.14 New Intermediate Rent homes will be developed under the core loan-funded model, and it is accepted that certain additional flexibilities may be, from time to time, required to, for example, ensure difficult sites can be viable. It is also understood that in some situations Intermediate Rent cannot be made viable. It is therefore seen as a product which can be scaled up but is not suitable for development everywhere. Setting of intervention rates takes into account the anticipated rental income which the programme operator can expect to attract. The Department considers that the initial level of intermediate rents and their uprating thereafter will

need to consider the wider viability and affordability requirements of the programme and officials will work with the programme operator on this matter. Creating confidence to attract private finance requires minimum scale and also a capacity to let properties quickly and have a clear plan to scale up. This indicates that it is best to start with buying off the shelf until, for example, new build and refurbished units can come on stream. Delivery should centre around a simple, scalable and viable model delivered through a single programme operator, as discussed earlier.

6.15 Initial viability analysis conducted on behalf of the Department, based on broad assumptions around rents set at 80% of local market rents and with the tenant paying a maximum of 25% of income to rent ratio, concluded that Government funding of up to 50% of total costs (including on-costs) could be viable. In order to cement viability, it would be desirable to have some flexibility to exceed the level of 50% intervention, with a ceiling of 60%. This would assist, in particular in more difficult to develop sites, where the programme operator would have to garner less than half the development costs from other sources.

#### 6.16 Using the established Total Cost

Indicators (TCI)<sup>23</sup> allowance used for social housing development may be considered a relevant point of reference for setting the levels of government subsidy allowed for Intermediate rent dwelling delivery. TCIs are all-in, forecast outturn development costs and include three main cost elements:

- Acquisition (including land)
- Works Cost
- On-Costs (professional fees, management costs and statutory charges)

6.17 The Department is mindful that there are a range of issues which have the potential to impact on the successful delivery of Intermediate Rent homes, including the availability of suitable properties to acquire, the availability of viable land for development in suitable locations, the potential constraints associated with Planning, the cost to develop and deliver the homes, and the sourcing of eligible tenants. The Department will work closely with the appointed programme operator, and with other interested parties, in finalising and publishing the detail of the scheme. Any such scheme will be kept under review and revised and developed as implementation moves forward.

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23 <https://www.communities-ni.gov.uk/total-cost-indicators-tci-summary>

**The Department proposes that:  
Delivering a scalable supply of  
Intermediate homes for rent can  
be achieved through a mix of long-  
term, low-interest government loan,  
matched with private finance.**

6.18 In considering the funding required to develop and deliver Intermediate Rent homes, the focus has been both on creating a viable model with an appropriate level of support from Government. In doing so, an important consideration has been to ensure that the focus of grant funding remains on increasing the supply of social homes. Chapter 3 of this paper discusses the use of loan funding using Financial Transactions Capital (FTC) loan, which would be the Department's preferred primary funding strategy for the delivery of Intermediate Rent homes.

6.19 Under the rules around use of FTC, it can only be used as support for private sector interventions and it has been much used across the devolved nations for private sector housing interventions, including the delivery of a number of significant and successful Mid-Market rent schemes in Scotland.

6.20 Preliminary indications are that Government loan support, coupled with a private finance element, can prove

viable over a longer-term loan period, for example, a term of between 20 and 30 years. The Co-Ownership model is a good example of the effective use of loan funding in delivering a supply of affordable homes, although key to its success is the established nature of the delivery body in providing confidence and in securing sufficient private finance on reasonable terms.

6.21 Working capital requirements over the early years of delivery are expected to be significant, regardless of the level of subsidy. Initial modelling indicates that this can be overcome by delaying payments of loan principal until at least year 10 of the loan term, and staged repayments over the term of the loan, or significant repayment deferred until towards the end of the loan period can help improve viability overall.

6.22 While the principles of the core Intermediate Rent model would seek to maximise the use of loan, this would not prevent site-specific 'flexibilities' that could reduce development costs which might include, for example, public land supplied at below market rate or as an in-kind contribution. Flexibilities would be supplementary to the core framework model and, as such, ad hoc and used only where development could not proceed within the core framework. If the cost of housing provision could be reduced by, for example, securing access to land at zero

or nominal cost and developing new build units that meet the required specification, then the viability of such products might be further improved.

## **Delivering Intermediate Rent Homes – Construction, Development and Standards**

**The Department proposes that: Intermediate Rent homes should meet the minimum statutory construction and quality standards, with opportunity for additional requirements as necessary.**

6.23 The introduction of this new rental model will take some time to bed in, and in order to maximise the early impacts of Intermediate Rent it is proposed that initially new supply could come forward through off the shelf purchase of new dwelling units and, where necessary, through the acquisition of suitable existing dwellings.<sup>24</sup> Consideration will be given to any competition this may create with housing associations for such properties and subsequent impact on the delivery of the SHDP.

6.24 The quality standard associated with Intermediate Rent properties elsewhere varies between meeting established build and design standards for social housing and meeting the requirements of Building Regulations. The type of housing also varies from apartments to family houses depending on demand and site availability in the area. Programme operators elsewhere are responsible for the maintenance of properties. Offering a high design quality standard, including flooring, internal painting and the provision of white goods can both help in attracting and retaining tenants, and can provide a long-term saving due to lower tenant turnover. Provision of other fixtures and fittings, in order to offer turnkey, may not always be appropriate, and it should be flexible enough to respond to particular needs where possible.

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<sup>24</sup> **Housing Association Guide** sets out the rules for Existing Satisfactory Purchase within the Social Housing Development arrangements. This provides an indication of the likely requirement for existing properties forming part of an Intermediate Rent Programme.



6.25 Indications are that a new supply of Intermediate Rent homes can be achieved primarily through specific new development or 'off-the-shelf' purchase of units. This can provide an opportunity to test some of the assumptions around rent setting, affordability and viability while opportunities can be identified to transition to include new build development and other routes to supply. While these could be standalone developments, Intermediate Rent may also form a part of larger mixed tenure schemes. Refurbishment of existing empty properties or the conversion of existing suitable properties may also add modestly to the supply of Intermediate Rent homes. Where Intermediate Rent dwellings are developed as part of a mixed tenure approach, ideally this should be planned for with a tenure blind approach.

6.26 It will be desirable that Intermediate Rent homes are developed to meet the identified needs, particularly those identified in the Housing Executive's assessment of housing need. This may include supplying dwellings suitable for single people, as well as for families and may comprise a mix of single bed dwellings and, where appropriate, providing for small-scale shared accommodation. It is not anticipated that Houses in Multiple Occupation will form part of Intermediate Rent dwellings, although where this is

proven to be a desirable outcome this may be considered.

6.27 It is important, in establishing a new subsidised housing product, to ensure that a high standard of building quality and that the internal layout and amenities and services within the home are suitable and sustainable. The forthcoming Housing Supply Strategy will set the agenda for the supply of new homes including construction standards. Properties within the Intermediate Rent programme will be required to meet all relevant statutory requirements including Building Regulations and Building Control requirements alongside at least the minimum standard of housing fitness. It is expected that Intermediate Rent homes will offer high quality, secure and accessible living that is sustainable, energy efficient and easily maintained. Furnishings such as blinds, floor coverings, and white goods such as cooker/ oven, washer, fridge-freezer and kitchen units may form part of the offering available to tenants. These details will be finalised subject to discussions with the programme operator.

6.28 At a minimum it is envisaged that all Intermediate Rent homes would be required to meet the building regulations requirements, selected or designed with sufficient flexibility to meet people's evolving needs. Many of the requirements of the SHDP general needs design



standard applicable to the development of social homes<sup>25</sup> could be appropriately applied to the provision of Intermediate Rent homes, however, there may be opportunities for flexibilities in terms of some elements as required. This will be further developed in conjunction with the programme operator.

Intermediate Rent homes should be provided or developed in a sustainable way, maximise energy efficiency and accessibility, as far as is practicable, and be developed in a way that is mindful of the Government's policy to move towards a net zero carbon position.

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25 <https://www.communities-ni.gov.uk/design-standards>

## **7. Producing a new Intermediate Rent Model**

- 7.1 An Intermediate Rent product should be understood as an additional tool in the armoury of interventions that helps address niche market failures or wider problems in the housing market. While it would not be on the scale of social housing interventions, it could make a significant difference to those households struggling financially to enable them to consume a higher quality of housing at below market rent and with greater security.
- 7.2 It is the Department's preference to establish an Intermediate Rent model which can be delivered at scale in those areas where it will be viable and where demand is evident. DfC is keen to commence rollout of a programme, beginning with acquisition of already developed dwellings for use as Intermediate Rent homes, and scaling up to new build development, including as an element of new mixed tenure developments. It is proposed that initial roll-out is on a modest scale in high demand areas delivered by a single programme operator who will then work towards operating at scale. This can allow for learning to be applied from initial delivery towards a larger scale programme.

- 7.3 The considerations and proposals outlined in this document have been informed by comprehensive research and analysis in conjunction with independent research and modelling, desk research on the needs of the housing market here, and through engagement both with Intermediate Rent programme operators elsewhere and with representatives with an interest in housing. While it is the Department's intention to continue with further direct and focussed engagement with potential tenants and potential programme operator organisations, we welcome feedback on any additional matters which the Department and any programme operator may wish to consider in developing, implementing, and operating an Intermediate Rent product here.

### **Co-Production**

- 7.4 Meeting the breadth of challenges posed by the issues within our housing market cannot be addressed by Government alone. Partners such as the Housing Executive, housing associations, councils, private developers, private landlords, lenders, and the advice sector must also participate in the planning for and implementation of new affordable rental products. In order to play their part effectively, however, they need to have clarity on what is required and what is possible in terms of delivery.

7.5 This document aims to facilitate engagement and consultation with those who have an interest in the development and delivery of a new Intermediate Rent product, setting out the Department's thinking on what a core framework model will look like and how it might operate. This process offers an opportunity to ensure that from the outset all key interests can contribute to the discussion and help shape an effective new product which makes a difference in our housing market.

7.6 Restrictions as a result of the Covid-19 pandemic may constrain the extent to which we can engage in face to face events, and it is our intention to bring together groups of stakeholders, most likely via virtual meetings, to discuss the proposals and secure your input to shape the final model. Your contribution, in terms of submitting feedback during those virtual meetings and subsequently through your response to this consultation will help inform the Department's thinking and shape the final model for rollout.

## **Conclusion**

7.7 The Department therefore, informed by your views in response to these proposals, intends to develop and implement a new Intermediate Rent housing programme. The finer detail around the funding model and the tenant offering will be finalised following engagement with interested parties, including the responses received to this consultation.

## 8. Monitoring and Evaluation

8.1 As far as possible, an Intermediate Rent programme will be evaluated for success using an outcomes-focused approach. This entails moving from simply measuring outputs, e.g. the number of homes delivered, or the number of households accessing a product, to assessing the impact that the policy has had, for example, how has the number of homes achieved the objectives and impacted positively on the circumstances and well-being of individuals, families and communities. This will be achieved by monitoring all performance against three key questions:

- 1) How much have we done?
- 2) How well did we do it?
- 3) Is anyone better off?

8.2 Among the key indicators of successful outcomes could be the extent to which Intermediate Rent:

- i) Addresses Housing Supply – How many Intermediate Rent homes are created; how many vacant properties/vacant sites are brought into use under the programme.
- ii) Addresses Tenant Choice – How many households apply for and are successful in being offered an Intermediate Rent home; how many Intermediate Rent tenancies are created.

8.3 The Department will keep these initial indicators under review and finalise these, in co-operation with the Intermediate Rent programme operator, to ensure coherence and consistency in how outputs are measured, monitored and reported. It is intended that feedback will also be sought from Intermediate Rent tenants around their experience of living in an Intermediate Rent home, and what difference (if any) this has made for them.

## Appendix A

### 9. Assessment of Impacts and Data Protection

9.1 These policy proposals have been screened for equality impact, data protection impact, and rural needs impact. No adverse impacts have been identified. We welcome any comments you may have in relation to the equality, rural, and data protection impacts of that which is proposed. The assessments prepared by the Department will be revisited as the detail of the Intermediate Rent model and its delivery is refined and revised to reflect any significant changes to the policy proposals as a result of consultation comments.

#### Privacy, Confidentiality and Access to Consultation Responses

9.2 For this consultation, we may publish all responses except for those where the respondent indicates that they are an individual acting in a private capacity (e.g. a member of the public). All responses from organisations and individuals responding in a professional capacity will be published. We will remove email addresses and telephone

numbers from these responses; but apart from this, we will publish them in full. For more information about what we do with personal data please see the Department's Privacy Notice at: <https://www.communities-ni.gov.uk/dfc-privacy-notice>

9.3 Your response, and all other responses to this consultation, may also be disclosed on request in accordance with the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR); however all disclosures will be in line with the requirements of the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation.

9.4 If you want the information that you provide to be treated as confidential, it would be helpful if you could explain to us why you regard the information you have provided as confidential, so that this may be considered if the Department should receive a request for the information under the FOIA or EIR.

## 10. How to Respond

10.1 You can respond using the Citizen Space link on the consultation page at <https://www.communities-ni.gov.uk/consultations>. If you would prefer not to use Citizen Space, the questions can be accessed in a Microsoft Word document on the consultation website, responses may be sent to the email/postal address below.

10.2 In responding to this consultation please do not submit any sensitive personal data or information. You are under no obligation to provide personal details in responding to this consultation.

10.3 If you do not wish to use Citizen Space you can email your response to this consultation to **AffordableRentBranch@communities-ni.gov.uk**

or write to:  
Intermediate Rent Consultation  
Affordable Rent Branch  
Department for Communities  
Housing Division,  
Level 3, Causeway Exchange,  
1-7 Bedford Street,  
Belfast  
BT2 7EG

10.4 When you reply it would be very useful if you could confirm whether you are replying as an individual or submitting an official response on behalf of an organisation/group and include:

- Your name
- Your position in the organisation (if applicable)
- The name of your organisation (if applicable)
- An email address

10.5 We will only use your information for the purposes of analysis of feedback to this consultation, and to contact you at your request to follow up on matters raised. Whether you are responding on behalf of an organisation or as an individual, please indicate if you consent for your identity to be made public, or otherwise. The opening sections of this consultation paper provide further detail on how to respond and what we will do with feedback received.

## Appendix A

| Approaches elsewhere to intermediate or affordable rent |   |  |   |  |
|---|---|--|---|--|
| Jurisdiction  | Model   | Main Subsidy   | Rent approach   | Governance   |
| England   | Affordable Rent Programme   | Upfront Grant and cross subsidy from re-let existing stock                           | 80% of market rent but varies inversely to demand (lower % in London)   | Provided by regulated social landlords with social tenancies                               |
| England   | Affordable rent/ intermediate rent (various)                        | Grant  | 80% of market rent, typically   | Examples run by regulated housing association group structures with subsidiaries           |
| Scotland  | Mid-market rent   | Upfront Grant (plus a non-grant version by Castle Rock Edinvar HA/Places for People) | Linked to LHA – initial rent 30th percentile of BRMA rent over time rising to no more than median (50th percentile) | Generally run by regulated social rented group structures as subsidiary                    |
| Scotland  | National Housing Trust  | Local Authority (LA) loan and state guarantee  | Originally 80%-85% market, later as MMR   | SPV partnership of developer and LA; subsequently LA only model                            |
| Scotland  | LAR housing trust   | FTC loan and private finance   | Similar to MMR but 30th percentile is initial rent cap  | SCIO charitable trust model regulated by OSCR  |
| Wales   | Rent First  | Upfront grant  | 80% of market or 100% of LHA  | Option to purchase   |
| Republic of Ireland                                     | Cost Rental (pilot) closely linked to Austrian limited profit model | Land in kind and public loan   | 70% of market rent but linked to construction & finance costs   | Pilot stage delivered by housing association partnering with councils & the housing agency |

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**Commonities**



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**Intermediate Rent Development of Policy and Model**  
**Consultation Response, Belfast City Council, December 2021**

**1. Introduction**

The Regional Development Strategy 2035 recognises that the provision of more affordable housing helps to build strong balanced communities. Additionally, the Strategic Planning Policy Statement acknowledges the role of the development plan as the primary vehicle for facilitating identified need by designating land for housing and indicating where a proportion of site may be required for affordable housing.

Northern Ireland presently supports social renting through both the housing association sector and the Housing Executive. It also has a long established shared ownership model, where the primary provider, the Co-Ownership Housing Association, also provides a market rental model which returns rent to the tenant in the form of equity to support access to home ownership – Rent to Own. There is however no affordable rent provision aimed at tenants who cannot or do not wish to access home ownership but would be unlikely to attain sufficient points on the Common Waiting List to have a realistic chance of accessing social housing in an area of choice.

In a statement to the NI Assembly in November 2020, the Communities Minister set out an ambitious housing programme and introduced new housing options including Intermediate Rent. This new product supports the SPPS aim of assisting eligible households into affordable housing and will help meet the affordable housing obligations of Policy HOU5 set out in the draft Belfast Local Development Plan 2035.

The Council are extremely supportive of measures that could enhance the potential for delivery of mixed tenure schemes and we believe that intermediate rent could play an important role in helping to deliver communities open to all tenures. However, it is not possible to provide a definitive view on the specific product proposed until there is clearer understanding on how the model will be delivered in practice. This paper sets out a number of aspects of the proposals that the Council believe could merit further considerations, including the need for a single programme operator, funding mechanisms, construction and quality standards, setting or establishing the appropriate rent level and deliverability.

Mixed tenure is defined as residential development which combines a range of tenure options, which can include owner-occupier housing, shared ownership housing and rental properties (social, intermediate and private). This diversity enables and fosters a greater sense of social mix supporting thriving and sustainable communities. While Intermediate rent is important, it is not the only delivery vehicle in creating mixed tenure communities. Notwithstanding this, the Council believe that the proposals within this consultation are a significant step in the right direction.

**2. Need for new affordable housing product(s)**

The Belfast Local Development Plan (LDP) draft Plan Strategy (dPS) sets out an ambitious policy approach to seek the delivery of a minimum of 20% affordable housing as a proportion of all housing schemes of 5 units or more. In the development of this approach it was recognised that there was a need for a broader range of affordable housing products to beyond social housing and shared

ownership, and paragraph 7.1.33 recognises the scope for the definition of affordable housing to be further expanded to include other innovative products.

As recognised within the Department's Consultation document, the definition of affordable housing has since been expanded to include the category of intermediate housing for rent alongside social housing and intermediate housing for sale. This represents an important aspect in facilitating the development and delivery of new affordable housing models, such as Intermediate Rent, into the housing market here. It is acknowledged that increasing social housing alone is not the only solution, and that growing the supply of other affordable products can help address housing need in its broadest sense. The Council would be very supportive of any product which could help add products to the market whilst providing greater scope for partnership delivery thereby increasing housing supply and contributing to reductions in housing stress.

The reference to the Local Development Plan (par. 6.11.4) within the consultation is welcomed and the Council would agree that the provision of an additional affordable housing product such as Intermediate Rent could improve the ability of developments to address any future policy requirements. For example, at present, there is no affordable housing product that would work as part of a mixed tenure development in the city centre or other higher density environments.

### **3. Single programme operator**

Paragraph 6.2 of the consultation states that *"Research indicates that a scheme could best be operated by a single entity, established for and focused on that purpose."* The Council would have significant concerns around the proposal and need to limit the potential delivery to a single supplier, which must be tied to a Housing Association (HA), and believe that this may limit the scope or use of the product in a broader range of settings.

It is recognised that scale may be important to drive forward attractive loan terms for any such delivery organisations, but we believe that a critical mass could still be achieved whilst allowing a broader range of delivery partners. If all housing associations are encouraged to deliver mixed tenure development, a restriction on access to a delivery model could place one HA at a competitive advantage over others who cannot provide the product.

Furthermore, the proposed Belfast LDP's affordable housing policy essentially seeks to shift the policy landscape with regards to mixed tenure development, meaning that there will be a requirement for the private sector to supply affordable homes as part of mixed tenure development. Should a single operator be established for intermediate rent, there would need to be a clear mechanism for early engagement with the development sector prior to planning applications being developed and the ability to make an early commitment to schemes that can be maintained throughout the development process.

It is anticipated that an intermediate rent product could be seen as an attractive prospect for private developers, particularly in a higher density, city centre context where other affordable products would have greater delivery challenges. Where a developer wishes to use an Intermediate Rent product as their affordable housing allocation in such cases, it is unclear whether the proposed model would require the allocation to be sold on a block/building basis or via individual flats across a scheme, or whether there is a mechanism to allow an operator to 'allocate' affordable homes without taking ownerships. Whilst there may be scope to address such questions through a single operator taking leases on units rather than purchasing, this is likely to introduce a number of risks that would need to

be effectively mitigated. One of the big challenges, for example, would be managing a single building, when different organisations are managing different units within it.

Alternatively, there are numerous examples in other jurisdictions of where the broad parameters of an intermediate rent product are defined in a general sense, but that the delivery is not limited to a single entity, in effect allowing the private sector to deliver intermediate rented housing directly, within the scope of the broader definition. It may be necessary to explore this as a delivery mechanism and to ensure that there is sufficient flexibility to enable delivery in all scenarios.

#### **4. Funding mechanisms**

The Council fully agree with the statement at paragraph 2.7 of the consultation that “it is critical to the achievement of a successful Intermediate Rent programme that the programme is based on a robust and viable funding model.”

It is vital that the funding of intermediate rent is not at the expense of funding for social housing and we welcome the recognition that a separate additional funding mechanism should be established. The Council would question why a low-cost loan from Financial Transactions Capital (FTC) is the only option suggested, rather a mixture of loans and grants as is the case in some of the English, Scottish and Welsh cases. This is a particularly pertinent given that HAS generally are already able to access private finance on relatively good terms.

As noted above, the appointed programme operator would need to work closely with other interested parties around the planning for and delivery and implementation of Intermediate Rent homes. This will require early engagement and mechanism needs to be provided that would allow this kind of collaboration. Such discussions and negotiations can only be possible, we believe, with multi-year budgets in place, so the Council would highlight the need for long-term funding for new intermediate rent homes.

#### **5. Construction and quality standards**

Paragraph 6.28 of the consultation states that “it is envisaged that all Intermediate Rent homes would be required to meet the building regulations requirements, selected or designed with sufficient flexibility to meet people’s evolving needs.” However, the Council don’t believe that limiting Intermediate Rent homes to meeting statutory building regulations only, would help in providing high quality, secure and accessible living that is sustainable. We would strongly recommend that the forthcoming Housing Supply Strategy set the agenda for the supply of new homes, including high quality sustainable construction standards.

Using a broader strategy to help drive up quality standards for all housing, rather than specifically through this product, will also help overcome potential challenges over any increased costs associated with construction to a higher standard, whilst limiting potential rental returns to 80%. Ensuring higher standards across the board will also help address broader policy requirements such as ‘tenure blindness’ in mixed tenure developments.

Paragraph 6.2 of the consultation also reference the use of existing and refurbished properties, but we would have concerns as to how the standards of these properties will be regulated. Will be they

be under the same regulatory regime as other private rented properties; will these properties have to have Certificates of Fitness in place before the tenancies can commence?

The current regulatory regime for privately rented properties is not fit for purpose and would not give any guarantee of the design and quality of the properties. There is no mention of any regulatory regime in the consultation paper, other than the notice to quit provisions in the amended Private Tenancies Bill in Paragraph 5.19 and securing of deposits. Will the landlords of these properties be required to be registered landlords? The Council would like to be assured that these tenancies would be of the similar standard to the social housing sector and would not be in breach of any of the private rented sector regulations for which the Council are the enforcement authority.

We would welcome clarity on whether the introduction of this new product would require separate legislation to regulate both rental levels and eligibility, as well as to secure the appropriate quality and design of homes within the sector. If new legislation is required, we would welcome confirmation of timescales and how quickly the new product can be rolled-out, given that we hope to have the new planning policy context, as set out in the LDP dPS, adopted in the near future.

The Consultation also states that details (including furnishing) will be finalised subject to discussions with the programme operator (par. 6.27 of the consultation). However, it would be desirable to set high quality standards before choosing partner organisations to deliver Intermediate Rent.

## **6. How will Intermediate Rent levels be set and reviewed?**

Viability will be at the heart of the delivery of this product. Rent setting will therefore be critical, being pitched at 67-80% of local market rents. Whilst we recognise that this will most likely be appropriate within a Belfast, a wider Urban Area context, we are aware that this may restrict the use of the product in more rural areas given the considerable spatial variations in rents and incomes within Northern Ireland. There will therefore need to be flexibility in how a broad Regional requirement is applied on a case by case basis to ensure that development can remain viable whilst delivering a supply of more affordable homes.

## **7. Deliverability**

Viability is clearly critically important in the delivery of the new product. We would encourage the Department to explore all available alternative options for the delivery of an intermediate rent product and ensure that the product is deliverable in a variety of circumstances.

There is encouragement to consider test cases/pilots based upon the purchase of 'Off the Shelf' products and, whilst this is understandable as it delivers schemes in areas on scale and at a faster pace, OTSs purchases are likely to only be available on the market at full market value. It is therefore unclear how such a purchase will be considered viable when based on rental returns of 80%.

Clearly there is also scope for commitment to new-build development up front, but the Council believes there needs to be more detailed financial modelling undertaken to show how such a product would work in practice. There are concerns that the private sector already believes there are viability issues for city centre residential development and it is unclear how will this be addressed when products are introduced that cap rents at 80%.

Another potential delivery mechanism we believe might be worth exploring is the conversion of existing vacant space above commercial premises, which has often required incentives to deliver within the private sector, but which may be relatively quick in comparison to new-build developments but more commercially viable at a reduced rental rate than OTS purchases may be. Within Belfast, we believe there is scope for such a scheme in areas of the City Centre and on many of the arterial routes within the District.

## **8. Conclusion**

In conclusion, the Council believe there is an important role for an intermediate rent product. The LDP dPS recognises the need for a broader range of affordable housing products beyond social housing and shared ownership and the proposals within this consultation are a significant step in the right direction. However, we believe there remain a number of key questions that need to be carefully considered before it can be fully determined if the product proposed is truly deliverable in an NI context. The Council would also encourage the Department to continue to investigate other affordable housing options that will help create genuinely sustainable, mixed tenure communities within the broader definition of the affordable housing.

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|                    |  |
|--------------------|--|
| Subject:           | Jobs and Skills update                         |
| Date:              | 8 December 2021                                |
| Reporting Officer: | John Greer, Director of Economic Development   |
| Contact Officer:   | Sinéad O'Regan, Employability & Skills Manager |

|   |   |
|---|---|
| <b>Restricted Reports</b>                         |   |
| Is this report restricted?                        | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| If Yes, when will the report become unrestricted? |   |
| After Committee Decision                          | <input type="checkbox"/>  |
| After Council Decision                            | <input type="checkbox"/>  |
| Some time in the future                           | <input type="checkbox"/>  |
| Never   | <input type="checkbox"/>  |

|                                       |   |
|---------------------------------------|---|
| <b>Call-in</b>                        |   |
| Is the decision eligible for Call-in? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

|            |   |
|------------|---|
| <b>1.0</b> | <b>Purpose of Report</b>  |
| 1.1        | The purpose of this report is to update members on a number of existing and planned interventions to improve skills and help people find a new or better job, focusing on key target groups and those furthest from the labour market.                                |
| <b>2.0</b> | <b>Recommendations</b>  |
| 2.1        | The Committee is asked to: <ul style="list-style-type: none"> <li>Note the range of existing and planned interventions to improve skills and help people find a new or better job, focusing on key target groups and those furthest from the labour market</li> </ul> |

|            |   |
|------------|---|
|            | <ul style="list-style-type: none"> <li>• Note the job outcomes delivered by some of the key interventions</li> <li>• Note the planned developments and activity for the coming months, including the development activity in new areas of work.</li> </ul>  |
| <b>3.0</b> | <b>Main report</b>  |
| 3.1        | Members will be aware that the pandemic has had a significant impact on the economy of the city with labour market volatility where demand hugely outstripping supply in a number of sectors (tech and digital; logistics and health and social care) while other sectors are much more vulnerable (hospitality; retail).   |
| 3.2        | Despite the volatility, council officers have been working closely with our stakeholder partners and with employers in key sectors to support the delivery of a range of interventions to help those furthest from the labour market to find sustainable employment in those sectors where demand has remained strong or is beginning to recover. This work has meant that, from April-September 2021, we have been able to bring 427 people on to our Employment Academy programmes across a range of sectors, with 202 currently on the waiting list for upcoming programmes. This level of demand – both from employers as well as those looking for a job or a better job – represents a significant increase on figures from previous years, as previously flagged at the October meeting of this committee. |
| 3.3        | Of those who started an Employment Academy since April 2021, 176 people have completed and 132 have secured employment so far. This represents an into-work rate of 75%. Of the 251 people still going through a programme, 92 are already in work and are receiving support, qualifications or licences needed to access a better job. These include Level 3-5 qualifications (e.g. in childcare sector, allowing staff to move to supervisory roles) and specific vehicle licences to help existing drivers progress to better-paid driving roles, including those within public sector organisations such as Belfast City Council.   |
| 3.4        | The ‘Take the Next Step’ event in St George’s Market on 9 November attracted over 450 people and gave residents a chance to find out more about the upcoming employment academies and to register interest to participate as well being able to apply directly for vacancies. A full breakdown of exhibitors can be found in Appendix 1. Employers across a range of sectors were in attendance, and feedback has been very positive, with 90% reporting that they were very satisfied and 10% reporting that they were satisfied. While the full job outcomes as a result of this event are yet to be completed, we have already had confirmation of 20 people that have started a new job following the event while 202 people  |



have been referred to a future employment academy programme. The breakdown of interest is detailed below:

| <b>Employment Academy</b> | <b>Interested as of 11th Nov</b> |
|---------------------------|----------------------------------|
| Construction              | 10                               |
| Business                  | 16                               |
| Haulage/Bus Driving       | 112                              |
| Taxi driving              | 30                               |
| Leisure                   | 15                               |
| Childcare/Playwork        | 19                               |
| <b>TOTALS</b>             | <b>202</b>                       |

3.5 A further 'Take the Next Step' event is being planned for the New Year (restrictions permitting). This is likely to feature planned programmes including:

- Construction Employment Academies for the Belfast Transport Hub
- Business Services Employment Academy
- Fibre Splicing Employment Academy
- Social Care Employment Academies
- Transport Employment Academies

3.6

#### Green Economy

While the Academies represent short, employer-focused, into-employment interventions, the team has also been engaged in a wider range of jobs and skills-related activities – always with the aim of supporting inclusive growth. One of the emerging areas of work is in the retrofit sector. We have recently been successful in a bid to the Community Renewal Fund to establish a vocational curriculum offer as there is currently no skills provision in this field. Work is at an advanced stage to develop a retrofitting qualification from level 2 through to level 5, with local training organisations and Belfast Met working together to support programme delivery in the city.

|      |  |
|------|--|
| 3.7  | <p>Once the skills infrastructure is established, this will offer opportunities for new entrants to access opportunities in a future growth area. It will also present significant re-skilling opportunities for companies in the construction sector, helping them to future-proof their business and look towards new opportunities for future growth.</p>   |
| 3.8  | <p><u>Fibre Splicing Programme</u></p> <p>Another emerging area of work is in utilities – particularly given the exponential demand for broadband as a result of Covid-19 as well as significant public investment in new infrastructure. Using the Dynamic Purchasing System (DPS) mechanism within our new procurement framework, we have recently appointed an operator to deliver a highly specialist intervention in early 2022 as a pilot exercise to test the potential in this new field. Once participants complete the programme, they will have an opportunity to find employment with companies that are currently offering salary levels in the range of £25,000-£35,000 pa. Updates on this programme will be brought back to a future meeting of the committee.</p>   |
| 3.8  | <p><u>Supporting BCC as an Employer</u></p> <p>In addition to working with private sector businesses across the city, officers have also been working closely with colleagues in the HR team to support people into new jobs or better jobs within Council. Some examples of this activity include:</p> <ul style="list-style-type: none"> <li>• Delivery underway for 20 Council staff to gain their Category C lorry licence. This will open up a pathway to a better job in the council. This is planned to be open again in the New Year for a further cohort</li> <li>• Planning for Jobstart jobs for 10 young people across Council such as Zoo Crew and Business Support, with a bespoke Employment Academy designed to target and engage people, provide pre-recruitment support, in-work upskilling and personal mentoring as well as agreeing and implementing a career progression pathway for each young person.</li> </ul> |
| 3.9  | <p><u>Financial and resource implications</u></p> <p>The activities set out within this report are being funded through the Employability and Skills budget previously agreed as part of the estimates process.</p>  |
| 3.10 | <p><u>Equality implications or Good Relations implications/Rural needs assessment</u></p> <p>One of the key advantages of this approach is that it will enable us to target resources on specific groups, including those with particular access issues and barriers that currently prevent them from accessing training and employment opportunities. Our participation data</p>  |

|          |   |
|----------|---|
|          | is regularly reviewed to ensure that we are making a positive impact on key target groups and the CRM system can provide real-time data to ensure effective targeting of resources. |
| <b>4</b> | <b>Appendices</b>   |
|          | Appendix 1: Employers who attended Jobsfair in St. George's Market  |

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## Job Fair Exhibitors, Tuesday 9<sup>th</sup> November

### Take the next step

Explore your job and skills opportunities



### Support and Advice

Jobstart  
Belfast Works  
Belfast Metropolitan College  
People 1st  
Belfast Careers Resource Centre  
Springboard  
Belfast City Council Enterprise  
Adviser Discretion Fund  
Make the Call  
USEL  
WorkForce

### Health and Social Care

AI Homecare Group  
  
Bryson Care  
Clear Day Nurseries  
Crossroads  
Early Years  
Kingdom Healthcare  
Macklin Group  
Playboard / Employers Forum  
Praxis Care

### Customer Services and Professional & Business Services

Andras Hotel  
BCM  
BT  
Clear Pharmacy  
Coca Cola  
Daniella Quinn  
Galgorm Collection  
GLL  
Greens Pizza

Inspire Wellbeing  
Kennedy Recruitment  
Loughview Leisure  
Maldron Hotel Belfast  
Premier People  
Sensee  
Simon Community  
Staffline  
Tim Hortons

### Construction and Security

Amberstone  
Falcon Green  
G4S  
GRAHAM (Civils)  
Legacy Resources  
LSTC Group

McKelvey Construction  
McQuillans  
On Track Technicians  
Securitas Security Services (UK) Ltd  
Sword Security

### Transport

Baloo Hire  
Bondelivery  
Bryson Recycling  
Derry Transport  
DFDS  
Driver Hire  
EA  
Frylite  
Industrial Temps  
Logistics UK  
MB Truck and Van

McCulla Transport  
McGimpsey Removals  
Montgomery Transport Group  
Musgrave Group  
Norspace Hire  
North Down Group  
RHA  
Sure Freight  
Sysco  
Translink  
Valu Cabs

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