

Draft Corporate Plan 2022/23 – 2024/25 Consultation Response Template

Your Details				
Is this submission on behalf of an:	Organisation	<input checked="" type="radio"/>	Individual	<input type="radio"/>
Name:	Belfast City Council			
Organisation:	Belfast City Council			
Postal Address:	City Hall, Belfast			
Postcode:	BT1 5GS			
Email:	doakn@belfastcity.gov.uk			

Please note that if a response is recorded on behalf of an organisation the consultation response will include the name of an organisation while all individual responses will be anonymised as 'individual'

1	<p>Our Corporate Plan outlines 6 new high level objectives with concise, clear targets and deliverables which highlight the impact we can make and the approach we adopt. These are listed below.</p> <ol style="list-style-type: none"> 1. We will work with our partners, taking the lead role as the Strategic Housing Authority, to increase social housing supply to help meet identified need. 2. We will help NI meet its emissions targets, address the impact of climate change and help sustain and protect our environment for future generations. 3. We will invest around £1,973m* (over the next 3 years) into our local economy, through our housing services, construction activity, employment opportunities and through our support for the health, voluntary and community sectors. In the same period we will process circa £1,148m in Housing Benefit payments across public and private housing tenures. 4. We will work with our partners to deliver innovative housing solutions for our customers and to help reduce poverty and improve Health & Wellbeing. 5. We will engage with our customers to ensure that they are at the heart of service improvements and our business delivery model. 6. We will be an employer of choice and deliver high quality services for all in N.I.'s increasingly diverse community. <p>For each of the six high level objectives, do you have any comments you would like us to consider and is there anything else you would like to see included?</p>
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Objective 1

- Council welcomes NIHEs commitment to taking the lead role as the Strategic Housing Authority to increase social housing supply to help meet identified need. The Council believes that good quality, affordable and sustainable housing is central to reducing housing stress, preventing homelessness and improving housing solutions for those most in need. Council can see clear alignment and synergies between the proposed objective and the Belfast Agenda (Belfast's Community Plan), which

has identified the need to support and enable population growth as well as a commitment to work across public and private sector to deliver a Housing-Led Regeneration programme within the city.

- Council also notes and acknowledges the NIHE's key and important role as Chair of the joint public sector **Housing-Led Regeneration Group** which has been established under the auspices of Community Planning, via the City Development Board, and which has responsibility for leading on the delivery of key actions identified under this priority.
- The Belfast Agenda sets out an agreed target to grow the city's population by 66,000 by 2035 with the draft Local Development Plan (LDP) providing the planning framework to allow us to build the 31,600 homes which are required to meet that target. Council notes the overall vision statement for the NIHE's Corporate Plan sets out a focus on "everyone" having access to "an affordable, sustainable and decent home," however, this first high-level objective focusses specifically on "social housing supply" only. Council highlights that as the Strategic Housing Authority, NIHE need to work to **address affordability in a broader sense**. Whilst social housing need is significant, particularly in Belfast, there are also affordability pressures in the private housing markets that also require intervention at a strategic level.
- The Council welcomes the work underway through the Housing-Led Regeneration inter-agency Group, chaired by NIHE, to **unlock key public sector sites** to deliver an agreed target of increasing mixed tenure homes by 6,000 units within the period of the refresh Belfast Agenda plan (up until 2026/27).
- It would create greater confidence for housing delivery partners across the public and private sector if the NIHE took a key role, not just in social housing delivery, but in **delivery of alternative housing products** to cater for those who could not otherwise access the housing ladder. The Housing Supply Strategy also seeks to promote all housing products to deliver 100,000 plus homes over 15 years with at least a third of these homes to be social homes...", this reinforces the need to look more ambitiously at how alternate tenures can help deliver the remaining two-thirds of this target across the housing tenures. This will require the NIHE to work closely with all key stakeholders to understand the **external policy and funding landscape** in order to unlock opportunities across all housing tenures needed across the city. Having similar focused aims and objectives across all partners would help ensure that housing can be delivered using a co-ordinated approach with all stakeholders committing to timeframes, aims and objectives thereby supporting a holistic and joined up approach.
- This approach would require NIHE under their action "to increase choice in our housing system" to do more than "supporting DfC's work to introduce Intermediate Rent." As NIHE are **part of the process**, Council considers that the NIHE has an important role in helping to inform and shape any work to develop new affordable housing products and models. There is a need to recognise that change is required in terms of processes aimed at removing barriers to the delivery of both existing and new affordable housing products. As well as 'intermediate rent' products, there is a need for **market intelligence** relating to the delivery of mixed-tenure developments (including social housing),

affordable housing within higher density settings, development of new products that could be delivered by the private sector, affordability pressures and the need for reforms in the private renting sector, etc.

- Council would encourage and welcome the commitment of the NIHE to carry out and **publish specific research and housing market intelligence on the range, opportunity and deliverability of alternate housing solutions**. This will provide opportunities for all stakeholders to engage, discuss and receive feedback on the latest findings to support broader provision and better understanding on the affordability and deliverability of innovative housing solutions to address the chronic shortage of housing supply across the city. In short, NIHE could provide valuable strategic leadership through widening the scope of its research and advice focus to support broader provision as part of statutory and other processes.
- Following on from the above, it is important that NIHE recognise their strategic role as a statutory consultee in the planning system. Whilst this is recognised in relation to Local Development Plans within the related Annual Business Plan, there is no related reference to the role of NIHE as a **statutory consultee in relation to planning applications**. In both cases, NIHE, as the strategic planning authority, will be required to provide up-to-date, clear information in relation to broader housing needs on a site-specific basis. This should include evidence of need in relation to broader affordable housing, as well as analysis of supply vs demand in the private sector also.
- Whilst there is reference to work with Councils to prioritise the processing of affordable housing applications, and the establishment of 'social housing planning champions' within two Councils, there is no consideration of the role NIHE have as a statutory consultee in the **development management process**. We anticipate that the adoption of the Plan Strategy in Belfast (as well as other Council areas), which will introduce a new threshold-based policy approach to affordable housing, the volume of consultation requests to NIHE may increase significantly. The Council would highlight the need for NIHE to consider and plan for the **associated resource pressures**. It is also notable that where mixed tenure development is expected to become the 'norm' in terms of the delivery of affordable housing, it should be a case that most, if not all, applications for housing should become 'affordable housing applications'.
- Given that the first of the new LDPs are now nearing adoption, there is an urgent need for support from the NIHE in the refinement and implementation of key housing policies informed by shared research and data analytics which is enabled through **new and different ways or working**. There is early reference to NIHE's role in housing-led regeneration and existing work that seeks to unlock key Housing Executive sites for housing and to enable the development of housing on strategic sites across Northern Ireland. However, only the last of these activities is referred to within the priorities, whereas NIHE should be more proactive in terms of work to consider the use of NIHE's own, and other public sector land, for housing-led regeneration. The reference to the Housing Led Regeneration Sub-Group in Belfast on p12 is a prime example, but there is an obvious need to link this work clearly

to the LDP processes, particularly as Council's move beyond strategic policy to the identification of new land for housing over the next couple of years.

- Council acknowledges that Housing Supply faces a huge range of related and interdependent challenges that requires a new approach to unlocking the necessary solutions. To guarantee effective delivery of any strategy or action plan, there is a need to ensure cross-cutting **collaboration and policy coordination** across all relevant public sector bodies, as well as exploring opportunities to work with third party and private sectors. This partnership approach is particularly important in the context of Belfast and the region as a whole, given the fragmented governance, financial complexities, planning, interface issues, land availability and housing stress. This approach is also reflective of the process adopted in the development and delivery of the Belfast Agenda.
- Council have commented through the CfE and Consultation on the Department for Communities Housing Supply Strategy that there are a number of barriers to delivery of housing supply including **funding, delivery vehicles, policy, infrastructure and land**. A link to our response to the Housing Supply Strategy can be found [here](#). **Question 3 sets out a number of key considerations that Council had previously made which we believe are critical to the development and delivery of housing supply**. Delivery of joined up policies and having supported and properly joined up infrastructure will be required. While Council welcomes the NIHE objective to work with partners, taking the leadership role as the Strategic Housing Authority working to increase social housing supply and help to meet identified need Council would also want to ensure that there is a clear and unambiguous promotion of mixed tenure products across the city. It is important that consideration is given to how the public sector could **dispose of land** with the sole objective of obtaining regeneration and local place making outcomes, especially in cases where this can only be facilitated where the best price that could be obtained for land is not the over-riding consideration.
- Council welcomes the review being undertaken by the Housing Executive on **alternate financial & funding models** which could support **additional social housing supply** to the market on top of the existing SHDP. However, Council would like to see this review widened to not just look at extension of the social housing provision but also to **include evidenced review on inclusion of Intermediate products** given how imperative it is to provide wider tenure solutions to housing led regeneration which would allow access to the housing market for those who may not otherwise be able to access it.
- As recommended within the Innovation and Inclusive Growth Commission's Reset for Growth Report (June 21), the provision of housing supply to meet demand may need to be supported through new investment models and delivery vehicles which involves innovative financing and partnership delivery models that may include institutional and private investment, joint ventures/partnerships, and other models of delivery. As the strategic housing authority Council would like to see the approach the NIHE are taking to overcome these financial constraints for eg Council notes the Homes England model,

acting as the governments housing accelerator with the resources and expertise to drive housing development and responsibility for increasing the supply of public land and bringing empty homes back into use utilising their land and investment to attract private sector investment.

- As the strategic housing authority Council would like to see greater emphasis on what **additional types of tenures** could be brought forward and to outline how the NIHE would work with Department for Communities, alongside public and private stakeholders, to **deliver an array of housing solutions** to provide **greater flexibility of approach**. As outlined above the Housing Supply Strategy objective ...”to deliver 100,000 plus homes over 15 years with at least a third of these homes to be social homes...” reinforces the need to look more ambitiously at how alternate tenures can help deliver the remaining two-thirds of this target.
- Within this context, as well as ensuring that Housing Associations can fully participate in creating and delivering new housing options across all tenure, consideration should be given to the role of private sector developers in contributing to affordable housing tenures. This is particularly pertinent in a higher density, city centre context where retaining ownership of rental properties may be central to the investment models required to ensure developments can be delivered (eg Build to Rent). Consideration should be given to **enabling the private sector to deliver affordable homes directly**, as well as in partnership with the Housing Associations.
- Council notes the on-going need to ensure commitment to a collaborative public - private sector approach **to unlocking key challenges** with identified major city housing led regeneration schemes, recognising that these will not only contribute to housing supply but can act as a catalyst for inclusive economic growth. Council would advocate for **optimal stakeholder/delivery vehicles for progression**. This includes the need for the NIHE, working closely with Department for Communities, Housing Associations, the private sector and the wider public sector including Council to continue to work collaboratively to bring forward mixed tenure residential development across the city, and particular exemplar schemes within the city centre, **including the strategic use of public sector lands and addressing current policies** which inhibit Housing Associations and the private sector to maximise housing led regeneration delivery.
- It is recognised within the introductory section on NIHE core activities that NIHE carry out Housing Need Assessments which are used for **Place Shaping**. The emerging Belfast Agenda Refresh 2022 – 2026 has proposed that an important strategic intent must be to **“Support communities through placemaking”**. Community Planning allows NIHE and key stakeholders including Council, to move beyond service delivery to taking a leadership role in shaping localities through Placemaking projects. There is an opportunity through the Belfast Agenda, and City Development Board to look at place-based plans for neighbourhoods and communities across the city to ensure that the aspirations of the community plan are realised at a local level, and to bring some of the other city-wide plans to life locally and to include a spatial element and options. In order to ensure **adequate resources** are

allocated to these placemaking projects, Council would like these recommendations referenced within the Corporate Plan in order to help future proof these projects as they develop through to delivery alongside a commitment to work with the public and private developers to ensure Visions and Strategies (eg BCCRIS, Masterplans etc) are embedded within the design of schemes to ensure better placemaking.

- Council welcomes the NIHE's comprehensive review of the **Common Selection Scheme** to ensure a more fit for purpose approach is taken in the allocation of social housing but would like to see this brought forward in a timely manner.
- To conclude Council would reiterate their commitment to continuing to working collaboratively with the NIHE and other stakeholders on maximising housing development and regeneration opportunities across Belfast noting the alignment to the Council's Corporate Plan 2020 – 2024.

Objective 2

- Council welcomes NIHE's objective to help NI meet its emissions targets, address the impact of climate change and help sustain and protect our environment for future generations. This objective has clear alignment and synergies with several themes in the Belfast Agenda, including "Our Environment" with its commitment to creating a net-zero emissions and climate resilient city and "Our Economy" with its focus on creating inclusive and sustainable growth, learning and opportunity and its aspiration to establish Belfast as a net-zero, circular economy which delivers business opportunities in green technology.
- Council launched a Zero-Net Carbon Roadmap for Belfast with our Resilience Strategy in 2020. We developed this as a Belfast Climate Commission partner through the Place Based Climate Action Network (PCAN). Council acknowledges the high level of strong partnership working and engagement that has taken place with the NIHE in developing the Belfast Resilience Strategy, Belfast Net Zero Carbon Roadmap, support for Belfast One Million Trees Project, and in emerging initiatives such as the new Belfast Retrofit Delivery Hub which is currently developing a programme of work around retrofit in Belfast. The Zero-Net Carbon roadmap identifies transport, buildings and industry as key sectors to decarbonise whilst the work of the Retrofit Hub is looking at skills in partnership with a number of key stakeholders.
- Council believes that housing, through **construction, renovation and repurposing** plays a key role in emissions reduction as we seek to ensure a fair and just transition to carbon neutrality by reducing whole-life carbon emissions from both new homes and existing homes. As regards climate change specifically, Draft Strategic Policy SP6 of the Council's draft Plan Strategy states: "The council will support development where it helps to reduce greenhouse gas emissions and is adaptable in a changing climate to build environmental resilience." This is supplemented by more detailed operational

policies, including Draft Policies ENV2 & ENV3 on climate change mitigation and adaptation. The Council have therefore embedded environmental resilience within the emerging LDP and consider this provides good alignment with this objective.

- Council support and endorses NIHE's drive to increase energy efficiency across its housing stock with the commitment to retrofit 1,700 homes and deliver a programme of innovative systems to 300 homes which will result in carbon free heating. We believe this is not only a key element to help residents of Belfast decrease their reliance on fossil fuels, reduce costs, etc but also a key **economic driver** for the city whereby residents will be able to train/re-train to get jobs in the emerging "green economy". We do, however, note with concern the current mismatch between the demand for and current supply around "green skills" within the construction labour market. Currently there is very little on offer with regards to green skills training courses (especially in terms of retrofit) in the NI further education and training sectors. It is acknowledged that this may be due to a lack of general understanding of what skills are required both now and in the future to help us meet our Net Zero Targets. Also, unlike England/Scotland/Wales there is no industry standard (e.g. PAS2035) currently being applied in NI with regards to retrofit. Without an industry standard, training and skills development may become ad-hoc with different courses and accreditation models being implemented which may impact on the quality of work being carried.
- The Council would highlight the potential opportunities which are attached to the **emerging green economy**, especially in terms of retrofit. This may be due to a general lack of financial investment across the public and private sectors with regards to what needs to be done to make our buildings more efficient. Even with more investment there may be a lag between what can be delivered in the short term as appropriately skilled workers are not in place and may take several years to train/re-train. While the NI Energy Strategy (The Path to Net Zero Energy) references growing the green economy to create new jobs and grow a skills base for the low carbon economy through innovation, support and focusing on our competitive strengths there is little with regards to what skills are needed to train/retrain residents for these new opportunities.
- Although many climate change mitigation, adaptation and retrofit works may not require planning permission, where they do, draft policy in the new LDP will generally support such alterations, as well as requiring appropriate measures in all new developments. We would recommend that the NIHE takes a lead in facilitating cooperation between relevant NI Departments and policy makers to take action to **approve and implement an industry standard** which will give our further education and training sectors a benchmark to develop the new qualifications which will be required to train the existing and new workforce to carry out the work needed to make our existing buildings more energy efficient.
- The Council would highlight the recent work taken forward through funding obtained from the UK Community Renewal Fund (CRF) and the Belfast Labour Market Partnership (LMP), to develop a

retrofit qualifications ecosystem in the city by establishing the Belfast Retrofit Academy in the city. The Belfast Retrofit Academy is a partnership of Workforce Training Services, The Retrofit Academy CIC and Belfast Met which is delivering a range of retrofit qualifications (from Level 2 to Level 5) as well as developing a NI curriculum for these qualifications. This funding allows over 95 people to gain industry specific qualifications in retrofit which will not only develop the participants understanding of the subject but also raise awareness throughout their organisations and the individuals they service. A number of NIHE staff are engaged in this. While this funding is limited and time bound the Belfast Retrofit Academy should exist beyond Council involvement. We suggest that NIHE should look to invest some of its resources to **train more of their staff** to help not only understand the world of retrofit but also deliver quality retrofit projects. We would also suggest that NIHE should consider engaging with their approved contractors to open this funding to allow them to have staff trained in retrofit which will **stimulate the market** and retrofit skills right across the sector. It is right that the largest social housing provider should take the lead with regards to stimulating the potential of the green economy, but this must be done with the acknowledgement that this is not going to be a quick fix.

- Other issues in the construction labour market, such as an ageing workforce (particularly in some trades such as plumbing) may impact on the ability of housing providers to carry out retrofit work. Many workers who are close to retirement may decide that re-skilling is not for them and opt out of the opportunities that the green economy will bring. If this happens in large numbers and these workers cannot be replaced with new entrants to the workforce, the ability for housing providers to carry out large scale upgrades will be hampered. There needs to be some **incentivising for workers** to remain in the industry and re-skill/skill-up and/or major investment in getting people to see the long-term future possibilities than can accrue to them by joining the construction trades and how the green economy is the jobs for the long term future.
- While we welcome a high-level objective focussing on sustainable development and responding to climate change and the significant financial commitments made by NIHE in relation to energy efficiency, retrofitting and modern methods of construction and the decarbonisation of NIHE's existing stock, it is noted that a lot of the related actions are high-level aspirations, with little obvious consideration of how they fit together. For example, there is still a focus on 'Boiler Replacement' as part of the Affordable Warmth measures, whilst also looking for opportunities to retrofit carbon free heating systems. Given the significant challenges we face over the coming years to reach carbon reduction targets, replacing old gas and oil-based heating systems with newer carbon-based boiler systems may not be the most cost-effective approach in the longer-term Council would welcome opportunity to work with NIHE to explore alternative heating models.
- There is still a need for more research to help inform these interventions and to learn from them. There is a **need to understand the barriers to retrofitting on scale** and the need for greater support to the home-owners in the private sector also. Given that a significant proportion of the housing stock in

Belfast is Victorian, including much of the NIHE housing stock, it would be useful to **pilot schemes** and understand the most cost-effective interventions to see carbon reductions. For example, transitioning to renewable energy sources may be more cost-effective than improving energy efficiency in old stock.

- It should also be noted that whilst beginning to explore and implement interventions relating to climate change and carbon reduction, we are still building homes that will require retrofitting in the future. Council feels that detailed consideration should be given as to how **all new homes should be built to zero carbon standards** so as to reduce the need for further retrofitting in the future. These are all areas in which we believe NIHE could take a greater leadership role as the Regional Housing Authority.

Objective 3

- Council welcomes NIHE's objective to invest into our local economy, through our housing services, construction activity, employment opportunities and through our support for the health, voluntary and community sectors. Council welcomes this investment which will bring increased employment opportunities and would encourage a more partnership led approach between NIHE and BCC in terms of co-designing and delivering inclusive and diverse employment pathways.
- **"Inclusive Growth"** is another key priority which has been identified in the Belfast Agenda. Whilst increased job opportunities are welcomed, without additional intervention, residents of Belfast that are currently furthest removed from the labour market may still find it difficult to avail of the newly created roles and likewise contractors from outside Belfast or further afield may fill the roles with people travelling for work. **Working collaboratively with Council's employability programmes** may help ensure well paid and **sustained employment opportunities** for unemployed and economically inactive residents of Belfast.
- Council would encourage a more joined up approach with all Labour Market Partnerships (LMPs) to ensure employment opportunities align with their local LMPs employability programmes. Councils and LMPs can enhance direct engagement and recruitment to help diversify workforces, encouraging more women into construction roles, engaging with numerous underrepresented demographic groups to increase representation through employment academies etc.
- It would be useful if NIHE showed commitment to giving the social enterprise sector notification of upcoming contracts so they can work to build capacity to respond to procurement opportunities. Council would be keen to add value to this where possible through our commitment to strengthening the sector.

Objective 4

- The Council can see clear alignment and synergies between the proposed objective to work with partners to deliver innovative housing solutions for all customers and help reduce poverty and improve health and wellbeing and several priority areas of the Belfast Agenda which are currently being refreshed – Our People and Communities (Making life better for all our residents) and Our Economy (Creating inclusive and sustainable growth). Actions under the Our People and Communities priority place a significant emphasis on housing, with strategic intents to address vulnerability by focusing on chronic homelessness and an action to deliver a multi-agency approach (i.e. the Complex Lives Whole System Model) to providing timely and appropriate support and interventions to Belfast’s most vulnerable citizens.
- Council are pleased to note the references to transforming the model of homelessness provision towards prevention and developing and increasing the Housing First model at scale in Northern Ireland. However, Council would be keen that a specific action such as ‘Continue to develop and **test the Complex Lives approach** within Belfast with a view to informing how this model could be implemented regionally’ is included within the 3-year Corporate Plan.
- As previously noted in response to Objective 1, there is little recognition of the need to broaden choice across all housing tenures as part of this priority. Developing and implementing a series of new affordable housing products as part of new development would greatly help **improve choice** and **help to reduce poverty by providing a range of more affordable housing options**. Many of the interventions outlined against this priority are reactive rather than proactive, focussing on interventions to address challenges with existing stock, whilst neglecting to focus on developing new, more adaptable stock.
- We would welcome further engagement in relation to the priority here relating to securing two new sites to provide “culturally sensitive accommodation for Travellers.” We are aware of a need for such accommodation in a Belfast context and would welcome further engagement with NIHE in relation to this.
- Housing is integral to creating sustainable communities. Consultation and engagement gathered to inform the development and priorities of the Belfast Agenda for the city, found that affordable and safe housing is fundamental to the quality of life of Belfast citizens. Council has committed to collaborative working through Community Planning to maximise the benefits of housing investment in the city, increasing the tenure mix, growing the population of the city, including the city centre, and helping to create sustainable communities. The Belfast Agenda is also seeking to deliver increased social and affordable housing in the city and will measure outcomes through housing supply and housing stress indicators. This included specific targets for the delivery of 1,800 social housing units to 2021 and recognised the need to agree city-wide targets for affordable housing.
- The Council believes that good quality, affordable and sustainable housing is central to reducing housing stress, prevent homelessness and improving housing solutions for those most in need. It increases supply and offers choice across all tenures, and helps to create thriving, inclusive

communities. Council welcomes the aim to prioritise housing solutions for those most in need. To help address this in the future, the Belfast LDP seeks to improve the adaptability and accessibility of new housing through the requirements for all new housing to meet a number of criteria intended to improve adaptability and accessibility of units, as well as a proportion of all new homes across all tenures to be wheelchair adaptable (see Policy HOU7).

Objective 5

- Through our own Corporate Plan, Council is committed to serving and representing citizens and communities to deliver the best possible value for money services for local people, communities and businesses. We therefore welcome and endorse NIHE's similar objective to engage with its customers to ensure that they are at the heart of their service improvements and business delivery model. Council welcomes NIHE's action to develop and deliver a customer engagement programme for Homelessness which will ensure that the views of people with lived experiences of homelessness are listened to, recognising their views as integral to the development of priorities and services.
- Council notes and welcomes the action to Implement the Year 2 Older People's Housing Strategy Action Plan and to develop a 3 Year Action Plan.

Objective 6

- Council welcomes and endorses NIHE's objective to be an employer of choice and deliver high quality services for all in N.I.'s increasingly diverse community. The Council is committed to applying for a 'Real Living Wage' employer and would welcome opportunity to explore with key anchor institutions and employers – such as NIHE – to extend this further.

2 Our 3 Year High Level Action Plan gives a broad overview of some of our main planned activities in the coming years to help deliver our six main objectives.

Please comment on how effective you feel our high level action plan will be in helping achieve our six high level objectives and is there anything else you think we should consider or include?

Please add any additional comments:

- Council notes that the NIHE's draft Corporate Plan has been developed during a time of considerable flux. As noted, the planning context has had to take into consideration the Programme for Government, the Department for Communities Corporate Plan, numerous other relevant government strategic and policies as well as NIHE's statutory requirements. Moreover, the context of Covid recovery, a spotlight on environmental and climate risks, economic challenges associated with market uncertainty and an on-going cost of living crisis are all important factors when developing inclusive

plans which must ensure that no one is left behind. Also noted is the then Minister for Communities statement issued on 3rd November 2020 setting out the ambitions regarding the 'revitalisation' on the Housing Executive and the aspiration to enable a long-term investment programme for NIHE homes which sees the NIHE hoping to be in a position to borrow by 2025.

- Council also notes that the caveat set out in terms of the delivery of the actions set out and aligned to the high-level objectives are “**subject to funding allocation**” (p.18). The Council would support and welcomes the work underway by the NIHE to explore and identify alternative financial/funding models. Council believes that the action plans will go some way to enabling the NIHE to deliver on the high-level objectives and notes that a number of the comments made in relation to the six high-level priorities also have implications for the 3-year Action Plan.
- The Council would support and welcome the following specific commitments as set out in the action plans:
 - planned introduction of new planning policies for affordable housing
 - A greater focus in the short-term to develop a broader range of products and the new approaches to deliver mixed tenure developments.
 - A greater focus on the production of housing market intelligence and other research to help inform the delivery of housing through the planning system;
 - Recognition of NIHE's key role as a statutory consultee in relation to live planning applications rather than just the development of Local Plans. This may require specific work to look at resourcing in the short-term to ensure NIHE are able to respond to a likely increase in demand for input.

The following provides some comments in relation to the Objectives as set out:

- In relation to **Objective 1**: Council notes and welcomes NIHE's commitment as a community planning partner working in partnership to unlock key sites for new housing. However, Council notes that there is also a commitment towards 'place making' in the Belfast Agenda and would welcome a specific action and budget allocation towards this programme of work.
- In relation to **Objective 2**: We would welcome an action to demonstrate leadership commitment in relation to all aspects of retrofitting (e.g. research to identify the right long-term solutions, implementation of industry standards, understanding the full potential of the green economy with regard to retrofit)
- In relation to **Objective 3**: Council notes a commitment to “monitor the outputs of the enhanced social clauses in our maintenance contracts providing opportunities for local employment and social enterprise.” **Council would welcome clarification on** *What the outputs of social clauses are in this instance, social value weighting considered in these contracts, how often these are monitored and what action is taken if outputs are not met.* It would be useful if NIHE showed commitment to giving the social enterprise sector notification of upcoming contracts so they can work to build capacity to respond to procurement opportunities. Council would be keen to add value to this where possible through our commitment to strengthening the sector. Council notes that the commitment to “invest

around £104m for grants for the private sector for repairs.” Clarification would be welcome regarding whether there will be opportunities for social enterprises.

- In relation to **Objective 4**: ‘We will work with our partners to deliver innovative housing solutions for our customers and to help reduce poverty and improve Health & Wellbeing.’ Council would be keen that a specific action and commitment is included in the 3-year Corporate Plan to ‘Continue to develop and test the Complex Lives approach within Belfast with a view to informing how this model could be implemented regionally’ is included within the 3-year Corporate Plan.

3 Each year we develop a new Annual Business Plan to help achieve high level objectives. The draft Corporate Plan includes the Annual Business Plan for Year 1 – 2022/23.

Are there any other activities or actions you would like to see more of in the Annual Business Plans in the coming years?

Please add any additional comments:

- As noted above, there is an urgent and pressing need to develop new approaches and solutions to the delivery of affordable housing as part of mixed tenure and mixed use developments. Given the likely adoption of new planning policies within the next few months, it is necessary for ways to deliver new homes and to integrate tenures to be in place now. We therefore welcome recognition in the 22/23 action plan of a need to identify innovative ways to do this, but suggest that this needs to move beyond a smaller-scale ‘piloting’ to **mainstream implementation**.
- Council submitted a number of key considerations as part of their response to the call for evidence for the Housing Supply Strategy and would like to highlight these are we believe they are critical in terms of developing and delivering housing supply some of which are already highlighted within the above response:
 - I. There are currently a **number of policy, financial and structural challenges to delivery of placemaking housing regeneration schemes via public /private partnerships** and this is significantly impacting on the ability to delivery of regenerative housing at scale. Council would propose that a Task Group be set up to undertake a sharp, short, and focused review of these challenges and the mechanisms to overcome. This is critical to understand and deliver on optimal ways of working and delivery vehicles that involve the public sector working with the private sector and funders to bring forward appropriate housing development opportunities in a more agile way. This would ensure the required processes, delivery vehicles, funding and supporting infrastructure are aligned to deliver agreed outcomes to provide for appropriate housing development at scale whilst ensuring proper integrated placemaking.

II. **Infrastructure** - There is a need to ensure that the resourcing deficit with required wastewater infrastructure including exploration of the potential for alternative funding models, is urgently addressed to ensure this does not prohibit housing development. As part of Councils feedback on DfCs Housing Supply Strategy it is incumbent on all stakeholders to articulate how this deficit impacts on housing provision across the region and to demonstrate that there is a clear route map to show how the housing growth ambitions can be facilitated in terms of all the requisite infrastructure requirements and particularly in relation to the wastewater infrastructure.

III. **Innovation and Inclusive Growth Commission: 'Reset for Growth' Report** – highlighted a number of key points which are relevant to the development and delivery of Housing Led Regeneration and of particular note are the strong recommendations around the need for structural models to support public-private collaboration and Housing Investment Funds. Relevant extract as below:

- *Renewed Future City – Housing:* There are a number of levers required to action the commitments of the Belfast Agenda at the pace and scale necessary to make an impact, which are not currently in place. A number of key gaps have been identified, principally in terms of the structural models required to support public-private collaboration and access to finance to bring forward developments. The Commission propose the establishment of a number of new institutions, namely Strategic Land Partnerships and Housing Investment Funds. The Commission feel that the scale of the task will require further intervention, particularly in stimulating private sector development, including affordable housing provision. For this reason, they suggest that the regional government and the Treasury should consider developing a Housing Investment Fund. This model has been successful in stimulating new housing construction at scale across a range of classes in many UK cities.
- **Key Proposition:** Create sustainable, vibrant communities in the city centre, delivering 11,500 new homes by 2035. The Commission's proposals to accelerate delivery include Council, NIHE and Department for Communities (DfC) establishing a delivery vehicle to utilise public sector land and undertake land assembly to facilitate new low carbon housing at scale across the city centre. (Note – a Housing Regeneration Group has now been set up under the Community Planning Partnership: City Development Board with BCC, NIHE, LPS and DfC, with a key focus of the group in identifying and utilising public sector lands). Vehicle should also develop housing mix, amenities, and neighbourhood development plan for city core. Target: 11,500 new homes in 10 years. Create new financial instruments including Housing Investment Funds to address market challenges related to risk and yield.

IV. **Funding** – Council advocate for consideration of how FTC and the Northern Ireland Investment Fund, Levelling Up Funds or other funding can be best utilised or refocused to support housing led regeneration priorities and unlock development. Of critical importance, particularly where there are viability issues and to underpin proper placemaking, there is a need for funding to facilitate enabling infrastructure for housing development. Specific funding for this should be prioritised in order to bring forward housing led regeneration schemes at scale.

V. **Collaboration** – There is a need to ensure commitment to a collaborative public - private sector approach to unlocking key challenges with identified major city housing led regeneration schemes, recognising that these will not only contribute to housing supply but can act as a catalyst for inclusive economic growth. Council would advocate for optimal stakeholder/delivery vehicles for progression. This includes the need for the NIHE to continue collaboratively working with the Council, Department for Communities , Housing Associations, and the private sector to bring forward mixed tenure residential development across the city, and particular exemplar schemes within the city centre, including the strategic use of public sector lands and addressing current policies which inhibit Housing Associations to maximise housing led regeneration delivery.

VI. **Current Policy and Legislation** – in relation to ensuring the appropriate policy frameworks are in place to accelerate housing supply, it is understood that there are issues with the current Housing Association Guidelines, which strongly need addressed. Our current understanding would suggest that the following issues need to be addressed:

- **Land:** These require a housing association to have acquired land ownership prior to award/payment of grant assistance (land purchase, construction). However, where the land is currently in public ownership then there is scope, utilising the Development Brief process, for reflecting this public ownership of land as distinct from privately owned thereby potentially negating the need for the housing association to initially acquire a site. This ties directly into when a housing association would be expected to then pay to acquire publicly owned land and to explore potential for deferred terminal payment or equity ground rent payment approaches which will also assist with de-risking development.
- Delivery of private sector tenure as part of a mixed tenure development is also currently impeded by **Article 15** of the Housing Order with limitation on delivery of private housing by housing associations to the existing co-ownership model only (i.e., no private sales or rentals). With the desire for city centre development to be delivered across all housing tenures there is an urgent need to address this policy issue, in conjunction with the Department for Communities, if this objective is to be advanced.
- Current lack of a **policy on affordable housing**, aligned to the revised definition of affordable housing, represents a risk to housing associations developing a business case in absence of affordable housing products. Council would like to see how the NIHE engages with the

Department to allow Housing Association and private developers bring forward an array of affordable housing products which is critically needed within the market.

- Whilst not policy per se – lack of a **city centre waiting list** impacts on clarity for housing associations and private developers on latent demand. Council would like to see the Housing Executive bring forward analysis until such time as the waiting list is available which would help give clarity to the housing developer with regards housing need, mix and tenure.

VII. **A Bolder Vision** – which has ‘*Promote City Centre Living*’ as one of its 4 key moves aimed at encouraging city centre living by ensuring the enabling infrastructure is in place to facilitate city centre living with place making at its heart. It highlights the importance of providing greater quality, choice and affordability of accommodation and of critical importance is establishing a city-wide network of people friendly routes and city parks to create and underpin a liveable city centre. Council believes that the delivery of A Bolder Vision priorities via the joint BCC/DfI/DfC approach will be critical to the successful delivery of city centre living. From a Belfast perspective therefore, Council would highlight that the future delivery of A Bolder Vision is intrinsically linked to housing supply and should be embedded within Central Government /Executive priorities. Council would like to see the Housing Executive promote the aspirations on Bolder Vision embedded within the Housing Executives Housing Design Standards to have consistence across the range of stakeholders.

VIII. **High Street Task Force** – city centre living is critical to the reimagining and future sustainability of the high street / city centre and should be central to the High Street Task Force recommendations and embedded within Executive funding priorities. Increased City Centre Living is also a key area within the Council’s Future City Centre Programme which is charting the way forward for the diversification and sustainability of city centre uses. The Future City Programme is a multi-faceted programme that seeks to bring together a number of strategic initiatives and projects within one overall programme approach to address the issues impacting upon the city centre. It includes projects and interventions across various pillars of work centred on regeneration and connectivity, increased city centre living, investment, inclusive economic and cultural growth.

4	Having considered questions 1-3 above, please provide any other comments or suggestions which you feel should be considered in the development and delivery of our draft Corporate Plan?
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Please add any additional comments:

- Council is satisfied that all comments are covered in responses to the previous questions and would reiterate their commitment to continuing to work collaboratively with the NIHE and other stakeholders on maximising housing development and regeneration opportunities

across Belfast as well as working together to address many of the associated social changes impacted upon through good quality housing