

Belfast City Council
Response to The Department for Communities
“Call For Evidence” on a
Draft Housing Supply Strategy for N.Ireland
July 2021

DRAFT

CONTENTS:

- **Call for Evidence Questions and Responses**
- **Introduction**
- **Bibliography**

DFC Questions:

1. Please confirm whether you are replying as an individual or submitting an official response on behalf of an organisation.
2. Do you agree that a 'Whole System' approach given the challenges is the right one?
3. Do you agree with the 15-year timeframe proposed for the Housing Supply Strategy?
4. Do you agree with the proposed vision for the Strategy?
5. Do you agree with the following proposed objectives for the Strategy:
 - (a) Increase housing supply and affordable options across all tenures to meet current and future demand.
 - (b) Reduce housing stress and homelessness and improve housing solutions for the most vulnerable.
 - (c) Improve housing quality
 - (d) Ensure the provision of housing options that contribute to the building and maintaining of thriving, inclusive communities, and places.
 - (e) Support the transition to carbon neutrality by reducing whole-life carbon emissions from both new homes and existing homes.
6. The terms good quality, sustainable and affordable mean different things to different people how would you define these terms?
7. What do you believe are the three main barriers to delivering the objectives for the strategy?
8. To what extent do you agree that there is a need to establish a more robust understanding of NI Housing Stock, e.g. by tenure, location, condition, etc.?
9. Are you aware of any specific data sources or methodological approaches to estimating existing housing stock, e.g. by tenure, location, condition, etc.?

Sustainable Communities and Homes

10. How can housing supply help create and maintain sustainable communities?
11. How do we engage communities more effectively in place making?
12. To what extent do you agree that housing led regeneration policy contributes to reversing the physical, social, and economic decline of:
 - (a) areas of deprivation
 - (b) town and city centres
 - (c) rural areas
 - (d) suburban areas
13. How can we change the approach to housing led regeneration and ensure that it is more integrated in delivering wider policy outcomes?
14. To what extent do you agree that it should be a priority to deliver more shared housing developments throughout NI?
15. How can more shared housing developments be delivered here?
16. To what extent do you agree that housing should be an integral part of the care and support system?
17. What challenges do you see in delivering a wider range of housing types, e.g. housing that is better suited to the needs of older people or those with disabilities and how can these be overcome?
18. How important is mixed tenure to addressing housing supply issues in NI?
19. What challenges do you see in progressing mixed tenure developments, and how could these be overcome?

Equality and Human Rights

20. The Equality Commission has framed local housing demand and supply in relation to three constructs – accessibility; adequacy; and sustainability. Are you content with this framework or are there other issues that may warrant inclusion?
21. In addition to the inequalities or data gaps already identified in the Equality Commission's Statement and the Wallace Report, are there any other issues that should be considered?
22. In relation to the issue of using multivariate analyses (Multivariate analysis is analysis that considers the impact of more than one Section 75 characteristic), are you aware of any work already undertaken that would be useful? Housing Supply in Rural Areas

23. To what extent do you agree that the Housing Supply Strategy should address the need for affordable homes in rural areas?

24. To what extent do you agree that community led housing should be supported and enabled in rural and urban areas across NI?

25. How can additional innovative multi-agency projects (or approaches such as 'Tackling Rural Poverty & Social Isolation') be created to deliver more affordable housing supply in rural areas?

Housing and Poverty

26. Is there a need for this Housing Supply Strategy to play a role in reducing poverty?

27. Currently housing stress is identified as 'those experiencing intimidation, insecurity of tenure, housing conditions, health and social wellbeing issues. Do you have any comments on this definition of housing stress or are there other causes of housing stress that need to be considered?

28. To what extent do you agree that more needs to be done from an interdepartmental perspective to improve the lives and life chances of those who are homeless or at risk of homelessness?

29. How do we help homeless people transition from temporary accommodation to long term homes?

30. To what extent do you agree that housing plays a significant role in reducing economic inactivity/enabling individuals to take up employment?

Land and Property

31. Are there changes to land & property legislation, policies, processes, or procedures that could transform housing supply for the better?

32. Should the options for making public sector land (local and central government) available to support a wider variety of housing options be explored?

33. Are there land & property practices adopted in other UK or European jurisdictions that you believe would transform supply if adopted here?

Planning

34. Are there changes to planning legislation, policies, processes, or procedures that could transform housing supply for the better?

35. Are there planning practices adopted in other UK or European jurisdictions that you believe would transform supply if adopted here?

36. Is land banking hindering housing supply here?

Finance

37. To what extent do you agree that the NICS could better utilise existing funding (e.g. Block Grant, Financial Transactions Capital, Housing Association Grant, Reinvestment and Reform Initiative) to leverage greater levels of private finance for housing development?

38. Are there other ways the private and voluntary community and social enterprise sectors can leverage other forms of funding to increase housing supply?

39. Are there any other areas of market failure that need public and/or private intervention?

Infrastructure

40. Are there changes to infrastructure legislation, policies, processes, or procedures, such as the establishment of an Infrastructure Commission, that could transform housing supply for the better?

41. To what extent do you agree that coordination of housing provision and infrastructure services need to be better aligned?

42. To what extent do you agree that a Housing Supply Strategy should consider both the provision of new homes and protecting existing supply?

43. How do we ensure that our housing supply integrates and brings together all the essential infrastructure (hard/soft & critical) required to create thriving homes and communities?

Climate Change/Net Zero

44. Are there changes to climate, sustainability and environmental legislation, policies, processes, or procedures that could transform housing supply for the better?

45. Transitioning to low carbon homes will require significant behavioural changes by householders. Is support required to aid the necessary behavioural changes?

46. Taking into account social impact, what incentives or disincentives could be introduced to positively impact the current and future delivery of low carbon homes?

Innovation

47. Should existing buildings, including our heritage assets, play an enhanced role

in transforming housing supply.

48. Are you aware of any innovations relating to housing including design, construction, procurement, contracting and commissioning that could help transform supply?

Skills

49. To what extent do you agree that the Housing Supply Strategy could act as a stimulus to improve and modernise construction skills and increase the importance of the sector?

50. Does the Construction Sector in NI need support to skill up in digital technologies, Modern Methods of Construction, low carbon construction and the whole life performance of house building etc.?

51. Does the age profile and make-up of the construction sector (older workers/ self-employed) require a specific intervention to support our housing supply in the future?

52. Does NI need some large Green Building Projects such as those being developed elsewhere to help create momentum for a changed skills agenda here?

53. Are there any other areas that could impact on the development of the Housing Supply Strategy that you feel have not been covered in this call for evidence?

Section 1 – Introduction

1. Please confirm whether you are replying as an individual or submitting an official response on behalf of an organisation

Belfast City Council welcomes this opportunity to provide a formal response to the Department for Communities “Call for Evidence” on the development of a Housing Supply Strategy for Northern Ireland.

This response forms the comments of Belfast City Council, however while every effort has been made to ensure cross Council support for the responses provided within the timelines as outlined within the Call for Evidence, this response remains subject to retrospective Committee approval and Council ratification.

Belfast City Council will ensure timely confirmation of the status of the response pending completion of the Council approval process.

2. Do you agree that a ‘Whole System’ approach given the challenges is the right one?



Housing Supply faces a huge range of related and interdependent challenges that requires a new approach to unlocking the necessary solutions. To ensure effective delivery of any strategy 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.

Council welcomes a “Whole System” approach that involves addressing the drivers for need and demand as well as supply levers which includes planning and infrastructure, finance and skills, demographics, and climate action. A whole system approach will require all partners working together to achieve long term sustainable change and this partnership approach is particularly important in the context of Belfast and Northern Ireland 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. The approach provides a potential opportunity to link to the Community Planning Partnership processes and structures to support the delivery of the city’s growth ambitions.

3. Do you agree with the 15-year timeframe proposed for the Housing Supply Strategy?

The 15-Year timeframe for the Housing Supply Strategy is welcomed and aligns with the timeframe for the delivery of the growth ambitions envisaged for Belfast as a city through the delivery of the ambitions of the Belfast Agenda – the community plan for the city.

In addition, the proposed timeframe is comparable to other regional strategies including the Northern Ireland Regional Development Strategy and emerging Local Development Plans (LDP).

Whilst Council note that the Call for Evidence on the Housing Supply Strategy states that it will be underpinned by a high-level delivery framework supported by multi-year action plans - in order to gain traction and create the needed catalytic effect in housing supply, Council would be keen to see that this includes significant committed investment and funding streams. The recently published Reset for Growth Report from the Belfast Innovation and Inclusive Growth Commission has found that Belfast presents a unique opportunity to position a significant housing building programme at the heart of its economic recovery plans. The Commission sees this

investment in housing stock as having the potential to address a number of economic and social problems. These findings should be used in support of ensuring significant investment and funding is aligned to delivery plans.

Council would welcome further detail on the delivery framework and multi – year action plans as part of the co-design of the strategy, to support the development of a robust process of action planning, funding, performance management, monitoring and review.

4. Do you agree with the proposed vision for the Strategy?

The proposed Vision for the Housing Supply Strategy is that *“Every household has access to a good quality, affordable and sustainable home that is appropriate for its needs”*. Council agree with this given the Vision for Belfast – by 2035 under the Belfast Agenda is that *“Belfast will be a city re-imagined and resurgent. A great place to live and work for everyone. Beautiful, well connected and culturally vibrant, it will be a sustainable city shared and loved by all its citizens, free from the legacy of conflict. A compassionate city offering opportunities for everyone. A confident and successful city energising a dynamic and prosperous city region. A magnet for talent and business and admired around the world. A city people dream to visit.”* The vision for the city under the Belfast Agenda is underpinned by the focus on inclusive growth where no one is left behind, with the vision and outcomes being long-term and intended to improve the lives of everyone in Belfast. Council can see clear alignment and synergies between the proposed vision for the Strategy and the Belfast Agenda, as well as a number of corporate strategies and strategic priorities for the Council, for example the Belfast City Centre Regeneration and Investment Strategy, the Resilience Strategy, the Local Development Plan draft Strategy plan, Inclusive Growth Strategy and Good Relations Strategy.

5. Do you agree with the following proposed objectives for the Strategy:

(a) Increase housing supply and affordable options across all tenures to meet current and future demand.

(b) Reduce housing stress and homelessness and improve housing solutions for the most vulnerable.

(c) Improve housing quality

(d) Ensure the provision of housing options that contribute to the building and maintaining of thriving, inclusive communities, and places.

(e) Support the transition to carbon neutrality by reducing whole-life carbon emissions from both new homes and existing homes.

Housing is integral to creating sustainable communities. Consultation and engagement gathered to inform the development and priorities of the Community Plan 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 centre, and helping to create sustainable communities.

The Belfast Agenda - the community plan for the city, created and being delivered via the Community Planning Partnership – will seek to deliver increased social and affordable housing in the city and will measure outcomes through housing supply and housing stress indicators. By 2021 the Belfast Agenda is committed to delivering 1,800 social housing units and agreeing a city target for affordable housing.

Furthermore:

- The Living Here priority of the Belfast Agenda places a significant emphasis on housing whilst the City Development Board has recognised housing led regeneration as a key priority area. The Resilience and Sustainability Board has identified 30 programmes which will improve Belfast's resilience including housing focused areas. Key to making progress on inclusive growth is addressing and mitigating poverty and issues such as affordable housing.

- In the Belfast City Centre Regeneration and Investment Strategy (BCCRIS – the policy framework for the city centre developed by the Council and adopted by Department for Communities), a key priority area is to increase the residential population within the city centre: the proposed objectives will be a key enabler to this alongside collaboration between Council and the public and private sectors.
- Council's partnership with QUB and the establishment of the Belfast Climate Commission, has identified the housing sector as a priority for the transition to net zero in the city.
- There is a strong degree of alignment between the overall Strategic Aims and Objectives (pg24-29) of the Housing Supply Strategy and the city's LDP, as well as the policy aims set out specifically in relation to housing (pg59).

Given the ambitions set out within the Belfast Agenda, in particular the ambition that the city is home to an additional 66,000 people, there is a real need to increase housing supply and affordable options across all tenures to meet current and future demand, as well as reducing housing stress, improving housing quality, ensuring options contribute to building and maintaining inclusive communities and support the transition to carbon neutrality.

Council supports the proposed objectives for the Strategy. They will go some way to enabling the delivery of new and regenerated inclusive, healthy, sustainable, resilient, and liveable neighbourhoods with housing options that responds to the needs of all sections of our city.

6. The terms good quality, sustainable and affordable mean different things to different people how would you define these terms?

Council agrees that good quality, affordable and sustainable housing is central to reducing housing stress, homelessness and improving housing solutions for the most vulnerable. It increases supply and offers choice across all tenures, and helps to create thriving, inclusive communities.

Council further believes that housing through construction, renovation and repurposing also 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. We need to do this while addressing inequalities and by ensuring that households in fuel poverty are not left behind in the move to net zero.

Council would see a significant advantage in ensuring that the definitions for such terms used within a housing policy context align with those being utilised within a planning policy context. By way of example, the SPPS has recently been updated to reflect the updated definition of 'affordable housing' adopted by DfC on 1 April 2021. This successfully ensures the required alignment between the use of the term in both a housing and a planning policy context.

In relation to the term 'good quality' this is a far more subjective context and much more difficult to define. The SPPS achieves this through the establishment of a core planning principle relating to 'good design and positive place making', which is then defined at length in sections 4.23-4.36. Within a Belfast context, the LDP draft Plan Strategy has similarly established an overarching objective "to promote sustainable urbanism and high-quality design", linking this to the protection and enhancement of the built environment and local distinctiveness.

The term 'sustainable development' is defined at length within Sections 3.1-3.9 of the SPPS with reference to both the United Nations definition of "meeting the needs of the present without compromising the ability of future generations to meet their own needs" and the Executive's Sustainable Development Strategy. The UN definition is also reflected in the glossary to the draft Plan Strategy in Belfast.

7. What do you believe are the three main barriers to delivering the objectives for the strategy?

Council believes that key challenges to the delivery of the draft Housing Supply Strategy objectives may revolve around the:

- Funding, Delivery Vehicles & Land - Availability of targeted funding streams and financial incentives as necessary, with flexibility in terms of appropriate delivery vehicles to bring forward housing development at scale, whilst addressing any viability issues and de-risking development as required. Availability of developable land in the right locations aligned to housing need and at appropriate value levels to underpin viable development.
- Policy - The ability to develop and deliver targeted and joined up policies to address the effective supply of the full range of housing options. This may present particular challenges given the fragmented nature of central and local government with responsibility for policies impacting on housing including planning, housing policy, housing delivery, financing, regeneration, land assembly, highways etc all sitting across a number of local and central government departments.
- Infrastructure – The criticality of having supported and properly financed infrastructure across the water, energy and transport sectors in order to support development and the growth ambitions as set out in the Belfast Agenda. In particular the underfunding of wastewater treatment works, and capacity issues is a critical issue.

8. To what extent do you agree that there is a need to establish a more robust understanding of NI Housing Stock, e.g. by tenure, location, condition, etc.?

Council believes that a robust approach is required for the strategic assessment of existing housing stock, by tenure, location, and condition.

Whilst Council understand there is already a significant amount of data available in relation to existing housing stock – although Council wouldn't be fully sighted on all data available – there is always room for improvement and we would support a

robust approach to putting this in place. There is also a need for alignment in relation to future housing requirements across a range of tenures that are both calculated and articulated, which we understand is being considered in depth by the NIHE.

A particular problem that we have encountered in Belfast is a disconnect between Housing Growth Indicators (HGIs) published by the Department for Infrastructure (DfI) and evidence of housing need and policy requirements. The HGIs, are developed by extrapolating forward past trends in housing growth, which take no account of policy aspirations – including those contained within the Regional Development Strategy (RDS) which the HGIs should be seeking to deliver against – and are disconnected from the areas with a high level of affordable housing need.

This results in a current context in Belfast where the HGIs suggest a housing growth of 5,600 units between 2016 and 2030 (or 400 units per annum) , whilst the NIHE estimate the future social housing need alone for Belfast to total 5,118 units between 2020-2025 (or 1,023 per annum). Clearly a significant disconnect, without even taking into account the range of broader housing tenures. This disconnected HGIs are then used by other public sector partners to provide a basis on which to plan for future growth, presenting a significant barrier to the delivery of housing over the longer-term.

9. Are you aware of any specific data sources or methodological approaches to estimating existing housing stock, e.g. by tenure, location, condition, etc.?

A significant amount of additional research was undertaken in Belfast as part of the preparation of the Local Development Plan, including a specific study analysing the existing housing markets and future housing need. Primarily this sought to link housing need to projected economic growth and sought to determine the size and type of housing needed over the next 15-20 years in comparison to existing housing stock. This research, including the methodologies applied in each case, are available for consideration within the Council's Local Development Plan document library via [Local development plan \(belfastcity.gov.uk\)](http://belfastcity.gov.uk) .

Sustainable Communities:

10. How can housing supply help create and maintain sustainable communities?

The housing policies within the Belfast Local Development Plan (LDP) Strategy 7.1.2, seek to “nurture the development of balanced local communities by achieving an appropriate mix of house types, sizes and tenures”¹ Mixed tenure developments that reflect a mix of privately owned, privately let, affordable and social accommodation can help to avoid the creation or the perception of ghettos by increasing the diversity of people living in an area.

This approach to mixed tenure development has been strongly supported throughout the LDP consultation process, receiving general support from most respondents as part of the Preferred Options Paper (POP) consultation and was stressed as a key factor in building sustainable communities.

The Strategic Planning Policy Statement (SPPS) for Northern Ireland, 4.1.4,² highlights the role of the planning system supporting Government to addressing sustainable communities, through its influence on the type, location, siting and design of development. As well as mixed use developments and mixed tenure housing schemes, the planning system should also encourage strong neighbourhood centres; temporary uses in interface locations; active street frontages; buildings that provide public services, including education, healthcare and recreational facilities; public paths and cycleways; and passive spaces such as civic squares and public parks.

Whilst a great deal of focus has been given to mixed use, mixed tenure development in an effort to build sustainable communities, Council also recognises the need for specialist housing types for people with specific housing needs, particularly those with physical and mental impairments and old age.

Research undertaken as part of the Belfast Agenda, states that people over 60 already make up one fifth of our population and this forecast is predicted to increase dramatically to over one third by 2050. As a member of the World Health Organisation’s Global Network of Age-friendly Cities, we must continue to play a

positive and supporting role in the delivery of homes to meet the full range of housing needs of those requiring additional support, that maximises access to facilities and services ensuring they can live independently within our communities.

With regards to shared space, the Executive through its “Together Building a United Community” Strategy vowed commitment to addressing barriers that prevent shared space ensuring all individuals can live where they choose.

Council is working with our Shared City Partners in a bid to achieve safe, sustainable neighbourhoods that diminish issues of division, segregation, crime, and fear of crime and pave the way for a more diverse, enriched environment.

Council is of the view that the delivery of homes offers significant opportunities to help achieve balanced communities through well-linked, accessible, inclusive, mixed-tenure neighbourhoods. Combined with creating opportunities for communities to access local employment shopping, leisure and social facilities ensuring that they can live full independent lives in an inclusive, cohesive, and sustainable community.

Council believes that an effective Housing Supply Strategy can go some way to creating and maintaining Sustainable Communities. Council further believes research undertaken as part of the Local Development Plan, Preferred Options Paper, emphasises the broad recognition that an appropriate mix of housing units could help foster balanced communities, provide housing choice, benefit health and wellbeing, reduce social exclusion and help tackle area based deprivation.

Q11: How do we engage with communities more effectively in place making.

The Council places great value in the importance of shaping places *with* rather than *for* those who will use it. It 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 ³in 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 place-making is a people-focused approach to the planning and design of new and future developments and places a great emphasis on 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, particularly for housing schemes, 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 planning system is clear, transparent and accessible to different user groups so that people 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 focused on the regeneration and 'place making' of specific areas, with community engagement being integral to this process. The Council believes a collaborative

approach involving community, landowners and other stakeholders is essential to realise the full place making 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 Citizen Space consultation platform provides a corporate approach to all consultations. However, we wanted to give people the opportunity to share their thoughts and ideas at an earlier stage and encourage more open and ongoing dialogue. So we have now set up a new engagement platform, called Your Say Belfast (using a system called Engagement HQ). Through this platform, residents and other interested parties can submit ideas and comments, to get involved in online forums and much more. We feel 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. Council would advocate that effective community engagement sits at the heart of all future plans for house building / supply with placemaking an integral part of this.

12. To what extent do you agree that housing led regeneration policy contributes to reversing the physical, social, and economic decline of:

- (a) areas of deprivation
- (b) town and city centres
- (c) rural areas
- (d) suburban areas

Council acknowledges the evidence that housing led regeneration delivers significant outcomes for local communities to include:

- Sustainable, Affordable & Good Quality Housing:
- Increase Health outcomes:
- Increase Environmental sustainability:
- Tenant Control and Community Governance:
- The right mix of social and physical infrastructures

Housing has a significant role to play in urban regeneration as it is an important part of the social/cultural dimension of regeneration, and can be directly related to the wellbeing and welfare of communities.

Urban/Rural regeneration is seen as a potential solution through its roles in promoting the different environmental, economic, social and health benefits.

Council believe that housing led regeneration policy contributes to reversing the physical, social, and economic decline of town and city centres. A key principle and policy area within the Belfast City Centre Regeneration and Investment Strategy (BCCRIS) is to increase the residential population in the city centre. BCCRIS advocates that city centre living will *“Add liveliness and bustle to the city centre at all hours and create a market for retail, restaurants and entertainment by supporting residential development of various types and tenures at key locations”*. BCCRIS outlines that a significant residential population is highly important for the successful functioning of a city centre, providing a home for the knowledge workers on whom the office sector is dependent. The development of city centre living is integral to re-imagining and diversifying underutilised city centre land assets, this is a key priority area within the Council’s Future City Centre Programme and its Recovery Framework under Housing Led Regeneration. The recently published Innovation and Inclusive Growth Commission, Reset for Growth Report, has found that the foundations of the city centre have been shaken by the impact of Covid-19. For the city and wider region to prosper the city centre needs to create a re-imagined, liveable and resurgent city core. Reset for Growth goes further in evidencing the

importance of housing led regeneration within the city centre as it identifies that in most successful urban areas, residential development is a core element of the mix.

13. How can we change the approach to housing led regeneration and ensure that it is more integrated in delivering wider policy outcomes?

Council acknowledges the evidence of key benefits of housing led regeneration in the development of new communities and improvement of others as significant. There is an increasing level of knowledge and understanding across key public sector decision makers about the wide contribution housing regeneration can make across a range of government priorities.

Council also recognises that housing led regeneration goes beyond the provision of social housing developments to include mixed use, mixed tenure developments providing a range of housing options to meet local need and growing demand.

Regeneration of this nature is about more than bricks and mortar. It is about investing in people, their communities, and the places in which they live, with jobs and improved health and life chances of our residents at its heart. The Innovation and Inclusive Growth Commission in the Reset for Growth Report have advised that Belfast has a unique opportunity to place house building at the heart of its economic recovery plans. The Commission sees this investment in housing stock as having the potential to address several social and economic problems.

Council would commend the significant benefits that can be achieved through housing led regeneration across the City:

- Through effective cross-sectoral joint working, as housing is recognised as a priority within the Programme for Government and aligns with the growth ambitions of the Belfast Agenda. We recognise the benefits to be realised cut across economic, social, and environmental factors;
- Through a range of capacity building measures for Councils and other statutory partners to better understand, develop, deliver, and monitor housing led regeneration plans and schemes and outcomes;

- Through the development of innovative funding models to support both private and social housing regeneration developments and supporting infrastructure requirements;
- Through the development of best practice policy and powers. To place statutory duties on key statutory departments to contribute to strategic housing led regeneration schemes – we believe that the Community Planning Partnership function and role is an important part of this process;
- Through working with communities to identify and measure social value and the wider benefits of housing led regeneration.

14. To what extent do you agree that it should be a priority to deliver more shared housing developments throughout NI?

As mentioned in earlier responses, the Belfast Agenda sets out a vision, values and outcomes for the city to achieve by 2035. As part of this vision, council believes that shared housing should be a priority for the Housing Supply Strategy as a fundamental enabler to redress the structural barriers to the inclusive growth of the city and its neighbourhoods – we know from the people that we have surveyed as part of the development of the Council's Good Relations Strategy in 2019, that shared housing could be an opportunity to promote good community and race relations.

The Local Development Plan (LDP) draft Strategy plan has adopted the Belfast Agenda's aim to ensure that Belfast will be a culturally rich and diverse city that is open, safe and welcoming to all - promoting good relations is key to improving the quality of life for everyone in the city. The strategic policy adopts a core planning principle to create and enhance shared space, to promote social cohesion and good relations in the plan area. Belfast has high levels of neighbourhood segregation, which has constrained development and connectivity to all parts of the city.

The Belfast Agenda is promoting inclusive growth to address social and economic inequalities in disadvantaged neighbourhoods. Increasing diverse neighbourhoods and access to opportunities through the spatial planning process is therefore an integral part of the LDP. This means considering how all communities may be affected by a development and ensuring that proposals help to improve community cohesion, fostering social integration, reducing isolation, and improving access to opportunities in the city.

Provision of good quality, shared social and community infrastructure is critical for social cohesion and contributes to the creation of lifetime neighbourhoods

15. How can more shared housing developments be delivered here?

Council acknowledges the delivery of shared housing is now an action in the Draft Programme for Government 2016 – 2021; Together: Building A United Community strategy and the Shared Housing headline action; and the Department for Communities is committed to delivering approx. 200 shared social housing units per year as part of the Social Housing Development Programme.

Council recognises that the concept of choice is an important one, and it acknowledges that a person's choice(s) may depend on familial links and/or community connections. Therefore, shared housing is not about forcing people to live in a certain way or in a certain area, but rather to improve the choices that are available by tackling the barriers that prevent individuals from opting to live in shared neighborhoods.

When considering sharing housing development it might be useful to consider developing a set of shared spaces principles: for example, the share spaces principles developed as part of Council's Good Relations Strategy 'Shared and Connected Spaces' could underpin the continued development of Shared Space in Belfast. When Council uses the term 'Shared Space' we are describing space that is welcoming, accessible, good quality and safe:

- Welcoming

- Shared Space should be welcoming, where people feel safe to visit and to take part in activity within that space, increasing an overall sense of shared experience and community
- Activities within the public spaces will respect diversity and promote inclusion

- Accessible
 - There will be equality of opportunity afforded to all those using public spaces and accessing goods, facilities, and services
 - In a Shared City, public expressions of identity will be respected and respectful
 - Shared Spaces should reflect the values of diversity and inclusion

- Good quality
 - Shared Space should be good quality, with attractive, high quality services and well-designed buildings and spaces

- Safe
 - Shared Space should be safe for all

We would recommend consideration of shared spaces principles – for more details on the Council's Good Relations Strategy and information on shared spaces, please contact the Council directly.

16. To what extent do you agree that housing should be an integral part of the care and support system?

Council believes that a "Whole system" approach to the provision of Housing is welcomed as an integrated approach between Housing and Public Health. Evidence linking human health and well-being to poor living and housing conditions has a long history as a driver of public health policy and action.

The interlinked dimensions of household, dwelling, community, and neighbourhood environment, have the capacity to affect individual health status through physical, mental or social mechanisms. As poor health is associated with poorer living

circumstances, there is a policy expectation that area regeneration and housing improvement strategies will contribute to health improvement and reduced social inequalities in health.

The development of an integrated approach to housing is likely to realise a range of key economic, social and health and wellbeing benefits for community and regions, to include:

- A reduction and prevention in homelessness
- Greater outcome for the most vulnerable to include children
- Enhancing living conditions through addressing energy and fuel poverty challenges
- Creating living and healthy communities which provides access to community-based assets, including parks, open spaces, and facilities.
- A significant increase in Inclusive economic growth for local communities and the city
- The development of an agile and better resourced approach to the tailoring of individual housing type to housing needs

17: What challenges do you see in delivering a wider range of housing types, e.g. housing more suited to the needs of older people or those with disabilities and how can these be overcome?

Council recognises that an aging population brings with it several challenges in terms of effectively meeting housing needs in the longer term. There is a significant cost associated with making modifications to existing stock to make them suitable for residents throughout their lifetime. 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).

Although it is recognised that there is a minor additional cost associated with these requirements that will need to be borne by developers, it is considered that this is

largely outweighed by the wider significant social benefits, including the current and anticipated cost of inaccessible housing, such as:

- The expense of adaptations to existing properties
- The cost of residential care and additional levels of social care
- Negative impacts of independent living, employment, and social life all of which have human, social and economic significance
- Falls and other accidents and the health and care costs triggered
- Mental health impacts and effect on general health; and
- Avoidable hospital admissions and increased stays in hospital.

In addition, it is important to recognise the importance of supported housing as providing important bridge between independent living and someone needing to go into a residential care setting.

It is notable that the Lifetime Homes standards have been widely used in other UK jurisdictions to address many of these challenges, but in Northern Ireland such standards only currently apply to new social housing. In other jurisdictions, the Lifetime Homes standards are now being amalgamated into building regulations and the Council would argue that similar changes to the Northern Ireland Building Regulations would probably represent the best mechanism to achieve flexible and adaptable housing consistently across the Region in the future.

18: How important is mixed tenure to addressing housing supply issues in NI?

Council believes that mixed tenure housing is important for Belfast and Northern Ireland. Housing policies within the Belfast LDP Plan Strategy seek to “nurture the development of balanced local communities by achieving an appropriate mix of house types, sizes and tenures”, “secure mixed tenure housing developments” and “build strong, inclusive and cohesive communities for people of all backgrounds”. Mixed tenure development is seen as vital in achieving these aspirations and in avoiding many of the problems now associated with large areas of single identity social housing in the City.

The Local Development Plan draft Strategy plan therefore includes two specific policies that seek to achieve an appropriate mix of housing, including Policy HOU5: Affordable housing and Policy HOU6 Housing mix. In both cases, Policy HOU5 requires that “affordable housing should be provided as an integral part of mixed-use development, integrated with general needs housing and not readily distinguishable in terms of external design, materials and finishes.” This ‘tenure blind’ approach is considered vital in the delivery of mixed tenure housing, as it helps to ensure that many of the perceived barriers to growth can be mitigated (see also response to Question 19 below).

This approach to mixed tenure development has been strongly supported throughout the consultation process, receiving general support from over two thirds of respondents as part of our Preferred Options Paper (POP) consultation and was often emphasised as an important factor in building sustainable communities.

19: What challenges do you see in progressing mixed tenure developments, and how could these be overcome?

Council believes that there are a few challenges to progressing mixed tenure development, but it is considered that many of these are perceived barriers, rather than the reality in practice. The primary concerns raised as part of the consultation process on the draft Plan Strategy in Belfast relate to the potential for a loss of value on private dwellings as a result of being in close proximity to social housing, differences in design standards/specifications between private and social housing and potential inefficiencies in management when properties are ‘pepper-potted’ rather than clustered throughout.

However, there is no evidence available in a Northern Ireland context to suggest that mixed tenure development has a negative impact on house prices generally, and evidence in other jurisdictions suggests that where development is truly tenure blind there is no evidence to support concerns about price differentials between mixed-tenure developments and mono-tenure schemes. The Council also believes that there is sufficient flexibility in design standards to enable tenure blind development to be achieved whilst meeting the differing requirements – tenure blind doesn’t mean that every housing unit needs to be the same, but rather that from the external

appearance there is nothing in terms of style, material or finishes that distinguish between tenures.

In relation to the perceived barriers associated with the management of pepper-potted housing tenures, the Council recognise that some flexibility may be required in the application of policies to ensure that any potential problems can be mitigated where possible. However, we would also note that it is not unusual for landlords, whether social or private, to manage multiple properties throughout a town or city, down to an individual dwelling in a development, so it is likely that such barriers can also be successfully overcome whilst achieving a desired mix of housing types and tenures.

Section 2 – Equality and Human Rights

20. The Equality Commission has framed local housing demand and supply in relation to three constructs – accessibility; adequacy; and sustainability. Are you content with this framework or are there other issues that may warrant inclusion?

Council is satisfied with this framing of local housing demand based on the constructs of accessibility, adequacy and sustainability. Whilst fully acknowledging the historic and systemic inequalities in relation to housing, particularly in Belfast where segregation in public housing estates increases to 94%, we welcome an approach which fully acknowledges the increasing diversity of the city.

21. In addition to the inequalities or data gaps already identified in the Equality Commission's Statement and the Wallace Report, are there any other issues that should be considered?

Council believes data gaps and how they relate to inequalities have been highlighted through an increased use of the Outcome Based Accountability (OBA) methodology, for example in community planning. Increasingly the ability to extract knowledge and insights from structured and unstructured data is becoming central to how we apply actionable insights across a broad range of policy areas. The centrality of the work to

address data gaps, as identified by ECNI and the Wallace Report is fundamental to addressing vertical and horizontal inequalities.

22. In relation to the issue of using multivariate analyses (Multivariate analysis is analysis that considers the impact of more than one Section 75 characteristic), are you aware of any work already undertaken that would be useful?

Council believes that within the field of equality there is an increased focus on multivariate analysis, related to intersectionality. In addition to the important work in this field by both local Universities, further research and application which may be useful in this regard are:

- The 'Understanding Inequalities' project is a partnership project exploring spatial inequalities, with published researched papers demonstrating a broad understanding of multivariate analysis, for example age and gender > [Welcome to Understanding Inequalities | Understanding Inequalities \(understanding-inequalities.ac.uk\)](#)
- The Office of National Statistics publication [Past experiences of housing difficulties in the UK: 2018](#) provides an important insight, including multivariate analysis, of experiences of housing difficulties and how they shape current situations. [Centre for Equalities and Inclusion - Office for National Statistics \(ons.gov.uk\)](#).

23. To what extent do you agree that the Housing Supply Strategy should address the need for affordable homes in rural areas?

The rural hinterland for the Belfast City Council area is relatively small compared to other Districts. That said, within the Local Development Plan draft Strategy there is provision for small levels of rural housing provision. Housing Supply Strategy should consider the need for affordable housing in rural areas based on evidence which sees affordable housing in rural areas going some way to mitigating against the issues of

- Poverty

- Poor Health & wellbeing
- Economic inactivity
- Homelessness and displacement of homelessness to regional cities

24. To what extent do you agree that community led housing should be supported and enabled in rural and urban areas across NI?

Council acknowledges that community led housing can be an innovative approach with the potential to provide homes that are affordable to rent or buy, whilst sustaining local economies and public services.

Council believes community led housing could provide an opportunity as part of the development of housing options in particular situations and developed through the concepts of Cohousing, Cooperative Housing, Community Land Trusts and Self-Help development models. We would however highlight that the opportunities to benefit from such housing development models is greatly enhanced in communities where good levels of community development and capacity exist.

25. How can additional innovative multi-agency projects (or approaches such as 'Tackling Rural Poverty & Social Isolation') be created to deliver more affordable housing supply in rural areas?

The rural hinterland for the Belfast City Council area is relatively small compared to other Districts. Council would however welcome the opportunity to input where we can, to the development process around the creation of innovative multi-agency projects to deliver more affordable housing supply in rural areas.

Housing and Poverty

26. Is there a need for this Housing Supply Strategy to play a role in reducing poverty?

Council believes that a Housing Supply Strategy for Northern Ireland will play a significant role in reducing poverty and notes that housing has been included as a cross-cutting issue in the Expert Advisory Panel's recommendations to DfC for an Anti-Poverty Strategy.

The concurrent development of a new Housing Supply Strategy, Fuel Poverty Strategy and Energy Strategy, presents an opportunity for greater policy alignment and the creation of a whole system approach to supporting vulnerable in poverty, addressing fuel poverty and substandard living conditions and improving health outcomes.

Improving social and economic wellbeing for citizens as energy consumers, including those deemed vulnerable, should be at the core of any emerging supply housing strategy, like other key emerging strategies such as the DfE new Energy Strategy. We recognise that it presents a significant potential to address the impacts of fuel poverty and health inequalities in the city and beyond in line with Outcome 4 in the Programme for Government. You will be aware that Belfast City Council declared a climate emergency in October 2019, and the Belfast Climate Commission and Belfast Resilience and Sustainability Board are progressing actions from within the published Climate Action Plan and Resilience Strategy with the ambition to transition to a zero emissions economy and the eradication of fuel poverty.

Council would like to take this opportunity to bring to your attention the Belfast Warm and Well Programme which has been developed and implemented under the auspices of community planning. The initiative has adopted an evidence-based approach to identifying vulnerable people and those at risk from experiencing adverse health conditions because of living in cold homes and suffering from fuel poverty. This has provided a model for inter-agency and cross-sectoral working, which has seen the mobilisation of local assets and communities to identify and support those who are at risk of cold weather and ensure they receive the services and support they require.

The development of a Housing Supply Strategy provides a pivotal opportunity to address these barriers, especially if closely linked to a renewed Fuel Poverty Strategy.

Although the past year has seen a decrease in energy costs, this has been accompanied by a fall in incomes and those living in cold homes are often less motivated to take appropriate efficiency measures or aware of the potential financial support and incentives available to make such measures affordable. Accordingly, there is a risk that those in greatest need may not access the support available resulting in a widening of the inequality gap.

Consequently, we wish to engage across each of these processes, at a senior and strategic level, to explore the potential of taking a whole system and integrated approach to supporting vulnerable people and consider opportunities to harness a more effective approach to addressing avoidable winter deaths in Belfast and beyond. The importance of such a whole systemic and integrated approach to supporting vulnerable people has never been demonstrated more than in the response to the Covid-19 pandemic, with much learning to build on.

27. Currently housing stress is identified as ‘those experiencing intimidation, insecurity of tenure, housing conditions, health and social wellbeing issues’. Do you have any comments on this definition of housing stress or are there other causes of housing stress that need to be considered?

Council is content with the current definition of housing stress as recorded. However, in support of this we would like to draw on the evidence established, that to a large extent cold homes and poor housing conditions are linked to excess winter mortality. Council would like to refer to the response to question 26, and the detail in paragraph four to support evidence of this, as well as a model for inter-agency work across the issue.

28. To what extent do you agree that more needs to be done from an interdepartmental perspective to improve the lives and life chances of those who are homeless or at risk of homelessness?

Council believes that there is a continued need for collaborative and coordinated action on homelessness in the city. Homelessness and associated vulnerabilities in Belfast are areas of concern for the Council. For example, following a Notice of

Motion (February 2019), the Council agreed 'through the office of the Mayor, to convene a statutory and non-statutory multi-agency task group that will seek to take further partnership actions in addressing all facets of homelessness.' This task group sought to bring together the relevant statutory and voluntary service providers for those living with addiction and mental health issues and those who have no place to call home.

Furthermore in 2019 Council provided a formal response to the Northern Ireland Housing Executive (NIHE) Public Consultation Plan on a "Chronic Homeless Action Plan for Northern Ireland", to include:

- that mechanisms needed to be developed across agencies for early identification of those who are at risk of homelessness or chronic homelessness:
- a robust approach to the monitoring of homeless data, trends, multi-agency case management system and accountability needs to be in place.
- services engage with those at risk of homelessness as quickly as possible

Council welcomes the Housing Executives proposal to tackle the difficult issue of homeless prevention and reduction through the development of multidisciplinary teams. There is a specific need to support those homeless people with mental health issues and chronic drug and alcohol addictions to achieve better life outcomes. Council would welcome the provision of services which target these specific issues, through collaboration with medical health experts such as Belfast Health and Social Care Trust and Public Health Agency, thus supporting the long-term prevention of homelessness.

Council would comment that in considering the approach to homelessness, it will be important that we focus on the individual needs. Wider social challenges (e.g. such as lack of life skills, alcohol, substance and other mis-use) may impact on the individual to remain in fixed accommodation, This may necessitate bringing together multiple partners and services to integrated wrap-around support which will enable an individual(s) to transition. Council would highlight the emerging Doncaster

Complex Lives initiative currently being co-designed with the NIHE and other Belfast Community Planning partners and services providers which has a housing led approach to supporting vulnerable people and targeted cohorts.

29. How do we help homeless people transition from temporary accommodation to long term homes?

Recent evidence presented by NIHE to council in relation to 'Dealing with Homelessness during the Pandemic' (March 2021) reported that the number of homeless presentations had fallen while demand for temporary accommodation had increased. In addition, it highlighted that young people had been disproportionately impacted and that the availability and throughput of temporary accommodation had reduced, necessitating an increase in the use of hotel and B&B accommodation.

In response to the NIHE Public Consultation on a Homelessness Strategy for Northern Ireland 2017–2022, 'Ending Homelessness Together', Council supported the key priorities within the Strategy to:

- To prioritise homelessness prevention
- To secure sustainable accommodation and appropriate support solutions for homeless households
- To further understand and address the complexities of chronic homelessness across Northern Ireland
- To ensure the right mechanisms are in place to oversee and deliver the strategy
- To measure and monitor existing and emerging need to inform the ongoing development of appropriate services

Council would refer to the final paragraph in the response to question 28, as it is relevant to the focus of this question.

30. To what extent do you agree that housing plays a significant role in reducing economic inactivity/enabling individuals to take up employment?

Housing can play a key role in economic development. It can enhance economic performance and place competitiveness, but it can also lead to segregation and spatial concentrations of poverty. Too often, however, housing investment has taken place in isolation from the wider economic context. The development of the Housing Supply Strategy presents an opportunity to improve the use of housing as an enabler of economic growth, but housing policy will need to be more responsive to local economic development conditions.

In the current downturn, ensuring new homes are delivered of the right type, in the right place, and linked to wider economic outcomes will be more important. Implementing a more integrated response to housing and economic development will be the key challenge facing the city. The type and quality of the housing offer can have a significant impact on the health and wealth of places. Their ability to attract and retain people and provide support for those who need it relies on good housing and attractive and inclusive neighbourhoods. Effective housing led regeneration approaches increasingly recognise this.

The importance of housing to the wellbeing and prosperity of places can play out in three ways:

- 1) The growing importance of skills to places' economic performance means that getting the right housing offer, including affordable housing, is essential to attracting and retaining a skills base that will encourage inward investment.
- 2) If we better align our strategies for housing and economic development, we increase the likelihood that efforts to address deprivation will be supported by measures to address the underlying economic causes of area deprivation. Co-ordinating regeneration and economic development interventions maximises the potential for achieving a virtuous circle that can deliver greater economic inclusion.
- 3) Finally, housing investment in of itself can be a powerful driver of local economic activity and can have a significant positive impact on local economies, particularly in deprived areas.

In line with recent evidence targeted investment in social and affordable housing has the twin benefits of meeting housing need for those unable to secure good-quality and low-cost housing in the market and, at the same time, permitting housing construction to generate economic benefits through creating local job opportunities, supply chains, spending and economic activity.

The additional house building proposals will provide significant opportunities for construction employment. One of the new areas of development that we see is the opportunity to invest in retrofitting skills development at scale. This will create opportunities across a range of skills levels and support inclusive growth by engaging those with lower skills.

Linked to housing supply, Council would also highlight the significant opportunities presented from 'green employment' in creating and sustaining jobs and supporting skills development. We would seek the support of the NI Executive and key NICS departments including Department for Communities, Dept. for Economy and Dept. of Finance to bring forward a green stimulus fund of scale which has housing supply at its core as a key enabler.

Land and Property

31. Are there changes to land & property legislation, policies, processes or procedures that could transform housing supply for the better?

Council would comment that there are certain changes that could benefit housing supply. In terms of land availability there is opportunity for a more joined up approach across the public sector to identify and collate land ownership details and identify lands with potential for housing development purposes considering suitability and deliverability. In tandem with this and as part of a more joined up public sector approach consideration should also be given to optimal ways of working and delivery vehicles for working with the private sector and funders to bring forward appropriate housing development opportunities in a more agile way.

Belfast City Council has been undertaking Strategic Site Assessments in respect of its own lands, as well as adjoining public sector lands and private sector as

appropriate to bring forward opportunities for housing led and mixed-use regeneration. Council have been working closely with the Department for Communities and NIHE in this regard. Various city centre proposals are currently being progressed and a city-wide approach is also in progress, with a proposition as to how this could be further progressed as part of the Community Planning process. The Belfast CPP City Development Board has identified housing led regeneration as one of its key priorities, with a Delivery Group being set up to specifically consider this issue of the collation of public sector land details aimed at bringing forward housing opportunities across the wider public estate and identification of private sector lands as appropriate – with further detail in Question 31 below.

A recent example of a joint BCC/DfC approach is the ongoing Development Brief process for combined BCC/DfC lands in the Inner North West area of the city centre inviting proposals from Housing Associations for a mixed tenure /mixed use development.

As part of a joined up public sector approach further consideration could also be given to optimising the D1 surplus land notification process in respect of lands available for housing.

As set out below (and in other questions) alternative models for delivery and financing should be considered including innovative financing models, Housing Investment Funds and Strategic Land Partnerships.

Council would advocate therefore for a much more joined up approach across the public sector to collectively bring forward housing opportunities with all partners contributing in terms of ensuring the required processes, delivery vehicles, funding and supporting infrastructure are aligned to deliver agreed outcomes.

32. Should the options for making public sector land (local and central government) available to support a wider variety of housing options be explored?

Council believes that further options for making public sector land available to support a wider variety of housing options should be explored. Belfast City Council already actively engages with government departments, NIHE, Housing

Associations, private sector, funders, and institutional investors in relation to the use of lands for housing development and to support a wide variety of housing.

Over the past number of years, the Council have disposed of various surplus lands across the city to Housing Associations, with other proposed disposals ongoing. By way of example the Council are currently working in partnership with a Housing Association in respect of housing development on Council lands at the Gasworks Northern Fringe site. As outlined in the preceding question Council have also been undertaking a comprehensive Strategic Site Assessments exercise across their own lands and are working with other public sector bodies, including DfC, and the private sector as appropriate in respect of their lands to bring forward housing led regeneration opportunities. The Development Brief process for BCC/DfC lands at the Inner North West area of the city centre is one example of the outworking's of this Strategic Sites Assessments work.

As part of the Belfast Community Planning process the CPP City Development Board has identified housing regeneration as a priority and specifically in relation to the use of public sector lands a Delivery Group under the City Development Board is being proposed. The objective of this emerging Delivery Group is to support integrated planning and greater collaboration across partners in relation to the assessment and identification of city wide public sector lands to facilitate housing led regeneration, as well as identifying potential strategic private sector land opportunities, either on their own or in conjunction with adjoining public sector owned lands. It is also intended that this group would explore mechanisms to establish partnerships for development of homes and ways of investing in housing throughout the city, as well as identifying barriers to delivery and potential solutions. It would also consider how best to maximise the wider regeneration benefits, connectivity and place making potential of identified housing development opportunities. It is intended that this could build upon the ongoing work undertaken by NIHE, DfC, BCC and other stakeholders in identifying and assessing public sector lands to facilitate housing-led regeneration within the city, as well as identifying strategic private sector land opportunities, either on their own or in conjunction with adjoining public sector owned lands. As outlined above in question 32 Council would therefore support a holistic and joined up approach to exploring options for making public sector lands available for housing.

As set out in the Belfast Innovation & Inclusive Growth Commission 'Reset for Growth' report it is being advocated that Strategic Land Partnerships are set up to bring together public and statutory bodies to make more effective use of public lands, providing a stable, sustainable supply of land for housing or other development types in line with strategic ambitions. The purpose of such Strategic Land Partnerships across the public sector will be to identify physical assets suitable for assembly into investable propositions of scale. It is proposed that relevant public sector organisations including DfC, Belfast City Council, NIHE and DoF as well as other major public sector landowners and private sector as appropriate could form part of such Strategic Land Partnerships.

At the initial consideration of this Call for Evidence, the Council's City Regeneration & Development Committee requested that the response included a proposal that consideration be given to the possibility of a ring -fenced fund for those areas with the highest need/deprivation.

It is also critical that the supporting infrastructure for housing development is in place and properly financed across the water, energy, and transport sectors in order to support development and the growth ambitions as set out in the Belfast Agenda.

33. Are there land & property practices adopted in other UK or European jurisdictions that you believe would transform supply if adopted here?

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.

The Council notes the Homes England model, acting as the government's housing accelerator with the resources and expertise to drive housing development and responsibility for increasing the number of new homes including affordable homes and homes for market, sale or rent. In addition, they have responsibility for increasing the supply of public land and bringing empty homes back into use and utilising their land and investment to attract private sector investment.

It is also noted that other UK / European jurisdictions adopt similar approaches to those advocated in the Belfast Innovation and Inclusive Growth Commission Report in terms of Strategic Land Partnerships and Housing Investment Funds.

The Council would also note that other jurisdictions utilise additional means to support housing supply, including:

- The provision of 'Green Finance' opportunities and community municipal bonds, for the retrofit of buildings and social and affordable housing for low-income households.
- Grants to support Living over the Shops to help reinvigorate high streets, support City Centre Living and provide low carbon sources of housing.
- Certain planning relaxations, with adequate controls built in, and/or tax incentives for the conversion of redundant office space and retail to residential.
- The use of vesting powers to support provision of land supply in places of need and to assemble sites.

Planning

34: Are there changes to planning legislation, policies, processes or procedures that could transform housing supply for the better? And

35: Are there planning practices adopted in other UK or European jurisdictions that you believe would transform supply if adopted here?

The Call for Evidence paper suggests that the planning system frequently attracts criticism in terms of 'process', but suggests that addressing these improving these processes is unlikely to transform the quantity, quality, sustainability, viability and/or suitability of housing supply in NI.

Council would contend that if unnecessary bureaucracy were removed and processes streamlined, planners could better add value to improve the quality of schemes through Pre-Application Discussions, bringing forward masterplans and generally having more time to help drive improvements in the quality of design and place making. There are also several process challenges in developing Local

Development Plans that serve to hinder the speed of developing and adopting new policies tailored to a local context, which serves to prolong periods of uncertainty for the development industry.

The Department for Infrastructure (DfI) is currently carrying out a review of the implementation of the Planning Act (Northern Ireland) 2011 and issued a “call for evidence” on 15 February 2021. This is a wide ranging review of the planning system as a whole and the Council would recommend that DfC to also review the Council’s submission to that call for evidence for an overview of the wide-ranging challenges and potential solutions that would also help improve the quantity, quality, sustainability, viability and/or suitability of housing supply in Northern Ireland.

The key issues identified by Council are:

- a) too many “checks and balances” at a regional level which serve to cause difficulties, uncertainty and delays in policy development and decision making.
- b) There is considerable “red tape” and unnecessary administrative processes for Planning Authorities to follow. The information requirements for applications at the beginning of the process is far too low and encourages “bad” applications to enter the system.

Council has sought to address this through publication of its "Application Checklist" in November 2018 – the first time anywhere in Northern Ireland guidance has been published on the type of information that should be submitted with a planning application at the start of the process. This has been very successful in front-loading the application process, resulting in higher quality applications and improved processing times. Our review of the Application Checklist was a key component of the Council’s response to the DfI’s Call for Evidence and DfI has already committed to changing planning legislation to improve planning application information requirements at the start of the process. The Council considers there is a need for fundamental reform if the NI planning system is to effectively support Belfast and the wider region.

More specifically, the following bullet points address the Council's views on key issues identified in the Housing Supply Strategy's Call for Evidence, many of which are reflected in the previous response to DfI noted above:

- Locations and use of sustainable travel modes: As noted in our response to Questions 8 and 9 above, there is a significant disconnect between housing growth projections, based on unsustainable past trends, and policy aspirations contained within both regional and local planning policy. The Belfast LDP embodies a 'whole system' approach to future growth, recognising the contribution that different aspects of a development process play towards delivering more sustainable patterns of growth.

In accordance with the SPPS and RDS, the Belfast LDP seeks to locate new homes closer to where residents work, which will maximise the use of existing infrastructure and services, including public transport and active travel opportunities through a network of good quality green and blue infrastructure. Alongside this, it seeks to make the most efficient use of land, promoting the redevelopment of brownfield land and the use of higher densities of development. It also advocates the re-purposing of buildings, particularly within the City Centre where there is already a significant level of vacancy because of the decline of the high street.

In contrast, whilst the rhetoric of much of the regional policy contained within the SPPS and RDS advocates a similar approach to sustainable development, the same documents and associated regional planning processes allow the unsustainable growth of housing on greenfield land in small towns and villages, as well as a significant number of single dwellings in the countryside. As the Call for Evidence notes, this results in a "locked-in car dependency", especially when much of the economic growth continues to occur in Belfast and the wider metropolitan area. This approach also serves to undermine the delivery of the more sustainable housing growth on brownfield land in Belfast, because of an oversupply of remote greenfield land elsewhere.

- Appropriate resourcing: Overall, the Council's Planning Service is well resourced in comparison with other major city planning departments. However, this is far from cost neutral and the fee structure for planning applications should be amended so that local planning authorities are much closer to being cost neutral. A

significant reason for the additional costs is that the NI planning system has some systemic issues that result in it being much more bureaucratic, slow and cumbersome. A significant contributing factor is the inherent system and structure of central and local government in Northern Ireland. Whilst planning powers were largely transferred to local government in April 2015, this did not include key responsibilities such as transport, regeneration, or listed buildings. In relation to housing, the housing authority operates as an independent body (NIHE) linked back to a responsible central government Department (DfC), which is separate from the planning structures. This structure combined with silo working and a lack of accountability is ineffective as currently operated.

In the Council's experience, many of these external 'statutory consultees' are significantly under resourced and unable to effectively support the development management process. Response times are generally poor, and the Council has no influence over resources, priorities or culture in these separate organisations, despite delays in response causing overall delays to decision making. The Department of Infrastructure's Planning Forum is attempting to resolve some of these issues through implementation of the "John Irvine" report, which makes recommendations on improving the role of statutory consultees in the planning application process.

- **Pre-application Process:** Pre-Application Discussions (PADs) are of fundamental importance to front-loading the planning application process, especially for Major and complex Local applications. The PAD process is generally valued by customers in Belfast, particularly for housing schemes, as it provides the opportunity to work through issues such as design and layout, transport and access requirements, parking including green travel measures, heritage and conservation issues, and environmental issues, such as contaminated land, with customers and developers up front.

However, as noted above, statutory consultees are already overburdened and overstretched and unable to effectively support statutory consultation on planning applications. They therefore frequently struggle to properly engage in the PAD process due to lack of resources. Legislative change is necessary to enable statutory consultees to charge their own PAD fees with the income ring-fenced to improve

capacity. Belfast City Council's experience is that that developers would be willing to pay statutory consultees for PAD advice if it would improve the quality of their applications and significantly improve processing times. In our experience, developers would be prepared to pay for a much faster and more responsive service and they already do so for PAD advice from the Belfast planning service. At present, we are currently the only council in NI to charge for PAD advice.

- Developer Contributions: The Council have been a strong advocate of the use of developer contributions as part of the planning system, although it should be noted that this has not to date related directly to the supply of housing. It should also be noted that Developer Contributions in a NI context are a planning tool used to mitigate or manage the impacts of new development, such as ensuring that new development is supported by the right infrastructure or that the environmental impacts of proposals are appropriately managed. The Council's existing approach to developer contributions is set out within the Council's Developer Contributions Framework, helping provide more certainty and transparency to in the process.

Whilst in the future the right policy environment could mean scope to use developer contributions to deliver affordable housing – i.e. a private developer funding the affordable housing – this is different to what currently proposed as part of the emerging Belfast LDP. Under Affordable Housing Policy HOU5, there is an assumption that the affordable housing (whether social or intermediate/shared ownership) can be fully funded by housing associations, and so will not result in loss of income from a private developer. Consequently, viability should be improved as the affordable units are essentially fully funded, reducing the risk for developers and providing the opportunity for cross-subsidy. The key driver behind this approach is that the shortage of affordable housing is driven primarily by access to land, rather than cost of delivery (see also comments on Land Banking under Question 36 below).

- Conditional planning approval: The onus should be for developers to resolve such issues as soon as possible in the development process. For example, if they were to front-load and provide the information upfront at the time the application is made, then there would not be a delay post-decision trying to discharge conditions.

However, there is a role for Planning Authorities to take a flexible and reasonable approach to pre-commencement conditions and only require them when necessary - sometimes the information could be provided prior to occupation depending on the nature of the issue (this would unlikely apply to contaminated land issues which is normally prior to commencement). BCC is producing a series of model planning conditions, in part to help this flexibility issue. Consideration should be given, with appropriate funding, to the commencement of Part 3 of the Waste and Contaminated Land (Northern Ireland) Order 1997, which would ensure that, where possible, those who pollute the land will pay for its remediation so that it is suitable for use.

36: Is land banking hindering housing supply here?

Council believes the “Call for Evidence” presents a balanced view of the role of land banking in hampering the supply of new housing. Although it states that there is data existing to suggest that this is not happening, there is no indication as to what this data is. The Council would argue that land banking does make a significant contribution to the constrained supply of land for housing, especially within Belfast.

In recognition of this view, the consultation paper makes reference to the research undertaken by Belfast City Council in the preparation of its draft Plan Strategy, which suggest that “there may in fact be an untapped land bank in NI, or at least within Greater Belfast”. Page 48 of the LDP draft Plan Strategy Consultation Report notes that the housing monitor data at the time identified land for over 22,000 units, much of which already has planning approval. By the 2019/20 Housing Monitor this figure had fallen to 21,692 but given that valid consents can in many cases be implemented without any further planning approvals, this still clearly indicates that housing delivery is not being hindered by the planning system itself.

It is recognised that there are economic and financial factors and market challenges related to risk and yield which may influence land banking and the lack of progress in housing development. Any approach to increasing housing supply needs to be cognisant of this but also any interventions that may need to be made to unlock such challenges.

37. To what extent do you agree that the NICS could better utilise existing funding (e.g. Block Grant, Financial Transactions Capital, Housing Association Grant, Reinvestment and Reform Initiative) to leverage greater levels of private finance for housing development?

The Council would support the better utilisation of existing funding to leverage greater levels of private finance for appropriate housing development. As set out in the recent Belfast Inclusive and Innovation and Growth Commission Report 'Reset for Growth' the Commission notes with interest the recent announcement by the Minister for Communities to reform the NIHE, establishing a new funding model that would enable borrowing for investment in existing stock and new build. It highlights this is a timely step with a target date of 2025, albeit some way off given the scale of need for new social and affordable housing across the city.

The Commission also noted that it positive that the Department for Communities was developing a Housing Supply Strategy aimed at bringing forward institutional, regulatory and policy change. It highlighted however that this ambition will be matched with appropriate levels of funding and policy change to deliver significant impact. It was felt that the scale of the task will require further intervention particularly in stimulating private sector development, including affordable housing provision.

As per the Commission it is proposed that the regional government and the Treasury should consider developing a Housing Investment Fund. This model has been successful in stimulating new housing at scale across many UK cities. Housing Investment Funds would be dedicated funds that provide financing through a range of innovative vehicles aimed specifically at bringing forward housing development at pace.

38. Are there other ways the private and voluntary community and social enterprise sectors can leverage other forms of funding to increase housing supply?

The Council would commend that all forms of funding and delivery models should be considered as part of a comprehensive assessment of vehicles for the funding and delivery of housing at scale across the city, with appropriate input from the public,

private and voluntary community and social enterprise sectors. The Community Planning structures may be a useful conduit to further consider this.

As set out in the recent Belfast Inclusive and Innovation and Growth Commission Report 'Reset for Growth', the Commission is advocating for the creation of new financial instruments including Housing Investment Funds to provide financing through a range of innovative vehicles aimed specifically at bringing forward housing development at pace.

39. Are there any other areas of market failure that need public and/or private intervention?

As highlighted in the preceding question the Council would commend that a review is undertaken in respect of all potential delivery and funding vehicles to deliver on housing and would propose that this should also identify any barriers to delivery and specific areas of market failure. There is a need also to consider how delivery vehicles and partnership models including those across the public sector and private sector funding institutions could be progressed in a more agile way that provides for appropriate housing development at scale whilst ensuring proper integrated placemaking.

The Council would highlight the very limited scale of residential development that has taken place in the city centre over the last few years with only c350 units completed since 2015, which would suggest that there may be market failure. Estimates suggest that the City Centre population is just over 9,000 people. Scaling up and bringing forward city new mixed tenure city centre residential developments are important in not only addressing housing need but also providing vibrancy to the city centre and supporting its economy and jobs. Over the past two decades development in the city centre has been in the commercial real estate sector with few residential starts since the financial crisis in 2008 and this balance needs to be addressed. The city centre has significant potential to contribute to meeting housing need by having comparatively large areas of undeveloped land close to strong supporting infrastructure. It is imperative therefore that proper consideration is given to unlocking the barriers that may exist in bringing forward

more city centre living which may include de – risking or government intervention as appropriate.

However, in order to support the ambitions of the Belfast Agenda and as set out in the Innovation and Inclusive Growth Commission report there is a need for a radical re-think of investment models involving both the public and private sectors. The housing issue does of course go beyond the city centre and with significant levels of housing stress and a commitment via the Belfast Agenda to the growth of the city's population by 2035 it is clear that housing development needs to be progressed at scale. At present there are a number of gaps principally in terms of the structural models required to support public-private collaboration and access to finance to bring forward developments. Innovation finance solutions, investment funds and public sector interventions will be required to unlock this.

Infrastructure

40. Are there changes to infrastructure legislation, policies, processes or procedures, such as the establishment of an Infrastructure Commission, that could transform housing supply for the better?

The Belfast Agenda highlights the importance of appropriate sustainable development to make the city competitive and to connect people to opportunities. Fundamental to creating the conditions for and enabling this inclusive growth, is infrastructure. This is also reflected in regional policy; the Regional Development Strategy 2035 recognises the importance of infrastructure to support sustainable growth. Fundamental to creating the conditions for and enabling this inclusive growth, including housing growth, is infrastructure.

The Belfast Agenda recognises that there are gaps in Belfast's key infrastructure which must be addressed if the city is to grow. The Agenda identifies that infrastructure planning for Belfast needs to be taken forward in a strategic and integrated way and a core goal of the Agenda is to create a partnership and plan for sustainable urban infrastructure.

The majority of Northern Ireland infrastructure has suffered from long-term under-investment resulting in the need for significant investment in key infrastructure

provision including wastewater, rail, and sustainable and active travel. There is a need for a longer-term regional prioritised infrastructure strategy and updated integrated localised strategic plans such as Belfast Metropolitan Transport Plan and Living With Water Programme. These strategic plans /programmes should provide a holistic and prioritised approach to the delivery of NI infrastructure and critically they need to be considered in the context of a realistic funding model to achieve the level of infrastructure required to enable the region to continue to grow and to compete effectively.

There needs to be an approach that ensures or helps support a process where infrastructure investment decisions can be made, and to ensure delivery on a long-term basis that sits beyond the standard political decision-making timescales. Infrastructure decisions should be made in line with a prioritised and agreed delivery strategy that considers social and economic change, demands and the longer-term return from the investment in terms of growth and sustainability. While political oversight is required, expert independent advice and guidance can help ensure that the infrastructure prioritisation is undertaken based on delivering the sustainable infrastructure requirements of the region as a whole, encouraging sustainable development and promoting the region to grow and to compete effectively.

An independent, expert-led Infrastructure Commission that is transparent and accountable, focusing on strategic prioritisation and delivery could bring value. If the focus is clearly on developing a strategy which will incorporate an infrastructure plan with associated delivery in the form of projects and priorities to improve both the quality and impact of infrastructure development.

An Infrastructure Commission can provide an oversight and challenge role and provide strategic advice and knowledge on infrastructure essential to future housing supply to ensure effective, sustainable and efficient delivery of housing.

41. To what extent do you agree that coordination of housing provision and infrastructure services need to be better aligned?

There is some alignment between housing provision and infrastructure services. The Urban Capacity Study ensures that the most suitable sites are proposed for allocation for housing and that all sites allocated for housing development will have been robustly tested for suitability, availability, and deliverability. This includes consideration of infrastructure constraints and the phasing of development to align with future infrastructure investment.

Community planning also enables local councils, statutory agencies, community, and voluntary sectors to work together to identify local community needs and integrate housing supply with essential infrastructure.

However, there is an opportunity to better align / coordinate housing provision and infrastructure services. As highlighted in Q40 it is critical that there is significant investment in key infrastructure provision that can match the growth ambitions as articulated in the Belfast Agenda and wider aspirations for housing across the city.

42. To what extent do you agree that a Housing Supply Strategy should consider both the provision of new homes and protecting existing supply?

Belfast City Council is committed to inclusive growth so that the success of the city reaches every citizen. Our aim is to connect all residents with economic growth and create vibrant communities where everyone has the opportunity and aspiration to succeed. Therefore, we strongly agree that a Housing Supply Strategy should consider both the provision of new homes and protecting existing supply. As set out in the recent Belfast Inclusive and Innovation and Growth Commission Report 'Reset for Growth', the Commission endorses the need for investment at scale in an energy retrofitting programme across public and private housing stock. This would require new financing and investment models to bring forward.

43. How do we ensure that our housing supply integrates and brings together all the essential infrastructure (hard/soft & critical) required to create thriving homes and communities?

The Belfast Agenda recognises that infrastructure planning for the Belfast city region needs to be taken forward in a strategic and integrated way, not on a project by project basis. This includes hard, soft, and critical infrastructure. In addition it is important to adopt a place based approach to create thriving, inclusive and sustainable neighbourhoods - Community planning enables local councils, statutory agencies, community and voluntary sectors to work together to identify local community needs and integrate housing supply with essential infrastructure.

Housing supply impacts on the need for infrastructure (hard/soft and critical) and this will have some implications for the Local Development Plan, including in terms of land use allocations and providing a policy framework against which to assess future development proposals.

Climate change / net zero

44. Are there changes to climate, sustainability and environmental legislation, policies, processes or procedures that could transform housing supply for the better?

Belfast City Council believes that the introduction of climate legislation in Northern Ireland will support our city ambitions and will support the transition of housing supply in the city. In addition, Council has recently hosted workshops on the Northern Ireland Energy Strategy Options Consultation with the aim of supporting its development.

The issue of climate change, both mitigation and adaptation, is addressed throughout the LDP draft Plan Strategy. This includes matters such as:

- Better integration between transport and land use planning;
- Increased urban densities;
- Reuse of brownfield land and repurposing existing buildings;
- Energy efficiency and green design;
- Avoiding flood risk areas;
- Sustainable drainage systems;
- Green & Blue Infrastructure;

- Active/sustainable travel; and
- Protection of trees and more new planting.

There are many draft LDP policies that seek to mitigate and adapt to the climate emergency across a wide range of policy areas, including those listed above. These include housing, design, environmental protection, and natural heritage policy areas.

As regards climate change' specifically, draft Strategic Policy SP6 - Environmental resilience 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."

The Innovation and Inclusive Growth Commission, Reset for Growth Report has identified that housing should be a key focus to contribute to the net zero commitments. Even though the UK is a leader in smart technology adoption, it is lagging Europe on energy efficiency. In Northern Ireland, less than 50% of housing has an Energy Efficiency Rating (EER) band at C or above. The Commission has identified that a retrofit programme at scale across Belfast would provide a significant boost to the local economy. The Commission has been encouraged by the findings of an independent study, commissioned by the Department for the Economy, which recommends "dramatic change in policy extent and funding levels... for Northern Ireland to put building energy performance in line with the UK's net zero carbon emissions commitment". The study concluded that policies would need to drive an annual peak of retrofits for over 50,000 buildings (across Northern Ireland) within the next decade.

45. Transitioning to low carbon homes will require significant behavioural changes by householders. Is support required to aid the necessary behavioural changes?

Council believes support is required, both financial and in the form of advice and guidance. Belfast Net Zero Carbon Roadmap points to housing as a key priority that must be addressed in Belfast. Behaviour change has been identified as a key area of work by both Belfast Climate Commission and Belfast Resilience and Sustainability Board.

46. Taking into account social impact, what incentives or disincentives could be introduced to positively impact the current and future delivery of low carbon homes?

Council believes potential incentives or disincentives could include regulation, grant aid, finance, information, advice, and guidance.

Innovation

47. Should existing buildings, including our heritage assets, play an enhanced role in transforming housing supply?

The Council supports the use of heritage assets and existing buildings to assist with the provision of housing supply. The adaptive reuse and retrofitting of older buildings for new uses provides an opportunity to ensure the longer-term sustainability of existing buildings and heritage assets. Given potential viability issues, this may however need to be underpinned by the use of central government interventions or incentives.

Given the number of heritage and vacant assets within the city centre and the Council's strong desire to see increased city centre living to help address housing stress as well as providing a diversified city centre offer, bringing vibrancy and supporting people and businesses, this could potentially form part of an overall solution to the delivery of housing within the city centre, whilst preserving the heritage and built environment .

48. Are you aware of any innovations relating to housing including design, construction, procurement, contracting and commissioning that could help transform supply?

Belfast City Council is supportive of the innovation concepts identified by the Future Cities Catapult, which include:

- Connected homes
- Low carbon homes
- Shared living
- Assisted living
- Modern construction methods
- Immersive applications
- Location intelligence
- Innovative financing

49. To what extent do you agree that the Housing Supply Strategy could act as a stimulus to improve and modernise construction skills and increase the importance of the sector?

Council believes that a Housing Supply Strategy may act as stimulus to improve and modernise the construction sector to deliver what industry needs now and into the future, skills. This will be a considerable challenge as it is the key to unlocking improved productivity and enabling construction to thrive and to maintain and deliver the UK's build pipeline.

For example, the net zero agenda challenges us to change the game in how we build new buildings, but also offers a significant opportunity to the smaller firms that power the Repair, Maintenance and Improvement (RMI) sector as we gear up to retrofit millions of homes to meet higher environmental standards.

Similarly, the digital skill needs will create totally new ways of doing things, as well as the potential for collectively massive efficiency gains through small improvements. One example of this is equipping hundreds of thousands of small and micro firms in our industry with the knowledge and skills required to adopt digitalised processes and management tools. For SMEs, cloud, and mobile-based Enterprise Resource Planning (ERP) software streamlines the control of workers, materials, logistics, tools and equipment – in turn driving efficiency, quality and productivity.

Council believes further that to improve the productivity of the construction industry and seize the opportunity for its wider contribution to N.I, it needs to improve the productivity of its main asset – its people. This means attracting talent by offering careers of choice and being a positive and fulfilling place to work and effectively upskilling, re-skilling and cross-skilling the workforce to work effectively and safely.

Construction industry support will need to focus on the key identified areas of skills development to include addressing the key areas of:

- Inclusive Access to the Construction industry as a career for all through direct employment, apprentices, further and Higher education:
- Making the industry attractive as a career:
- Skill competence of individuals:
- Providing skills for a Modern Industry:

There are opportunities to invest in significant re-skilling of local construction companies, particularly focusing on new technologies and retrofitting/integration of environmental solutions. This can potentially provide those businesses with competitive advantage, enabling them to grow their business – including in external markets.

Section 9 – Skills

50. Does the Construction Sector in NI need support to skill up in digital technologies, Modern Methods of Construction, low carbon construction and the whole life performance of house building etc.?

Council believes that Construction Sector in NI needs support to skill up in digital technologies, Modern Methods of Construction, low carbon construction, retrofitting and the whole life performance of house building. That this is a key element of transitioning the economy to enable local people and employers to take advantage of the opportunities created through the journey to net zero.

51. Does the age profile and make-up of the construction sector (older workers/ self-employed) require a specific intervention to support our housing supply in the future?

Council believes new roles are emerging to deliver retrofit, and there is an additional need to plug growing skills gaps in construction. Filling these gaps and delivering new skills for retrofitting will require a rapid shift in NI's provision of existing vocational qualifications.

The complex processes involved in energy retrofitting require 'energy literacy' across all construction roles, and the related occupations listed above. Now is the time to develop new Retrofit training to meet the demand anticipated within the social housing and public buildings across Belfast City. This must include general knowledge of low energy construction and skills in understanding the 'whole house' needs, alongside tailoring to specific skills for the trade or role. In addition, COVID-19 has left many sectors e.g., travel and hospitality, with increased levels of unemployment.

It would be fruitful to explore how the transferable skills of these workers can be utilized in retrofitting. For example, experts in consumer protection from these sectors could potentially combine their existing knowledge with new training on buildings and energy to work within retrofitting.

There are specific challenges around apprenticeships – and the ability of businesses to give time to bring young people on. Attracting additional talent into the system is a must – although consideration should be given to the profile of roles and the nature of employment – this may help to attract more people into this sector.

52. Does NI need some large Green Building Projects such as those being developed elsewhere to help create momentum for a changed skills agenda here?

Council believes NI need some large Green Building Projects such as those being developed elsewhere to help create momentum for a changed skills agenda here this would align with and support Belfast's ambitions to address to transition to net zero within a generation as set out in the Belfast Resilience Strategy. This should connect to the Belfast City Region Deal programme.

We would also highlight the significant opportunities presented from 'green employment' in creating and sustaining jobs and supporting skills development. We would seek the support of the NI Executive and key NICS departments including Department for Communities, Dept. for Economy and Dept. of Finance to bring forward a green stimulus fund of scale.

We believe that both need to work hand in glove: simply commissioning green building projects without having the supply chain in terms of skills and talent within the indigenous construction sector will not be a sustainable approach.

53. Are there any other areas that could impact on the development of the Housing Supply Strategy that you feel have not been covered in this call for evidence?

Council is satisfied that for the most part the Call for Evidence and questions therein provide a comprehensive analysis of the key issues that could impact on the development of a Housing Supply Strategy.

Council further believes that COVID19 has and may well continue to have a destabilising effect upon the economy for some time. Its therefore imperative that the Department for Communities is aware of the positive impact Housing led Regeneration at scale can make to driving inclusive growth in cities particularly after significant economic shocks.

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