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**Belfast City Council Response to the Department for
Communities Housing Supply Strategy 2022 -2037**

February 2022

Questions

Strategic Framework

1. The Call for Evidence consultation showed that there was broad support for the proposed vision, objectives, and timeframe for the Strategy. Based on the comments received we have updated these for the draft Strategy – are you content with these?
2. The assessment of the Call for Evidence has enabled us to develop a total of 15 longer term policies and interventions that will provide the basis to develop appropriate action plans. Do you agree with the focus of these 15 high-level long-term policies and interventions?
3. The Strategy includes an enabling principle to: 'Adopt a whole system approach, collaborate with central and local government and the third and private sectors to inclusively transform supply.' Do you agree with the proposed enabling principle?

Measurement

4. Do you agree with the proposed ambition to deliver 100,000 plus homes over the 15-year lifespan of the Strategy?
5. Do you agree with the proposed indicators to measure the success and progress of the Housing Supply Strategy?
6. Are there any additional indicators that you consider would add value in measuring success and progress?

Delivery and Oversight

7. How can we best ensure that key strategic partners such as other Departments, local government, the Voluntary & Community sector, and private sector can participate in the delivery and oversight of the Supply Strategy delivery?

Action Planning

8. Are there any proven or new approaches you are aware of, that you believe would help us work best with other organisations to develop and deliver the action plans?

Citizen Engagement

9. There was broad support in the Call for Evidence for the need to engage local communities in housing supply to create sustainable, thriving, and inclusive communities. In what way do you consider this could best be achieved and do you have any examples of best practice in this area?

Equality

10. Do you agree with the findings of the EQIA?
11. Are there any other inequalities that have not been highlighted in the EQIA that you believe the EQIA needs to note?
12. Do you agree with the immediate next steps as outlined in Section 5 of the EQIA?

Rural

13. The Rural Needs Impact Assessment outlines that the development of the Housing Supply Strategy is likely to have a positive impact on people on Rural Areas? Do you agree with this assessment?
14. Is there any other evidence, information, or issues you think should be considered in this screening?

Strategic Framework

- 1. The Call for Evidence consultation showed that there was broad support for the proposed vision, objectives, and timeframe for the Strategy. Based on the comments received we have updated these for the draft Strategy – are you content with these?**

The Housing Supply Strategy Call for Evidence proposed the vision that *'Every household has access to a good quality, affordable and sustainable home that is appropriate for its needs'*. The proposed vision for the Housing Supply Strategy adds new element of 'Everyone' having access to a home in a *'thriving and inclusive community'*. This revised vision is welcomed as it encompasses issues such as affordability, accessibility, sustainability, quality, and security of tenure. Additionally, this vision recognises the need not just to build new homes and to protect existing supply but also to build and maintain the inclusive and cohesive places in which homes are located. It focuses on creation of sustainable and thriving places, where the voices of local people have a say, and they can take responsibility with others in how their areas are developed and maintained.

The Council can see clear alignment and synergies between the proposed vision for the Strategy and the Belfast Agenda (the Community Plan for the City) which focuses 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. Moreover, the proposed vision for the Strategy is aligned with a number of corporate strategies and strategic priorities for the Council, including the Belfast City Centre Regeneration and Investment Strategy, the Belfast Resilience Strategy, the Local Development Plan (LDP) draft Plan Strategy, the Inclusive Growth Strategy, and the Good Relations Strategy.

The aim for the Housing Supply Strategy will be to create a housing system that can deliver upwards of 100,000 homes over 15 years. It is centred on delivering five key objectives:

- Increase housing supply and affordable options across all tenures to meet housing need and demand.
- Prevent homelessness, reduce housing stress, and improve and prioritise housing solutions for those most in need.
- Improve housing quality.
- Ensure the provision of housing options that contribute to the building and maintenance of thriving, inclusive communities, and places; and
- Reduce whole-life carbon emissions from both new homes and existing homes and support a 'just transition' to carbon neutrality.

Housing is integral to creating sustainable communities. Consultation and engagement gathered to inform the development and priorities of the Belfast Agenda for the city, found that affordable and

safe housing is fundamental to the quality of life of Belfast citizens. Council has committed to collaborative working through Community Planning to maximise the benefits of housing investment in the city, increasing the tenure mix, growing the population of the city centre, and helping to create sustainable communities. The Belfast Agenda is also seeking to deliver increased social and affordable housing in the city and will measure outcomes through housing supply and housing stress indicators. This included specific targets for the delivery of 1,800 social housing units to 2021 and recognised the need to agree city-wide targets for affordable housing.

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.

In the Belfast City Centre Regeneration and Investment Strategy (BCCRIS – the policy framework for the city centre developed by the Council and adopted by the 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.

There is also a strong degree of alignment between the overall Strategic Aims and Objectives of the Housing Supply Strategy and the city's LDP, as well as the policy aims set out specifically in relation to housing.

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.

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

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

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.

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2. The assessment of the Call for Evidence has enabled us to develop a total of 15 longer term policies and interventions that will provide the basis to develop appropriate action plans. Do you agree with the focus of these 15 high-level long-term policies and interventions?

The Strategy sets out a number of long-term policies and interventions over a 15-year period to 2037, of which the most significant from a Council perspective include:

- Working collaboratively and innovatively with the private, public and third sectors to address issues around land availability and considering issues such as local services, infrastructure constraints, sustainable drainage, digital connectivity, and transport:

The Council believes a collaborative approach involving community, landowners and other stakeholders sits at the heart of all future plans for housebuilding, with placemaking an integral part of this. It is also key that there are strong collaboration across-Government departments so that, for example, there is strong alignment between the policy frameworks and stated outcomes for both planning and housing policy. This is particularly relevant around the supporting infrastructure required, there is a need to ensure that the resourcing deficit for required wastewater infrastructure including exploration of the potential for alternative funding models is addressed to ensure this does not prohibit housing development. In addition, there is a critical need to ensuring we have sustainable transport options, if we are to meet housing growth ambitions, we will need to work collaboratively to deliver on alternative travel options and end car dominance, which has been identified as one the key moves within A Bolder Vision.

In relation to land availability, we welcome recognition that there should be a greater use of public land for housing, as well as recognition that local government has a key role in this alongside central government. It should be noted that the LDP process is the most appropriate mechanism for the consideration of the suitability of any available land for housing, but we recognise that within this context public sector land assets could have an important role to play. It is important that more is done to enable the public sector bodies to dispose of land with a sole objective of obtaining stated regeneration outcomes, especially in cases where this can only be facilitated where the best price that could be obtained for land is not the over-riding consideration. There is also a strong case to be made for re-commencing work to extend regeneration powers to local Council's to further facilitate this objective.

Alongside public sector land, more should also be done to ensure there is a ready supply of private land for housing and we would like to see early actions to disincentivise land speculation and land-banking within the private sector, as well as incentives to help de-risk private development where viability is marginal leading to market failure. The annual housing land availability monitor in Belfast identifies land for over 20,000 new housing units, most of which

has received planning consent, suggesting that the planning system is not the primary barrier to delivery.

- Working innovatively to optimise access to alternative forms of public and private finance such as Financial Transactions Capital (FTC) and institutional funding to develop and deliver new and affordable housing products:

We welcome that the policies will include 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.

- Supporting the delivery of a more diverse range of housing types, delivery of housing solutions for those who are most in need and provide lifetime homes. Encouraging mixed tenure and promote shared housing. Delivering higher quality homes; AND Putting place-shaping at the heart of our actions by developing policies that will support delivery of housing led regeneration, encourage mixed tenure development, and promote shared housing AND Ensuring the planning system, including Local Development Plans can deliver the appropriate supply of housing, reflecting the changing nature of need and demand and with consideration to wider policy influence including adaptive reuse and climate change:

Council believes that mixed tenure housing is important for Belfast and Northern Ireland. Housing policies within the Belfast LDP draft 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 Council believes that housing led regeneration policy contributes to reversing the physical, social, and economic decline of town and city centres. 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. Provision of good quality shared social and community infrastructure is critical for social cohesion and contributes

to the creation of lifetime neighbourhoods. Accessibility cannot compromise attractiveness and the Council therefore supports the need for good design.

We recognise that there is a need for a broader range of affordable housing products available to help deliver these ambitions and note the on-going work in relation to the development of an affordable rent policy and model for NI and to explore the scope for private sector leasing. Whilst this work is to be welcomed, it should be noted that progress on practical delivery of mixed tenure development is required now to maximise the potential of existing proposals both within the planning system at present and those recently granted approval. Furthermore, the imminent adoption of the Plan Strategy for Belfast will necessitate the need for workable solutions for mixed tenure development in a far broader range of circumstances in the very near future.

Within this context, as well as ensuring that Housing Associations can fully participate in creating and delivering new housing options across all tenures, consideration should be given as to how private sector developers can better contribute to affordable housing tenures. This is particularly pertinent in a higher density, City Centre context where retaining ownership of rental properties may be central to the investment models required to ensure developments can be delivered (e.g., Build to Rent). Consideration should be given to enabling the private sector to deliver affordable homes directly, as well as in partnership with Housing Associations.

- Protecting and optimising existing supply, across all tenures, with consideration to retrofit, adaptive reuse and climate resilience AND Supporting the vision and objectives of the Green Growth and Energy Strategies, with an emphasis on improving the energy efficiency of homes and ensuring a just transition to decarbonised solutions.

The 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.

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.

As regards climate change specifically, Draft Strategic Policy SP6 of the Council's draft Plan Strategy states: "The council will support development where it helps to reduce greenhouse gas emissions and is adaptable in a changing climate to build environmental resilience." The Council

have therefore embedded environmental resilience within the emerging LDP and consider this provides good alignment with the emerging Housing Supply Strategy.

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3. The Strategy includes an enabling principle to: ‘Adopt a whole system approach, collaborate with central and local government and the third and private sectors to inclusively transform supply.’ Do you agree with the proposed enabling principle?

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.

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 and private sectors.

Working collaboratively across central and local government and with the private and voluntary and community sectors will be crucial in making a difference to the challenges facing the housing supply system. It is essential to realise the full place making potential of an area. It will also help to ensure delivery remains focused on the vision and objectives included within the Strategy.

Measurement

4. Do you agree with the proposed ambition to deliver 100,000 plus homes over the 15-year lifespan of the Strategy?

The aim for the Housing Supply Strategy is to create a housing system that can deliver upwards of 100,000 homes over its 15-year lifetime. 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 and emerging LDP. We believe that this long-term view is required, supported by short-term action plans and interventions.

Whilst the figure of 100,000 new homes is considered realistic in terms of recent housing delivery rates, the Council note that it is relatively unambitious given that house building over the last 11 years has averaged 6,200 new homes, compared to just over 6,600 required to deliver 100,000 new units by 2037.

Perhaps of greater importance is where these new homes are to be delivered, rather than the overall number. For example, the latest housing statistics from the Department for 2019/20 show that over 25% of the new homes delivered were private single dwellings in rural areas of the Region, which places an unsustainable pressure of supporting infrastructure and the environment and causes increased pressures for existing employment and service centres within the larger urban areas.

Furthermore, there is a significant disconnect between the areas in which housing is most needed, most notably within the social and affordable housing sectors. For example, recent delivery shows that the highest rates of housing growth have been seen in Newry, Mourne and Down and the Mid Ulster Districts, whilst the greatest level of need in terms of social housing and the greatest affordability pressures are seen in Belfast and the North West/Derry.

To illustrate this point, there are currently 11,858 people on the social housing waiting list in Belfast, which represents over 27% of the Regional social housing demand. However, the Housing Growth Indicators (HGIs), which are published by the Department for Infrastructure (DfI) to provide a starting point for planning for future housing growth, suggest only 8.7% of new housing should be within Belfast. The Council has therefore undertaken its own work to inform the LDP draft Plan Strategy and have proposed a far more ambitious target of 31,600 new homes to 2035. This again highlights the need for a joined-up policy environment across different Departments of Regional Government, as well as broad alignment at local level.

The consultation document states (page 33) that 'the Housing Supply Strategy will be delivered through a series of detailed Action Plans, each of which will align with budget periods. The Strategic framework adds (page 8) that 'long term policies and interventions over a 15-year period to 2037 will be divided into enabling action plans over 1–3-year periods. Given the medium to long term nature

of housing delivery at scale, it is imperative that the action planning and funding processes provide an appropriate multi-year framework to support the development of a robust process of action planning, funding, performance management, monitoring, and review. The Council would welcome further discussion on this overall delivery framework and how it may align with similar processes at a local level designed to delivery community planning and other strategic priorities.

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5. Do you agree with the proposed indicators to measure the success and progress of the Housing Supply Strategy?

The measurement of the impact of the Housing Supply Strategy will be monitored and reported upon with reference to a basket of indicators which include:

- Housing Stock figures.
- Number of households in housing stress.
- Number of households who are homeless both presentations and acceptances.
- Proportion of households spending 30% or more of their household income on housing costs.
- Proportion of households who report being either “very satisfied” or “fairly satisfied” with their house or flat.
- Percentage of homes that meet the Fitness Standard.
- Standard Assessment Procedure (SAP) ratings - for assessing energy ratings for homes.

Council agrees that the measurement of the impact of the Housing Supply Strategy needs to be monitored and reported.

6. Are there any additional indicators that you consider would add value in measuring success and progress?

Whilst Council understands there is already a significant amount of data available in relation to existing housing stock there is always room for improvement, and we would support a robust approach to addressing this. 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. It is important from a local government perspective that these associated indicators are available at a District level, as well as Regionally, as this will allow for greater alignment with monitoring processes that are already in place locally.

As noted above, a particular problem that we have encountered in Belfast is a disconnect between the HGIs published by 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 7,400 units between 2016 and 2030, whilst the NIHE's latest Housing Market Analysis estimate the future social housing need alone of over 6,000 units between 2020-2035. Clearly a significant disconnect, without even considering the range of broader housing tenures.

Whilst we welcome recognition that the NIHE's new approach to Housing Market Analysis may provide useful indicators to provide a more nuanced picture of the supply picture against housing need, it is also recognised that this is currently undertaken in an ad-hoc manner and without the necessary frequency to provide a robust monitoring framework. Considerations should therefore be given as to how a more regular programme of locally focused housing market analysis could be provided for this purpose.

Council agrees with the number of households in housing stress indicator to measure the success and progress of the Housing Supply Strategy. For example, 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 also measure outcomes through housing supply and housing stress indicators. By 2021 the Belfast Agenda had committed to delivering 1,800 social housing units and agreeing a city target for affordable housing. Since publishing the Belfast Agenda 1,391 new social homes have been built across the city.

Delivery and Oversight

7. How can we best ensure that key strategic partners such as other Departments, local government, the Voluntary & Community sector, and private sector can participate in the delivery and oversight of the Supply Strategy delivery?

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. 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.

BCC has commented through the Call for Evidence response that the 3 main barriers to delivery of the Housing Supply are Funding, Delivery Vehicles & Land. Delivery of joined up policies and having supported and properly joined up infrastructure, with all 3 having to be overcome to support the development and growth ambitions of the Belfast Agenda, will be required.

As part of the Belfast Community Planning process the CPP City Development Board has identified housing regeneration as a priority. Specifically, in relation to the use of public sector lands a partnership Delivery Group, under the City Development Board, has been created. Through this partnership working the Group's objective 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 land opportunities across all sectors (which includes the private, community and voluntary sector), either on their own or in conjunction with adjoining public sector owned lands. It is also intended that this group will 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 will also consider how best to maximise the wider regeneration benefits, connectivity and place making potential of identified housing development opportunities. By having similar focused aims and objectives across all partners ensures that the Housing Supply Strategy can be delivered within a co-ordinated approach with all stakeholders committing to timeframes, aims and objectives thereby supporting a holistic and joined up approach.

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.

Belfast City Council and partners including NIHE, LPS, DfC and SIB have taken forward the approach advocated for within the Innovation & Inclusive Growth Commission 'Reset for Growth' report around the establishment of a Strategic Land Partnership. This collaborative approach brings together public and statutory bodies to drive forward 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 focus of this group is to identify physical assets suitable for assembly into investable propositions of scale, and importantly will look at the availability of both public and private sector land. There are currently a number of policy, financial and structural challenges to delivery of placemaking housing regeneration schemes via public /private partnerships and this is significantly impacting on the ability to delivery of regenerative housing at scale. We would propose that a Task Group be set up to undertake a sharp, short, and focused review of these challenges and the mechanisms to overcome. This is critical to understand and deliver on optimal ways of working and delivery vehicles that involve the public sector working with the private sector and funders to bring forward appropriate housing development opportunities in a more agile way thus ensuring the required processes, delivery vehicles, funding and supporting infrastructure are aligned to deliver agreed outcomes to provide for appropriate housing development at scale whilst ensuring proper integrated placemaking.

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.

At present there are also 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. Innovative finance solutions, investment funds and public sector interventions will be required to unlock this.

Action Planning

8. Are there any proven or new approaches you are aware of, that you believe would help us work best with other organisations to develop and deliver the action plans?

Council welcomes the details outlined within “Delivering the Strategy”, in that the Housing Supply Strategy will be delivered through a series of detailed Action Plans, each of which will align with budget periods. In our response to the Call for Evidence we called for significant committed investment and funding streams in order to gain traction and create the needed catalytic effect in housing supply. The Innovation and Inclusive Growth Commission, Reset for Growth Report 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 advocate for the approach taken with Community Planning, in Belfast, to assist in working with other organisations to develop and deliver the action plans. As touched on in the previous question, Council have led the community planning process. We worked with partners, including representatives from the statutory, business, higher education, and community and voluntary sectors, to develop a long-term plan to improve the social, economic, and environmental well-being of the city. Council feels that we can continue to develop and improve our collaborative actioning and delivery through strategic partnerships we have forged across the city and utilising the structures that are there to support these for example the Community Planning Partnership and associated boards. These partnerships will go some way to enabling the delivery of new and regenerated inclusive, healthy, sustainable, resilient, and liveable city centre neighbourhoods. We believe that community planning provides a good platform to bring partners and stakeholders together with a clear focus on place including as a priority area Housing Led Regeneration. We would recommend, however, that urgent consideration is given to refreshing the legislative basis of community planning in Northern Ireland to bring it more in line with other jurisdictions such as Scotland and Wales. There is a need to strengthen the role of central government in the process and encourage and enable community planning partners to commit shared resources to implement agreed action plans and programmes of activity to truly add value and unlock growth potential and ambitions to assist with delivering on housing aspirations.

The Community Planning Partnership in Belfast consists of a number of Boards aligned to the pillars of the Belfast Agenda. The City Development Board is of particular relevance, which has representation from across government departments, VCSE, anchor institutions and local development community. This structure provides a key vehicle for the delivery of a joined-up action plan to deliver on outcomes, with a priority themed area of Housing Led Regeneration.

As part of this Council officers and partners brought forward proposals for the establishment of a Housing Led Regeneration Group. This group currently includes representatives from BCC, NIHE, SIB, DfC & LPS and is chaired by the Chief Executive of NIHE. Aligned to the Terms of Reference of this group, the immediate task is site identification across the city with the key purpose as follows:

- 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.
- To 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.
- To consider how to maximise the wider regeneration benefits, connectivity and place making potential of identified housing development opportunities.
- Contribute to realising the ambitions and opportunities which will deliver on the city's housing and population growth targets as set out in the Belfast Agenda.

As mentioned previously the Innovation & Growth Commission 'Reset for Growth' report had recommended that a Strategic Land Partnership be established to identify assets suitable for assembly into investable proportions of scale for housing. In order to accelerate delivery their proposition was that BCC, NIHE and DfC establish a delivery vehicle to utilise public sector land and undertake land assembly to facilitate new low carbon housing at scale across the city. This proposition was also to include the identification of private sector lands and involvement of the private sector. The establishment of the Housing Led Regeneration Group therefore aligns with these recommendations and provides an opportunity to coalesce around the work of the various partners to try and drive forward housing opportunities.

Citizen Engagement

- 9. There was broad support in the Call for Evidence for the need to engage local communities in housing supply to create sustainable, thriving, and inclusive communities. In what way do you consider this could best be achieved and do you have any examples of best practice in this area?**

The Council is committed to early engagement with local communities and stakeholders to ensure from the outset they are involved in shaping places that will encourage sustainable, thriving, and inclusive communities.

The Council has sought to encourage wide-ranging and comprehensive discussions on the Belfast Agenda and more recently the review of the Belfast Agenda (The Belfast Agenda: Continuing the Conversation), 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 in March 2018, which set out the method and timeframe for engagement on the draft Plan Strategy and POP which states when stakeholders and the community could contribute to preparation of the LDP, its Sustainability Appraisal (SA) and decisions around planning applications. It promotes a more meaningful and effective approach to enable interested parties and the local community to engage early in the plan process and throughout its preparation.

Council understands that housing supply requires a people-focused approach to the planning and design of new and future developments and places therefore Council places great emphasis on collaborative engagement between applicants and stakeholders in advance of a full planning submissions.

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 that 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, safe, and thriving communities.

Council has also led on various non statutory Masterplans and regeneration plans focused on the regeneration and 'place making' of specific areas, with community participation being integral to this process. Consultation and engagement have included workshops, events, and discussions in the heart of communities where residents, landowners and other stakeholders can become involved realising the full place making potential of an area.

Council believes regular, collaborative, and inclusive community engagement is fundamental to shaping our city at all levels. The Belfast City Council Consultation and Engagement Framework, 2020, sets out a pathway to how we listen, consult, and involve people. We are committed to ensure that all voices have an opportunity to be heard, particularly those who may find it more difficult to participate because of disability, age, language, caring responsibilities, or any other circumstance. Our consultation is guided by the principles contained in the Equality Commissions guidance "Section 75 of the Northern Ireland Act 1998 - A Guide for Public Authorities (April 2010)" and our Equality Scheme - chapter 3, 'Our arrangements for consulting.

As well as traditional methods of consultation, Council has invested in digital technology and has created a dedicated online engagement platform to make it easier for residents and stakeholders to share their thoughts and ideas at an early stage and encourage open and ongoing dialogue. Your Say, noted in the Housing Supply Call for Evidence, is a platform where residents and other interested parties can submit ideas and comments and get involved in online forums and much more.

Council feels that we can continue to develop and improve our means of engagement through strategic partnerships we have forged across the city and utilising the structures that are there to support these for example the Community Planning Partnership and associated boards. 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.

Equality

10. Do you agree with the findings of the EQIA?

The Council has submitted through the call for evidence that it is satisfied with the framing of local demand based on the constructs of accessibility, adequacy, and sustainability. The EQIA has examined data across all section 75 groups and rightly recognises that not all groups experience the same housing challenges and welcomes that inequalities will be addressed by improving housing solutions for those most in need. This also acknowledges the increasing diversity within Belfast and the historic and systematic inequalities in relation to housing, particularly in Belfast, where public segregation in Belfast has increased to 94%

11. Are there any other inequalities that have not been highlighted in the EQIA that you believe the EQIA needs to note?

The Strategy's vision statement:

"Everybody has access to a good quality, affordable and sustainable home that is appropriate to their needs and is located in a thriving and inclusive community" ...provides an opportunity to maximise equality of opportunity and good relations. It is recognised that it can be difficult to engage with some harder to reach groups. However, it is imperative that vulnerable groups such as young people leaving care, victims of domestic violence, refugees and others are not overlooked.

The Council has previously highlighted that data gaps and how they relate to inequalities have been evidenced through the increased use of the Outcome Based Accountability (OBA) methodology for example in community planning. Increasing the ability to extract knowledge and insights from structured and unstructured data is becoming central to how we apply actionable insights across areas. The centrality of the work to address data gaps, as identified by the ECNI and the Wallace Report is fundamental to addressing vertical and horizontal inequalities.

12. Do you agree with the immediate next steps as outlined in Section 5 of the EQIA?

The Council agrees that the Housing Supply Strategy must be set in the context of persistent inequalities in housing supply across Northern Ireland and welcomes the positive ways in which the EQIA will lessen the severity of any adverse impact on any relevant equality categories.

The HSS as a long-term framework for guiding transformational change and the challenges associated with housing supply is needed to address those challenges which are contributing to increased levels of homelessness and housing stress, the gap between housing requirements and new housing supply and the affordability and accessibility problems faced by renters and first-time buyers.

The Council welcomes that the strategy acknowledges the critical importance of considering housing supply through the lens of equality of opportunity and good relations and the commitments to learn from elsewhere on the approaches to increase stability and security for people in poverty such as the 'Housing First' model and the interdepartmental working through the covid-19 model.

Through the call for evidence, the Council has submitted 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).

The Council agrees that the current social housing stock needs to be protected and a fair social housing allocations system implemented which will ease housing stress. The impact of Equality of Opportunity and Good Relations is welcomed through the development of a monitoring framework which will consider the impact of investment.

Rural

13. The RNIA outlines that the development of the Housing Supply Strategy is likely to have a positive impact on people in Rural Areas. Do you agree with this assessment?

The Council agrees that the development of the HSS will impact positively on people in rural areas. The assessment rightly identifies the challenges to housing supply in rural areas and acknowledges that specific policies emerging from the Strategy will be subject to RNIAs as necessary.

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. The Council acknowledges that community led housing can be an innovative approach with the potential to provide homes that are affordable to buy or rent, whilst sustaining local economies and public services. This in turn should mitigate against:

Poverty

Poor Health and Wellbeing

Economic Inactivity

Homelessness and displacement of homelessness into regional cities.

14. Is there any other evidence, information, or issues you think should be considered in this screening?

The Council recognises that since the start of the covid-19 pandemic in March 2020, government advice has recommended that employees who 'can work from home, should work from home'. This has been particularly challenging for those living in rural areas where access to broadband has been a greater issue than in rural areas and welcomes the recent announcement by the Economy Minister, Gordon Lyons that public funding of £32 million will be utilised to extend gigabit capable broadband coverage to reach an additional 8,500 homes and businesses in predominantly rural areas in Northern Ireland.

General

We would welcome any other comments or suggestions you have that you consider are relevant to developing and delivering the Housing Supply Strategy.

We welcome the opportunity to respond to this consultation process and are keen to stay engaged in this very important area of work, to ensure the ambitions of the Belfast Agenda are realised in relation to Housing Supply, to meet the demands of attracting 66,000 additional residents to the city. We would like to take this opportunity to provide further comment which is relevant to the development and delivery of the Housing Supply Strategy:

- There are currently a **number of policy, financial and structural challenges to delivery of placemaking housing regeneration schemes via public /private partnerships** and this is significantly impacting on the ability to delivery of regenerative housing at scale. Council would propose that a Task Group be set up to undertake a sharp, short, and focused review of these challenges and the mechanisms to overcome. This is critical to understand and deliver on optimal ways of working and delivery vehicles that involve the public sector working with the private sector and funders to bring forward appropriate housing development opportunities in a more agile way thus ensuring the required processes, delivery vehicles, funding and supporting infrastructure are aligned to deliver agreed outcomes to provide for appropriate housing development at scale whilst ensuring proper integrated placemaking.
- **Homeless Demographic** – According to NIHE figures at the end March 2021 at least 11,781 Belfast households were on the waiting list for a social home. At least 8,689 of them were living in housing stress, and of this group, at least 6,851, equivalent to 4.8% of Belfast households, were recognised as Full Duty Applicant homeless. It is therefore important to highlight that Housing supply is not just about mixed tenure (social, affordable, private) but the homeless demographic has an increasing level of unmet need also. There is a pressing need to articulate how this will be reflected within the Housing Supply Strategy.
- **Infrastructure** - There is a need to ensure that the resourcing deficit with required wastewater infrastructure including exploration of the potential for alternative funding models, is urgently addressed to ensure this does not prohibit housing development. The HSS should demonstrate that there is a clear route map to show how the housing growth ambitions can be facilitated in terms of all the requisite infrastructure requirements and particularly in relation to the wastewater infrastructure.
- **Innovation and Inclusive Growth Commission, Rest for Growth** – whilst Council referred to the IIGC RfG report within responses to questions outlined in the consultation,

and have made further comments which align to the recommendations, we would like to specifically highlight a number of key points which are relevant to the development and delivery of the Housing Supply Strategy particularly around the need for structural models to support public-private collaboration and Housing Investment Funds:

- Renewed Future City – Housing: The Commission considers that the policy position, as articulated through the Belfast Agenda, remains sound. However, their view is that the levers required to action these commitments at the pace and scale necessary to make an impact on these ambitions are not currently in place. They identified a number of key gaps, principally in terms of the structural models required to support public-private collaboration and access to finance to bring forward developments. The Commission propose the establishment of a number of new institutions, namely a Strategic Land Partnerships and Housing Investment Funds. The Commission note the Department's work on developing a Housing Supply Strategy, however they outline that It is critical that this ambition will be matched with appropriate levels of funding and policy changes to deliver significant impact. The Commission feel that the scale of the task will require further intervention, particularly in stimulating private sector development, including affordable housing provision. For this reason, they suggest that the regional government and the Treasury should consider developing a Housing Investment Fund. This model has been successful in stimulating new housing construction at scale across a range of classes in many UK cities.

	Strategic Land Partnerships	Housing Investment Funds
What is it?	The purpose of strategic land partnerships across the public sector will be to identify physical assets suitable for assembly into investable propositions of scale for housing or other development purposes	Housing Investment Funds will be dedicated funds that provide financing through a range of innovative vehicles aimed specifically at bringing forward housing development at pace
How will it work?	Strategic Land Partnerships will 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	These vehicles will address market challenges related to risk and yield that have historically acted as a barrier to investment in housing in Belfast and Northern Ireland, they will work by de-risking investment
Who needs to be involved?	Relevant public sector organisations including Department for Communities, Belfast City Council (for Belfast investment projects), Northern Ireland Housing Executive and Department of Finance as well as other major public sector land owners and private sector as appropriate	Partners to include local councils and other public sector land owners and private sector as appropriate
What advantages would it have?	Simplified governance and management process to release land for agreed uses, supporting delivery of strategic ambitions relating to housing and economic growth	It would provide assurances to the market to support the delivery of city and regional ambitions and would potentially lever additional resources for investment

- Key Proposition: Create sustainable, vibrant communities in the city centre, delivering 11,500 new homes by 2035. The Commission's proposals to accelerate delivery include Council, Northern Ireland Housing Executive (NIHE) and Department for Communities (DfC) to establish a delivery vehicle to utilise public sector land and undertake land assembly to facilitate new low carbon housing at scale across the city centre; (Note – as above a Housing Regeneration Group has

now been set up under the Community Planning Partnership: City Development Board with BCC, NIHE, LPS and DfC, with a key focus of the group in identifying and utilising public sector lands). Vehicle should also develop housing mix, amenities, and neighbourhood development plan for city core. Target: 11,500 new homes in 10 years; Create new financial instruments including Housing Investment Funds to address market challenges related to risk and yield.

- **Funding** – Council advocate for consideration of how FTC and the Northern Ireland Investment Fund, Levelling Up Funds or other funding can be best utilised or refocused to support housing led regeneration priorities and unlock development. Of critical importance, particularly where there are viability issues and to underpin proper placemaking, there is a need for funding to facilitate enabling infrastructure for housing development. Specific funding for this should be prioritised in order to bring forward housing led regeneration schemes at scale.
- **Collaboration** – There is a need to ensure commitment to a collaborative public - private sector approach to unlocking key challenges with identified major city housing led regeneration schemes, recognising that these will not only contribute to housing supply but can act as a catalyst for inclusive economic growth. Council would advocate for optimal stakeholder/delivery vehicles for progression. This includes the need for the Department to continue collaboratively working with the Council, the Northern Ireland Housing Executive, Housing Associations, and the private sector to bring forward mixed tenure residential development across the city, and particular exemplar schemes within the city centre, including the strategic use of public sector lands and addressing current policies which inhibit Housing Associations to maximise housing led regeneration delivery.
- **Planning Policy** – Council notes the submission does question the credibility of the HGIs and the proposed regional housing target, which we understand was also the focus of discussion at one of the virtual consultation events. Although the Strategy refers to the Review of the Planning Act and reform in planning, which are undoubtedly important to housing delivery, the evidence doesn't seem to support this overly simplistic assertion given the degree of extant permissions that exist as illustrated in the housing monitor annually.
- **Current Policy and Legislation** – in relation to ensuring the appropriate policy frameworks are in place to accelerate housing supply, it is understood that there are issues with the current Housing Association Guidelines, which strongly need addressed. Our current understanding would suggest that the following issues need to be addressed:
 - **Land:** These require a housing association to have acquired land ownership prior to award/payment of grant assistance (land purchase, construction). However, where the land is currently in public ownership then there is scope, utilising the Development Brief process, for reflecting this public ownership of land as distinct from privately owned

thereby potentially negating the need for the housing association to initially acquire a site. This ties directly into when a housing association would be expected to then pay to acquire publicly owned land and to explore potential for deferred terminal payment or equity ground rent payment approaches which will also assist with de-risking development.

- Delivery of private sector tenure as part of a mixed tenure development is also currently impeded by **Article 15** of the Housing Order with limitation on delivery of private housing by housing associations to the existing co-ownership model only (i.e., no private sales or rentals). With the desire for city centre development to be delivered across all three housing tenures there is an urgent need to address this policy issue if this objective is to be advanced.
- **Barriers:** BCC have commented through the Call for Evidence response that the 3 main barriers to delivery of the Housing Supply are Funding, Delivery Vehicles & Land. Delivery of joined up policies and having supported and properly joined up infrastructure, with all 3 having to be overcome to support the development and growth ambitions of the Belfast Agenda, will be required.
- Current lack of a **policy on affordable housing**, aligned to the revised definition of affordable housing, represents a risk to housing associations developing a business case in absence of affordable housing products.
- Whilst not policy per se – lack of a **city centre waiting list** impacts on clarity for housing associations on latent demand.
- **Rent Levels** – welcome clarity on whether the housing supply strategy will cover rent levels and controls, however mindful that this may be picked up in other legislation.
- **A Bolder Vision** – which has '*Promote City Centre Living*' as one of its 4 key moves aimed at encouraging city centre living by ensuring the enabling infrastructure is in place to facilitate city centre living with place making at its heart. It highlights the importance of providing greater quality, choice and affordability of accommodation and of critical importance is establishing a city-wide network of people friendly routes and city parks to create and underpin a liveable city centre. Council believes that the delivery of A Bolder Vision priorities via the joint BCC/DfI/DfC approach will be critical to the successful delivery of city centre living. From a Belfast perspective therefore, Council would highlight that the future delivery of A Bolder Vision is intrinsically linked to the HSS and should be embedded within Central Government /Executive priorities.
- **High Street Task Force** – city centre living is critical to the reimagining and future sustainability of the high street / city centre and should be central to the High Street Task Force recommendations and embedded within Executive funding priorities. Increased City Centre Living is also a key area within the Council's Future City Centre Programme

which is charting the way forward for the diversification and sustainability of city centre uses. The Future City Programme is a multi-faceted programme that seeks to bring together a number of strategic initiatives and projects within one overall programme approach to address the issues impacting upon the city centre. It includes projects and interventions across various pillars of work centred on regeneration and connectivity, increased city centre living, investment, inclusive economic and cultural growth.
