Dear Sir/Madam,

Thank you for the opportunity to comment on the Belfast City Council Local Development Plan draft Strategy.

The Department welcomes the Draft Plan Strategy’s visible commitment to improving good relations and promoting/advancing the shared housing agenda in Belfast that is evidenced throughout the document. The clear articulation of the desire to continue developing Belfast as a city for all mirrors the vision of NI Executive’s Together: Building a United Community Strategy to deliver “a united community...where everyone can live, learn, work and socialise together”, and is a key theme across the Plan Strategy from those sections dealing generally with the proposals to grow the residential population in the city centre through to specific proposed innovative local plan policies e.g. CGR1 and CGR2.

I hope the following comments are helpful:

- The Department would expect the ‘sport’ element in the Local Development Plan to also reflect the broad thrust of the need identified within the Facilities Strategy (draft) and Local Area Reports.

- At para 7.1.5, the draft plan strategy policy aims seek to facilitate ‘city centre living’. However there does not appear to be any specific focus throughout the document on this particular matter nor how this would be achieved. Without specific policies or a greater emphasis on city centre living this key element of change for the city centre may be overlooked. This point was previously raised at recent workshops held by the Council.

- At para 7.1.28, the draft plan strategy sets out the current definition of affordable housing (as per SPPS) which allows for the future expansion of affordable
housing products. Wording in subsequent paragraphs helps to future proof the
document in light of ongoing considerations to examine if and how the definition
of affordable housing might be amended to better suit current and foreseeable
housing demands and increase the supply of suitable housing. It is worth noting
that any change to the current definition will likely require approval of two
Ministers – Communities and Infrastructure.

- The draft plan strategy recognises a move towards mixed tenure developments
  and specifically at para 7.1.36 states: ‘Within mixed tenure developments,
  affordable housing should be distributed or ‘pepper potted’ throughout a
development, rather than concentrated in a specific part of a site. It should be
‘tenure blind’ – i.e. indistinguishable from the general market housing in the
development – to ensure it is well integrated within housing schemes. In the
case of apartment buildings, some clustering of affordable units may be
considered appropriate where ‘pepper-potting’ would lead to less efficient
management arrangements.

- The Department for Communities in collaboration with the Northern Ireland
  Federation of Housing Associations recently launched a draft think piece
entitled ‘Mainstreaming Mixed-Tenure in Northern Ireland – the way forward for
developing homes?’ This paper points out that literature on spatial
configuration suggests there is no set ‘blue print’ for ideal mixed tenure
development. With this in mind, the Council might consider softening their
approach, perhaps advising that their preferred option is to ‘pepper pot’ rather
than to prescribe this in every case. This point was previously raised at recent
workshops held by the Council.

- The Plan Strategy makes the assumption that homelessness is covered
  through social housing need assessment. It would be preferable to make
specific mention of this issue, e.g. after HOUS in the amplification.

- At para 7.3.29, reference is made to “living over the shop”, a grant scheme
  which closed some years ago. This reference should be removed on the basis
that it falls within the broader aim to facilitate city centre living

Yours sincerely,