

Submitted to **Belfast LDP 2035 - Plan Strategy**

Submitted on **2018-11-15 12:04:17**

Overview

1. Data Protection

Q1. Please tick to confirm that you have read and understood the privacy notice above.

I confirm that I have read and understood the privacy notice above and give my consent for Belfast City Council to hold my personal data for the purposes outlined.

Q2. Do you consent for us to publish your response?

Yes, with my name and/or organisation

2. Your details

Q3. Are you responding as an individual, as an organisation, or as an agent acting on behalf of an individual, group or organisation?

Individual, Organisation or Agent:

Organisation

Q4. What is your name?

Title:

Mr

Full Name:

Justin Cartwright

Q5. What is your telephone number?

Telephone number:

██████████

Q6. What is your email address?

Email:

████████████████████

Q7. Did you respond to the previous Preferred Options Paper consultation phase?

No

If yes, and you have your previous response ID (beginning ANON) please enter it here::

4. Organisation

Q9. If you are responding as a representative of a group or organisation, please provide details below:

Organisation:

Chartered Institute of Housing

Your Job Title:

Policy and Engagement Manager

Address Line 1:

Carrmoney House

Line 2:

Edgewater Office Park

Line 3:

City:

Belfast

Postcode:

BT3 9JQ

6. Before you submit your comments

7. Is the plan sound?

Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

Q12. Do you consider the Plan Strategy to be sound or unsound?

I believe it to be sound

8a. Sound

Q13. If you consider the Plan Strategy to be sound and wish to support the Plan Strategy, please set out your comments below:

Reasons for support:

CIH Northern Ireland welcomes the opportunity to comment on the council's draft plan strategy. We support the ambitious aspirations of the plan strategy and its strong vision for the future of Belfast city. We particularly welcome the focus on achieving a strong supply of affordable accommodation in the right locations, as well as the recognition that land availability is one of the main barriers to achieving this.

We believe the plan strategy's affordable housing policy could act as an important contributor to the supply of housing that is affordable, thereby helping to reduce the levels of housing stress in the city which are some of the highest in Northern Ireland.

We support the minimum 20 per cent requirement for affordable housing on sites greater than 0.1 hectares and/or containing five or more dwelling units. Research in Britain has shown that standardised approaches are statistically related to achieving more planning agreements and higher value obligations. Furthermore they serve to provide a degree of predictability, so developers can to a certain extent calculate the impact of the obligation in advance of the agreement.

Not only would a minimum requirement contribute to an increase in provision of housing that is affordable, but it would also contribute to developing more mixed-tenure neighbourhoods.

On 14 November we published a research report on the future of social housing policy, Rethinking social housing Northern Ireland, which was principally sponsored by the Department for Communities. The research involved interviews with over 230 housing and associated stakeholders, 35 per cent of whom were tenants or residents.

The research participants valued social housing and what it offers. At the same time they do not want to see large, single-tenure social housing estates being built. Instead, mixed-tenure developments are valued as they are seen to support sustainable communities. They can also facilitate a mix of people from different community and income backgrounds.

The report therefore recommends that local government facilitate mixed-tenure schemes through the planning system, and implement systems of planning obligations for social and affordable housing.

We are pleased to see that Belfast City Council's draft plan strategy reflects these recommendations and we will be urging other councils to adopt similar measures.

Stigma is an issue that has been raised as a barrier to mixed-tenure developments, due to a perception that the presence of social housing impacts on the sale prices of private homes. However the evidence is that mixed-tenure developments do not reduce property prices, provided the housing quality and the design of the development overall are of a high standard. Tenure blindness serves to remove unnecessary differences between social and private housing – we therefore welcome the draft plan strategy's policy that affordable housing not be readily distinguishable in terms of external design in such developments.

While we support the draft plan strategy in relation to the above points, the affordable housing policy needs to be implemented well. The minimum affordable housing requirement, while being as much as possible a robust and standardised approach, must also take stock of the circumstances and contexts of local housing markets.

First, this includes being informed by up-to-date information and evidence on local markets, including housing needs. This is important in order to achieve, through negotiation, the right mix between social rented homes and co-ownership housing in a development, thereby avoiding for example too much social housing in areas of low housing need, or too much co-ownership housing in areas of high housing need.

Second, viability evidence is important to avoid delays in agreements and housing supply through unviable requirements. In one case study from England a council had more forms of obligations than bordering councils. Despite this, the adjacent councils' development rates were dropping faster reportedly due to their unrealistic affordable housing requirements – some were still asking for a 40 per cent provision of affordable homes after the market downturn and this meant too much negotiation.

Furthermore we would recommend additional clarity around the process by which the affordable housing requirement is secured.

For example, one of the cleaner methods used by some councils in Britain is a requirement for a percentage land contribution by the developer, after which the affordable housing provider purchases the bricks and mortar on the associated land. This approach maximises clarity for developers – they can factor the cost into negotiations with land owners while the relevant homes represent a pre-sale which can give funders confidence. We recognise that this approach may amount more to a contribution rather than an obligation, and developer contributions for affordable housing do not appear to form part of the current planning policy framework. It nevertheless serves to demonstrate the kind of approach that should be sought.

Finally, we recommend that the council be proactive in its engagement with the housing sector early on in the planning process with cognisance of the current ways that social and intermediate housing are delivered. This will help to ensure a smooth experience for all parties involved in the delivery of these sites, in what is a new and welcome opportunity for partnership working between the council and private and social housing providers to deliver the right homes in the right places for the people who need them.

Files should be no more than 10MB and in either PDF or Microsoft Word format:

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9. Type of Procedure

Q18. Please indicate if you would like your representation to be dealt with by:

Written representations