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Planning Department
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Date: 9th February 2022

Dear Sir/Madam,

Re: DfC Housing Supply Strategy Consultation: Council response

In response to the public consultation on the above, I wish to make the following comments on behalf of the Council's Planning Department:

Strategic Framework

1(a): Vision

It is unclear how a "thriving and inclusive community" is defined, particularly in a council area with a significant number of single dwellings in the countryside, where there is no community in the immediate area.

The Strategy has the aim to build upwards of 100,000 homes in 15 years, with at least 1/3 to be social housing and a significant number of intermediate homes. This overall total equates to around 6,700 units per annum. The ONS dataset:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ukhousebuildingpermanentdwellingsstartedandcompleted/current>

Indicates that the annual build rate in Northern Ireland since January 2016 has been around this figure, which suggests overall this figure is reasonable. However, the proportion completed by Housing Associations is very low compared to the target in the strategy, highlighting the need for their current ability to contribute towards this target needs to be reviewed.

Figure 3 shows how the level of completions is higher than the HGIs. The current HGIs indicate a figure of 84,800 units for NI over a (albeit different) 15 years.

The document refers to the DfC's Housing Symposium in 2017 and its recommended overall target of 8,000 new dwellings per annum (which equates to 120,000 new units over 15 years), which appears now to be an under-estimate. A new model to estimate future requirements would be welcomed as suggested, with DfC indicating this would be the HMA reports.

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It is unclear how this proposal sits with the HGIs, which are produced by DfI and are used to inform local development plans. DfI consider the HGIs are a robust evidence base. Has DfI indicated that HGIs should be replaced with HMAs, or is there a formal relationship between the two sources that has been supported by both Departments? Confirmation of this would be helpful to councils as they progress their local development plans.

1 (b) Objectives

Objective 1:

The introduction to this objective makes reference to “Creating the right policy and legislative environment, including better utilising the powers already in place to support new supply and reuse/adapt existing buildings, for example land acquisition, rating and planning powers”. However, it is unclear what is meant by the reference to planning powers – does this refer to utilising the powers already in place or creating the right policy and legislative environment, or both?

Clarification would be helpful. In any event, this would require a change via DfI, and appropriate consultation. For example, in an attempt to increase housing supply via the reuse/adaptation of existing buildings, any proposals to allow for changes of use from office to residential to be treated as permitted development, as has occurred in England, should be assessed as unsatisfactory living accommodation could be the unwelcome outcome of this approach.

The issues outlined in the first bullet point are similar to planning considerations for housing generally regardless of its tenure and should guide the distribution of new housing in local development plans.

It is unclear in the second bullet point if the planning data referred to is the Planning Portal, which is to be ungraded later this year, or another source. Clarification would be helpful.

No comment on the remaining bullet points.

Objective 2:

Under the Existing and New Enabling Activities, the title states: We will, and the first point is that: We will build more social houses, especially where they are most needed. This suggests DfI will build these social houses – clarification on the intended delivery of these would be helpful.

The support for the establishment of an Infrastructure Commission is noted.

Objective 3:

It is considered the Long-Term Policies and Interventions do not reflect the Introduction with regard to tenure neutral homes.

It is unclear who the 'our' is referring to in the Introduction and Long-Term Policies and Interventions. Does the second bullet point refer to new homes where the intended occupier has existing care needs, and would this include those with a need for specialised accommodation? Is it intended that this will apply to private sector housing?

The uplift of the Building Regulations, as referred to in the Existing and New Enabling Activities is supported.

The introduction states: "It is also about supporting the principles of tenure neutral standards and requiring housing developers and homeowners to ensure their properties meet current and future fitness standards. It must also necessitate action to ensure our buildings are fit for the future and meet our 2050 Net Zero Carbon objectives.

Linked to Objective 2, other issues around quality and design also include considerations around whether our homes are designed to best meet our needs. In this respect, stakeholders emphasised the need for good design, so that accessibility does not compromise the attractiveness of their home or demarcate their home as different from surrounding homes."

Objective 4:

As DfC is a participant in the planning function, and not the determining authority, the wording of the second bullet point should be reconsidered.

The acknowledgement that a 'One Size Doesn't Fit All' approach is welcomed. The second paragraph in the Introduction should clarify the role of DfC in this proposed approach. The majority of developments in Northern Ireland's towns tend to smaller scale, and towns overall may be considered to comprise a neighbourhood, or a small number of neighbourhoods based on the DfI's Planning for the Future – Time for Change 15 minute neighbourhood approach. The suggestion that the provision of mixed tenure in new developments creates a balanced social mix may be more appropriate to larger scale developments. On smaller schemes as is common in many towns, the local context in which the development site sits is a consideration.

Objective 5:

Under the first Long Term Policy and Intervention, is it the intention of DfC to contribute to these measures in private sector housing?

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2: High level long-term policies and interventions

The roles of specific parties, their extent of influence and ability to deliver the longer-term policies and interventions across all of the housing market should be fully considered to determine if rewording is required. If not, the policies and interventions may not be achievable.

3: Enabling Principle

This is a laudable principle, but its delivery may be difficult without specific steer from the relevant Central Government Departments, e.g. through necessary changes in legislation. Housing associations, with the adequate support of DfC and financial assistance, may have the ability to be more active in the process. It may be difficult to include the private sector within this approach.

4: Measurement

As not all of the Housing Market Analysis reports have been completed, it is difficult to comment. Also, the response from DfI, as the originators of the HGIs, to this proposal would be welcomed.

The proposed ambition includes a 30% target for affordable housing, in effect 30,000 homes. Is this a realistic target for this sector?

Given the level of affordable housing that is required, the use of the threshold policy in local plans should not be considered a primary source for these units. Specific land zonings for affordable housing would be a more effective delivery mechanism.

The NI population is forecast to increase by 41,900 between 2020 and 2035, <https://www.nisra.gov.uk/system/files/statistics/NPP20-Bulletin.pdf>. While this is not the same timeframe, based on a household size of 2.0 per unit, this equates to a possible housing need for around 21,000 new units. Do issues such as hidden households, housing stress, new demand from the existing population, vacancies, and second homes equate to an extra 80,000 new units?

5: Indicators

No comment. The Community and Place Indicators are in development.

6: Additional Indicators

An indicator relating to the proportion of housing in the affordable and private sectors may be helpful.

7: Delivery and Oversight

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Under the Delivery Principles, the private sector is not referred to, although it is elsewhere in the document.

The first principle states that DfC will provide leadership across central government, local government and third sector in relation to housing supply. More information on the intended leadership to local government is required, as it is up to local authorities to defend their planning decisions and provide the required evidence to do so.

8: Action Planning

Given the high level of affordable housing requirement (at least 30%) contained in the proposed strategy, the NIHE suggested Local Development Plan approach of a percentage on sites over a certain threshold will deliver a small proportion of affordable units in the council areas outside of Belfast City and Derry City and Strabane District, and could affect their delivery timescale as they are related to a private sector scheme on the same site which comprises the majority of the development. The size of most of the larger settlements in the remaining council areas lend themselves to zoning of land for affordable housing purposes, which could include a small proportion of private sector units if necessary.

9: Citizen Engagement

No comment

10: EQIA

No comment

11: EQIA – additional issues/inequalities

No comment.

12: Immediate Next Steps

No comment.

13: Rural Needs Impact Assessment

The Rural Needs Impact Assessment states:

“The Housing Supply Strategy aims to expand the choice of tenures available in NI and to reduce the number of people experiencing housing stress while improving the quality of rented accommodation available.” This appears to be an acknowledgement that the focus of the Strategy is in the non-private sector, and the expansion relates to the social or more widely the affordable sector, and the third sector.

14: Any other evidence, information or issues you think should be considered in this screening?

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No comment.

15: General Comments

No comment.

Yours sincerely,

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