

Karen Mills
Department for Social Development
Housing Director's Office
The Lighthouse Building
1 Cromac Place
Gasworks Business Park
Ormeau Road
Belfast
BT72JB

05 December 2012
Our Ref: CW/NIHS

Dear Ms Mills

**RE: CONSULTATION ON FACING THE FUTURE: NORTHERN IRELAND HOUSING STRATEGY
2012 - 2017**

Thank you for the opportunity for the Royal Town Planning Institute Northern Ireland (RTPI NI) to respond to the consultation on the above. The Institute seeks to advance the science and art of spatial planning for the benefit of the public.

The Institute is the largest professional body representing spatial planning and represents over 23,000 professional planners covering a broad range of disciplines in both the public and private sectors. The Institute has over 560 members in Northern Ireland.

The document has been discussed by the RTPI NI Executive Committee members. Members acknowledged the challenges faced by the Department for Social Development during this difficult financial time. It is also acknowledged that the delivery of the strategy will be further complicated by the Review of Public Administration in 2015, halfway through the strategy life span. While it was considered that it was not appropriate for RTPI NI to comment on the development and delivery of the majority of principles and themes outlined in the strategy, as issues such as management of housing stock, fuel efficiency, funding innovations and benefit management are essentially outside of the remit of planning, we do wish to make the following comments.

Theme 1: Ensuring access to decent, affordable, sustainable homes across all tenures

It was felt that the creation of a Housing Supply Forum could help identify and unblock land supply and associated issues that would have a positive trickle down effect on the construction industry in Northern Ireland. The Forum should include a mix of both Governmental and Non-Governmental Organisations, while remaining a manageable size. It is essential that DoE Planning and Local Government Group are

involved due to their regulatory role in the development process. Representatives from local councils should be central to this forum as they will take on responsibility for the majority of planning functions post Review of Public Administration.

While there are clearly issues in relation to funding caused by the current economic climate, there are opportunities to look at best practice in other nations and parts of the UK, on how government has contributed to housing growth stimulus. For instance the sale of Government owned surplus land to private sector that will be developed with the inclusion of social housing.

RTPI NI has concerns that the proposal to reduce the level of Government subsidy for new social housing development will consequently result in problems with deliverability and viability.

RTPI NI suggests that the Department should reconsider the issue of Design and Build as a way of encouraging more competition for both design and construction, although this may have limited scope due to scale and problems with land purchase and investment. Concerns were also expressed that a reduction in costs for new build may result in longer term costs to tenants due to issues, such as poorer insulation standards.

Planning Policy Statement 12: Housing in Settlements HS 2 Social Housing (page 34) states that:

***“In locations where a demonstrable housing need is identified by the Northern Ireland Housing Executive, planning permission for housing proposals will only be granted where provision is made for a suitable mix of housing types and tenures to meet the range of market and social housing needs identified. The proportion of land or units to be set aside for social housing will be determined as part of the development control process.*”**

Justification

This policy will be applied where a need for social housing is established through a local housing needs assessment and the development plan for the area has not provided for it.”

While the policy in PPS 12 goes some way in requiring developers to contribute a portion of new developments for social or affordable housing it was felt that more could be done through legislation to ensure a legally binding agreement.

Theme 2: Meeting housing needs and supporting the most vulnerable

RTPI NI has limited comment to make on theme 2, we felt that the development of a joined-up approach reflected that of both spatial and community planning models that are being promoted in other parts of the UK, and again there was the opportunity to look towards best practice in other parts of the UK and Ireland. Consideration should be given to widening this approach to consult with the Department of the Environment and Department for Employment and Learning.

Theme 3: Housing and Welfare Reform

RTPI NI has no comments to make in relation to specific planning issues associated with theme 3.

Theme 4: Driving regeneration and sustaining communities through housing

RTPI NI supports the elements and aims of theme 4 and would again encourage the Department to consider delivery models across the UK such as the Homes and Communities Agency and Empty Homes Agency that offer practical help and advice to individuals and communities.

It is also felt that it was important to reiterate the relationship with RPA and the impact this will have on the delivery of planning related issues. The Planning (NI) Act 2011 places emphasis on Community Planning and the Power of Well-being. Community planning highlights the need to bring together council functions, government functions and the community. The success of community engagement in delivering regenerated and sustainable communities depends on various factors, including, the culture of engagement between sectors and agencies in an authority area. While RTPI NI recognise that the strategy spans across the transition period of RPA it was felt that it did not place enough emphasis on the opportunities that a planning system, driven by spatial and community planning themes, can deliver. Current spatial planning and community planning thinking promotes interagency collaboration to achieve maximum public benefit. Therefore, it is important that all Departments are communicating with each other when addressing issues of decline, deprivation and a dwindling population. There are significant levels of work going on in these areas by the RTPI NI, along with other bodies such as NILGA and Department of Environment, to prepare for RPA and the delivery of a fit for purpose planning system.

Theme 5: Getting the structures right

RTPI NI has no further comments on theme 5.

I trust you will find these comments useful. If you require any clarification, or feel you need further comment, please contact me at the above address.

Yours sincerely

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