



Views on the Housing Supply Strategy

Response to the call for evidence by The Department for Communities (DfC)

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Call for Evidence

The Department for Communities (DfC) has opened a consultation based on the development of a new Housing Supply Strategy. This is the first formal stage of public engagement.

This document provides the response submitted by RTPI NI in July 2021 to the Department.

The Policy Objectives

The policy objectives of the Strategy are to:

- Increase housing supply and affordable options across all tenures to meet current and future demand.
- Reduce housing stress and homelessness and improve housing solutions for the most vulnerable.
- Improve housing quality.
- Ensure the provision of housing options that contribute to the building and maintaining of thriving, inclusive communities and places.
- Support the transition to carbon neutrality by reducing whole-life carbon emissions from both new homes and existing homes.

Introduction Questions

1. Do you agree that a 'Whole System' approach given the challenges, is the right one?

Yes. It can be agreed that housing is a key tool for 'supporting people, building communities and shaping place'. Housing is more than bricks and mortar. An integrated system is important for Northern Ireland to move forward and meet people's required needs. It can be easily recognised that housing supply needs to be increased however, it must be understood that housing tenure is most important and needs to meet the population's needs correctly in order to help tackle inequalities and increase community cohesion. If the 'Whole System' approach is correctly implemented and adopted by the whole Executive, it will be a step in the right direction, helping to increase the housing supply in Northern Ireland. This approach is proactive and welcomed in the delivery of new housing however it must be recognised that planning can help and is not a barrier. Good planning should therefore be recognised as a solution to the housing shortage and planners must be provided with the right tools to assist with the delivery of quality housing supply in Northern Ireland.



2. Do you agree with the 15-year time frame proposed for the Housing Supply Strategy?

Yes, it must be a long-term strategy which should be adopted by the whole Executive.

4. Do you agree with the proposed vision for the Strategy?

Yes

5. Do you agree with the following proposed objectives for the Strategy:

(a) Increase housing supply and affordable options across all tenures to meet current and future demand.

Yes, there is a need for diverse tenure type in Northern Ireland to meet current and future demand of changing demographics.

(b) Reduce housing stress and homelessness and improve housing solutions for the most vulnerable.

Yes, access to quality housing is a basic human right to which everyone should have access, regardless of their socio-economic situation.

(c) Improve housing quality

Yes, there is a great need for better quality housing in Northern Ireland across tenure. This will support improving health outcomes and also address impacts on climate change by introducing low carbon homes.

(d) Ensure the provision of housing options that contribute to the building and maintaining of thriving, inclusive communities and places.

Yes, social cohesion and inclusive communities are important outcomes that quality housing should contribute towards to create better relationships within Northern Ireland. Homes built in the right location with easy access to a range of local services and reduce the need for travel by the private car.

(e) Support the transition to carbon neutrality by reducing whole-life carbon emissions from both new homes and existing homes.

Yes, this transition is vital to help Northern Ireland meet net zero carbon targets and enhance quality of life for future generations. This would also assist in addressing the problem of fuel poverty by integrating energy efficiency into homes.

6. The terms good quality, sustainable and affordable mean different things to different people - how would you define these terms?

Good quality – Would define the physical condition and how high of standard a product is. All housing should be built to a good quality, even that which is addressing the lower priced end of the market. There should be a distinction between quality and luxury.

Sustainable – Would refer to how long something lasts, the long-term viability. It means that it has not had an adverse impact or unintended consequences on other related factors.

Affordable – Describes something that is reasonably priced. In terms of housing there needs to be recognition that everyone is able to meet the costs of market housing and there is a need for support mechanisms.

7. What do you believe are the three main barriers to delivering the objectives for the strategy?

1. Governance
2. Behavioural Change
3. Funding



8. To what extent do you agree that there is a need to establish a more robust understanding of NI Housing Stock, e.g. by tenure, location, condition, etc.?

It is important that there is a robust understanding of the housing stock to help identify gaps which are required to meet identified need.

9. Are you aware of any specific data sources or methodological approaches to estimating existing housing stock, e.g. by tenure, location, condition, etc.?

No comment

Sustainable Communities and Homes

10. How can housing supply help create and maintain sustainable communities?

Housing can create and maintain sustainable communities as it is the key to positive wellbeing, social interaction and strong economic growth. Policy today is often concerned with social and community cohesion in which housing is identified as a key role, therefore the planning of housing is vital to meet the correct needs. Sustainable communities can be achieved in many ways with a proactive approach that can involve the provision of mixed tenure developments which are breaking through in housing policy.

A debate however remains around tenure mixing (social and market housing). It could be argued that many people are parochial in their choice of housing, however, the provision of adequate housing supply has the potential to dilute barriers of division within communities. Creating mixed and sustainable housing will help to reduce social exclusion and concentrated poverty, especially in an area with high levels of social housing. Mixed tenure helps to counteract the effect of mono-tenure estates, therefore helping to create sustainable communities.

11. How do we engage communities more effectively in place making?

Community planning is important in gaining residents' trust and making place-making more effective. Community engagement should allow the local community to have an input and voice their opinions at an early stage of the design and proposals. It should not be referred to as a tick box exercise to keep people happy. If community engagement is done effectively it could help to overcome challenges and tensions and instead replace them with a successful place-making, meeting people's current and future needs. Community engagement tends to stop once a development starts, however, this engagement should proactively increase throughout a development process to build relationships and trust.

The RTPI has produced practice advice on delivering large scale housing:

[deliveringlargescalehousingpracticeadvice2019.pdf \(rtpi.org.uk\)](https://www.rtpi.org.uk/deliveringlargescalehousingpracticeadvice2019.pdf)

12. To what extent do you agree that housing led regeneration policy contributes to reversing the physical, social and economic decline of:

(a) areas of deprivation

Areas of deprivation are likely to also be experiencing housing stress and therefore housing supply can be a valuable element to the policy, if integrated into the overall strategy and approach.

(b) town and city centres

Integrating housing into town and city centres has the benefit of diversifying the uses of these predominately economic centres. It extends opportunities for maintaining footfall and presence beyond the standard 9 to 5 of town centres.

(c) rural areas

It is important that housing is provided in rural areas for those that support rural enterprises, such as farming and forestry. In addition, providing affordable housing in



rural settlements to maintain their future and to provide young people with options to be able to stay are beneficial.

(d) suburban areas

Suburban areas are traditionally housing focused and re-investment in those which are in decline is valid. However considering what the underlying cause for the decline is important; too often suburbs have been built in the past without adequate community facilities and services and poor public transport links, making them unattractive. Investment in these areas may be best addressing services to support housing rather than housing directly.

13. How can we change the approach to housing led regeneration and ensure that it is more integrated in delivering wider policy outcomes?

Housing led regeneration needs to be integrated and implemented through partnerships for it to be effective. Local Development Plans (LDPs) are essential to providing the spatial integration for housing and regeneration actions. Any approach needs to consider a range of different uses and services, including transport – active travel and access to public transport – the location of community services, including schools and sports and leisure facilities.

14. To what extent do you agree that it should be a priority to deliver more shared housing developments throughout NI?

It should be a priority in Northern Ireland due to its unique politics, it would help promote social cohesion and encourage future shared neighbourhoods. The RTPI agree that a well-resourced, plan-led, positive planning service can deliver more shared housing developments throughout Northern Ireland.

15. How can more shared housing developments be delivered here?

Shared housing development can be delivered with strong and sustainable policy that cannot be abused or form loopholes, therefore providing a genuine housing mix through mixed tenure developments. It could be argued that currently social housing policy in Northern Ireland shows gaps that are not effective and transparent to meet demand. The current and future generations highlight the need for change which will help in the creation of shared housing developments that people will be more accepting and receptive towards.

16. To what extent do you agree that housing should be an integral part of the care and support system?

RTPI agrees, as housing is a key tool that helps with economic success, health and well-being, highlighting it should be a major part of the care and support system and this must be clear within policy. Housing plays an important role in shaping social identity, social behaviours and sense of belonging.

17. What challenges do you see in delivering a wider range of housing types, e.g., housing more suited to the needs of older people or those with disabilities and how can these be overcome?

Challenges for delivering a wide range of housing types include funding and viability, which is the biggest barrier to development; effective leadership, with a commitment to develop new types of housing delivery schemes; political stability; and flexibility of housing type. There is a huge demand for one-bedroom and complex needs accommodation in Northern Ireland. The delivery of wider ranges of housing type can be overcome with strong collaboration between stakeholders involved, through building relationships, addressing key issues and providing solutions.

Community engagement, if done right and not be thought of as a tick box exercise, can provide a valuable insight into the needs of the local community. Planning is often criticised in the delivery of housing however spatial planning has an important role in bringing stakeholders together to overcome the challenges.



18. How important is mixed tenure to addressing housing supply issues in NI?

Mixed tenure is important as it has the potential to meet not only housing demand but tenure demand. Mixed tenure can reduce divisions within communities and remove stereotypes associated with social housing by promoting social cohesion and creating successful neighbourhoods and promoting a sense of place and belonging. Mixed tenure in Northern Ireland needs to be tested properly.

19. What challenges do you see in progressing mixed tenure developments, and how could these be overcome?

Challenges would include people's attitudes and perceptions towards mixed tenure development, such as stereotypes concerning social housing and opinions involving house prices, anti-social behaviour and poor community relationships. Private developers and housing associations could argue that the development of mixed tenure development will upset stock, cause management issues and problems concerning funding. Although this could be overcome with proactive and effective planning that highlights the importance of community engagement for people to voice their opinions and concerns so positive relationships and trust can be made to remove the challenges in progressing mixed tenure developments. Strong policy must be set to reduce loopholes within the system therefore offering equal chances.

There are many case studies which demonstrate that the provision of 'tenure blind' developments, overcomes many of the issues which arise and deliver successful neighbourhoods.

Equality and human rights

20. The Equality Commission has framed local housing demand and supply in relation to three constructs – accessibility; adequacy; and sustainability. Are you content with this framework or are there other issues that may warrant inclusion?

Yes, RTPI NI supports this.

21. In addition to the inequalities or data gaps already identified in the Equality Commission's Statement and the Wallace Report, are there any other issues that should be considered?

No Comment

22. In relation to the issue of using multivariate analyses (Multivariate analysis is analysis that considers the impact of more than one Section 75 characteristic), are you aware of any work already undertaken that would be useful?

It is estimated that around one in four people will experience a mental health condition. In recognition of this, the RTPI has published practice advice on planning places with mental health in mind. [RTPI | Mental health and town planning](#).

There are estimates to suggest that there are around 22,000 people in Northern Ireland living with the condition by the Alzheimer's Society. Practice advice has been specifically written to address the needs of those with dementia: [RTPI | Dementia and Town Planning](#)

Housing supply in rural areas

23. To what extent do you agree that the Housing Supply Strategy should address the need for affordable homes in rural areas?

Yes, 36% of people live in rural areas in Northern Ireland. Attention can be too easily focused on urban areas and therefore the rural population experiences a lack of services, unaffordable housing, social isolation and rural poverty. Everyone should have an equal opportunity to quality homes, and it should not be limited in the case of people living in rural areas. However, housing in rural areas should be carefully managed to



prevent sprawl which has a negative impact on the countryside, has a negative impact on climate change and makes it inefficient and expensive to provide public services.

24. To what extent do you agree that community led housing should be supported and enabled in rural and urban areas across NI?

Community-led housing should certainly be promoted to help achieve the best outcome by putting people's needs first through public and stakeholder involvement with community participation. This should be a proactive approach that listens to people's socio-economic needs to reduce the lack of decent and affordable housing in Northern Ireland.

25. How can additional innovative multi-agency projects (or approaches such as 'Tackling Rural Poverty & Social Isolation') be created to deliver more affordable housing supply in rural areas?

Grant funding and public policy should be designed to encourage partnerships for housing delivery. In Wales a successful programme has been the use of Rural Housing Enablers, who are able to work with communities and draw together partnerships for the delivery of housing in areas of need: [Evaluation of the Rural Housing Enablers \(RHE\) in Wales | GOV.WALES](#)

Housing and poverty

26. Is there a need for this Housing Supply Strategy to play a role in reducing poverty?

The quality and location of housing can play a big part in reducing poverty. Good quality housing which is built to low carbon standards can reduce fuel poverty by reducing costs to the householder. Locating affordable housing close to local services and in easy reach of affordable public transport can also reduce travel poverty and give communities better access to a choice of affordable services.

27. Currently housing stress is identified as 'those experiencing intimidation, insecurity of tenure, housing conditions, health and social wellbeing issues'. Do you have any comments on this definition of housing stress or are there other causes of housing stress that need to be considered?

No Comment

28. To what extent do you agree that more needs to be done from an interdepartmental perspective to improve the lives and life chances of those who are homeless or at risk of homelessness?

No Comment

29. How do we help homeless people transition from temporary accommodation to long term homes?

No Comment

30. To what extent do you agree that housing plays a significant role in reducing economic inactivity/enabling individuals to take up employment?

A decent and secure home is important in giving individuals security so they can concentrate their efforts on their job / finding employment or on education. It also gives them a place where they can keep healthy, prepare meals and have decent rest to allow them to function well for employment purposes.



Land and property

31. Are there changes to land & property legislation, policies, processes or procedures that could transform housing supply for the better?

Progressing Local Development Plans (LDPs) to adoption to provide a strong spatial mechanism for delivering housing in the right location and integrated with other services is essential. This will embed the plan-led system which was introduced by the Planning Act 2011.

A well-resourced, plan-led, positive planning service can bring together objectives across services and should be invested in accordingly.

32. Should the options for making public sector land (local and central government) available to support a wider variety of housing options be explored?

Yes, for example in the Republic of Ireland, the Land Development Agency was set up as a collaborative approach to make more effective use of public land, working with government bodies and local authorities to offer a sustainable supply of land and homes.

33. Are there land & property practices adopted in other UK or European jurisdictions that you believe would transform supply if adopted here?

Scottish Land Commission

The Homes and Community Agency

ROI Land Development Agency

Planning

34. Are there changes to planning legislation, policies, processes or procedures that could transform housing supply for the better?

Planning has often been criticised for contributing to the housing crisis and a barrier to development. There is a complex relationship between supply and demand within Northern Ireland and planning is often ignored as a potential solution to this issue. Firstly, changes must be made recognising planning as a positive role, that can deliver a good quality supply of housing that meets people's social and economic needs. The pre-application stage of planning should be encouraged and welcomed for all types of proposed developments; in terms of housing developments, the pre-application stage could help improve the quality and efficiency of a housing development.

The RTPI has developed several policies aimed at addressing the complications around the supply of housing. It is important that there is a more strategic view within planning, ensuring that there is not a narrow focus on housing numbers, but an understanding of the wider socio-economic factor in which the 'whole system approach' is welcomed. It could be argued that crosscutting is a current issue within Northern Ireland policy. The Executive can support proactive planning and meet housing needs by providing stronger direction and policy, looking at the potential within the land market and encouraging build to rent. The housebuilding sector must be developed to become more diverse and skilled, by getting the public sector building, support housing associations building and provide future sustainability for the next generation by investing in future housing.

Further information can be found here: [better-planning-for-housing-affordability-summary.pdf \(rtpi.org.uk\)](https://www.rtpi.org.uk/better-planning-for-housing-affordability-summary.pdf)

35. Are there planning practices adopted in other UK or European jurisdictions that you believe would transform supply if adopted here?

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The approach by Plymouth City Council has been applauded for its approach in delivering housing: [The plan for homes | PLYMOUTH.GOV.UK](https://www.plymouth.gov.uk/the-plan-for-homes) It is a comprehensive city wide planning framework that considers a range of issues including land release, infrastructure and delivery.

36. Is land banking hindering housing supply here?

There is no evidence to say this is the case. The Regional Development Strategy 2035 acknowledges that there is an opportunity for housing on underutilised or vacant land in Northern Ireland. There is a target for 60% of new housing to be developed on brownfield sites. Public actors can provide a role here in de-risking appropriate housing sites for development; the Local Development Plan would provide the policy for identifying the right sites.

Finance

37. To what extent do you agree that the NICS could better utilise existing funding (e.g., Block Grant, Financial Transactions Capital, Housing Association Grant, Reinvestment and Reform Initiative) to leverage greater levels of private finance for housing development?

No Comment

38. Are there other ways the private and voluntary community and social enterprise sectors can leverage other forms of funding to increase housing supply?

No Comment

39. Are there any other areas of market failure that need public and/or private intervention?

No Comment

Infrastructure

40. Are there changes to infrastructure legislation, policies, processes or procedures, such as the establishment of an Infrastructure Commission, that could transform housing supply for the better?

There needs to be an overall acceptance that changes need to happen now and funding should not be a barrier as it is an essential need.

The planning system must be looked upon as a solution and this is where funding should be delivered to make the decision-making process efficient and effective; for example, more emphasis put on the digitalisation of the planning system. The establishment of an Infrastructure Commission would mean that progress and decisions are made if the Assembly is suspended again, which is welcomed by RTPI NI, which would offer reassurance for future developments. However, the planning system is able to fulfil this role through implementing policy and the local democratic structures in place. There should be more faith and authority placed on the planning system within Northern Ireland. There is a real need for the Executive and its Departments to look forward and be realistic in the investment and time scales required.

Planning plays a key role in delivering a range of benefits, including housing and health, but they are poorly understood and seldom attributed to the planning system. Without an effective planning system, many of these benefits would not be captured, affecting the quality of life for residents and imposing costs on both the public and private sectors.

The National Infrastructure Commission (NIC) has adopted the 'whole system approach' and takes into consideration cross cutting issues in relation to infrastructure for example for transport and housing development and how they support and strengthen each other; this is a positive example that Northern Ireland should take note of, that could be of value in terms of accountability and collaboration.



41. To what extent do you agree that coordination of housing provision and infrastructure services need to be better aligned?

There needs to be a joint up approach between sectors within Northern Ireland. Covid19 has highlighted not only the importance of our homes but the importance of accessing services within proximity to our homes. Infrastructure should be integrated into development as part of a strategic plan that enhances economic and social development and better access to blue and green infrastructure is essential - the Local Development Plan structure in Northern Ireland provides this strategic plan. It could be suggested that the focus on housing is too top-heavy and not effectively integrated with infrastructure, for example drainage. The coordination of housing provision and infrastructure services will help enhance the vitality and viability of developments.

42. To what extent do you agree that a Housing Supply Strategy should consider both the provision of new homes and protecting existing supply?

The existing supply of homes is equally as important as the supply of new housing. Existing homes can be retrofitted to become more sustainable in the future concerning mitigation and adaptation measures.

43. How do we ensure that our housing supply integrates and brings together all the essential infrastructure (hard/soft & critical) required to create thriving homes and communities?

For this to work, a collaborative approach is needed from both internal and external stakeholders to create thriving homes and communities. A collaborative approach will make sure that all relevant issues and solutions can be discussed and explored using spatial planning at the forefront. Not only is a collaborative approach needed but community engagement is vital to ensure support throughout development. The Local Development Plan also provides the plan for integrating development, services and infrastructure.

Climate Change

44. Are there change to climate, sustainability and environmental legislation, policies or procedures that could transform housing supply for the better?

Planning plays a major part in meeting the zero-emission targets by minimising carbon emission within all sectors including housing. However, currently the planning system is not fully equipped to deal with the issues surrounding climate change. This must be evaluated so the planning authority is appropriately resourced to deal with pressing issues like climate change. The RTPI has been promoting the delivery of climate mitigation and adaptation across communities to deal with climate change. It can be argued that the delivery of climate adaptation and mitigation has been poor, due to a strong focus on house building and criticism of the planning system. The RTPI believe that stronger climate change law and policy is required as is currently the key barrier to effective planning. It would be welcomed that a stronger emphasis is placed on retrofitting existing dwellings and enhancing standards could help transform the housing supply for the better. The Climate Change Bill that has been introduced will establish Northern Ireland's own legally binding net zero carbon target which although should have been established before now to deal with NI own individual issues, it will hopefully lead the future of sustainable housing supply in the right direction, however, a joint up approach is vital. [RTPI | Planning for a better future](#)

45. Transitioning to low carbon homes will require significant behavioural changes by householders. Is support required to aid the necessary behavioural changes?

It is agreed that the transition to low carbon homes will require significant behavioural change that can be lead through proactive governance that ensures new developments are not only low carbon but align with the sustainable development goals. The RTPI support zero carbon home policies in order to improve energy efficiency however strong



leadership must ensure ease in behavioural changes, through more education and funding in relation to the matter.

46. Taking into account social impact, what incentives or disincentives could be introduced to positively impact the current and future delivery of low carbon homes?

The RTPI report 'Planning for a Smart Energy Future' highlights several approaches that could positively impact the current and future delivery of low carbon homes. In Northern Ireland, the main use of greenhouse gas emissions is 13% residential use of fuel, 23% transport and 27% agriculture. Policy should require new developments to present an energy strategy to demonstrate how they will be net-zero ready, making sure materials are ready and retrofitting solutions are put in place. Smart technology plays a huge role in which policy could be developed for technology to monitor performance so everyone involved in the development process can access information. It is important that long term policy for new developments is put in place and allow flexibility in building design so new housing can adapt to the changes by being sustainable and low carbon homes. It is important that where possible, we are planning for outcomes rather than specific solutions, and policy should encourage developers to do this. Taking a proactive approach is vital for developers to build partnerships therefore reducing barriers to achieving net zero carbon developments. This will be important as the COP26 is set to take place next year in Glasgow. [Microsoft Word - Planning for a Smart Energy Future.docx \(rtpi.org.uk\) and](#)

[RTPI | RTPI design quality](#)

Innovation

47. Should existing buildings, including our heritage assets, play an enhanced role in transforming housing supply?

Finding sustainable uses for heritage assets to give them a sustainable future is important, and housing can be part of the solution for this. Housing Justice is an example of an initiative which looks to release surplus land or buildings from churches of all denominations in England and Wales for affordable housing. [Faith in Affordable Housing – Housing Justice: Housing Justice](#)

48. Are you aware of any innovations relating to housing including design, construction, procurement, contracting and commissioning that could help transform supply?

The Welsh Government is investing in a social housing building strategy which is exploring the use of Modern Methods of Construction: [Social house building strategy | GOV.WALES](#)

Skills

49. To what extent do you agree that the Housing Supply Strategy could act as a stimulus to improve and modernise construction skills and increase the importance of the sector?

No Comment

50. Does the Construction Sector in NI need support to skill up in digital technologies, Modern Methods of Construction, low carbon construction and the whole life performance of house building etc.?

No Comment



51. Does the age profile and makeup of the construction sector (older workers/ self-employed) require a specific intervention to support our housing supply in the future?

No Comment

52. Does NI need some large Green Building Projects such as those being developed elsewhere to help create momentum for a changed skills agenda here?

No Comment

53. Are there any other areas that could impact on the development of the Housing Supply Strategy that you feel have not been covered in this call for evidence?

No Comment

Royal Town Planning Institute (RTPI)

The RTPI champions the power of planning in creating prosperous places and vibrant communities; RTPI NI leads on our work in Northern Ireland. We have over 26,000 members, with 750 in Northern Ireland, in the private, public, academic and third sectors.

Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that give our members, wherever they work in the world, a unique ability to meet complex economic, social and environmental challenges. We are the only body in the United Kingdom that confers Chartered status to planners, the highest professional qualification sought after by employers in both private and public sectors.