



Department for
Communities

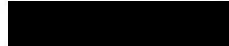
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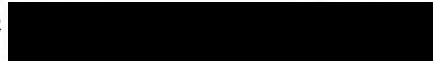


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Date: 25 October 2018

Development Planning and Policy Manager

Via e-mail localdevelopmentplan@belfastcity.gov.uk

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 HOU5 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,

