



Housing Supply Strategy:

RTPI NI Response to the NI Housing Supply Strategy

February 2022

The Department for Communities has issued this Housing Supply Strategy for consultation, following a Call for Evidence in 2021.

[Consultation on the new housing supply strategy | Department for Communities \(communities-ni.gov.uk\)](https://communities-ni.gov.uk)

Housing is a key tool that contributes to economic success and health and wellbeing. It plays an important role in shaping social identity, social behaviours and sense of belonging.

The [RTPI Invest and Prosper Research](#) found that “planning systems across the UK underpin economic, social, environmental and health outcomes. Quality planning, and housing delivery in particular, is integral to meeting sustainable development targets. Key benefits the planning system directly provides or supports include:

- Affordable housing delivered through planning obligations saved the NHS £240 million in 2019;
- Living in a well-planned neighbourhood can support up to 59% of NHS-recommended weekly activity;
- Urban greenspaces in Great Britain provide £16.5 billion in environmental, health and amenity value per year.”



The table below, from the RTPI Invest and Prosper research shows the ambitious affordable housing targets in the UK and the benefits they could provide. Refer to the research for further information and the evidence behind these figures: [RTPI | Invest and Prosper](#)

	Housing target	Healthcare savings (£m/yr)	Rent savings (£m/yr)	Employment opportunities (£m/yr)	Unemployment benefit savings (£m/yr)	Total (£m/yr)
England	145,000	120	5,000	120	14	5,200
Scotland	50,000	18	140	8	1	170
Wales	20,000	4	25	3	<1	32
Northern Ireland	1,850	2	11	1	<1	14

Source: Vivid Economics

Planning plays a key role in delivering many benefits, but often these benefits are not attributed to the planning system. Without effective planning systems, 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.

It is vital that housing supply is considered holistically, alongside location, services, active travel and public transport provision etc. if we are to address other issues such as isolation, health and wellbeing, decarbonisation and other environmental and climate targets.

The adequate resourcing of the planning system is also a key factor in delivery and an issue recently raised in the Northern Ireland Audit Office: Planning in Northern Ireland report [NIAO Report - Planning in NI.pdf \(niauditoffice.gov.uk\)](#).



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The Call for Evidence consultation showed that there was broad support for the proposed vision, objectives and timeframe for the Strategy. Based on the comments received we have updated these for the draft Strategy – are you content with these?

Housing quality is identified as being important in both the physical quality of the building, but also in relation to the quality of the environment and neighbourhood in which it sits. We recommend that more emphasis is placed on the 'place' quality of housing developments as part of this objective so that those delivering much needed housing are doing so in a sustainable, future proofed way that ensures a thriving, prosperous and connected home and neighbourhood. Too often, developments fail its residents by not providing adequate green space, safe and vibrant streets, access to schools, services etc. that are vital to a good quality of life. This should be prioritised in the early stages of identifying suitable sites, coming up with a holistic masterplan for the area, and phasing it appropriately to ensure jobs and services are provided for within walking or cycling distance.

The location of development ([RTPI | Settlement Patterns](#)) is extremely important in providing a sustainable healthy community, and one that does not 'lock in' certain behaviour traits such as car dependency. We need to move away from single tenure, sprawling housing estates with no services and car dominated streets with a high carbon cost, to a much more integrated holistic way of planning for new housing and growth, and one that allows for connectivity and diverse options and lifestyle choices in the future as we start to adapt away from carbon heavy lifestyles.

Finally, a whole systems approach to housing is to be welcomed, however we would argue that a 'whole place' approach is more important and people centred. It would allow for the integration of social, environmental and economic aspects of sustainable housing, which is crucial if we are to provide quality, adaptable, safe and efficient homes of the future.

We believe that implementation and delivery of the vision and objectives are the key issue. The vision, objectives and timeframe will require support and a collaborative approach across government at all levels. This is essential. Working closely with DfI, DAERA, DfE along with local authorities, housebuilders, housing associations, community/third sector etc. There's a need for alignment across all the strategies, in particular the Regional Strategies, e.g. RDS, Regional Economic Strategy, Environment Strategy, etc. to all achieve the

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same objectives and vision. However, the Northern Ireland Audit Office: Planning in Northern Ireland report [NIAO Report - Planning in NI.pdf](#) ([niauditoffice.gov.uk](#)) makes the point that there “is an urgent need for improved joined-up working between organisations delivering the planning system”. This needs to be addressed as a matter of urgency, if we are to deliver shared visions and objectives.

It is unclear how this strategy relates to vacant land or empty homes strategies.

The assessment of the Call for Evidence has enabled us to develop a total of 15 longer term policies and interventions that will provide the basis to develop appropriate action plans. Do you agree with the focus of these 15 high level long term policies and interventions?

As with the vision and objectives discussed above, it is the implementation and delivery of these longer-term policies and interventions that are key. In this case that will be the supporting Action Plans. These require adequate resourcing, clear targets and support from all stakeholders. Cyclical monitoring and evaluation should also be put in place. The Action Plans should not be solely a package of existing initiatives. Clear guidance is needed on implementation and delivery of the policies and interventions, in particular around roles and responsibilities etc.

Any changes to the planning system following the DfI’s report on the implementation of the Planning Act, is likely to have an impact on the policies and interventions. Along with the re-organisation of the Housing Executive which could be a significant change for one of the main stakeholders in housing supply. Further clarity and information as these matter progress would be extremely useful for all parties.

The consultation references exploring the “potential for more options and flexibility around design standards/regulations” under the ‘Whole System Approach’ section. Planning is an important regulatory process that is vital to ensuring all aspects of quality of place. Experience from other nations has shown that attempts to streamline the planning process has in some cases resulted in sub-standard housing under permitted development and we would stress caution in attempting to streamline the planning process in this way.

Mixed tenure needs further enablement in Northern Ireland. We feel this strategy currently doesn't go far enough to identify the barriers to mixed tenure

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housing and needs to set out policies that will break through these to ensure the strategy can deliver on its objectives. It is important that all stakeholders recognise the value of mixed tenure, how to design it effectively to ensure maintenance and management works for tenants and homeowners. We need to encourage a change of attitudes and working culture in our building industry to connect housing providers and developers, to develop new housing models that encourage new ways of developing sites. Through this strategy we should also be working with communities to recognise the value of diverse neighbourhoods that are less vulnerable to market shocks, vibrant and resilient in the face of change, so that we are reducing the inequality gaps and providing a region that is fair and equal in terms of geographic inequalities.

The Strategy includes an enabling principle to: ‘Adopt a whole system approach, collaborate with central and local government and the third and private sectors to inclusively transform supply.’ Do you agree with the proposed enabling principle?

We welcome the whole system approach set out in the consultation. However, it is vital that there is clarity, certainty and communication around the approach. All parties including all central and local government departments, with the support of all stakeholders understand their role and working together to deliver shared goals.

This way of working will require resourcing at all levels across the approach.

Also see comments above in relation to a whole place approach.

Do you agree with the proposed ambition to deliver 100,000 plus homes over the 15 year lifespan of the Strategy?

Proposals must be based on strong accurate data and evidence. If targets and proposals are not evidence based then they cannot fully take into account the context and local issues they are addressing.

Further information and clarification is required on the above figure and the data and evidence behind it, for example, how this aligns with Local Development Plans etc.

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We have concerns regarding the following paragraph set out in the consultation document,

“In 2017, the Department for Communities’ Housing Symposium, in recognition of the growing gap between supply and overall requirements had already recommended an overall delivery target of 8,000 new dwellings per annum – **but even this was based on increasingly outdated estimates of the number of households. As such, there is general agreement that a significant increase in new housing completions is required** to underpin the strategic priorities of the NI Executive ...”

It is vital that the right data is collected to provide a clear NI context picture on which to base housing figures and understand impact and implications for future policy/intervention. It is important that there is further information and clarity on how capacity will be increased to enable this to be achieved.

An equally important issue is where these new homes are to be delivered. Building the majority as single dwellings in rural areas is not sustainable. We need a holistic approach, when considering numbers, that takes into account other factors such as sustainable locations etc.

Delivery of housing targets requires significant effort and partnership working from all sectors, (as set out in above response to Q1), as well as an understanding of how the housing market is performing in different parts of the country.

Use of the planning system to define new housing growth e.g. new developments, urban extensions and growth plans should be encouraged to go through collaborative masterplanning processes to ensure developments that are of good quality, phased appropriately, more feasible, have involved the local community and key stakeholders, and therefore more likely to be deliverable.

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Housing supply and need should work closely together and align with other strategies to identify sites etc. Other factors that could impact on delivery in the future and should be addressed include:

- Budgets and the resourcing of planning;
- The performance and resources of statutory consultees;
- Viability;
- Inadequate infrastructure, including sewage and water;
- Dealing with contaminated land and the re-use of brownfield sites.

Do you agree with the proposed indicators to measure the success and progress of the Housing Supply Strategy?

In relation to measuring quality of place the RTPI Measuring What Matters Toolkit and routemap could provide a guide to improving design and the success of the housing supply strategy [RTPI | Measuring What Matters: Planning Outcomes Research](#) . This toolkit sets out a cyclical/regular measuring approach to consistently improving outcomes. RTPI Northern Ireland would be happy to discuss the research and toolkit in more detail.

A strategy should also be put in place to address issues if objectives and indicators are not being met.

Are there any additional indicators that you consider would add value in measuring success and progress?

Further consideration and clarity should be given around the indicators, given the statement “we will also factor in indicators included in other relevant Strategies”. Monitoring and evaluating is an important element of building a future evidence base and improving outcomes and impact on the ground. Relevant wider targets such as climate change, carbon reduction targets, regional and national ambitions etc. should be considered.

What are future plans for NI in terms of the introduction of schemes similar to Passivhaus/LEED/BREAMM housing developments? These could also provide useful indicators.

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RTPI Measuring What Matters [RTPI | Measuring What Matters: Planning Outcomes Research](#) and Invest and Prosper [Invest and Prosper \(rtpi.org.uk\)](#) could provide further guidance on this

How can we best ensure that key strategic partners such as other Departments, local government, the Voluntary & Community sector and private sector can participate in the delivery and oversight of the Supply Strategy delivery?

The report of the Northern Ireland Audit Office, Planning in Northern Ireland [NIAO Report - Planning in NI.pdf \(niauditoffice.gov.uk\)](#) and the report on the implementation of the Planning Act can both provide useful evidence and guidance on this matter. The Audit report identifies the number of organisations who are instrumental in delivering an effective planning system, not least housing.

Much of this comes from moving from a reactive planning system with a lack of up-to-date policies and plans, to a dynamic, collaborative and proactive planning system where plans are codesigned by all and used to streamline permissions that engage early with the Local Development Plan and develop good quality places. By recognising the place shaping function of the Housing Authority and how it should engage with the planning system we can move towards better delivery of housing and more sustainable places.

Are there any proven or new approaches you are aware of, that you believe would help us work best with other organisations to develop and deliver the action plans?

Place shaping approaches that involve communities in meaningful discussions about their area are being trialled and tested in NI through community planning - using the governance structures of collaboration developed since this new power came to NI.

There is an example of this in Armagh where the Housing Executive, DfC and Local Authority have developed a close working relationship and have codesigned a strategy for the future of the city - one of the key actions is to plan sustainably for housing growth through integrating different statutory bodies e.g. housing, transport, land use etc.

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Housing led regeneration on a small scale through the DFC Building Successful Communities initiative (across 6 pilot areas) has shown how partnership working can deliver small housing projects. The private sector as well as Housing Associations should also be involved.

There was broad support in the Call for Evidence for the need to engage local communities in housing supply to create sustainable, thriving and inclusive communities. In what way do you consider this could best be achieved and do you have any examples of best practice in this area?

There is little reference in the consultation document to LDPs, yet the LDP process is the way to address housing supply issues at a local authority level. Community planning and engagement is important in gaining residents' trust, providing important communication and making place-making more effective.

Community engagement can stop once development commences, however, instead it should remain throughout a development process for transparency, clarity and trust.

Enquiry by Designs is collaborative design exercises that take place within the communities and involve all key stakeholders. Ideas and plans are tested and drawn live with expertise of all stakeholders, local community and landowners. A masterplan can then be brought forward for adoption as supplementary planning guidance and phased to release housing responsively to help keep the market buoyant, but also to secure longer term housing delivery. This process of codesign should be a fundamental characteristic of a functioning planning and housing sector that works closely at all stages and avoids siloed working i.e. whole place approach. This proactive approach also creates codesigned strategies and plans for the future of a place and this is recognised as important to securing sustainable places of the future.

<https://d16zhuza4xzjqx.cloudfront.net/files/princesfoundation2007-enquirybydesignebd-b9b4493b.pdf>

https://www.mackay.qld.gov.au/_data/assets/pdf_file/0009/88542/Enquiry_by_design_brochure_-_final.pdf

Listening to community needs and aspirations and collaboratively delivering 'realistic' outcomes is important but is extremely resource/staff/time intensive and requires support from all parties.

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The Rural Needs Impact Assessment outlines that the development of the Housing Supply Strategy is likely to have a positive impact on people on Rural Areas? Do you agree with this assessment?

The impact assessment recognises an aging population and suggests providing more rural housing but makes no mention of wider issues such as location, services, transport etc. that need to be considered alongside rural housing, in particular with an aging population.

A living locally approach (referred to as 20 or 15 minute neighbourhood) supports new housing located near existing services and facilities. “At its heart lies the notion of sustainable, efficient, accessible and connected places where local residents can access daily goods, services and places by a short walk or cycle, or without the use of a private motor car. Places support community bonds and social cohesion, where dwellers feel part of a community and through participation in decision making have a feeling of ownership within their local area.” The RTPI’s Living Locally in Rural Wales discusses this approach in more detail [RTPI | RTPI Cymru Discussion Paper: Living Locally in Rural Wales](#)

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