

From the Permanent Secretary
Dr Denis McMahon

Your Reference:
Our Reference: SCORR-0410-2023

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25 October 2023

Dear Ms Dickson

RE: DFC HOUSING SUPPLY STRATEGY: BUILDING 100,000 HOMES

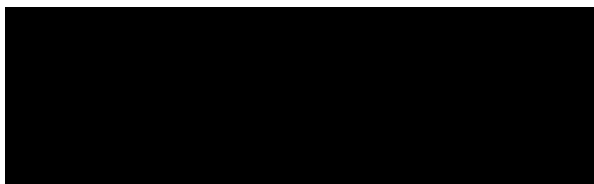
Thank you for your letter of 3 October 2023 regarding the above matter.

In your correspondence you posed several questions seeking clarification of a number of issues in order to assist you with considering the impact of the Department for Communities (DfC) draft Housing Supply Strategy for your Local Development Plan's Spatial Growth Strategy.

Responses to your questions are provided as an Annex to this correspondence. They provide answers from the perspective of the Department for Infrastructure's regional planning role, including publication of Housing Growth Indicators, and overseeing the Local Development Plan process. Should you have further queries related to the content and purpose of the DfC Housing Supply Strategy these should be directed to DfC who can also provide an update on progress since publication of the draft in December 2021.

I hope these comments will be helpful and my officials would be happy to discuss them with you if you need further clarification.

Yours sincerely



DR DENIS McMAHON
DfI Permanent Secretary

Who will build these homes, and if it is the intention of DfI to contribute to these measures?

It is anticipated that market housing will continue to be provided in the normal way by housebuilder/developers who will acquire land, obtain planning permission and oversee the construction process. As highlighted in your correspondence, the Housing Supply Strategy indicates that at least a third of home shall be social housing and a significant number will be 'intermediate' (comprising products such as co-ownership or intermediate rent). These homes may therefore be provided by Registered Housing Associations who will partner with housebuilders/developers to help meet demand for affordable housing.

The important role of infrastructure and planning are both identified in the Housing Supply Strategy as key levers to increase housing supply and affordable options across all tenures in order to meet housing need and demand. While the Department does not have a role in the provision of housing directly, it does have a role in ensuring that the supporting infrastructure (including roads and water infrastructure) is in place, or can be provided, to support the development of housing and help meet housing need. DfI also has a role both in maintaining a supportive regional planning policy context to facilitate sustainable housing growth and in overseeing Council Local Development Plans to ensure they make appropriate policy provision for housing in response to changing need.

How the proposal to build these 100,000 homes sits with the Northern Ireland Housing Growth Indicators (HGIs) which must be taken account of when preparing our LDP?

The HGI is a robust starting point for the assessment of housing need within a council area however it is an indicator of housing need and is not a cap or target to be met. In accordance with the advice issued by the Chief Planner in September 2019, councils should first consider its applicability to local circumstances by taking into account a range of other sources of evidence including Housing Needs

Assessment /Housing Market Analysis prepared by the NIHE and any other relevant local evidence.

The draft supply strategy is relevant in a strategic sense because it highlights the need for a supportive policy context to facilitate the delivery of housing in a range of tenures. It is, however, a high-level strategic document that uses a 'whole systems' based approach to set out long term policies and interventions with the objective of increasing housing supply and affordable options. It includes an aspirational housing figure of 100,000 and does not attempt to allocate housing growth at the level of individual council areas.

The HMA provides cross-tenure evidence on housing need within functional 'Housing Market Areas'. A strategic HMA report for the Northern Area (including Ballymena and Causeway Coast Housing Market Assessment Area) was published in final form in June 2022. In this report the Causeway Coast Housing Market Area (HMA) is coterminous with the CCGBC area. For Causeway Coast HMA, the number of newly arising households over the period 2020- 2035 is expected to be 2,860. After allowing for expected changes in second homes, vacant dwellings and the replacement of dwellings lost to dereliction the projected total new dwelling requirement amounts to 5,440. This increases to 5,950 once the net backlog of housing need is taken into consideration. Although it relates to a different timeframe this figure is broadly comparable with the HGI for CCGBC which is 5,600 units between 2016 – 2030. This HGI figures does not consider net backlog however.

What is the provision allocation to Causeway Coast and Glens Borough Council?

The draft Housing Supply Strategy is a strategic document which adopts a 'whole system' based approach to explore factors that influence housing need and demand on the one hand and housing supply on the other. It is a high-level strategy that sets out long term policies and interventions to create a housing system that would be capable of delivering an aspirational figure of 100,000 plus homes. Consistent with its role as a high-level strategy it does not provide an allocation of housing to Causeway Coast and Glens Borough Council. In this regard there are more relevant

sources of evidence such as the Department's HGI and the NIHE Housing Market Analysis which should be considered by the Council before arriving at a housing allocation in their Local Development Plan.