

Report on	Consultation from Department for Communities Consultation Paper on 'Definition of Affordable Housing'
Date of Meeting	26th September 2019
Reporting Officer	Sinead McEvoy – Head of Development Plan
Contact Officer	Chris Boomer – Planning Manager

Is this report restricted for confidential business?	Yes	
If 'Yes', confirm below the exempt information category relied upon	No	x

1.0	Purpose of Report
1.1	The purpose of this report is to provide members with details of a consultation from the Department for Communities (DfC) Consultation Paper on 'Definition of Affordable Housing,' and a response to the consultation.
1.2	The consultation commenced on 24 th June 2019 for 12 weeks, and officially closed on 13 th September 2019.
2.0	Background
2.1	Following notification of the consultation to the July Council meeting, it was agreed that an all member workshop be organised to prepare a response to the consultation, and that the officers who prepared response to Housing Executive Chronic Homelessness Action Plan consultation, be invited to workshop.
2.2	The workshop took place on Thursday 8 th August 2019, at 5.30pm, in the Council Chamber, Council Offices, Cookstown, and the discussion that took place is reflected in the response attached at Appendix 1.
2.3	Due to the fact that the consultation formally closed on 13 th September 2019, the response at Appendix 1 was presented to the September Planning Committee, and subsequently issued to DfC to ensure that our comments are registered before the consultation closed.
2.4	Members will note that in the response to DfC we requested that opportunity is given to amend, or supplement, the attached response by 30 th September 2019, following the September Council meeting, should members so desire. DfC have responded to confirm that they are content to accede to this request.

3.0	Main Report
3.1	We welcome the opportunity to re-consider the definition of the phrase ' <i>affordable housing</i> ' as set out within the Strategic Planning Policy Statement (SPPS), adopted since September 2015.
3.2	The existing accepted definition of ' <i>Affordable Housing</i> ' within Northern Ireland is set out through Regional Planning Policy. There is no legal definition and therefore no legal requirement on Local Government to apply or consider the term, except through the Local Planning Authority requirement to <i>take into account</i> the SPPS document.
3.3	Until the term has a legal definition stipulated in Primary Legislation, and Secondary Regulations, within Northern Ireland, there will continue to be ambiguity regarding the meaning of the said ' <i>umbrella term</i> '.
3.4	Whilst this council welcomes the consultation; it has some serious concerns which are summarised below and reflected in our answers to the specific questions attached at Appendix 1. These are:
3.5	<p>a. The timing of the consultation which has been over the summer and when most councils take a summer break. It has not been possible to present this response to our full council in advance of the consultation closure and therefore we have requested that the opportunity is given to amend or supplement these comments by 30th September 2019 if our elected members so desire;</p> <p>b. The models of provision presented appear too narrow and the council would welcome a study looking at publically provided housing in the EU, particularly the Netherlands and Germany, where the public sector provides top end housing in order to generate subsidies for those in need;</p> <p>c. There is particular concern at the suggested amendment to include privately provided housing within the definition. Unless properties were subject to a legislative regime and publically overseen, we do not believe, the appropriate controls are in place to generate proper governance. It is also inappropriate to ask the planning system to take on this task;</p> <p>d. While the scope of affordable housing may increase, the council is concerned that in the absence of detail, it is unclear how resources will be prioritised to ensure that those in the greatest need come first.</p>
3.6	In conclusion, therefore, Mid Ulster District Council invites the Department for Communities / NIHE to explain its priorities for resources and present robust legislation to regulate and enforce the provision of good quality decent homes.
4.0	Other Considerations
4.1	Financial, Human Resources & Risk Implications

	Financial: None identified
	Human: None identified
	Risk Management: None identified
4.2	Screening & Impact Assessments
	Equality & Good Relations Implications: The consultation document has been subject to an Equality Impact Screen by DfC.
	Rural Needs Implications: The consultation document has been subject to a Rural Impact Assessment by DfC.
5.0	Recommendation(s)
5.1	Members are requested to note the contents of this report and attached response, which has already been issued to DfC. Members are asked to agree that the attached response at Appendix 1 can be confirmed to DfC as the response of this council.
6.0	Documents Attached & References
	Appendix 1 – Affordable Housing Consultation Response