

## **Houses in Multiple Occupation Subject Plan for Belfast City Council Area 2015, Draft Plan 2006**

### **Background**

Following representations received in response to the Draft Belfast Metropolitan Area Plan (published November 2004) and the high public profile surrounding problems associated with Houses in Multiple Occupation (HMO), particularly in South Belfast, the Planning Service initiated preparation of a Subject Plan to specifically address planning issues that are linked to shared housing. This was in parallel to the setting up of an Inter-agency Group by Belfast City Council, under the chair of the Chief Executive, to address the wider issues associated with this matter. Preparation of the Draft Plan also served as the major contribution by Planning Service to this initiative.

### **Approach**

A team within the Belfast Metropolitan Area Plan Section of Planning Service was tasked with preparing the Subject Plan for the whole Belfast City Council Area to a tight timescale and following a prescribed statutory process. After initial consultation and information gathering, including examination of statistical trends, an Issues Paper was published in August 2005. This raised seven main issues in relation to Houses in Multiple Occupation and invited feedback on these plus any other matters considered relevant within a statutory 14-week period. The Department employed consultants (PricewaterhouseCoopers) to engage with community groups, local residents and other interested parties during this stage and close consultation also took place with other stakeholders including those represented on the Inter-agency Group [Environmental Health and Building Control Departments of Belfast City Council, Universities and colleges, Northern Ireland Housing Executive (NIHE)] and Landlords' Association. The information and views gained from the entire comprehensive consultation process helped inform the strategy and plan proposals included within the Draft Subject Plan, intended to ensure that the need for HMO development is accommodated while protecting the amenity of residential areas and contributing to regeneration. In deciding on the detail of the policies, including capping levels, much attention was given to trend analysis and evidence from other regions.

### **Outcomes**

The publication of a draft Subject Plan in June 2006, while primarily intended for further public consultation prior to progressing to plan adoption, also serves as a material consideration in the further processing of planning applications for HMO development. This includes a clear Plan Strategy seeking to positively influence and shape the market for HMOs, rather than only curtailing development in areas where such accommodation is currently concentrated. The policy framework in the draft plan, intended to achieve the Plan Strategy consists of four spatial policies plus sets of associated designations that identify the extent to which further HMO development will be permitted in different locations, along with two policies that set out development criteria for consideration of HMO development

proposals. Within this innovative framework, a combination of restriction and promotion applied to HMO development opportunity provides a balanced approach to regeneration and amenity driven accommodation of HMO need. The particular promotion of purpose built student accommodation provides a mechanism for helping solve the student related adverse impact on amenity that exists. Furthermore the Plan raises the profile of the need for other agencies to consider other HMO related non-planning issues through identification from the consultation process.

133 representations were received during the eight-week statutory consultation period ending in August 2006. These include a combination of wide-ranging support for, and objection to, the specific plan proposals that will require to be considered prior to plan adoption possibly with the aid of a Public Inquiry. A further statutory eight-week counter-objection period is now imminent to allow objections to objections and thus complete the opportunity for public representation.

### **Lessons Learned**

The very comprehensive consultation process followed has ensured that all the planning issues that need to be raised and considered can be, before a final plan is adopted.

The innovative approach as outlined above, that has created regeneration led opportunities while seeking to protect amenity, has generally received positive response from the general public and other agencies.

Planning can not always address all the issues surrounding a land use problem, but it can be a vehicle for highlighting those other non-planning issues that need to be addressed by other bodies.

### **Summary of Key Features of Policy Process**

The policy framework set in the draft Subject Plan is forward looking and clear in the desired outcome for areas under pressure from HMO development and also the positive role that such further development can make to regeneration, within a longer-term perspective. The preparation has been outward looking and evidence based through analysis of statistical information on HMO levels and trends in Northern Ireland and elsewhere. NIHE has been instrumental in its assistance on this.

The policy framework in the draft plan is considered innovative and creative, incorporating several new approaches in policy previously not employed in Northern Ireland such as HMO capping on a street-by-street basis, and positive encouragement for an often contentious form of development in appropriate locations to spread the incidence of land use and avoid further concentration in particular areas.

Through the widespread consultation undertaken and the further opportunities ongoing, the process followed has been very inclusive and accommodating to appropriate communication.

The outcome of the Plan represents a holistic response to tackling a problem that extends beyond normal planning matters through the combination of the policy framework and recognition of other non-planning considerations required.

The evaluation of policy effectiveness will be assessed through the development control process and monitoring of impact, which is an inbuilt requirement along with the commitment to review as necessary.