**Greater Shankill**

**Reasons for Vacant Sites**

**1.0 Introduction**

This document highlights some of the potential reasons for the continuing existence of a large number of vacant sites in the Greater Shankill area of Belfast. Its purpose is to contribute to the current discussion of why so many Greater Shankill sites that have been cleared of buildings over the decades remain undeveloped.

Hopefully, this document will provide some insight into the problem, however, it does no claim to address all the possible reasons. Undoubtedly, additional explanations can and will be put forward. Furthermore, the explanations put forward in this document may benefit from additional research and analysis.

Much of the data and information referred to was obtained by way of online research which was carried out over a relatively short period of time. For omissions and errors, the author takes full responsibility and apologizes in advance.

**2.0 The Scale of the Problem**

From information made available by relevant organisations, it is understood that:

* The NIHE owns approximately 30 sites in the Greater Shankill.
* 16 sites are privately owned.
* The Department for Communities (DfC) owns approximately 15 sites in the Greater Shankill.
* The PSNI owns one site.

More up-to-date data may be available in relation to the number of vacant Greater Shankill sites, however, the above data provides some indication of the scale of the problem.

**3.0 Reasons**

**3.1 Policy/ Strategic Context**

**3.1.1 Programme of Government**

The Northern Ireland Executive website advises that, between 25 January and 22 March 2021, it held a public consultation on its ‘Programme for Government draft Outcomes Framework’ and that responses are currently being considered.

The draft Framework sets outs nine strategic Outcomes. One of these is;

‘We live and work sustainably – protecting the environment.’

Linked to this, one of the Key Priority Issues is;

‘Built Environment

Creating and shaping high quality, sustainable, places for people to live, work and spend leisure time. Furthering sustainable development and supporting positive place making and effective stewardship.’

Responsibility for this is allocated to the Department for Infrastructure, Department for Communities and Department of Finance.

Within this Key Priority Issue, there is no reference to neighbourhood physical regeneration. This seems to be a policy weakness at the highest level.

To enable measurement of progress against the Outcomes, the Executive had previously put in place 49 Indicators. These Indicators cover a broad range of policy areas, including crime, health, education, employment, the economy, culture, recycling, disability, energy, tourism, the environment, access to public services and housing. There is no Indicator specified for the redevelopment of vacant sites or even physical regeneration in neighbourhoods. This suggests that vacant sites aren’t a priority issue at a policy level.

**3.1.2 Department for Communities**

The Department for Communities (DfC) (previously Department for Social Development - DSD) website identifies the Department as having a regeneration responsibility. It refers to its role in relation to ‘programmes that target social need through social, economic and physical regeneration of cities, towns and villages, local government reform.’

The key related DfC policy document seems to be the ‘Urban Regeneration Community Development Policy Framework (July 2013)’. This Policy Framework sets out the Department's policy objectives for urban regeneration and community development in Northern Ireland for ‘at least the next decade’. Two Policy Framework Key Actions that seem to relate to the development of vacant sites are;

* *‘Physical regeneration of interface areas, including environmental improvement, remodelling, securing the release of development sites and the agreed removal of interface barriers where this is safe, practicable and desirable.*
* *Sustainable brownfield redevelopment, including the protection and improvement of buildings and open spaces, preservation of historic and cultural heritage, and development of community gardens, allotments and green spaces.’*

The Policy Framework sets out a number of Outcome Indicators. Policy Objective 1 is ‘To tackle area-based deprivation’. One of the ‘Associated Outcome Indicators’ is a ‘reduction in area of derelict sites’.

The Policy Framework provides for monitoring and evaluation of policy impacts and expenditure in terms of effectiveness, efficiency and value for money. This includes the establishment of baseline positions.

It is positive that there is an Indicator focused on reduction of derelict sites. However, it isn’t clear whether the situation in the Greater Shankill has been monitored and evaluated and action taken in response. If action has been taken, given the situation on the ground, it has been very limited.

**3.1.3 Belfast City Council**

**3.1.3.1 The Belfast Agenda**

In 2017, Belfast City Council (BCC) published a community plan called the ‘Belfast Agenda’. It was created by a partnership of key city partners, residents and community organisations. It set out a joint vision and long-term ambitions for Belfast’s future and outlined BCC’s priorities for action over the next four years.

The Belfast Agenda set 25 key, priority targets across four themes.

* Creating jobs and investment.
* Creating a competitive and sustainable city infrastructure.
* Making life better for all our residents.
* Connecting people to opportunities.

BCC makes available, on its website, a Belfast Agenda ‘Statement of Progress’ covering the period 2017 – 2019. This shows the progress made during the two-year period in relation to the 25 Indicators. None of the 25 targets in the Belfast Agenda directly addresses the issue of vacant sites.

The Belfast Agenda does refer to ‘exploring the potential for delivery of a Neighbourhood Attractiveness programme for Belfast to tackle dereliction’, however it is unclear if any action flowed from this.

**3.1.3.2 BCC Physical Investment**

In respect to physical investment, the Belfast City Council (BCC) website says;

*‘Our physical investment programme is a £400 million citywide commitment to making Belfast a better place to live, work, visit and invest. The programme, which includes around 400 projects, includes major schemes to boost the economy, create jobs and improve the quality of life in our neighbourhoods. The programme is not simply about building new facilities or assets. Investment decisions are taken in line with the strategic aims and objectives of the Belfast Agenda’.*

The website sets out the elements of the programme:

Local Investment Fund

The Local Investment Fund (LIF) offers funding to local projects which aim to make a real difference in people’s lives at a neighbourhood level by addressing local community need. Since 2012, BCC has invested £7.7 million into more than 100 projects across the city through LIF. A number of initiatives in the Greater Shankill supported by the LIF are shown on the website. Some of these involve improving open space.

Belfast Investment Fund

Through the Belfast Investment Fund (BIF), BCC set aside £28.2 million for projects that help to develop or regenerate facilities for people who live in, invest in or visit Belfast. A key objective of the fund is to encourage key private and public sector partners to co-invest in these projects. This initiative seems to be focused on improving or replacing existing buildings rather than development on existing vacant sites.

Social Outcomes Fund

The Social Outcomes Fund (SOF) is a £4 million programme created to support the city’s growing tourism infrastructure. The main aim of the SOF is to support local tourism and social economy initiatives. Two initiatives are linked to this fund in the Greater Shankill. Both involve improving existing buildings.

PEACE IV Shared Spaces

Three major shared spaces capital projects in north and west Belfast are underway. The council-led projects are funded through the EU’s PEACE IV Programme and managed by the Special EU Programme. Two of the funded initiatives involve new development on vacant sites.

Social Investment Fund

The Social Investment Fund (SIF) was set up by the Northern Ireland Executive Office to deliver social change. It aimed to make life better for people living in targeted areas by reducing poverty, unemployment and physical deterioration. The fund was to run until March 2020 and all funding had been committed to projects. Two initiatives in the Greater Shankill were supported by this fund. Both involved extensions to existing facilities.

The allocation of funding is in response to project applications. Greater Shankill funding applications seem to have not generally focused on new building on vacant sites.

The BCC website states, ‘The programme is not simply about building new facilities or assets. Investment decisions are taken in line with the strategic aims and objectives of the Belfast Agenda, the city’s first community plan which sets out a vision for Belfast in 2035.’ As the Belfast Agenda does little to directly address the problem of vacant sites, it may not be surprising that so few applications addressed the problem.

**3.1.4 Greater Shankill Strategic Regeneration Framework**

The Greater Shankill Strategic Framework (GSSF) was commissioned by the Greater Shankill Partnership and the Belfast Regeneration Office (DSD) in November 2007. It stated;

*‘Successive attempts have been made to regenerate areas of the Greater Shankill. Despite some notable successes and the presence of community initiatives that are well established and respected, none has succeeded in transforming the area. It is now recognised that a comprehensive and strategically based approach to the entire area is urgently needed and that piecemeal regeneration efforts are unable to produce lasting outcomes.*

*Despite numerous plans and proposals for different elements of the Greater Shankill there has not been a comprehensive vision for the whole area since 1969. Almost 40 years on, this Strategic Regeneration Framework provides the opportunity to:*

*a) fully assess the nature and extent of issues currently facing the Greater Shankill, and;*

*b) establish a set of strategically founded priorities by which to drive the reversal of its decline. The SRF provides a clearer role for existing programmes and plans within a positive, outward looking regeneration framework that offers the best chance for the Greater Shankill to reconnect with opportunities in Belfast and utilise the assets it already possesses.’*

The GSSF also outlined some of the many existing strategies and regeneration plans that impacted on the Greater Shankill along with a vision for this part of Belfast;

*‘The Greater Shankill will be revitalised as a sustainable community playing a vibrant role in the life of Belfast. The physical, social and economic decline of the past 40 years will be reversed in a community that experiences educational achievement; accesses employment opportunities throughout the city and sees the improving health of its residents, all set in a safe and attractive environment with affordable housing and a vibrant social and cultural scene. It will be a community at ease with itself and its neighbours.’*

Realisation of this vision was to be delivered by way of a model of comprehensive regeneration based along a number of key initiatives (46 in total), some of which were already underway or planned. They included;

*‘The Shankill Road*

*Comprehensive improvement of its buildings, businesses and open spaces, so that the Shankill Road plays an enhanced role as the social and commercial spine of the area.*

*Sustainable Neighbourhoods*

*Focused regeneration of the Greater Shankill’s different neighbourhoods with an emphasis on repopulating low density areas, ensuring good access to services and stimulating community cohesion.’*

The approach would include;

*‘Stimulating private sector confidence in the area. This will involve the establishment of a community led Urban Regeneration Company, providing a vehicle for effective cross sectoral partnership with Government and the necessary drive capability and access to successfully bring about positive and sustainable physical regeneration and investment’.*

The Urban Regeneration Company;

*‘Would be formed via the contribution of all key public and private sector stakeholders with the community, providing a vehicle for procurement of resources and expertise and the management of delivery. Focussing primarily on physical regeneration, it would be based in the heart of the Greater Shankill area and be required to rapidly establish the confidence of all communities through an open and transparent working relationship. Ultimately, such an organisation would be judged on its ability to deliver, meaning that the setting and achieving of short-term goals will also be a key factor.’*

The Framework sets out a series of regeneration proposals and provided suggestions for necessary action. It also provided an Action Plan setting out projects, priorities and timeframes as well as identifying relevant implementation bodies.

Although some of the projects identified provided the potential for development on vacant sites the Framework does not specifically address vacant sites as an issue.

**3.1.5 Neighbourhood Renewal Initiative**

**3.1.5.1 Greater Shankill Neighbourhood Renewal Action Plan**

In June 2003, the Northern Ireland Government launched the document ‘Neighbourhood Renewal – People and Place’. Neighbourhoods in the most deprived ten percent of wards across Northern Ireland were identified using the Noble Multiple Deprivation Measure.  Thirty six areas across Northern Ireland, including the Greater Shankill, were targeted for intervention.

Neighbourhood Partnerships were established in each Neighbourhood Renewal Area as a vehicle for local planning and implementation. The Greater Shankill Partnership took on the role of Neighbourhood Renewal Partnership and took its lead from the Greater Shankill Community Convention in relation to neighbourhood Renewal issues.

In 2005, the Convention set priority themes and established ‘Task Groups’ around them to develop a Neighbourhood Renewal Action Plan for Greater Shankill. The themes set were:

* *Education*
* *Young People and Youth Issues*
* *Training*
* *Employability, Jobs & Business*
* *Health and Wellbeing*
* *Arts and Culture*
* *Crime and Community Safety*
* *Sports and Leisure*
* *Arterial Routes and Environment*

The Action Plan is updated following Community Conventions. The most recent Action Plan on the Greater Shankill Partnership website is for 2017/18. It addresses the issues of derelict sites and razed land and the regeneration of the Shankill Road.

In respect to derelict sites and razed land, the Action Plan sets down an Output/ Action to ‘map and designate all existing sites for use’. In terms of which organisations were to be involved, the following were specified - Agreed Agenda Housing Strategy Group, BCC, NIHE and DfC.

In respect to Shankill Road regeneration, the Action Plan specifies a number Outputs/ Actions including, to ‘map and designate all existing razed sites for use’. In terms of which organisations were to be involved, the following were specified - Greater Shankill Business Forum.

The only planned action seems to have been to ‘map and designate all existing sites for use’. There don’t seem to be any other proposed actions.

In order to be able to assess performance against these Outputs/ Actions, it is necessary to have output measures and to collect data related to these measures. The Greater Shankill neighbourhood Renewal Action Plan Annual Reports set down a series of output measures for physical regeneration in the Greater Shankill. These are:

* *Area of land reclaimed and made ready for development.*
* *Area of land improved and made ready for development.*
* *Number of traffic calming schemes.*
* *Number of buildings improved.*
* *Number of projects improving community facilities.*
* *Number of people/ volunteers involved in environmental improvement projects.*

The range and wording of output measures is set by DfC. There is no output measure for the number of derelict sites developed. The absence of a relevant output measure suggests that progress could not effectively be assessed.

**3.1.5.2 Physical Deprivation Definition**

The Government’s current measure of the spatial distribution of deprivation or disadvantage in Northern Ireland is the Northern Ireland Multiple Deprivation Measure 2017. Local areas (890 in total) across Northern Ireland are ranked under a number of deprivation ‘domains’ to show how they compare against each other. Examples of domains are ‘Crime and Disorder’, ‘Health and Disability’ and ‘Living Environment’. It is the latter domain, ‘Living Environment’ that would be expected to be the place where the issue of vacant sites would be taken account of when assessing local deprivation. The ‘Local Environment Domain’ has three sub-domains;

* Housing quality.
* Housing access.
* Outdoor physical environment.

It is the last of these, ‘Outdoor Physical Environment’, that would be expected to be the place where the issue of vacant sites would be taken account of when assessing local deprivation. The issues specified as being given consideration under this sub-domain are;

* Domestic dwellings with Local Area Problem Scores.
* Standardised rate of road defects.
* Road traffic collisions.
* Proportion of properties in flood risk area.

It appears that the Government, when measuring levels of deprivation across Northern Ireland, does not take into account the existence, or state, of vacant sites in neighbourhoods. This may help to provide some understanding of why Greater Shankill local areas score relatively low under the Local Environment Domain. Low scores (indicated by a higher number out of 890) can give the impression that the problem is not significant in the Greater Shankill. Examples are set out below:

* Shankill 1 area. This area is ranked 561 out of 890 areas in Northern Ireland.
* Shankill 2 area. This area is ranked 116 out of 890 areas in Northern Ireland.
* Woodvale 1 area. This area is ranked 368 out of 890 areas in Northern Ireland.
* Woodvale 2 area. This area is ranked 118 out of 890 areas in Northern Ireland.
* Woodvale 3 area. This area is ranked 134 out of 890 areas in Northern Ireland.

**3.1.6 Building Successful Communities Initiative**

The Building Successful Communities (BSC) initiative was introduced by the Department for Communities as part of the Facing the Future - Housing Strategy for Northern Ireland in 2013. The initiative aims to use housing intervention as one of the main catalysts for local regeneration.

The BSC strategic aims are:

* *To work collaboratively across government, with the NIHE (Housing Executive), Housing Associations, and communities to improve housing and infrastructure.*
* *To improve current housing stock, deliver new social and affordable homes and bring empty homes into use.*
* *To target ways to bring physical, economic and social regeneration to each area.*
* *To use housing interventions as the driver to regenerate these areas and start to reverse community decline.*

Six pilot areas from across Northern Ireland were selected. Two Greater Shankill neighbourhoods were included – Lower Shankill/ Brown Square and Lower Oldpark/ Hillview.

The Lower Oldpark neighbourhood has a large number of vacant sites. Over the seven years of implementation of the BSC initiative in Lower Oldpark, one small vacant site has been redeveloped with the provision of five affordable houses. This was completed in April 2021. Redevelopment work on another small site started in April 2021. The implementation of the BSC initiative in Lower Oldpark has had a very limited impact on the problem of vacant sites in the neighbourhood.

**3.1.7 Northern Ireland Housing Executive**

The Northern Ireland Housing Executive (NIHE) is currently guided in the delivery of its services by its Corporate Plan 2017-2021. This Plan includes three Strategic Themes:

* People
* Property
* Places.

In respect to Property, the Plan specifies the following High Level Action;

*‘Increase the number of new social homes being built.’*

In recent years, a number of vacant sites across the Greater Shankill have seen the development of new social housing.

Again, in respect to the Property Strategic Theme, the Plan specifies the following High Level Action;

*‘Release more public sector land for housing development.**’*The Year 1 (2017-2018) Target for this Action is;

*‘By 31st December 2017, to have scrutinised the NIHE Undeveloped land Schedule to identify sites suitable for housing development (of all tenures).*

It is unclear how many NIHE owned vacant sites in the Greater Shankill were identified by the NIHE as being suitable for housing.

A further Year 1 (2017-2018) Target for this High Level Action is;

*‘By 31st March 2018, to have agreed a schedule of disposals over the PfG period for those sites identified as suitable for housing development’*

It is unclear how many NIHE owned vacant sites in the Greater Shankill were included in the schedule.

In respect to this Action, the Plan sets down Targets to be achieved in each of the three years between 2018 and 2021. The same target (largely) was specified for each of the three years, namely;

*‘Identify development lands for release to develop 150 social homes.’*

This is significant because, despite the NIHE’s above Target to identify sites suitable for housing development of all tenures, there are only Targets set for the development of social housing and no targets have been set for the development of affordable or other owner-occupier housing.

In the section of the NIHE Corporate Plan 2017-2021 that deals with Places, the following Outcome is identified;

*‘Fostering vibrant sustainable communities.’*

The following High Level Action linked to this Outcome is specified;

*‘Place Shaping.’*

In respect to this Action, the Plan sets down Targets to be achieved in each of the three years between 2018 and 2021. The same target was specified for each of the three years, namely;

*‘Continue with our place shaping and regeneration work in collaboration with Councils on local development plans and community plans.’*

This vague statement does not include any meaningful SMART target for neighbourhood regeneration, or site release for private development on NIHE owned sites. Indeed, there are no Key Performance Indicators related to these in the NIHE’s Business Plan covering the period 2020 – 2021 except relating to ‘those actions that the Housing Executive is responsible for delivering from the DfC’s Building Successful Communities Action Plans’.

The NIHE produces Belfast Housing Investment Plans. The most recent covers the period 2019 to 2023. The NIHE also prepares an annual update, the most recent of which was prepared in 2020. This Housing Investment Plan links into the NIHE’s Corporate and Business Plan and is consistent with these plans is so far as it does not directly address the need within communities for neighbourhood regeneration or site release for private development on NIHE owned sites

**3.2 Planning Considerations**

**3.2.1 Planning Policy Statement 8 – Open Spaces (PPS8)**

Landowners have demolished buildings and cleared and grassed over the sites at a number of locations in the Greater Shankill over the decades. A DfC Building Successful Communities document relating to the Lower Shankill and Brown’s Square Pilot Area states;

*‘The NIHE land in the Shankill is unlikely to be specifically zoned – it will either be land already within a housing context that was never developed or land left after demolition and clearance. However, planning approval may not necessarily be straight forward because the DoE’s PPS8 (Open Space, Sport, Outdoor Recreation) may apply which affords protection to existing open space (of any quality) by restricting development.’*

It may have been, and may continue to be, the case that landowners have held back from releasing cleared, grassed over sites because of an expectation that PPS8 would negatively impact on the potential for securing planning permission for e.g. new housing development.

‘PPS8 Policy OS 1 Protection of Open Space’ states;

*‘The Department will not permit development that would result in the loss of existing open space or land zoned for the provision of open space. The presumption against the loss of existing open space will apply irrespective of its physical condition and appearance.*

*An exception will be permitted where it is clearly shown that redevelopment will bring substantial community benefits that decisively outweigh the loss of the open space.*

*An exception will also be permitted where it is demonstrated that the loss of open space will have no significant detrimental impact on the amenity, character or biodiversity of an area and where either of the following circumstances occur:*

*(i) in the case of an area of open space of 2 hectares or less, alternative provision is made by the developer which is at least as accessible to current users and at least equivalent in terms of size, usefulness, attractiveness, safety and quality; …..’*

Further clarification is provided in PPS8 when it states;

*‘The Department will permit an exception to the presumption against loss of open space* *where development would produce such community benefit that this would decisively outweigh its loss. In such cases, applicants will generally be expected to demonstrate that their proposals are supported by the local community.’*

New development on cleared, grassed sites can be delivered by landowners and developers by way of them making the case to planning authorities that redevelopment is supported by the local community and will bring substantial community benefits that decisively outweigh the loss of the open space and securing local community support. For a fee, landowners and developers can access a Pre-Application Discussion (PAD) service provided by BCC Planning Service through which landowners and developers can speak with a planning officer and discuss proposals before making a planning application.

**3.3 Public Sector Owned Sites**

**3.3.1 Land Ownership**

The main public sector owners of vacant sites in the Greater Shankill seem to be the DfC and the NIHE. From the information available, it is understood that the NIHE owns approximately 30 sites in the Greater Shankill. A DfC Building Successful Communities document relating to the Lower Shankill and Brown’s Square Pilot Area states;

*‘NIHE records indicate that there are currently 3.7 hectares of undeveloped NIHE land in the Greater Shankill area’.*

**3.3.2 Land Disposal - Department of Finance (DoF) Policy Framework**

The following extracts from the Northern Ireland Department of Finance document, ‘Disposal of Surplus Public Sector Property In Northern Ireland October 2018 – DoF’, provide policy context for the disposal of surplus public sector land in the Greater Shankill sector of Belfast.

*‘3.4 Managing Public Money (Northern Ireland) establishes the requirement for public sector organisations to arrange for the efficient and effective use, maintenance, acquisition and disposal of the public sector assets under their control…….*

*‘3.5. The objective should be to identify and release surplus property with the least possible delay, subject to the need to realise best value for the Northern Ireland Block……*

*‘3.6. Public bodies are reminded of the importance of limiting their holdings of land and buildings to the minimum required for the performance of their present and clearly foreseen responsibilities.*

In relation to asset disposal, the document, Managing Public Money NI (Protocol for Disposals of Land, Property and Other Assets) states at A.4.8.12 that;

*‘Public sector organisations should take professional advice when disposing of land and property assets. Some key guidelines are set out in Box A4.8D. Further guidance can be obtained from the LPS Central Advisory Unit (CAU).*

Box A4.8.12 states that public organisations should:

*‘Dispose of surplus land/ property within three years subject to professional advice on the market’s capacity to absorb the additional supply.’*

Department of Finance document, ‘Disposal of Surplus Public Sector Property In Northern Ireland October 2018 – DoF’ requires Departments to prepare annually updated Asset Management Plans with a five year planning horizon covering all business areas’….. AMP’s are required to contain details of assets which are scheduled for disposal over the next few years.’

**3.3.3 Land Disposal – Department for Communities**

DfC land disposal is guided by the Department of Finance document, ‘Disposal of Surplus Public Sector Property In Northern Ireland October 2018 – DoF’ referred to above. Efforts to identify any specific DfC internal guidance relating to the disposal of surplus land (except in relation to social housing development by housing associations) were unsuccessful. Information provided suggests that the DfC doesn’t release sites in the Greater Shankill on the market in accordance with a transparent, co-ordinated and integrated programme of asset disposal. Instead, it releases land on the basis of occasional assessments of the local market. This seems like an ad hoc and casual approach to facilitating early physical regeneration in the Greater Shankill.

The Department of Finance document, ‘Disposal of Surplus Public Sector Property In Northern Ireland October 2018 – DoF’ requires Departments to prepare annually updated Asset Management Plans with a five year planning horizon covering all business areas’….. AMP’s are required to contain details of assets which are scheduled for disposal over the next few years.’ It is unclear whether this information is available for DfC assets in the Greater Shankill.

Over the last four decades, there have been a number of significant and successful private housing developments flowing from land release by public bodies. These highlight the capacity and potential of the Greater Shankill private housing market. If market conditions in the Greater Shankill are presented by public sector site owners as a factor in the pace and scale of site release on the market, this can be further explored.

The DfC provided information relating to when it acquired the 15 sites it owns as well as details of the date on which each of the sites was first placed on the open market for sale and the dates on which each site may have subsequently been placed on the open market.

This information offers an insight into whether DfC has sought to ensure least possible delay or to limit their holdings of land. The information provided by DfC is set out below. From this information we can see that DfC;

* Acquired 3 sites prior to 2000. Of these;
	+ Development has started on one site.
	+ Plans are in place for open space provision on one site.
	+ Improvement work is underway to sports facilities.
* Acquired 4 sites from 2000 to 2005. Of these;
	+ There are no development plans in relation to one site.
	+ One site has a temporary use.
	+ Development plans are in place in relation to two sites.
* Acquired 6 sites from 2006 and 2010. Of these;
	+ There are no development plans in relation to four sites.
	+ Development has started on one site.
	+ Development plans are in place in relation to one site.
* Acquired 2 sites between 2011 and 2015. Of these;
	+ One site is in use under lease.
	+ Environmental improvement plans are in place for one site.
* Acquired 0 sites between 2016 and 2020.

To summarise the above, off the 15 sites;

* There are no developments or development plans or current uses in relation to five sites (33 percent).
* Development has started on two sites (13 percent).
* Development plans are in place in relation to three sites (20 percent).
* Plans are in place in relation to provision/ improvement of open space and sports facilities for three sites (20 percent).
* One site is in use under lease (7 percent).
* One site has a temporary use (7 percent).

When consideration was given to the date of site acquisition and the date on which sites were first released on the market under development brief, the following was identified for 13 sites:

* Two sites were first released under development brief within three years of site acquisition.
	+ Land at Mayo Link / Mayo Street. (SWC plans to develop new Centre. Project appears to be making steady progress.)
	+ 294-296 Crumlin Road (Junction of Tennent St). (No development proposals/ plans)
* Four sites were first released under development brief within six and 10 years of site acquisition.
	+ 308-312 Shankill Road. (No development proposals/ plans).
	+ Land at 141-145 Shankill Road. (No development proposals/ plans).
	+ Land at 42-48 Shankill Road. (The site is currently being developed under development agreement in 2020).
	+ Merkland Place. (Development under way).
* One site was first released under development brief within 11 and 15 years of site acquisition.
	+ 284-296 Shankill Road. (The site currently being developed under development brief.).
* Six sites weren’t released under development brief.
	+ CLABC, Craven Street. (The site is being used under lease).
	+ Land at 93-107 Shankill Road.(Cleared site being maintained).
	+ Land at Springvale. (Vacant land. Site will be used to form part of the BCC Forth Meadow Community Greenway Project)
	+ Paisley Park. (Sports Facilities. Park will transfer to BCC ownership on completion of a programme of improvement works).
	+ Land at Denmark Street (Community Garden).
	+ Sites on Springfield Road (Highfield side between West Circular Road & Springmartin Road). (Black Mountain Shared Space Project).

From the above information, we can see that 5 sites were held by DfC for a period exceeding five years before being released under development brief. In addition, one site that was purchased by DfC in 2007 has never been released under development brief.

When consideration was given to the date on which sites were first released on the market under development brief and the date on which they were subsequently released on the market under development brief, the following was identified:

* Two sites were released under development brief for a second time within six and 10 years of the first release.
	+ 308-312 Shankill Road. (No development proposals/ plans).
	+ 294-296 Crumlin Road (Junction of Tennent St). (No development proposals/ plans)
* One site was released under development brief for a second time within 11 and 15 years of the first release.
	+ Merkland Place. (Development under way).
* Five sites were released for a first time weren’t release for a second time.
	+ 284-296 Shankill Road. (The site currently being developed under development brief.).
	+ Land at 141-145 Shankill Road. (First released 2020). (No development proposals/ plans).
	+ Land at 42-48 Shankill Road. (The site is currently being developed under development agreement in 2020).
	+ Land at Mayo Link / Mayo Street. (SWC plans to develop new Centre. Project appears to be making steady progress.)

From the above information, we can see that 3 sites were released under development brief for a second time more than 5 years after being released for the first time.

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| --- | --- | --- | --- |
| **DfC Owned Site** | **Acquisition Date** | **First and Subsequent Release Under Development Agreement** | **Additional Information** |
| 308-312 Shankill Road | 2003 | Released under development brief on two separate occasions.2009. First release within 6-10 years of acquisition.2019 Second release within 6-10 years of first release. | Site cleared and currently being maintained.Site previously released under development brief on two separate occasions.* First occasion. Developer appointed to build a three storey mixed use building for ground floor retail and 4 apartments. Preferred developer unable to proceed with original development.
* Second occasion in 2019. No response.
 |
| 284-296 Shankill Road | 2006 | Released under development brief in 2018 approximately.First release within 11-15 years of acquisition.Site not previously released under development brief.No second release. | The site currently being developed under development brief. Four retail units and 11 apartments over 2 buildings.No previous attempts to develop site. |
| 278-282 Shankill Road | 11.11.2005 | Released under development brief but date not provided.Need clarification if released or not.Site not previously released under development brief.No second release. | Site previously released under development brief but preferred developer unable to proceed. Information provided on 16.6.21 states that the site wasn’t marketed via development brief because of the proposed Shankill Greenway Project.Site being used under license by Groudwork NI. |
| Land at 141-145 Shankill Road | 2007-2011 (three parts) | Released under development brief for the first time in 2020.First release within 6-10 years of acquisition.Site not previously released under development brief.No second release. | No market interest in site following release under development brief in 2020. |
| CLABC, Craven Street | 29.3.2012 | Never released on market to date.Not released under development brief. | The site is being used under lease. |
| Land at 93-107 Shankill Road. | 31.3.2007 | Not released on market to date.Not released under development brief. | Cleared site being maintained. |
| Land at 42-48 Shankill Road. | 7.4.2010 | Date of release under development brief not provided. However, presuming 2020 is the year.First release within 6-10 years of acquisition.Site not previously released under development brief.No second release. | The site is currently being developed under development agreement in 2020.No previous attempts to develop the site. |
| Land at Peter’s Hill / Greenland Street | 2001-2006 | Date of release under development brief not provided.No date provided. | Development Agreement now being drawn up with the preferred developer selected to develop 96 bed hotel and 12 apartments.The land had been agreed for development with the adjoining landowner but the proposal did not proceed. |
| Land at Springvale | 1998 | No attempts to develop apart from initial plans to use the site for the Springvale Education Village (SEV) to develop a new university campus which did not proceed.Not released under development brief.(Alternative use). | Vacant land. Site will be used to form part of the BCC Forth Meadow Community Greenway Project |
| Paisley Park | 1998 | None.Not released under development brief.(Use planned) | Sports Facilities. Park will transfer to BCC ownership on completion of a programme of improvement works. |
| Land at Mayo Link / Mayo Street | 2005 | A Development Brief Competition was advertised in 2007 and the chosen developer planned to build 52 houses on the site however the proposal was withdrawn in 2009 following the economic downturn.First release within 3 years of acquisition.In August 2009, BELB approached the Department with a view to acquire the site to build a Nursery School. The land disposal completed in 2014.No second release.(Alternative use) | Half of the site was developed into a Nursery School. The remainder of the site was advertised by Development Brief in 2016, the successful applicant was Shankill Women’s Centre who plan to build a new Centre. Development has been delayed due to funding issues however BCC are now on board with the funding and the project appears to be making steady progress. |
| Land at Denmark Street (Community Garden) | 2012 | The Department (DfC) is transferring its land to Belfast City Council as part of the scheme.Not released under development brief.(Alternative use). | In 2012 the Department was approached Alpha Programme Steering Group regarding the development of Community Gardens on the vacant site at Denmark. The scheme was delivered through Groundwork NI and the lease for the garden was signed in 2013.The Department for Communities is involved with an Environmental Improvement scheme adjacent to Denmark Street. The scheme is part of the Lower Shankill and Brown Square Action Plan which is in turn part of the Building Successful Communities initiative. The Department is transferring its land to Belfast City Council as part of the scheme. |
| 294-296 Crumlin Road (Junction of Tennent St) | January 2007 | The site was advertised for development via a Development Brief in October 2010 and December 2017 without any success.First release within 3 years of acquisition.Second release within 6-10 years of first release. | The site was environmentally improved in November 2012 to improve its visual appearance. This site is currently fenced, locked and monitored on a monthly basis. The grass and hedges are cut as required. |
| Merkland Place | The site was acquired by means of a Comprehensive Development Scheme in 1990’s. | A development brief was advertised in November 2004.First release within 6-10 years of acquisition.The site was advertised by Development Brief in May 2017.Second release within 11-15 years of first release. | A successful developer was appointed however by 2008 the application changed so much from the original application and following the economic downturn, development never took place.The successful applicant planned to develop 14 light industrial units. Construction is currently underway and the developer hopes that the development will be completed by the end of March 2022. |
| Sites on Springfield Road (Highfield side between West Circular Road & Springmartin Road) | October 2007 | The sites are fenced and maintained.Not released under development brief. | In 2015 Black Mountain Shared Space Project held a meeting to discuss their plan to enhance the area through the provision of housing units on Sites A-D. However, there was no community support and no development has ever taken place. |

**3.3.4 Land Disposal - NIHE Owned Sites**

NIHE land disposal is also guided by Department of Finance document, ‘Disposal of Surplus Public Sector Property In Northern Ireland October 2018 – DoF’ referred to above.

Internal NIHE guidance relating to the disposal of surplus land was identified, namely, ‘NIHE Land and Regeneration Services Manual (Part 3) – Land Asset Management – Land Disposal (2014)’. Section 7 (Land Disposal) (7.1) states;

*‘Where land has been identified as surplus and is not to be transferred within the public sector or offered back to the former owner, it should be disposed of with the least possible delay and at the best value obtainable in accordance with Land & Property Services Central Advisory Unit guidance on the Disposal of Surplus Public Sector Property in Northern Ireland. As indicated previously, Managing Public Money NI states that disposals of surplus property should occur within 3 years subject to professional advice on the capacity of the market.’*

A request has still to be made to the NIHE for details of when it acquired each of the sites it owns in the Greater Shankill. Also, to be requested are details of the history of NIHE action in relation to disposal of each of the sites. Receipt of this information will provide a clearer picture of the role of the NIHE in relation to urban regeneration in the Greater Shankill neighbourhood and in relation to whether it has sought to ensure least possible delay or to limit their holdings of land.

**3.5 Site Attractiveness**

**3.5.1 Planning Permission**

One of the problems in securing the development of sites may be their attractiveness to potential developers. The appeal of a site to a purchaser will be affected by a range of factors. One of them may have been uncertainty over securing planning permission.

In respect to publicly owned sites, the Department of Finance document, ‘Disposal of Surplus Public Sector Property In Northern Ireland October 2018 – DoF’ states;

*‘Asset owners are advised to obtain explicit advice, at an early stage, from the local Planning Service within the District Council area to establish whether there is likely to be potential for development, the nature of such development and/ or whether there are particularly sensitive planning issues.’*

It is assumed that public sector landowners have sought such advice from BCC Planning at an early stage in relation to the Greater Shankill sites it owns.

The above document also highlights the option of the public sector landowners seeking planning approval for a site prior to putting it on the market. If appropriate, this could increase the potential attractiveness of a site and, at the same time, increase its value. It is unclear to what extent public bodies have sought to obtain planning approval for Greater Shankill sites before trying to sell them.

**3.5.2 Market Failure**

As outlined above, there is clear evidence of effectively operating private housing markets in the Greater Shankill. However, there are locations e.g. adjacent to, or near, peace walls or interfaces where private development may not be financially viable for developers without subsidisation by Government.

3.5.2.1 Urban Development Grant

Urban Development Grant (UDG) is a discretionary grant scheme operated by DfC with the main aim of encouraging the economic, physical and social regeneration of disadvantaged urban areas across Northern Ireland, by promoting regeneration. This is done by encouraging investment in property to improve:

* *The economy (by assisting the expansion of local businesses and the creation of jobs); and*
* *The environment (by the improvement of the appearance of new buildings on derelict sites).*

A range of physical development projects may attract UDG including retail, commercial, light industrial and housing.

The DfC website states that in relation to UDG;

*‘Presently, there are no Urban Development Grant schemes open for application.’*

This seems to have been the case since the scheme was temporarily opened to enable a significant grant application to be made for the Portrush Regeneration Programme linked to the Open Golf tournament at Portrush. However, information available indicates that a contract was signed in October 2018 in relation to the payment of UDG in connection with the housing development at the vacant site at the Shankill Road/ Lanark Way junction. It may be the case that this application preceded the suspension of the UDG funding programme.

It is interesting that DfC highlights development grants in development briefs linked to efforts to sell land it owns but also state that ‘ it should be noted that at the time of going to press, the Department is not currently in a position to offer grant assistance, however, all development proposals should indicate any requirement for assistance in the event of this assistance changing.’

3.5.2.2 Housing Development Grant - Building Successful Communities

Housing Development Grant (HDG) was piloted as part of the Building Successful Communities (BSC) housing led regeneration pilot programme. This grant was introduced as an alternative to UDG and was to be available in the six BSC pilot areas. The aim of the scheme was to:

* *‘Encourage the construction and sale of new build or refurbished private sector housing where these developments would be unviable without grant assistance.*
* *Lever private sector investment into BSC areas.*
* *Create work in the construction industry.’*

Work began on developing the grant in 2015 and it came into force three years later in 2018. HDG was paid in relation to the Cliftonpark Avenue/ Oldpark Road site affordable housing development. This involved the provision of five new owner-occupier homes. It is unclear as to whether developments in any other BSC Pilot Areas received HDG. It is also unclear as to whether HDG is still in place or available to support further new development.

The long time it took to introduce HDG and problems linked to the implementation of the Building Successful Communities initiative have meant that HDG has been of very limited value in terms of securing development on vacant sites in the Lower Oldpark.

**3.6 Privately Owned Sites**

Information available suggests that there are approximately 16 vacant privately owned sites in the Greater Shankill. Some of these sites are subject to development planning applications. Others have scheme planning approval.

In the Greater Shankill, there have been a number of cases where developers obtain planning permission, perhaps to simply add to the value of the land, but then fail to commence development. There have also been cases where planning applications have been resubmitted, thus providing the owner/ developer with a further five years to sit on the land without commencing development. Some sites may simply be held by landowners without any planning application being submitted.

**3.6.1 Compulsory Purchase Orders**

The DfC may seek to purchase sites by voluntary agreement where there is no prospect of development taking place. However, agreement from the owner isn’t always available. Legislation in Northern Ireland gives many authorised bodies (acquiring authorities) the power to acquire land compulsorily where the landowner or occupier is not willing to sell by agreement. This power enables them to acquire land and rights over land for specific purposes set out in legislation. Common purposes include the construction and alteration of roads, urban regeneration, housing redevelopment, industrial development and the provision of new educational and health facilities. As an example, in 2007, the Department for the Environment compulsorily acquired the dilapidated Herdman’s Mill in Sion Mills.

It is unclear to what extent public bodies have used compulsory purchase to try and address the problem of the Greater Shankill’s many privately owned vacant sites.

**3.6.2 Planning Options**

Planning Act NI 2011 specifies the duration of planning permissions. Part 3 Section 61 specifies;

* 5 years of the date on which the permission is granted; or
* Such other period (whether longer or shorter) as the authority concerned with the planning permission considers appropriate having regard to the provision of the local development plan and any other material considerations.

The latter may provide a policy option that hasn’t been employed to limit the duration of repeat planning applications.

**3.7 Social Housing Need Assessment**

New social housing development provision can and does contribute to reducing the number of vacant sites in an area. The problem for the Greater Shankill is that data provided by the NIHE indicates the need for a low level of newbuild social housing (by housing associations) in the area.

A document called ‘Commissioning Prospectus Affordable Social and Intermediate Housing For Social Housing Development Programme Period (2020/21-22/23)’ sets out Projected Social Housing Need for a five year period for different parts of Belfast. For the Greater Shankill, the projected figure is 35. This does not mean that there are only 35 people in the Greater Shankill who need social housing. The figure is achieved by way of a fairly complex calculation process that looks at, amongst other things, a projection of the number of people on the waiting list who have at least 30 points (indicating they are in Housing Stress) and a projection of the number of allocations of social housing in the area.

Greater Shankill waiting list data highlights a reasonably strong demand for social housing. The NIHE document ‘Belfast Housing Investment Plan 2019-2023’ indicates that, in 2019, there was a total of 673 applicants on the Greater Shankill waiting list. However, it is those who are defined as being in Housing Stress (with 30 points or more) who are taken account of when the need for new social housing is being calculated. Off the 673 applicants referred to above, 415 were deemed to be in Housing Stress. This figure also points to a fairly strong need for new social housing. The difficulty is that the NIHE also looks at the turnover in social houses which is assessed by looking at the number housing allocations. A projection for allocations is calculated. In basic terms, the NIHE says that if an existing social house is allocated to someone on the waiting list, then that reduces to need for a new house to be built. The problem for the Greater Shankill is that it has a fairly high turnover of houses and when a figure for allocations is projected and included in the calculation, this reduces the number of new houses that are deemed to be needed. ‘Belfast Housing Investment Plan 2019-2023’ indicates that, in 2019, there were 226 allocations over a twelve month period. As a contrast, the number of applicants in Housing Stress in West Belfast in 2019 was 2,552 while the number of allocations was 380.

The calculated low level of need for new social housing in the Greater Shankill has been the case for a significant period of time. While the NIHE has supported new social housing development in the Greater Shankill on the basis of calculated need, the contribution of such development in reducing the number of vacant sites has been limited.

**3.8 Types of Private Development**

**3.8.1 Community Concerns**

There have been a number of private housing developments in the Greater Shankill neighbourhood. Private development on vacant sites offers the opportunity to secure neighbourhood and community regeneration. However, within communities, there can be a concern that such development will involve new homes being sold to investors and private landlords. This concern can arise from the potential for inflated house prices, high turnover of properties, anti-social behaviour and deterioration in the local environment. Local residents want to see homes sold for owner-occupation which is viewed as generating long-term community stability. These concerns may have impacted on enthusiasm within communities towards sites being used for private development.

There may also have been, within communities, a concern about private development bringing apartment development. This type of development is sometimes viewed as potentially bringing private landlords and investors, high turnover of properties, anti-social behaviour and detachment from the surrounding community.

For sites in private ownership, opportunities for ensuring that the new homes are sold for owner-occupation and take the form of family housing may have been missed. Local communities may not have had the chances, or even, in some cases, the knowledge or confidence to meet with developers to discuss their plans and the type of housing to be provided. Sometimes, local communities may have met with a negative response from developers.

When sites are in public ownership, the situation is rather different. These public bodies have access to tools for ensuring that land is developed with housing for owner-occupation and that the properties take the form of family houses. However, local communities may not always have been aware of this and public bodies may not always have provided them with the relevant information.

**3.9 Site Specific Reasons**

No examination of the reasons for the continuing existence of a large number of vacant sites in the Greater Shankill would be complete without consideration of the specific circumstances associated with each site. To do this comprehensively would be beyond the scope of this examination of the problem. However, based on anecdotal evidence, it is possible to speculate on some of the site specific reasons. These are summarized below:

* Delays in the submission of planning applications and delays in planning application decisions.
* Landowner/ developer scheme funding problems.
* Developer/ contractor bankruptcy.
* Delays in introduction of relevant policies by public bodies.
* Unexplained delays.

**4.0 Conclusions**

Addressing the problem of undeveloped vacant sites has not been a priority for Government and public bodies at a policy and strategy level.

Where a policy or strategic framework does exist for tackling the problem of undeveloped vacant, inadequacies in terms of delivery have meant that significant progress hasn’t been delivered.

Other factors such as limits on the Greater Shankill newbuild social housing development programme have also played a role in preventing progress.

**5.0 The Future**

Hopefully, the Shankill BUILD initiative will create an energy and drive that will lead to development on every single vacant site in the Greater Shankill over the next ten years.

(February 2022)