

EQUALITY IMPACT ASSESSMENT

**SOCIAL HOUSING DEVELOPMENT  
PROGRAMME**

**STRATEGIC GUIDELINES**

**Consultation Report**

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Please contact:

Tony Steed,  
Equality Unit,  
5<sup>th</sup> Floor, Housing Centre,  
2 Adelaide St,  
Belfast  
BT2 8BP

Tel 028 9031 8556

Fax 028 9031 8775

Email: [tony.steed@nihe.gov.uk](mailto:tony.steed@nihe.gov.uk)

Textphone: 0845 6504381

## **1.0 Introduction**

This consultation report provides an outline of the consultation process around the equality impact assessment (EQIA) of the Social Housing New Build Strategic Guidelines (the Guidelines) which was conducted primarily in the latter part of 2008. The report will also cover the significant amount of preliminary consultation which dates, in some cases back to 2001 when initial consultation was conducted on the equality screening of Housing Executive policies. This also coincides with the implementation of the Housing Executive's Consultative Forum on Equality which received quarterly updates on the Housing Executive's EQIA programme and regularly fed into the process.

## **2.0 Background**

The Strategic Guidelines were identified as a significant policy with the potential for equality impacts in 2001 when the Housing Executive conducted the initial screening of policies. This was confirmed following consultation and the policy was scheduled for year 5 of the Equality Scheme timetable.

## **3.0 Consultation programme**

- 3.1 Initial work on data collection and preliminary consultation began in 2005 with a presentation to the Consultative Forum on Equality at its Annual meeting in October 2005. A total of 24 organisations attended the Forum.
- 3.2 At this stage the EQIA was added to the agenda of the Consultative Forum steering group for quarterly reporting and analysis. The data collection and analysis stages were carried out and discussed with the Consultative Forum Steering group.
- 3.3 The issue of housing inequalities was raised in a document released by the Committee for the Administration of Justice

(CAJ) in September 2006 titled “Equality in Northern Ireland, the rhetoric and the reality”. The CAJ report did highlight the complexities of providing housing services in Northern Ireland and the limitations of general understanding amongst the Section 75 community. We do note however that the Housing Executive did set out reservations about the robustness of the evidence presented in this report.

- 3.4 One of these issues related to how equality is assessed and measured. The Housing Executive recognised the sensitivity of this and during 2007 it sought independent expert advice (Adrian Jones consulting) on how its monitoring systems measured the operation of the waiting list and allocation of social housing. Adrian Jones concluded that the Housing Executive’s approach was good practice and that Housing Need and Housing Supply (and how equality impacts are measured) should be assessed in section 75 terms, using comparative analysis techniques including, the relative scale of need, and the comparative waiting times (for example between Catholic families and Protestant families). He acknowledged also that a range of statistical measures should be used to present the information including using both mean and median values to highlight the skewing effect of outlying values.
- 3.5 The assessment of impact stage was completed using the techniques developed with Adrian Jones Consulting. Consultation was stepped early in 2008 and a seminar was held in the Housing Executive’s Boardroom to discuss the EQIA. Twelve representative groups participated in this seminar and the findings were included as an appendix in the formal EQIA consultation report.
- 3.6 The process of formal consultation was implemented after the summer break in early September 2008 and ran through to mid December with an extension to early January 2009. All statutory consultees were contacted and forwarded an email or hard copy of the document. Face to face meetings were offered and were held with Diversiton, the Inter Community Network, Committee for the Administration of Justice, Rural Community Network and Southern Health and Social Services trust. A presentation was also made to the Northern Ireland Housing Council.

3.7 The DSD Committee, not one of the Housing Executive's statutory consultees, received two presentations in June and July 2009. At these the Housing Executive:

- Indicated that evidenced-based housing needs assessment is crucial to the fair distribution of the overall Social Housing Development Programme (SHDP), particularly in the context of finite and diminishing resources.
- Indicated that the Strategic Guidelines must be responsive to the places and people where housing need is greatest.
- Explained the rationale for introducing new Strategic Guidelines, including the removal of ringfencing from all areas, and the distribution of the Social Housing development Programme on the basis of an area's proportionate share of total housing stress. Importantly, this distribution is also weighted to reflect the length of time applicants are on the waiting list.
- Described the impact of the changes locally.

3.8 A total of ten responses were received to the formal consultation and these are set out with comments below. The Committee for the Administration of Justice met with the Housing Executive and advised that it would follow up with written comments. No comments were received.

Name of Organisation	Consultation Response	Comment
Rural Community Network	<ul style="list-style-type: none"> <li>It is essential to factor latent demand into the housing need equation</li> <li>A wider view of housing need to be taken</li> </ul>	<ul style="list-style-type: none"> <li>Noted and accepted: This point was accepted as it is already taken into account through the out come of the Latent Demand Tests, where identified, in local housing needs assessment. The introduction of PPS21 requires the Housing Executive to confirm that a housing need exists when a PPS21 application is submitted; additional latent testing may indeed result from this requirement.</li> </ul> <p>Community regeneration can be accepted as an aspect of the housing needs assessment</p>

	<ul style="list-style-type: none"> <li>• Housing and Homeless services are not provided in rural areas resulting in added pressures to the housing market. Homeless people have no alternative but to resort to sofa surfing etc.</li> <li>• Need is currently limited to people who present and fill in forms.</li> </ul>	<p>It should be noted that the methodology for assessing rural housing needs is currently under review.</p> <p>Whereas it is not possible to provide temporary accommodation in isolated rural locations, the Housing Executive has, through its 5 Area Homelessness Action Plans, considerably increased the supply of temporary accommodation across N. Ireland. The objective is to ensure that rural homeless households do not have to travel excessive distances to secure temporary accommodation. In addition information packs on services available to rural homeless households are now available for each District.</p> <p>Not accepted: Current methodology considers both waiting list and other</p>
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	<ul style="list-style-type: none"> <li>• There is a need for a new mechanism where the evidence is collected to qualify the decision.</li> <li>• Concept of the rural enabler would help this, e.g. network groups, councillors etc.</li> <li>• Need should be explored at a Community level using wide intelligence gathering methods</li> <li>• There is a need to understand the key role of sustainable rural communities and the relationship with social and affordable housing.</li> <li>• Important link also to the equality and Cohesion agenda.</li> <li>• The NIHE should promote its rural work as an integral aspect of rural development rather than housing seen as a separate issue from rural development;</li> </ul>	<p>relevant factors in assessing need such as demographics, regeneration, latent demand etc.</p> <p>It should be noted that the methodology for assessing rural housing needs is currently under review.</p> <p>Noted</p> <p>This is already in place</p> <p>Noted</p> <p>Noted</p> <p>We endeavour wherever possible to work with others to improve rural development. We are currently working</p>
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	<ul style="list-style-type: none"> <li>• When identifying rural housing need, there is a need for the NIHE to address 'communities of need' rather than only 'individuals in housing need' - the 30 point criteria for housing need is an urban indicator and does not recognize the dispersed nature of those in housing poverty in rural areas;</li> <li>• There is an opportunity to work alongside rural communities in addressing affordable housing need by adopting the Rural Housing Enabler model;</li> </ul>	<p>with DARD in the development of a rural white paper for NI which will further integrate housing with rural development</p> <p>Points are allocated for a range of matters such as overcrowding, sharing, unfitness, homelessness, intimidation, social and medical well being etc. Taking the above into consideration it was deemed that 30 points represented a level of housing stress to warrant the requirement for a house in both urban and rural areas It has also been accepted that Community regeneration can be accepted as an aspect of the housing needs assessment</p> <p>Accepted</p>
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	<ul style="list-style-type: none"> <li>• The timescale from area identification to housing development completed needs to be substantially shortened - it is unrealistic and unacceptable given the current housing market and increasing affordability issues;</li> <li>• The Housing Executive should explore the issue of 'local preference' in housing allocation in the context of Good Relations and Equality Legislation;</li> <li>• The 'right to buy' is a welcome option, however the NIHE needs safe guards against prospective buyers rather than those in housing need;</li> <li>• Promotion of co-ownership requires greater attention.</li> </ul>	<p>Noted</p> <p>This matter is currently under consideration by our Legal department</p> <p>"Right to buy" is a statutory requirement with no opportunity to vary from the rules.</p> <p>Noted</p>
NIFHA	<ul style="list-style-type: none"> <li>• NIFHA would stress that proper and due consideration is given to ensure that an acceptable percentage of the social housing</li> </ul>	<p>This is allowed for via programme formulation using the strategic guidelines</p>

	<p>development programme is sufficient to address the supported housing needs for those who are vulnerable within our society.</p> <ul style="list-style-type: none"> <li>• It is also important to take account of the need for provision of specialised homes including wheelchair designed bungalows.</li> </ul>	<p>This is factored into the local housing needs assessment methodology</p>
<p>Disability Action (1<sup>st</sup> response)</p>	<ul style="list-style-type: none"> <li>• Disability Action welcomes the location of information on alternative formats in a prominent position in the document (page 2).</li> <li>• Disability Action applauds the Executive's decision to pursue the issue of quality as an equality issue. We look forward to working with the Executive to develop measures to monitor quality/equality considerations (page 7).</li> <li>• Whilst Disability Action recognises the pressures on public expenditure and availability of land, the issue of dwelling density is an important equality consideration for people with physical disabilities in relation to housing type and space constraints.</li> </ul>	<p>Noted</p> <p>Noted</p> <ul style="list-style-type: none"> <li>• This is recognised and the Housing Executive works with a range of organisations on issues associated with the built environment. However it must be noted that the Housing Association Guide sets out the</li> </ul>

	<p>standards for new build schemes. However we note also that this is currently being revised to ensure that the requirements of disabled people are accommodated. It is noted that good design and the requirements associated with density are not at variance with the needs of disabled people which can be met within higher density solutions. It is important to point out that under the Department for Social Development review the provision of bungalows will only be approved in exceptional circumstances.</p>
<p>Additionally qualitative data is of greater importance to disabled people (page 8, paragraph 1).</p> <ul style="list-style-type: none"> <li>○ As stated above although some technical quantitative information exists on housing need and disability this is not comprehensive. Housing research regarding disabled people requires a</li> </ul>	<p>We note and accept this point. Where possible the Housing Executive has added an equality dimension to the research agenda. This has provided much needed evidence for policy development and equality impact assessment. This approach continues to be developed with further research activities proposed in the</p>

	<p>different approach and we would encourage the Northern Ireland Housing Executive to develop a qualitative research agenda, not only on a disability but on lesbian, gay, bi-sexual and trans-gendered (LGBT) and black and minority ethnic community issues (page 14, section 5).</p> <ul style="list-style-type: none"> <li>○ Disability Action fully recognises the importance of housing in relation to religion and political opinion, we further recognise the work of the Northern Ireland Housing Executive's Equality Unit in developing relationships with the other equality groups, but we would point out that 15 pages have been devoted to that issue, 3 pages to racial background, 1 page to age, ½ page to gender, 1 page to marital status, 5 lines to sexual orientation, 1 page to disability, 5</li> </ul>	<p>Disability Action plan. Researching the LGBT community presents some more complex issues however we have developed a close working relationship with the representative sector as a starting point for collecting qualitative information on housing issues.</p> <p>The profile of each equality category reflects the scale of impact in relation to this policy. The issue of multiple identity is implicit within each assessment of impact. Given the nature of this policy and its outcome/benefit to customers, i.e. that it results in a set of guidelines that informs how a programme is formulated, the Housing Executive had to take a pragmatic view of its customers from an equality perspective. To examine every</p>
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	<p>lines to dependants. We believe this is a disproportionate emphasis and there has been no focus on issues of multiple identity.</p> <ul style="list-style-type: none"> <li>○ Disability Action accepts the Executive's identification of the differential impact on waiting list times and welcomes the working groups efforts to action plan the service improvements for wheelchair users (page 37 and 38 paragraph 6.8).</li> <li>○ Additionally Disability Action would encourage the Executive to further examine housing issues faced by disabled people other than permanent wheelchair users (pages 37 and 38, paragraph 6.8).</li> <li>○ Regardless of the commentary in paragraph 7.3 Disability Action believes the Executive should have identified the adverse impact on wheelchair users in paragraph 7.1 and should have identified mitigation measures further on in this</li> </ul>	<p>permutation of multiple identity would have been extremely resource intensive with limited additional benefit.</p> <p>Noted</p> <p>We note this point. There is a considerable range of contacts with disability organisations looking a range of housing policy and service areas. We are happy to continue and expand this dialogue.</p> <p>The Strategic Guidelines do not influence the final design of the scheme. Design and accessibility issues are considered locally to meet the specific needs of families on the waiting list. In addition the</p>
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	<p>section (page 43, paragraph 7.3).</p> <ul style="list-style-type: none"> <li>○ Disability Action is happy to work specifically on issues of data collection, storage and qualitative research on disability as we believe in the Executives fundamental commitment to equality (page 43, paragraph 7.3).</li> </ul>	<p>report sets out the work being conducted with regard to wheelchair accessible dwellings.</p> <p>Noted</p>
Disability Action (2 <sup>nd</sup> response)	<ul style="list-style-type: none"> <li>• Disability Action would ask the Northern Ireland Housing Executive to provide us with details of the level of accessibility of its website and whether or not it meets current European Standards. (Covering Letter)</li> </ul>	<p>We have tried to make our website accessible and easy to use for everyone, no matter what browser you choose to use, and whether or not you have a disability.</p> <p>The site's layout takes into account users who are blind or visually impaired. It is compatible with popular screen reading software. If you have difficulties using a mouse, the site can be navigated using</p>

	<ul style="list-style-type: none"> <li>Disability Action seeks clarity as to why people with disabilities are not identified as a specific policy area (Table 1, Page 13).</li> </ul>	<p>only a keyboard.</p> <p>In technical language, all pages on this site should be valid to Hyper Text Markup Language (HTML) 4.01 Transitional and use Cascading Style Sheets (CSS).</p> <p>This website conforms to the UK government guidelines for websites. It also follows the Worldwide Web Consortium's (W3C) Web Content Accessibility Guidelines 1.0, meeting all level double-A checkpoints. Some of our older reports do not conform to level double-A.</p> <p>Maintaining an accessible site is an ongoing process and we are continually working to offer a user-friendly experience</p> <p>This was not deemed necessary as people with disabilities represent a wide ranging group with wide ranging needs.</p>
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	<ul style="list-style-type: none"> <li>Regarding disabled people and the consideration of measures to mitigate adverse impact Disability Action has the following comments to make: <ul style="list-style-type: none"> <li>Disability Action would advise that whilst the 16 Lifetime Homes Standards does facilitate some disabled people's accommodation requirements they do not cover every disabled person's particular requirements.</li> <li>Disability Action recognises the rationale and welcomes the NIHE establishment of a working group to improve the service for people needing wheelchair accommodation. However, would recommend that this document provides background information, for the uninitiated, on the difference between the Lifetime Homes Standards and Wheelchair Housing</li> </ul> </li> </ul>	<p>Many disabled people's housing needs are met in standard housing designs, lifetime homes or adapted dwellings. Where additional support is needed this is identified under supported housing needs.</p> <p>Noted</p> <p>Noted and accepted. The final document will include a section on Lifetime homes standards.</p>
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	<p>Standards.</p> <ul style="list-style-type: none"> <li>○ In general, regarding the NIHE new build social housing Disability Action would point out that, as well as the building requiring accessibility, the approach to the building and to the site in general must address broader and holistic access issues in regard to, for example, geographical location, car parking, drop kerbs, accessible bus stops and transport.</li> <li>● Disability Action is concerned that the NIHE does not state that it will input a system to monitor this policy nor that it will revise the policy if monitoring/evaluation shows greater</li> </ul>	<p>We acknowledge these points however some of the issues are beyond the control of the Housing Executive. The Housing Association guide sets out standards that newbuild schemes must achieve. The Lifetime Homes standards cover the issues associated with accessibility within the dwelling and the boundary, including car parking. Location is important and we seek land in areas where there is housing need. This can prove to be a difficult with land availability and cost having a significant bearing. With regard to accessibility features beyond the dwelling e.g. drop kerbs bus stops etc we have no direct influence but work with the relevant agencies at appropriate times to address them.</p> <p>This point is made by the Equality Commission also. The monitoring of adverse impact is included in the Housing Executive's equality monitoring systems.</p>
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	<p>adverse impact than predicted as stated in the Equality Commission for Northern Ireland's Guide to Statutory Duties.</p> <ul style="list-style-type: none"> <li>Disability Action recognises the time and effort that have gone into producing this document for consultation and thanks the NIHE for the opportunity to respond and looks forward to continued dialogue.</li> </ul>	<p>A statement to this effect will be added to the document.</p> <p>Noted.</p>
Diversiton	<ul style="list-style-type: none"> <li>Diversiton were concerned that the balancing approach which skewed the programme towards communities who were waiting longer on the waiting list was applied across Northern Ireland. This was important and demonstrated a fair and logical approach.</li> <li>It is important to evaluate the evidence base for drawing conclusions as society changes and can change quickly. Migrant workers is an example but also the housing aspirations of young men/boys and young women/girls needs to be understood.</li> </ul>	<p>Noted</p> <p>The Housing Executive regularly examines the research and evidence needs of the organisation and adopts it approaches to collecting evidence accordingly with migrant Workers being a good example.</p>

	<ul style="list-style-type: none"> <li>• The Housing Executive should note that equality law is a long way from the faith needs of people. Equality law tends to force people into single identity camps yet their individual faith may be very different, even within the general grouping called “Catholic”.</li> <li>• The Housing Executive may need to consider how it builds faith needs into its policies generally as these are more about understanding a person’s lifestyle and is not the same as how religion is perceived.</li> <li>• It is difficult to get a measure of faith and the Housing Executive should begin a conversation with people to understand it and factor it into their planning. Consider the importance of spirituality and faith compared to religion.</li> <li>• At a strategic level there is a movement away from the dominance of world religions with low church attendance and scandals etc.</li> </ul>	<p>We note this point; however we cannot ignore the law. We have strong consultative relationships with customer groups, community voluntary and equality groups and use this relationship to ensure that we are directly clued into the needs and aspirations of customers.</p> <p>This is a complex area and we have invited Diversiton to join the Consultative Forum on equality to advise on faith issues. We note also the overlap with BME issues and culture.</p> <p>Noted:</p> <p>Noted:</p>
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	<ul style="list-style-type: none"> <li>• New housing plans must take account of local knowledge and individual judgement based on the right level of consultation.</li> <li>• The Housing Executive should ensure that it takes the widest possible view of society when compiling evidence upon which to base its policies.</li> </ul>	<p>Housing proposals consider the numbers and type of dwelling required based on qualitative and quantitative information. Consultation on newbuild proposals are led out by the housing associations.</p> <p>Noted.</p>
Newry & Mourne Traveller Partnership	<ul style="list-style-type: none"> <li>• It is important that the findings of the new Traveller Research are fully considered in this EQIA. The EQIA is unclear on who is “grabbing the nettle” with regard to Traveller housing need and the research project identifies “Strategic Partnerships” as having key responsibility. The Traveller accommodation issues require a holistic approach.</li> <li>• Whilst the EQIA indicates that Traveller accommodation plans will reflect the assessed need as identified by the Traveller unit, it is not clearly set out. There is also no clear reference</li> </ul>	<p>Although led by the Strategic partnerships team in the Housing Executive, the approach to Traveller Accommodation has a multi agency input via the Interagency working group. We note also and accept that the research findings will inform policy in this area.</p> <p>The planning of any programmes or schemes is based on the scale of need within the geographical areas of choice of Traveller families and is informed by a</p>

	<p>to the relationship between Traveller group housing schemes and the much needed “halting sites” and “transit sites”. For a full assessment of impacts it would be important to set out the full plan for Traveller accommodation/sites stating where, how and when these were programmed.</p> <ul style="list-style-type: none"> <li>• For such an important and sensitive EQIA there should be evidence that all the information on Traveller families has been considered.</li> </ul>	<p>comprehensive needs assessment of current and projected accommodation requirements of all Travellers. The latest Traveller Accommodation Needs Assessment was launched in December 2008 and will be used to facilitate decision making in relation to future accommodation schemes for the Traveller Community including halting and transit sites</p> <p>The comprehensive needs assessment interviewed all Traveller households in Northern Ireland. Its main aims were to</p> <ul style="list-style-type: none"> <li>• Conduct an accommodation needs assessment of the Traveller community in NI</li> <li>• Determine the housing, health and support needs of the Traveller community and examine any social issues to be tackled</li> <li>• Provide a socio-economic profile of and inform future planning of accommodation for the Traveller population in NI</li> </ul>
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	<ul style="list-style-type: none"> <li>• The principle established in the assessment of impacts between Protestant and Catholic families is acknowledged as a good practice in targeting housing inequalities. The Housing Executive should consider applying this in a wider sense e.g. comparing waiting times for appropriate accommodation between Traveller families and settled families.</li> <li>• The Guidelines should demonstrate knowledge of the unique family structures of Travellers and the trends emerging which are documented in the new research report.</li> <li>• The EQIA should also explain the position of Traveller families within the Housing market. This would support a theory for example that a holistic and diverse set of accommodation policies would add value to that housing market</li> </ul>	<p>This is not necessary as the Traveller accommodation programme is developed based on the specific needs of this group.</p> <p>As new evidence emerges it is considered in the annual review of the Guidelines. The Strategic Guidelines is a policy tool to identify a fair proportion of the SHDP for Travellers based on an assessment of need. The needs assessment will consider unique family structures.</p> <p>The final report will include a section on Traveller issues and housing.</p>
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	<p>and reduce pressures on other parts of the housing market.</p> <ul style="list-style-type: none"> <li>• The report also needs to reflect the socioeconomic circumstances of Traveller families in different parts of the country. For example Travellers in Newry have no economy now as there is limited need for tinsmiths, tarmac, logging, scrapping etc.</li> <li>• The needs and housing aspirations of young Travellers need examination to ensure future proofed planning in housing and accommodation.</li> </ul>	<p>This level of detailed information is contained in supplementary studies on the Traveller community in Northern Ireland. Where appropriate the final report will reference these reports.</p> <p>This is covered in the recent Traveller Needs Assessment research report.</p>
Equality Commission	<ul style="list-style-type: none"> <li>• The Commission welcomes the opportunity to comment on the Northern Ireland Housing Executives' equality impact assessment.</li> <li>• <b>Consideration of available data and research -</b></li> <li>• Paragraph 5.3 refers to data originating from</li> </ul>	<p>Noted</p> <p>Noted: Much of the original data is filed in</p>



	<p>the equality scheme and the screening of policies. To ensure that consultees have the optimum information, we would recommend that NIHE consider providing further detail on how data and information from these sources have been used to inform the EQIA.</p> <ul style="list-style-type: none"> <li>• Paragraph 6.7 (page 37) states that '<i>following consultation with the LGB sector no issues specific to the Strategic Guidance were identified which could be regarded as a differential impact</i>'. The EQIA should include a summary of the key points raised from this consultation together with the NIHE analysis of the issues in order that other consultees can understand see how this decision was reached. Similarly NIHE should clarify if this policy was discussed with BME representatives at a meeting of the Consultative Forum and BME Forum.</li> <li>• As the focus of the EQIA is on those in 'housing stress' and persons with 30+ points on the waiting list, it would be useful to provide</li> </ul>	<p>storage but could be made available if requested. General summaries including the original screening report, minutes of consultative fora etc are available on request.</p> <p>The LGB sector is represented ion the Consultative Forum steering group. This group receives regular reports on EQIA progress and can comment on an ongoing basis. The sector also attended a number of meetings that addressed the subject. No specific points were made or recoded other than the issue presented no major opportunities to promote equality further for the LGBT sector.</p> <p>Accepted. This will be set out in the final report.</p>
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	<p>consultees with a definition of housing stress and an explanation of how the points system operates.</p> <ul style="list-style-type: none"> <li>• Consultees might have found it beneficial if a key was provided to what geographical area Districts covered. For example Appendix 5 (Table 4) contains data on Belfast 1, Belfast 2 etc but no information is given to what areas these refer to in the city.</li> <li>• <b>Assessment of impacts and Mitigating measures/alternative policies</b> - Adverse impact has been identified for the category of religion (and also by implication for the political opinion category) in relation to: <ul style="list-style-type: none"> <li>○ the percentage of allocations to different religions against proportionality of the waiting list</li> <li>○ the length of time applicants of different religions spend on the waiting list at local levels.</li> </ul> </li> </ul>	<p>Accepted. This will be set out in the final report.</p>
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	<ul style="list-style-type: none"> <li>• Section 7 of the EQIA sets out three options to mitigate the adverse impact identified and Table 17 illustrates the ‘net effect of these options using current data available’. Consultees might have found it beneficial if the information was further analysed at District level to enable a clearer understanding of how the options would impact on particular districts (e.g. North Belfast/West Belfast)</li> <li>• NIHE recommends that the ‘application of option 3 to the Strategic Guidance would take full account of our duties under Section 75 of the Northern Ireland Act 1998’ (pg 44). The Commission welcomes this mitigating measure has having the potential to address the rising number in housing stress and on the waiting list.</li> <li>• The Commission notes that the lack of suitable housing for disabled people continues to create hardship. The Commission welcomes the establishment of a wheelchair users working group (pg 43) and looks forward to receiving further information on the policy</li> </ul>	<p>This could have been provided if requested as efforts are made in the report to provide as much information as reasonable at District level. However it would have been a significant piece of work to provide all information given the 35 Districts. It would also have resulted in a very large and inaccessible document.</p> <p>Noted:</p> <p>Noted:</p>
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	<p>outcomes arising from the work of this group.</p> <ul style="list-style-type: none"> <li>• <b>Consultation on the likely impact of proposed policies</b> - Most of the Guiding Principles on consultation (as set out in the <i>Guide to the Statutory Duties</i>) have been adhered to. NIHE has for example allowed more than 12 weeks for consultation on the EQIA, and to providing the document on request in alternative formats. However, while NIHE should be commended for holding preliminary consultation events, consultees might have found it useful if a summary of points raised at all preliminary consultation events had been included in the EQIA.</li> <li>• There is no explicit reference in the EQIA to specific consideration being given to how best to communicate information to young people and those with learning disabilities.</li> <li>• <b>Good Relations</b> - The Statement on Key Inequalities states 'Segregation in housing and communities reduces choice, represents</li> </ul>	<p>This point is accepted. We would note however that all information referred to in the report was available on request.</p> <p>This point is noted and will be given full consideration in future consultation reports. The issue generally is currently under consideration as we are seeking to develop a consultation toolkit.</p>
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	<p>Official report, 27 July 1998, col 109) (Guide to the Statutory Duties pg 18).</p> <ul style="list-style-type: none"> <li>○ Paragraph 2.17 of the Guide (pg 18) further states that ‘to the extent that public authorities perceive, in particular circumstances, a tension between the two duties, the primary duty of a public authority is its equality duty. The good relation duty cannot be invoked to justify a failure or refusal to comply with the equality duty’.</li> <li>● <b>Conclusion</b> - The Commission wishes to emphasise the requirement of the section 75 legislation (Schedule 9, paragraph 9.2), that in making any decision with respect to a policy adopted or proposed to be adopted by it, a public authority shall take into account any equality impact assessment and consultation carried out in relation to the policy.</li> <li>● The Northern Ireland Housing Executive must</li> </ul>	<p>Noted and accepted</p> <p>Noted and accepted</p>
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	<p>establish a system to monitor the impact of the policy in order to determine its effect on the relevant groups. The results of the ongoing monitoring must be reviewed on an annual basis. The Northern Ireland Housing Executive is required to publish the results of this monitoring (Schedule 9 paragraph 4 (2) (b)). The results of the monitoring must be included in the Northern Ireland Housing Executives annual review of progress to the Equality Commission.</p> <ul style="list-style-type: none"> <li>It is essential that monitoring is carried out in a systematic manner and that the results are widely and openly published (see 1.6 of the Commission's Monitoring Guidance). If the monitoring and evaluation show that the policy results in greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, the Northern Ireland Housing Executive must ensure that the policy is revised.</li> </ul>	<p>The Housing Executive is continuing to develop integrated monitoring systems for the ongoing analysis of equality of opportunity in addition to adverse impacts. We provide a general summary in the Annual report to the Equality Commission as a full report would be very large.</p> <p>This is noted. The Housing Executive presents its monitoring findings to the Full Consultative Forum when requested and to the Steering group on a regular basis.</p>
Housing	<ul style="list-style-type: none"> <li>Members were concerned to note the adverse</li> </ul>	Noted

Council	<p>impact in terms of religious imbalance and agree with the Housing Executive's preferred option to address this through Housing Need Assessment, weighted by waiting time.</p> <ul style="list-style-type: none"> <li>• Although location is not included in the equality impact assessment Members remain concerned about the imbalance in social housing provision between rural and urban areas. Members note the ongoing attempts to increase social new build in rural areas and accept the constraints in doing so. However, Members would recommend that the Housing Executive gives consideration to including measures in the Strategic Guidelines to protect the interests of those in need of social housing in rural areas.</li> <li>• Members welcome the latent demand tests undertaken by the Housing Executive which often result in additional schemes being added to the social new build programme in new locations. There were concerns, however, that the existing residents in the new areas are not fully consulted on the proposed social housing</li> </ul>	<p>The Strategic Guidelines ensure the formulation of the SHDP is spread fairly across the Province based on housing need by local Government District. In addition it identifies the total rural need against the overall need and identifies a proportion of the SHDP for rural housing based on need.</p> <p>Consultation on newbuild proposals are led out by the housing associations who are regulated by the Department for Social Development.</p>
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	<p>provision and that this can lead to future objections at planning stage.</p> <ul style="list-style-type: none"> <li>Members also discussed the difficulties faced by young people who wish to stay in rural areas but who are unable to buy houses due to affordability issues and who are also unable to obtain social housing. Such cases have implications for projected need which Members feel is not being made on the basis of the fullest information. It was also agreed that such cases demonstrate a lack of rural – proofing in the Strategic Guidelines and Members have asked that their concerns in this regard be included in this response. Members would welcome a bi – annual update from the Housing Executive, identifying social housing demand in rural areas.</li> <li>Members also feel that the Housing Selection Scheme (HSS) adversely impacts on young people (particularly single males) and are concerned that they are now being more</li> </ul>	<p>Community regeneration can be accepted as an aspect of the housing needs assessment. In addition the introduction of an ‘exceptions’ clause in PPS21 for social and affordable housing may facilitate the provision of further housing in rural areas.</p> <p>It should be noted that the Housing Executive is currently reviewing the methodology for assessing rural housing needs.</p> <p>Housing need is assessed annually. This information can be made available to the Housing Council on an annual basis.</p> <p>HSS has been equality proofed and was approved. The pilot scheme identified has not yet commenced and therefore it is difficult at this stage to assess what stock</p>
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	<p>frequently steered towards private sector lettings and hostels, due to the lack of availability of social housing. The Housing Council is also aware of the pilot scheme underway whereby the Housing Executive works with selected private sector landlords in the provision of accommodation for waiting list applicants. This is likely to impact more on young singles by the very nature of the tenure offered.</p> <ul style="list-style-type: none"> <li>• Accordingly, the Housing Council would urge the Housing Executive to ensure that such private sector accommodation and management practices, meet the same standards applicable to social housing provision. Too often Members have evidenced young singles living in poor accommodation and paying rents more appropriate to better quality accommodation. This may also adversely impact on the public purse by way of higher Housing Benefit for higher rents and does not provide good value in terms of standards, for public money.</li> </ul>	<p>may become available. The matter identified however will obviously be considered in the review</p> <p>Housing standards will be considered in the pilot exercise</p> <p>The need for wheelchair accommodation</p>
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	<ul style="list-style-type: none"> <li>During discussions Members referred to the year long waiting time for wheelchair users and to the reference on page 43 of the consultation document which suggested that a differential impact was not established. Members were uncomfortable with the explanation provided i.e. that the outcome of the Strategic Guidelines is simply a statement of intent to allocate a number of houses to a certain location and not to determine the type of dwelling provided. It was noted that the content of a scheme would be determined at scheme design stage and through the outcome of the analysis of the waiting list. Members feel that the location of a scheme may well render it prohibitive for wheelchair users and that consideration should be given to the make up of the waiting list at an earlier stage. Members noted that Disability Action had expressed a similar view and like the Housing Council would perhaps argue that the Strategic Guidelines, if omitting to address such issues, should at least make clear reference to the policy area where such impacts will be taken into account.</li> </ul>	<p>is assessed annually. In addition, each case is considered individually against existing available stock and the need for new additional stock.</p> <p>Site specific issues are addressed i.e. suitability for wheelchair accommodation as part of the scheme assessment process</p> <p>With regard to the Traveller</p>
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	<ul style="list-style-type: none"> <li>Members would also refer to accommodation provision for Travellers, whose needs have been given special recognition in law. These needs, while recognised, have not been matched with sufficient resources to produce the required transit and emergency halting sites.</li> </ul>	<p>Accommodation policy approach it should be noted that the challenge is addressing accessibility and availability of land in suitable locations. In creating a site for Travellers the NIHE bases the planning of programmes on the scale of need. This includes reference to the Comprehensive Needs Assessment of Traveller families which informs the development of the Traveller Accommodation Programme. The 2002 Comprehensive Needs Assessment exercise which underpins the current Traveller Accommodation Programme was recently updated. The current programme is prioritised in terms of location and the type of scheme in each year and to take account of greatest need, land availability planning etc</p>
	<ul style="list-style-type: none"> <li>Members' discussion extended to the methodologies used for assessment of need and felt that in some instances artificial results were being produced. Members consider that</li> </ul>	<p>Every applicant has the opportunity to identify on the housing application where they wish to be housed. In addition they are provided the opportunity to identify locations where they would wish to live</p>

	<p>encouraging applicants to seek housing in towns, particularly in the private sector, skews or misrepresents the demand for social housing in rural areas. On this basis Members would argue that if the fundamental premise on which the Strategic Guidelines are operated is wrong, then the outcomes for housing provision both in terms of location and numbers are likely to be wrong.</p> <ul style="list-style-type: none"> <li>• Members discussed instances whereby applicants were being encouraged to seek housing in the private sector thus reducing the numbers of the applicants on the waiting list. However, if those directed to the private rented sector fail to keep up with high rental payments, they have little chance of obtaining social housing, as they are deemed to be suitably housed and are awarded minimal points. This in many instances could be detrimental to the applicant's original position and may fail to include their re – application in any assessment of need.</li> </ul>	<p>should accommodation be provided.</p> <p>In response to this point it is important to note the context of increasing waiting lists, reduced turnover of housing stock and the limitations of the newbuild programme.</p> <p>It is also incumbent on the Housing Executive to offer advice on alternative options including the Private Rented Sector to applicants who are increasingly unlikely to receive an allocation of social housing. Any advice is offered on an optional basis i.e. that the applicant can choose to pursue the PRS option or not.</p>
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	<ul style="list-style-type: none"> <li>Referring to the Children's Order 1995 and the obligations on authorities to meet the needs of children and young people, Members discussed particular circumstances whereby households may be formed within households but are not recognised as such for housing purposes. Such hidden demand is not captured in needs assessments and does not therefore influence planning policies. Members also discussed the perceived shortcomings of the Housing Selection Scheme in reflecting the needs of the type of cases referred to.</li> <li>Members' in general agreed with the broad thrust of the Strategic Guidelines and their aims in relation to the equality categories, with the exception of Disability. The Northern Ireland Housing Council would ask you to take</li> </ul>	<p>Any subsequent application from an applicant who has taken up a PRS property that is no longer available to them will be assessed on the basis of their housing need at that time. This issue is currently under review.</p> <p>We accept that this is a sensitive area and each case will need careful assessment. However we will need to recognise the recent House of Lords decision <i>Holmes-Moorehouse v Richmond upon Thames</i> which also acknowledges the limited capacity of the "authority" to allocate houses.</p> <p>Noted</p>
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	<p>into account the views expressed by Members in relation to disability and rural proofing and, on assessing the full extent of housing need, in the development of the final guidelines. Members would welcome sight of these in due course.</p>	
Mencap	<ul style="list-style-type: none"> <li>▪ Mencap welcomes the opportunity to comment on the EQIA on the Social Housing Development Programme Strategic Guidelines and wishes to highlight the following concerns:</li> <li>▪ Lack of consideration of distinct needs and circumstances of children and adults with a learning disability.</li> <li>▪ The reliance on housing waiting lists to determine housing needs.</li> <li>• The impact of area based strategies on small, geographically dispersed communities, such as people with a learning disability.</li> </ul>	<p>This issues is considered through the Supporting housing Commissioning process</p> <p>Need is not determined solely through waiting lists for Supported Housing but also through the Supporting housing Commissioning process</p>

	<ul style="list-style-type: none"> <li>• Mencap is extremely disappointed at the lack of evidence produced by the Northern Ireland Housing Executive regarding the housing needs of people with a learning disability and their limited access to the same housing opportunities as other members of the community. We note the reliance on information provided by health and social care Boards and Trusts around Supporting People requirements and suggest that the Housing Executive should carry out its own research into the housing needs of this excluded and often overlooked group.</li> <li>• Mencap draws attention to the evidence produced by the Joseph Rowntree Foundation and the Bamford report about the housing and accommodation needs of people with a learning disability: ("Audit of learning disability in Northern Ireland. Roy McConkey, Eamonn Slevin, Owen Barr, UUU, May 2007; <a href="http://www.jrf.org.uk/knowledge/findings/housing/2208.asp">www.jrf.org.uk/knowledge/findings/housing/2208.asp</a>) <ul style="list-style-type: none"> <li>○ most children with a learning</li> </ul> </li> </ul>	<p>The Supporting People Commissioning structure is a partnership between the Housing Executive, Health and Social Services and the Probation Board. The housing and support needs of people with a learning disability are not determined solely through housing waiting lists.</p> <p>The Housing Executive does take into account research and other need assessments, including the JRF work noted by Mencap. Indeed, the Housing Executive commissioned research with each of the, then four Health and Social Services Boards to examine the future housing and support needs of people with a learning disability.</p> <p>The research findings have informed the Supporting People commissioning process and have lead to the development of a range of supported housing and floating support services for people with a learning disability.</p>
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	<ul style="list-style-type: none"><li>○ most adults with a learning disability (66%) live with family carers, and are rarely given the opportunity to move from the family home and provided with support to live independently. Few will be on housing waiting lists and evidence about their housing needs is not</li></ul>	<p>The Housing Executive has also contributed to the Bamford review and is working to address the recommendation arising from the review. The Housing Executive is represented on the DHSSPS Resettlement Group</p>
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	<p>usually gathered in a systematic or robust way to inform assessments of housing need.</p> <ul style="list-style-type: none"> <li>○ the current living arrangements of a number of people with a learning disability are vulnerable for the following reasons: Nearly one third of adults with a learning disability live with a single carer and over 25% of adults with a learning disability live with a carers who are over 65 years of age. Nearly one in six carers are in poor health. The above risk factors can mean that alternative accommodation is required with little or no notice because of illness or death of a carer. Despite carers wanting to plan for the future, 62% of carers over 55 years reported that no plans had been put in place. This contrasts with 39% in the Irish Republic and 13% in the United States.</li> </ul>	Noted
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	<ul style="list-style-type: none"><li>○ around 450 people with a learning disability live in one of three special hospitals throughout Northern Ireland. This is a priority group for Health and Social Services because of the government's target on resettlement.</li><li>○ nearly 1900 people with a learning disability live in some form of residential provision provided by a range of sectors.</li><li>● Few people with a learning disability are given a choice about where they live or with whom they live. People with a learning disability also said that they do not have access to advice and help if they want to move.</li><li>● Just over 50% of family carers live in owner-occupied accommodation with most others living in Housing Executive or Housing Association property. This is lower than the regional average.</li></ul>	
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Participation and the Practice of Rights Project (PPR)	<ul style="list-style-type: none"> <li>• The Draft EQIA on the Social Housing Development Programme Strategic Guidelines aims to:  “Direct the development of the social new build programme based on an objective assessment of social housing need and housing condition in accordance with existing strategies and commitments”.</li> <li>• Official government statistics clearly recognise the prevailing inequalities and objective need which exist in North Belfast, West Belfast and Derry with regard to housing. The chronic differentials which exist with respect to religion have already been acknowledged within this draft EQIA which states:  “This report takes these issues into account and highlights the scale of inequality in Northern Ireland and the specific locations where the differential is the greatest. In relation to religion these areas include North Belfast,</li> </ul>	<p>Noted</p> <p>Noted</p>

	<p>West Belfast and Derry/Londonderry”.</p> <p>Further to this the Northern Ireland Neighbourhood Information Service (NINIS) Deprivation measure lists Super Output Areas in Northern Ireland, ranking them from 1 – 890 regarding their level of deprivation for housing access. NINIS defines deprivation as ‘unmet need’. Of the 20 most deprived Super Output Areas in Northern Ireland for Housing Access, 16 of them are in North Belfast, West Belfast or Derry.</p> <ul style="list-style-type: none"> <li>• Despite this acknowledged record of long standing inequality and deprivation, this EQIA proposes a method of calculating the build of new social housing over the next five years that will leads to the number of units of social housing being built in the Belfast area, falling by a quarter. No figures are included on its impact on Derry. It is proposed that ring fencing will end, to be replaced by a Housing Needs Assessment, Weighted by Waiting Time.</li> </ul>	<p>Noted</p> <p>Importantly the percentage of overall Housing Stress has decreased in the Policy Areas of West Belfast, North Belfast and West Bank. Clearly ring-fencing has been a success for those locations. However, to continue to ring-fence these Policy Areas would only exacerbate the situation for those locations elsewhere experiencing increasing levels of housing stress e.g. Newry and the Rural community. Ring Fencing was introduced on a time</p>
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	<ul style="list-style-type: none"> <li>PPR is concerned that the Draft EQIA presents no evidence that the religious differential that required the ring fencing to be put in place has abated.</li> </ul>	<p>limited basis to support particular strategies in parts of the province. The Equality Impact Assessment (EQIA) on the Strategic Guidelines confirmed the changing pattern of housing need across the province and the disproportionate share of the new build going to the ring fenced areas. This meant that other areas did not get a proportionate share of the programme and the revised approach will ensure a more equitable sharing of the limited new build programme.</p> <p>Ring fencing was not applied due to religious differentials but instead it was as a result of high levels of housing stress being experienced in those areas at the time of the various Policy Areas being approved. As stated above, the percentage of overall Housing Stress has decreased in the Policy Areas of West Belfast, North Belfast and West Bank.</p>
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	<ul style="list-style-type: none"><li>• The EQIA acknowledges that religious differentials still exist but does not state how this reduction in social housing new build in Belfast will affect the equality of opportunity of those who require social housing in North Belfast, West Belfast and Derry.</li><li>• Throughout the Draft EQIA document, insufficient statistics are presented to illustrate how the previous policy of ring fencing has affected the housing need and inequality in these areas, and how the proposed policy of calculating new social housing build on the basis of Housing Needs Assessment, Weighted by Waiting Time will impact on the differential and need. PPR is convinced that these statistics are crucial in order to fully assess the impact of this new policy on these still existing differentials and on equality of</li></ul>	<p>The EQIA acknowledges religious differentials at a Regional level. The aim is to have a social housing programme based on need shared equitably across all areas of housing need. Therefore housing need in North Belfast, West Belfast and Derry will determine the levels of newbuild required, proportionate to the Regional requirements.</p> <p>While it is acknowledged the numbers on the waiting lists for Belfast continue to increase, waiting lists are increasing in all Areas. The number of applicants in Housing Stress is the primary indicator of the need for newbuild. The overall percentage of Housing Stress has reduced in recent years for Belfast and the West Area as demonstrated below</p> <table><tr><th rowspan="2">Housing Stress</th><th colspan="5">Area</th></tr><tr><th>Belfast</th><th>N</th><th>South</th><th>S</th><th>West</th></tr></table>	Housing Stress	Area					Belfast	N	South	S	West
Housing Stress	Area												
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	opportunity.													
	<ul style="list-style-type: none"><li>• PPR would also raise concerns on the use of a NIHE specific method of assessing need using the 'Housing Needs Assessment'. The document outlining this methodology was not included in the EQIA and only a brief version was made available on request. This lack of transparency means it is difficult to assess how this methodology sits with the NIHE's legal obligation to tackle housing based on 'objective need'.</li><li>• The point that quality of accommodation has never been raised as an equality issue is concerning. This has been raised by the Committee on the Administration of Justice's 'Equality in Northern Ireland: the Rhetoric and the Reality' in relation to the Common</li></ul>	<table><tr><td></td><td></td><td>East</td><td></td><td>East</td><td></td></tr><tr><td>%Change in Stress Mar 2003 Mar 2007</td><td>-4.7</td><td>+0.7</td><td>+4.4</td><td>-0.2</td><td>-0.3</td></tr></table> <p>Statistics are not yet available to determine the success of the revised methodology for formulating the SHDP.</p> <p>We are happy to make the methodology available as requested. The local housing needs assessment has been validated by 4 leading housing experts from GB and accepted by DSD, DRD and DOE. The Housing Executive local housing needs assessment is subject to scrutiny through the planning appeals process and Area Plan Public Examination.</p> <p>We note the reference to the CAJ report which contained a number of errors. However, with regard to this EQIA, age and dependents differentials have been fully considered in the context of the objectives of the Strategic Guidelines.</p>			East		East		%Change in Stress Mar 2003 Mar 2007	-4.7	+0.7	+4.4	-0.2	-0.3
		East		East										
%Change in Stress Mar 2003 Mar 2007	-4.7	+0.7	+4.4	-0.2	-0.3									



	<p>Selection Scheme EQIA. This EQIA contained information on household size by religion of applicants on the waiting list. These figures showed significant differences between housing needs across the two communities. As concluded in CAJ's report::</p> <p>“Decisions about the kind of house to be constructed and where it is constructed will clearly have a major equality impact in terms of housing provision.”</p> <p>In turn the Draft EQIA on the Social Housing Programme Strategic Guidelines relegates the issue of housing quality as outside the scope of the EQIA. Yet the document goes on to define quality as being about the size of property, type of house, age/condition and access. These are all issues which clearly impact on meeting the needs of different equality groupings, namely those with disability, those with dependents and the needs of older people. In answering ‘Is there any evidence that different groups have different needs, experiences, issues and</p>	<p>The specific housing mixes of schemes are considered at a later stage in the delivery of housing schemes at local levels to ensure that the design is suitable for the types of families likely to accommodate the houses i.e in their areas of choice.</p> <p>The debate about housing quality in the EQIA considers whether one equality grouping receives a different level of quality of housing when compared with its Section 75 comparator. This includes for example;</p> <ul style="list-style-type: none"> <li>• Catholic families compared to Protestant families who are in the same circumstances and with the same level of need.</li> <li>• A family with a disabled family</li> </ul>
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	<p>priorities in relation to the particular policy?' researching the needs of these groups will go directly to answering this question and discharge the NIHE obligations under s75. The NIHE cannot sideline quality when considering the differential, as it is a crucial factor in ensuring that the social housing units built actually meet the needs in the area, and therefore reduce differentials.</p>	<p>member compared to a similar family with no disabled family members.</p> <ul style="list-style-type: none"> <li>• A Same Sex household compared to a heterosexual household in the same circumstances.</li> </ul> <p>These are measures that we are discussing with consultees and looking at ways of assessing and building into our understanding of housing inequalities.</p> <p>The issue of quality when raised by the CRE in guidance suggested that there was more to a property than its bricks and mortar e.g. its popularity, style, accessibility etc which were measures of quality.</p> <p>The issues referred to by the consultee and in the CAJ report refer to the suitability of the properties to the existing or future household. This is an important feature but rests outside the scope of this</p>
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	<p>In follow up communications PPR stated.</p> <ul style="list-style-type: none"> <li>a) Proposed removal of “ring fencing” protection for areas noted by the draft EQIA as experiencing greatest religious differentials and chronic housing need namely North Belfast, West Belfast, Derry-Londonderry. According to NINIS deprivation measures, 16 of the 20 most deprived areas in Northern Ireland for housing access are located in these areas.</li> <li>b) Proposed new method of calculating the build of new social housing over the next five years that will lead to the number of units of social housing being built in the Belfast area falling by 25%.</li> </ul>	<p>policy. These features of housing developments are decided at a more advanced stage when detailed briefs are prepared for the developer based on the needs of the families on the waiting list.</p> <p>In our response we point out that “Evidence based housing needs assessment is crucial to the fair distribution of the overall <i>Social Housing Development Programme</i>, particularly in the context of finite and diminishing resources. The mechanism which determines the <i>Social Housing Development Programme</i> has to be responsive to the places and people where housing need is greatest.</p> <p>The <i>ring fencing</i> approach, which historically had been sound when concentrated high levels of housing need were confined to parts of Belfast and Derry City, had become inflexible by not</p>
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	<p>c) Proposed new method of assessing housing need “Housing Need Assessment – weighted by waiting time” and the lack of information either in the draft EQIA or since made available by NIHE on how this will impact the areas most in need.</p> <p>d) The calculation of housing need under the new proposals being done on the basis of a “median” figure rather than the mean. In effect this means that those on the waiting list the longest are no longer included in the calculation of “housing need”.</p>	<p>providing proportionately for the huge growth in housing need in additional places across Northern Ireland.</p> <p>We note also that “The 25% quoted by PPR shows some misunderstanding of Table 17 contained within the EQIA. For example the provision of new social housing in Poleglass, which was formerly part of Belfast’s figures is now included within the figures for the South-East area which is the management unit responsible for social housing in Lisburn/Poleglass (formerly Poleglass figures had been included in West Belfast)”.</p> <p>The issue for the Strategic Guidelines is not the fall or rise in the level of new social housing provision but rather the careful targeting of social housing to areas where housing need is greatest.</p> <p>It is wrong to suggest that: <i>“Those on the waiting list the longest are no</i></p>
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		<p><i>longer included in the calculation of housing need”</i></p> <p>The proposed new guidelines for the social housing new build programme do take into account, for the first time, waiting times for housing, which was not the case previously. Importantly, the distribution is weighted to reflect the length of time applicants spend on the waiting list. This will help ensure that a greater share of the Social Housing New Build Programme is provided in those areas where people have been waiting longer.</p> <p>The Housing Executive, using its experience and expertise, made the decision to use the median measurement because it is more sensitive to the most extreme cases which would disproportionately distort housing need.</p> <p>PPR’s comments that the evidence</p>
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		<p>presented in the draft EQIA (appendices and statistical tables) was done so in a way that was unhelpful to them is disappointing. The Housing Executive has taken considerable steps throughout the process to ensure the PPR understands the data, the rationale and the implications of the revised Strategic Guidelines. As well as receiving the documentation the PPR attended a presentation (2<sup>nd</sup> April 2008) on the Strategic Guidelines. This presentation was not the PPR's final opportunity to comment and there has been a series of correspondence to assist the PPR in its understanding of the data in the EQIA Report since then.</p>
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