

## **Northern Ireland Housing Executive Response to Department for Communities Draft Housing Supply Strategy**

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The Housing Executive welcomes the opportunity to respond to the consultation on the draft Housing Supply Strategy (dHSS) which are set out under the questions contained in the dHSS.

The Housing Executive strongly supports the proposal in the dHSS to provide a holistic approach to the delivery and supply of housing and agree that a new Housing Supply Strategy should consider issues beyond simply increasing housing numbers including the form and quality of housing, the sustainability of housing and how new and existing housing can be built or adapted to meet future needs. We also support a strategy that recognises housing as central to the development of sustainable communities and which provides cross cutting benefits across society.

The Housing Executive supports the promotion of collaborative working practices that can better provide change and improvement. We recognise that inflexible organisational structures, in delivering public services, can restrict the ability to provide a strategic and holistic approach to address often complex and multifaceted issues, including housing supply.

The Housing Executive believes that housing is cross cutting and we recognise the benefits of partnership working to achieve the identified objectives, long term policies and interventions and the proposed enabling activities in the dHSS. We have extensive experience of working with Councils, Government Departments, Registered Housing Associations (RHA), academics, local communities and other stakeholders on a range of social, economic and environmental issues and look forward to continuing cooperation with a wide range of organisations and communities over the 15 year lifetime of the new Housing Supply Strategy.

### **1. The Call for Evidence consultation showed that there was broad support for the proposed vision, objectives, and timeframe for the Strategy. Based on the comments received we have updated these for the draft Strategy – are you content with these?**

#### **Vision**

The Housing Executive, in its response to the Call for Evidence consultation in July 2021, stated that the dHSS Vision should not be focused solely on housing outside of its context within neighbourhoods and communities. We, therefore,

welcome that the amended Vision now includes that housing should be located within a thriving and inclusive community. However, as the environment is a key determinant of people's health and wellbeing and quality of life, we believe that a quality environment, and climate resilient and sustainable housing need to be embedded as fundamental principles in all decision making. We therefore support a further amendment to the Vision to state:

*“Everybody has access to a good quality affordable and sustainable home that is appropriate for their needs and is located within a thriving, environmentally-sound and inclusive community”.*

## **Objectives**

The Housing Executive supports the five identified objectives:

1. Creating Affordable Options
2. Prevention and Intervention;
3. Quality;
4. Better Places; and
5. Decarbonisation.

We believe that the five objectives can encompass a wide and comprehensive range of cross tenure housing issues and further believe they can contain actions relating to the elements of an “adequate” house as identified by the UN:

- Security of tenure;
- Availability of services, materials, facilities and infrastructure;
- Affordability;
- Habitability;
- Accessibility;
- Location; and
- Cultural adequacy

## **Timeframe**

The Housing Executive welcomes the long-term 15-year timeframe for the dHSS, which is needed to embed structural change. There is potential for significant changes within this time frame and we note dHSS states that a strategic review will be carried out every five years, to ensure that proposals are delivering the expected outcomes, however, we believe these could be increased to every three years. This would also provide more frequent opportunities to publicise and energise the strategy and to refocus those involved in delivery.

The Building Research Establishment reports that it is generally accepted new buildings will last at least 60 years. As houses last several decades, and will home different generations, it is important that a long term Strategy and Vision for housing is developed which gives consideration to current and future housing needs and the number, type and quality of housing required and which will better

ensure that houses built now will be enduring and flexible to meet housing need for at least 60 years.

### **Housing Target**

We welcome the objective for at least a third of these homes to be social housing, which equates to approximately 2,222 new social housing units per annum. We would like to seek clarification within the Strategy on whether these are “starts” or “completions”, with completions representing a more accurate representation of delivery. Nevertheless, this is a substantial increase in the current social housing targets (1,900 units for 2021/22) which is necessary to help meet increasing numbers of applicants on the waiting list and in housing stress.

We also believe that there could be further discussion regarding the level of social housing targets set each year over the 15 year period, so that these can be set in a way, which can be effective at reducing those on the waiting list in housing stress in a shorter and medium term.

We also believe that the forthcoming completion of our SHMA research can help to identify intermediate housing need within a housing target.

### **Strategic Housing Market Analyses**

The Housing Executive welcomes the recognition in the dHSS that the Housing Executive’s Strategic Housing Market Analysis (SHMA) reports can provide “a new integrated, transparent model for estimating future requirements based on scenario planning and integrating demographic, economic and stock information”.

The SHMA reports are an evidence base and are factual in scope and policy neutral. Importantly, SHMA scenarios of housing need, on a long term and cross tenure basis, assess existing and future housing need. The purpose of the SHMAs is not to set housing targets but rather inform decision makers when preparing housing policy and supply objectives. We believe that the completion of SHMA reports in spring 2022, will be an important evidence base to inform a new home target for the 15-year period 2022-2037.

As referenced in the dHSS, SHMAs have the ability to assess potential demand for intermediate housing and can provide information on house types and sizes which can inform the Strategy on policy objectives in relation to the design and specification of homes to meet housing needs.

### **The widening gap in housing supply**

The Housing Executive notes that the dHSS also includes Department for Infrastructure (DFI) Housing Growth Indicators (HGIs) to provide information on housing need and housing supply.

We believe HGIs are a useful indicator of future housing need, however, they assume that current households are adequately housed and, unlike SHMAs, they do not include a “backlog” figure for existing households in housing need.

We, therefore, believe that HGIs, used on their own, could underestimate total housing need and that it is important decision makers in Council Local Development Plan (LDP) teams use both HGIs and the SHMAs when developing local housing policies within LDPs, as required by regional planning policy.

### **Energy Efficiency**

We would like to see emphasis with in the Strategic Framework on the key role for the Department of Finance to introduce high energy efficiency standards incorporated within Building Regulations. Higher energy efficiency within domestic buildings will ensure they are fit for purpose in future years, will help reduce carbon emissions and will help to address fuel poverty in an environment of rising energy prices.

### **Quality of Place**

We believe this is explicitly linked to sustainable communities. A definition for sustainable communities has been agreed in the Bristol Accord, and this is set out under our comments to Objective 4.

### **Housing Equality**

Page 16 of the dHSS uses the term BAME (Black, Asian and Minority Ethnic), however, it is noted that, in March 2021, the Commission on Race and Ethnic Disparities recommended that the Government stop using the terms BAME and BME which were criticised for emphasising certain ethnic groups and excluding others and were stated to be unhelpful which could mask disparities between different ethnic groups. It is suggested that the preferred term “ethnic minorities” or “ethnically diverse” be used.

### **Whole System Approach**

The Housing Executive agrees to a whole system approach and this will require cross departmental agreement and action for successful implementation. This will require strongly advocating the cross cutting nature of housing and that the policies and enabling activities will help provide benefits across Northern Ireland and can assist helping to meet other Departments objectives. Demonstrating the how Government departments and organisations can gain from supporting the Housing Supply Strategy will help provide the cross sector, long term endorsement and involvement required.

### **Data and Evidence**

The Housing Executive strongly supports work to improve data quality and availability to improve our understanding of the housing system and to monitor and measure the effect of actions.

The Housing Executive is committed to providing a range of housing evidence through its Research Department which can carry out bespoke research projects as well as providing regular statistics including:

- The House Condition Survey – the HCS has been awarded National Statistics status by the Office for Statistics Regulation and aims to provide a comprehensive overview of Northern Ireland dwelling stock and occupants. It is carried out approximately every five years and provides data to support objectives 3 “Quality” and 5 “Decarbonisation”;
- The Housing Executive’s Strategic Housing Market Analysis, Housing Need Assessments, Housing Investment Plans and Commissioning Prospectus provide information on housing market dynamics, cross tenure and affordable housing need, waiting list statistics on housing stress and homelessness figures for Objectives 1 “Creating Affordable Options” and 2 “Prevention and Intervention”;
- The Housing Executive’s Place Shaping work in Community Planning, Local Development Plans and Site Identification Studies consider quantitative and qualitative place based data to support Objective 4 “Better Places”.

**2. The assessment of the Call for Evidence has enabled us to develop a total of 15 longer term policies and interventions that will provide the basis to develop appropriate action plans. Do you agree with the focus of these 15 high level long term policies and interventions?**

The Housing Executive believes that the long-term policies and interventions should be cognisant of DfC’s Anti-Poverty Expert Advisory Panel’s (2020) Recommendations for housing. This would help provide the connected approach to housing that the dHSS is endorsing. The recommendations are:

- Reduce the contribution which housing, and energy costs make to the number of households in poverty by long-term investment in social housing.
- Prevent further decline in Northern Ireland Housing Executive (NIHE) stock by abolishing the right to buy.
- Ensure culturally appropriate affordable housing solutions for extended kinship communities and others including Travellers; Roma; age-appropriate independent living for young people; those identifying as LGBT+; care leavers; elderly and disabled people.
- Ensure that Local Housing Allowance rates do not fall below the 30th percentile of market rents and increase this in stages to its original 50th percentile value.
- Ensure that social housing tenants on social security benefits are not further impoverished by differentials in rent for NIHE properties and those of Housing Associations which are elevated by service charges.
- Extend and strengthen the regulations covering Houses in Multiple Occupation across the private rented sector, with the objective of developing uniform standards across the rented sector.
- Use rent regulation as a lever to bring substandard private rented sector properties up to standard.
- Carry out a radical overhaul of building standards with a view to setting the high energy efficient standards necessary to meet the climate emergency.

- Introduce compulsory environmental health approval before new lettings are put on the market.

Additional Housing Executive comments on the long term policies and interventions are set out under each of the five objectives.

## **Objective 1**

### **Creating Affordable Options: Increase housing supply and affordable options across all tenures to meet housing need and demand;**

The Housing Executive welcomes the intention to increase housing supply and affordable housing options to meet need and demand. We agree that SHMAs can help provide an understanding of housing need by location and tenure.

We believe that once the SHMA is completed this could help provide evidence for a new build housing target and can help determine if the 100,000 new housing supply can reduce the gap between overall housing requirements and supply.

#### Long Term Policies and Interventions

The Housing Executive supports the long term policies and interventions, including working collaboratively with different sectors, to address issues around land availability. We would like to see greater transparency of public land sector holdings and believe that the LDP process can best identify private sector land for housing and affordable housing.

We welcome the statement that land for housing should be considered alongside infrastructure and transport and believe that this could be expanded to include services, facilities and specifically public transport. Housing, which is located in areas with nearby services and with good access to public transport, walking and cycling facilities can lead to more cohesive communities, as well as contributing to the reduction of greenhouse gases and promoting active lifestyles. Research shows that when people travel without cars, they interact with neighbours and use local shops and facilities and the inclusion of housing near a mix of uses and the integration of transport and patterns of development will help support achieving Objectives 4 and 5; “Better Places” and “Decarbonisation”.

The Housing Executive welcomes the lifting of borrowing restrictions to allow it to lever in private capital to invest in its housing stock and to enable it to re-establish a new build programme.

The Housing Executive’s statutory Housing Sale Scheme continues to reduce the supply of social housing required to meet current and future need with many sold properties entering the private rented sector. This also means that the owners of sold properties do not benefit from the added value and investment that the Housing Executive can provide in its housing stock. We also believe that the continued operation of the statutory Housing Sale Scheme can contribute the residualisation of Housing Executive estates and will continue to undermine the promotion to deliver sustainable communities.

In the 10 years from 2011/12 to 2020/21 nearly 4,000 Housing Executive houses were sold. During the same time the SHDP delivered just under 15,000 units. This meant that 26% of the new social homes were, in effect, replacing sold housing stock, meaning that there was less capacity for the SHDP to meet increasing levels of housing need. The Housing Executive believes it is crucial that legislation is brought forward to end the statutory House Sales Scheme. This would ensure social housing stock is secured for future generations to help meet rising waiting lists and those in housing stress.

We would also like to see a review of the current annual budgeting cycle and consideration given to multi-year budgeting to allow it to plan investment across a number of years to better support and maintain an additional supply of housing.

The Housing Executive notes the long term policy for access to alternative forms of public and private finance such as Financial Transactions Capital (FTC) and institutional funding to develop and deliver new and affordable housing products. We are, however, disappointed that the dHSS does not emphasise and include the introduction of a developer contributions for affordable housing as an objective.

Developer contributions have been successful in increasing housing supply in other jurisdictions but continues to be a lost opportunity in Northern Ireland. Developer contributions have been commonplace in Great Britain, Ireland and Europe for a number of decades where it is deemed as reasonable and equitable to receive a proportion of the increased value of land resulting from the granting of planning permission i.e. a Government decision; “planning gain”.

The benefits of a developer contribution policy include:

- Meeting affordable housing need;
- Giving access to land for affordable housing;
- Freeing up social housing grant for additional affordable housing provision; and
- Providing mixed tenure/social mix.

The dis-benefits of a developer contribution policy include:

- An additional reliance on grant with an adverse impact on housing need;
- No access to additional land impacting on the Social Housing Development Programme; and
- No additional resources for social policy aims.

### Existing and New Enabling Activities

The Housing Executive supports the existing and new enabling objectives, in particular to build more social homes and to progress Housing Executive revitalisation.

We would like to see further information in relation to the ring fencing of Housing Association Grant funding and more detail on the basis and justification in the identification of areas for ring fencing and how this can be implemented in a way that supports equality.

The Housing Executive welcomes work on revitalisation. Existing housing stock is important infrastructure and the Housing Executive, therefore, welcomes the lifting of borrowing restrictions to allow it to lever in private capital to invest in its housing stock and to enable it to re-establish a new build programme. A broader investment programme will enable a new build and re-provision component and would complement our role in the administration and delivery of the Social Housing Development Programme. This would help support additional new stock, investment and the maintenance of existing stock and maximise the level of stock available to meet housing need.

Rental income for social housing must take account of affordability but it should also be able to support investment in tenant services and the housing stock. A planned long-term rental level trajectory based on investment requirements will assure viability and value for money. There needs to be a clear but stable pathway for rental income growth that is based on reinvestment in properties, delivering community priorities and tenant value for money.

To deliver the necessary investment for the Housing Executive to build directly, or commission from social housing provider networks new social homes, an appropriate (possibly mutualised) borrowing 'vehicle' needs to be constructed. The Housing Executive has a major unleveraged housing asset. Setting an appropriate level of 'gearing', a market revaluation of existing stock, promoting the very low levels of bad debt and secured direct rental income would in combination, form a solid foundation for an attractive investment opportunity. These attributes offer the prospect of stable, long-term, secure, acceptable returns that would appeal to a range of institutional investors. This could make social housing bonds an attractive long-term investment proposition, which would deliver a new low cost of capital investment option, blended each year with the available but reformed HAG (Housing Association Grant). This could provide the necessary substantial additional investment resources to enable the 'tapered' (front loaded) new build social housing programme.

We welcome the enabling activity to "extend the scope of the Government Land and Property Register Programme to digitally map all land and property holdings for both Central Government and Local Government in NI". Improving access to information on public land holdings and increased transparency will enable faster and better decision making and help to improve supply. However, there needs to be better engagement and willingness across public sector bodies to use their land to improve housing supply which goes beyond simply understanding where the land is located to gaining agreement to partner with housing providers to deliver housing, including affordable housing.

We welcome the establishment of a cross departmental Infrastructure Commission and the prioritisation of water infrastructure. Upgrading of existing waste water drainage and management is required to improve the effectiveness of waste water treatment, serving existing housing areas, and to provide needed capacity for future housing development schemes in the Social Housing Development Programme. Lack of capacity has had a major impact on viability of a number of social and private housing schemes in recent years and, without the planned major investment, is likely to become an increasingly challenging environment.



The Housing Executive is assisting DfC in the development of new intermediate housing products, including intermediate rent and intermediate home ownership, which will increase affordable housing for households who spend more than 30% of their income on market housing and who are unlikely to attain sufficient points to access social housing.

We believe that, as additional intermediate housing models are developed and become available to households, including Housing Executive tenants, there will be less reliance on the Housing Executive's House Sales Scheme as a means to low cost homeownership. However, the availability of intermediate housing, to households who require affordable housing, will be dependent on the willingness of RHAs to deliver intermediate products.

LDP policies will require intermediate housing, as well as social housing, to be provided within mixed tenure developments and the Housing Executive strongly welcomes the intention in the dHSS to "mainstream" mixed tenure. We, therefore, support the assessment of RHA powers and the Department creating mechanisms to encourage RHAs to provide intermediate housing. However, we believe that reducing risks in the provision of intermediate housing should not involve diverting Housing Association Grant from financing social housing to other housing tenures.

The Housing Executive believes that both domestic and business rates, in addition to contributing to the delivery of public services, can be an important tool to provide wider economic, social and environmental benefits. We consider that, in a reduced public spending environment, rates can be set in a way which helps businesses and industry, promotes the revitalisation of town centres and the reuse of empty properties and encourages the development of properties that are energy efficient. We agree that, to address these broader aims, rates should be part of a holistic and integrated approach, aligned with the Programme for Government (PfG) and community planning outcomes. This enabling activity will also help achieve Objectives 4 and 5; "Better Places" and "Decarbonisation".

As the Regional Housing Authority, the Housing Executive believes that it is well placed to provide a land assembly approach to support housing supply and believe this should be incorporated as an enabling activity within the dHSS. We would also like to see DfC and DOF support for the Housing Executive to deliver a programme of "spade ready" sites for social housing development, assisted by allowing public sector land to be made available to deliver a wider variety of housing options. The Housing Executive can also work with Council LDP teams to identify suitable sites for development and by acquiring and consolidating sites and undertaking any necessary remediation.

We also believe that Housing Executive Land Acquisition (HELA) could be a key way to develop and maintain a sustainable pipeline of developable land in areas of acute housing need. The Public Land for Housing Project provided renewed impetus to consider the role of public bodies and agencies can have in identifying sites suitable for development and the delivery of affordable housing. With an anticipated budget of £3m per annum, the HELA business case, which is under development, aims to allow the Housing Executive to purchase sites across public sector land to facilitate development for affordable housing.

It is intended the HELA policy contains three approaches:

1. Early release of lands: scoping exercise of existing public sector lands / buildings in areas of housing need, building on the work of the Public Land for Housing Project and also the Community Planning Partnerships (with local Councils);
2. Public land purchase vehicle: The Housing Executive would acquire the lands and release them to a registered housing association for development. This approach seeks to create a more agile / responsive option for disposing agencies and could better assist with the budgeting and management of capital receipts. Targeting acquisitions in areas with high housing need will also assist in ensuring that new affordable housing development is compliant with NIHE's Strategic Guidelines.
3. Vesting of lands: The Housing Executive as the Regional Strategic Housing Authority will consider the use of its vesting powers, where appropriate and within areas of unmet acute housing need, to release sites for housing led development. There will be strong links to a place shaping approach and would require engagement and collaboration with local councils and central government departments such as the Department for Communities, Land & Property Services and the Strategic Investment Board.

The Housing Executive would also like to see an enabling action supporting a Housing Executive Stock Acquisition programme. Currently, the Department and the Housing Executive are considering a business case seeking approval for the acquisition of 100 housing units in areas with housing need across Northern Ireland. This would increase the supply of social homes in local areas to address housing need; and with a primary focus on Housing Executive estates, purchases would largely be ex-NIHE properties. This would bring benefits from an asset management and housing management perspective as well as enhancing the long term sustainability local communities and places.

We would like the Strategy include additional activities that support the private sector and construction industry. Continued engagement with these sectors will be important to identify actions to support cross tenure housing delivery to meet the housing needs of everyone.

## **Objective 2**

### **Prevention and Intervention: Prevent homelessness, reduce housing stress and improve and prioritise housing solutions for those most in need;**

The Housing Executive welcomes the objective to prevent homeless and reduce housing stress, which contribute to inequality and insecurity.

The dHSS states there is an “inextricable link between housing and the social care and support system” and we believe this could be expanded to include health. It has been long recognised that the quality of homes and neighbourhoods can greatly affect people’s mental and physical health and well-being. Housing is an important determinant of health and good quality housing

can directly, and indirectly, support positive health outcomes. Good-quality, accessible housing that suits people's needs can lead to better health by:

- Preventing and reducing the need for health and social care;
- Preventing hospital admissions;
- Enabling timely discharge from hospital;
- Enabling safe recovery from periods of ill health; and
- Reducing health inequalities.

The Marmot Review in 2010 concluded that social determinants such as a healthy standard of living, the creation and development of sustainable places and communities, housing, education, employment and social cohesion have a significant impact on health and wellbeing and work in these areas is crucial to reduce health inequality. Due to the range of different factors involved, action to reduce inequality will require integrated and collaborative action between Government Departments, the Housing Executive and housing providers, the NHS and social care organisations, Councils, community planning and planning authorities and service users.

### Long Term Policies and Interventions

The Housing Executive supports the identified long term policies and interventions including the continuing aim to deliver housing to those most in need. We believe that inequality and poverty can be reduced by delivering policies and strategies in relation to homelessness to provide accessible housing solutions and supported housing.

### Existing and New Enabling Activities

The Housing Executive welcomes the recognition in the dHSS of the Housing Executive's draft Homelessness Strategy 'Ending Homelessness Together' which provides strategic direction on how to prevent and address homelessness. This Strategy was developed in partnership with a wide range of statutory and voluntary agencies who sit on the Central Homelessness Forum and which acted as a consultative body. The draft Homelessness Strategy 2022-2027 states the key role that other statutory and voluntary partners can play, particularly in preventing homelessness, and this collaboration is important to effectively prevent homelessness, repeated instances of homelessness and to find secure and suitable accommodation.

A common reason for homelessness is the loss of rented accommodation. The Housing Executive will, therefore, in its response to the Department's Consultation on Notice to Quit (December 2021) support an extension to Notice to Quit periods. We believe that a lengthening of the current four week Notice to Quit period, for tenancies of less than 10 years, can reduce housing stress and prevent homelessness and that an extended Notice to Quit period will provide people with adequate time to find and move to a new home. We also do not believe that four weeks is sufficient for tenants who have been in a property for less than a year and would recommend an extension to 12 weeks to assist the delivery of our Homelessness Strategy. We also believe that this longer period is merited for

families, older people and those with a disability who require accessible or wheelchair standard homes.

The Housing Executive understands that demographic structural changes, including an increasingly aging population with decreasing proportions of younger and working age households and the trend for smaller households, will affect service delivery and infrastructure needs.

We welcome inclusion of references in the dHSS to the Housing Executive's Older People's Housing Strategy 2021/22- 2026/27 and the Irish Travellers Accommodation Strategy and we will continue to implement actions in relation to these Strategies in partnership with other stakeholders as appropriate.

We welcome the recognition that assistive technology can support independent living. Assistive technology, adaptive and rehabilitative devices for people with disabilities and older people can be provided within homes to help people function and communicate within their home and support independent living. We would like to see new homes with built-in assistive technology, which is particularly important in the context of an aging society.

The Housing Executive strongly supports an increase in accessible housing to help people live independently in their own home. While we advocate that accessible housing policies for all housing tenures are included within LDP Plan Strategies, we believe that increased numbers of accessible housing units are best achieved by a change to Building Regulations.

We would like to see Lifetime Homes, or an equivalent standard, as a requirement for all new homes and buildings and would also like to see a standard for wheelchair housing, similar to that included in the Department's Housing Association Guide, developed within Building Regulations. This would better allow LDPs to include a policy with a proportion of wheelchair standard housing as a requirement. We believe that, if these standards were adopted by DoF, it would also help ensure that knowledge and skills in the building design and the construction industry are developed. An increase in accessible buildings would also reduce costly, disruptive and carbon emitting adaptations and would reduce the need for Disabled Facilities Grants, saving public money.

We, would strongly support active stock management included as an enabling activity within the dHSS. We believe this approach can match people to accommodation which best meets their needs. Active stock management recognises and acts on the evidence of changing patterns of need and to make the best use of existing and new stock. It would, for example, encourage the development of extra care housing aimed at both providing older and other vulnerable people with safe and appropriate housing, releasing existing housing for reuse as family homes. Additional accessible housing and housing of different types, forms and sizes could support this policy approach and can accommodate a variety of household needs across age and health requirements.

The Housing Executive administers the Supporting People programme, in partnership with the HSC Board and the Probation Board, to fund high quality, cost effective and reliable housing support services. The programme's purpose is "to provide housing support services to vulnerable people to live as independently as

possible in the community”. We believe that a key enabling activity will be to review Supported Housing in relation to the Department of Health’s consultation on a new Integrated Care System (ICS). Agreement will need to be achieved on what geographical tier Supported Housing will be administered and funded as a regional and specialist service or if some services will sit at more local level within the new proposed ICS tiers.

The Housing Executive strongly welcomes that there will be a review of the future of its statutory House Sales Scheme and would like to see the introduction of legislation ending the Scheme to ensure social housing stock is retained, now and in the future, for those in housing need. The Housing Sale Scheme reduces the supply of social housing required to meet need and many sold houses are now in the private rented sector (PRS) which also means that the owners of sold properties do not benefit from the added value and investment that the Housing Executive makes in its stock.

The Expert Advisory Panel’s Recommendations for an Anti-Poverty Strategy (December 2020) states that one of the consequences of selling of public sector housing, coupled with PRS growth, is that more low-income families with children are now living in the PRS with higher rents and poorer conditions than if they were accommodated in the public sector. It also states that, in Northern Ireland, four times as much is spent on subsidising rents as is invested in new build and refurbishment. More than half the public expenditure that subsidises rents goes to private landlords with no obvious medium or long term public benefit. We, therefore, believe that the retention and investment in Housing Executive stock, alongside increased supply of new social housing, maximises public investment and can aid regeneration. In contrast, we believe that the House Sales Scheme has often contributed to the residualisation of Housing Executive estates, undermining the delivery of sustainable communities.

### **Objective 3**

#### **Quality: Improve housing quality;**

The Housing Executive supports an aim that all homes are of a high quality, regardless of tenure, and are future proofed so that they remain suitable and can be easily modified to meet people’s needs in the long-term. This includes housing that is adapted for, and mitigates against, climate change. Improving housing quality is important for existing homes, which may require retrofitting, and quality should be a key design requirement for all new homes.

#### Long Term Policies and Interventions

The Housing Executive agrees with the long-term policy to develop new policy to ensure housing standards can deliver high quality homes. This will require a fundamental review of the existing Fitness Standards and the Decent Homes Standard, however, more robust standards will provide better evidence on housing quality and how resources should be targeted to ensure the safety of residents. We also support a policy that the design of homes supports independent living.

#### Existing and New Enabling Activities

A review of the housing fitness standards was proposed by DfC in May 2016 and we would like to see this review given a high priority in the dHSS. Fitness standards are a crucial indicator of the safety of a home and the current standards, in this regard, are now inadequate. The home is the most common location for an accident to happen and the Department of Health reports that, in Northern Ireland, two people die each week as a result of home accidents. In addition, there are approximately 17,000 admissions to hospital each year as a result of unintentional injuries.

The Housing Executive believes that the health and safety of residents is of paramount importance and we, therefore, support the introduction of the Housing Health and Safety Rating System (HHSRS) in Northern Ireland. We consider this system to be more robust, evidenced based and comprehensive and is therefore more able to ensure hazards which can cause injury and endanger health and life are minimised. The HHSRS assesses 28 different hazards in the home and is more wide ranging than the current Fitness Standards 'tick box' system.

The current Fitness Standard, or an enhanced Fitness Standard that is a simple pass/fail model, does not consider the impact on the end user, the degree of failure or whether the conditions pose a severe, remote or imminent threat to health. Defects are judged on the extent and cost of remedial work rather than the potential threat to health and safety.

The Housing Executive believes a key benefit of HHSRS is that it is a qualitative risk-based assessment for assessing housing conditions which focuses on the function of the dwelling, rather than structural issues. The HHSRS does not set a standard for defects but focuses on the effect of the hazard, grading the severity of any threat to health and considers the age group which is most vulnerable to the defect. The HHSRS looks at a comprehensive range of potential hazards and rates them according to:

1. The likelihood of an occurrence; and
2. The potential severity of harm.

The HHSRS allows for the banding of hazards to create a 'hazard profile' which provides a more complete assessment of the safety of a building and includes evidence and statistical information to assist surveyors to determine the most appropriate actions.

Other advantages of adopting the HHSRS are that it will enable direct comparison of the performance and rating of dwellings in Northern Ireland with those in England and Wales.

The Housing Executive already assesses fitness standards using the HHSRS system in its HCS and a number surveyors and environmental health officers have therefore already been successfully trained and have practical experience in using the system.

However, the Housing Executive notes that, while the HHSRS examines the effects of excessive heat and excessive cold, it does not cater for thermal comfort.

Therefore, if HHSRS was adopted, a separate provision for thermal comfort would be required. The Housing Executive would like to see the introduction of new energy efficiency regulations which would not only greatly enhance the health and wellbeing of tenants but would also help combat climate change by reducing carbon emissions.

The Housing Executive considers that the provision of reasonable security standards should be part of an updated Housing Fitness Standard in order for people to feel safe within their home. In addition, while all new build social housing needs to comply with Secure by Design Standards, the Housing Executive would like to see this requirement extended across all tenures.

The standard of Housing Executive stock is vital to addressing housing need, good housing management, sustaining vibrant, sustainable and resilient communities and supporting community strategies such as tenant engagement. The Housing Executive welcomes the lifting of borrowing restrictions to allow it to lever in private capital to invest in its housing stock. Maintaining and investment in existing stock will maximise the level of stock available for letting to meet housing need. A broader investment programme will support a new build and re-provision component which will be important to enable the Housing Executive to replace uneconomic and obsolete units and to implement its Tower Block Strategy Action Plan.

It is important to note, with regard to the overall housing provision, that poor housing conditions is a cross tenure issue and that many private sector dwellings also need investment to bring them up to modern standards. The Housing Executive's HCS records higher proportions of unfitness in the private sector than in social housing with 3.0% of social housing dwellings identified as unfit compared to 4.1% in the owner occupied sector and 4.9% in the private rented sector.

We also note that DfC is introducing new legislation that will improve the safety, security and quality of the Private Rented sector. The Private Tenancies Bill includes proposals to restrict rent increases to once in a 12 month period; extend the Notice to Quit period a landlord must give a tenant; set limits on tenancy deposit amounts; introduce a mandatory requirement for private landlords to provide smoke and carbon monoxide detectors; and carry out periodic electrical checks. While the Housing Executive supports the provisions of the Bill, we believe that additional legislation and policies are needed including landlord and property licencing and the proposals within DfC's 2017 Proposals for Change document, such as new Fitness Standards, introducing Letting Agent Regulation and regulation on Grounds for Eviction. We believe that to meet the Department's ambitions as stated in the consultation for the Bill, to make the PRS private rented sector "a safer and more secure housing option for a wider range of households" and "to offer greater protection to private renters", a review of fitness standards and regulation of letting agents is urgently required.

In addition, the Housing Executive's HCS reports that PRS tenants experience higher levels of fuel poverty than other housing tenures, with properties having lower energy efficiency measures in place. 26% of tenants in the PRS are in higher fuel poverty than the Northern Ireland and UK averages (HCS 2016). Inadequate

home heating can have a serious detrimental effect on people's health and well-being, therefore, the Housing Executive would like to see a specification for a 'reasonable degree of thermal comfort' included in the new regulations. We would also like to see the dHSS provide activities to evaluate how landlords and home owners may be able to achieve support and assistance in order to implement energy efficiency measures for their property. This support could be in the form of advice, information and signposting, as well as financial support from new grants or low cost loans.

We believe that quality for new homes should be a requirement in Building Regulations and by Council LDPs.

#### **Objective 4**

#### **Better Places: Ensure the provision of housing options that contribute to the building and maintenance of thriving, inclusive communities and places;**

The Housing Executive agrees with this objective which aligns to the Vision contained in its Corporate and Business Plan "Everyone is able to live in an affordable and decent home, appropriate to their needs, in a safe and attractive place".

We note the dHSS states that an agreed definition for "sustainable homes and communities" is required. As stated in our response to the Call for Evidence, the Housing Executive supports the definition in the Bristol Accord agreed at an EU Ministerial Informal meeting in December 2005 which defined a sustainable community as being:

- Inclusive and safe;
- Well connected;
- Well serviced;
- Environmentally sensitive;
- Economically successful;
- Well designed and built;
- Fair for everyone; and
- Well run.

We welcome the recognition that this is an approach which can be led by Council LDPs and Community Plans. We understand that, to be successful, place making requires communities to be involved in decision making around the development they desire and the services they need.

The Housing Executive supports the statements in the dHSS in relation to building the capacity of communities through social value in procurement and through Community Asset Transfer. We currently support these activities and also help Social Enterprises which offer employment and training opportunities for local people and reinvest profits into local areas which helps engender stewardship of places, an important factor in the provision of better places.

#### Long Term Policies and Interventions



The Housing Executive strongly welcomes the inclusion in the dHSS of the aim to mainstream mixed tenure development. This policy goal will be important to support our work with Councils to provide affordable housing policies in LDPs that increase affordable housing supply within a mixed tenure environment. Mixed residential areas help people from different backgrounds meet, interact and live together, leading to inclusive, cohesive and balanced communities.

We agree that the planning system, and in particular the LDP process, is central to shaping places and communities, providing balanced communities, adapting and mitigating climate change and supporting additional housing supply through the identification of land. However, the Northern Ireland Audit report into planning has heavily criticised the system for the length of time processing planning applications and to produce new Local Development Plans. Direct action to implement the Audit reports amendments and recommendations is highly important to provide a more effective planning system which can better support private and affordable housing delivery.

### Existing and New Enabling Activities

The Housing Executive welcomes working with partners to support enabling activities including:

- Delivery of Shared Housing;
- Development of city centre waiting lists;
- City and town centre living;
- Supporting housing led regeneration;
- Implementing the Housing Executive's Reaching Rural 2021/2025 strategy; and
- Delivering and developing policies on Community Asset Transfer and capturing social value in land and property disposals.

We would like to see the dHSS incorporate the concept of a 15 or 20-minute city or neighbourhood as a way to ensure sustainable communities and sustainable development. This concept means that people can access services, facilities and places of employment within a 15 or 20-minute walk from their home. The location of residential development, linked with land use, can reduce the need to travel and promote active travel, such as cycling and walking, thereby promoting physical and mental health. In addition to limiting climate change, this concept also supports the local economy as retail and other services can be readily accessed by local people. It can also apply to rural areas where there are village or town centres that are accessible by public transport. We note 20-minute neighbourhoods have been adopted as an outcome within the Scottish Programme for Government.

The Housing Executive believes that mixed tenure development can improve community cohesion and recognise that many social housing states are segregated, with private sector developments often providing a higher degree of social mix. We believe that the development of mixed tenure residential areas can reduce concentrations of deprivation, thereby reducing geographical inequalities, and mixed income areas can better support a range of services and facilities. Large concentrations of social housing have often been characterised by deprivation in terms of low income, poor health, low education attainment, higher crime rates, continuing cycles of poverty and social disadvantage where residents

feel disenfranchised and marginalised. Living in a deprived neighbourhood often leads to reduced opportunities, consequent inequalities and repeated regeneration initiatives. Therefore, the Housing Executive strongly support the opportunity the dHSS presents to promote and create well-linked, mixed-tenure neighbourhoods so that communities can share access to employment, services and social facilities.

As stated previously in relation to mixed tenure, the Housing Executive would like to see the Housing Supply Strategy include a developers' contributions policy supported by DFI. We have long supported the introduction of a developer contributions policy which ensures the uplift in land values generated by the granting of planning permission provides a wider social benefit to local communities and contributes to the development of sustainable communities and their well-being. We believe the introduction of developer contributions can deliver much needed affordable housing, with a reduction in public funding, and ensure the delivery of mixed tenure housing development.

The Housing Executive supports regeneration through the reuse of buildings and vacant dwellings where they can provide good quality housing with adequate space and with access to facilities and services. The adaptation and renovation of some town, city centre or heritage buildings, where appropriate, safe and quality housing can be supported, can protect a buildings viability and survival. The use of existing buildings and previously developed land promotes sustainable development by reducing the need for greenfield sites and preventing urban sprawl. Brownfield land often has more access to services and, in central locations, can reduce the need for travel. In addition, infrastructure, including water connection, is more readily available in brownfield locations and within existing buildings than on undeveloped or agricultural land.

We would also like to see the dHSS include enabling activities in relation to destigmatising social housing. This can often act as a barrier, when seeking to deliver new schemes.

## **Objective 5**

### **Decarbonisation: Reduce whole-life carbon emissions from both new homes and existing homes and support a 'just transition' to carbon neutrality.**

While the Housing Executive supports the objective of decarbonisation and a reduction in greenhouse gas (GHG) emissions in relation to housing, we believe this objective is narrow in scope and could be expanded to include additional environment objectives and outcomes.

We would like to see the dHSS include measures that protect environmental assets, reduce waste, minimise flooding, protect biodiversity and mitigate and provide resilience to climate change. For example, we believe there could be actions in relation to the provision of Sustainable urban Drainage Systems (SuDS), open space, play areas, trees and biodiversity in housing estates. During the pandemic these elements, and environmental quality, have been proven to be crucial to support health and wellbeing and also links closely with Objective 4 Better Places.

It is also important to note while this Objective allows targets to be identified, we believe that environmental and climate change considerations should be central and integrated into all decision making, including the long term policies and interventions and enabling activities under the four other objectives.

### Long Term Policies and Interventions

The Housing Executive supports the long term policies and interventions. We believe there is an opportunity for the dHSS to include further environmental policies, some of which will be important to help mitigate negative effects of climate change such as flooding and damage to ecosystems.

### Existing and New Enabling Activities

As the Home Energy Conservation Authority, the Housing Executive supports actions to improve energy efficiency. Housing is a key target for energy efficiency improvements, with residential development accounting for 14% of GHG. To achieve decarbonisation, there is a strong need to retrofit existing building stock and for new build to meet higher energy-efficiency standards. Therefore, we support, and have responded to, DOF's current review of Building Standards to improve energy efficiency standards. Higher energy efficiency standards for new build will be a crucial element in achieving carbon reductions.

The Housing Executive continues to work to improve the health and well-being of our tenants by, for example, implementing energy efficiency programmes to improve thermal comfort in our homes and to provide adaptations for elderly and disabled tenants. However, retrofitting Housing Executive homes, to achieve the energy efficiency standards that would be necessary to help meet carbon emissions targets, will be costly and is one of several competing stock investment priorities that we face.

In addition, the HCS indicates that there are lower levels of energy efficiency in the private sector; overall, 49% of properties have Energy Performance Certificates in Bands A-C compared to 79% in the social housing sector (and is reflected in lower levels of fuel poverty in the social housing sector). There is a clear relationship between unfitness, energy efficiency and a dwelling's age with older properties exhibiting higher unfitness levels and lower energy efficiency.

The continuation of Affordable Warmth and Boiler Replacement schemes will help households in the private sector carry out improvements to address fuel poverty and to improve thermal comfort. The Housing Executive welcomes the introduction of Minimum Energy Efficiency Standards (MEES); however, skills and funding will be key challenges to achieving MEES and to retrofitting existing homes. We believe that developing new approaches and financial support will be necessary so that owner-occupiers and social and private sector landlords can comply with MEES, otherwise, while an MEES can be set, it may not be feasible to achieve on a widespread basis.

The Housing Executive would like to see support and resources made available to allow all homes to achieve a SAP rating of C and above by 2030. We believe the dHSS could adopt this medium term target and investigate higher targets for the long term.

The Housing Executive notes that quality development and environmental protection can promote attractive places where people wish to live, work and invest in, thereby supporting local economies and social wellbeing. Green spaces are also important for physical and mental well-being and support community cohesion. Therefore, the Housing Executive would like to see the dHSS state that natural environment considerations are mainstreamed into housing policy and decision making to realise benefits in creating and maintaining high quality living places.

We believe that promoting residential development within mixed use neighbourhoods and enhancing walking and cycling accessibility can reduce reliance on private cars, leading to lower GHG emissions. LDPs can help promote liveable places, where people want to live and stay, can help offset urban sprawl contributing to decarbonisation, resilience and lower inequality. Wider sustainable development plans can contribute to regeneration by helping to make areas attractive places to live, as well as improving resilience to climate change impacts.

The Housing Executive would also like to see the dHSS require Sustainable Urban Drainage Systems (SuDS) for all new development. We believe that SuDS, as well as slowing the flow of water, can aid regeneration and biodiversity by increasing and enhancing green and recreational space and the planting of trees. Reducing the risk of flooding can increase health and well-being for local communities and we believe that the dHSS could promote features such as spray taps, low flush toilets, water butts and dishwashers within new and existing homes to alleviate pressure on water infrastructure.

The construction industry's consumption of resources could be reduced by limiting demolition and rebuilding, in favour of the retrofit and refurbishment of existing buildings, to provide new homes and improve existing dwellings.

The Housing Executive believe that accessible building designs, such as Lifetime Homes standards, in housing will reduce the need for adaptations, leading to less intensive use of resources. Accessible housing means that houses can better meet the needs of all, including increasing numbers of older people, without the need for adaptations. We also believe that an increased proportion of new wheelchair accessible homes would reduce the need for new bespoke dwellings and expensive adaptations to improve accessibility. Accessible housing will enhance the flexibility and endurance of a dwelling, allowing it to adapt for different users and their needs, without requiring resource intensive new build solutions. The Housing Executive, as a statutory consultee in the LDP process, is promoting the introduction of accessible housing and wheelchair standard housing in all new residential development. However, we believe an amendment to Building Regulations, to require accessible housing, could be more effective and provide an equal opportunity for all households occupying accessible housing across all Council areas in Northern Ireland.

**3. The Strategy includes an enabling principle to: 'Adopt a whole system approach, collaborate with central and local government and the third and private sectors to inclusively transform supply.' Do you agree with the proposed enabling principle?**

The Housing Executive strongly supports a whole system based approach to develop the Strategy, recognising the interconnected nature of the housing supply system. Housing is cross cutting and can have social, economic and environmental benefits and can provide investment, regeneration, environmental improvement and is important to support health and wellbeing. Housing can contribute to meeting all the new PfG outcomes, therefore, we strongly welcome the dHSS, which recognises the positive effect housing can have on peoples' lives and experiences.

We welcome the intended collaboration with a range of partners and Government Departments and we would like to see Government Departments sign up to the Strategy at an early stage. This will be important to provide a holistic and comprehensive approach, given the role played by other Departments in delivering potential actions, for example, Building Regulations and Rates setting by DoF and the supply of land supply and planning of residential development by DfI and Councils.

We believe that the dHSS will be central to support the ambition for joined-up services and a system built around collaboration enabling an integrated policy environment.

## Measurement

### **4. Do you agree with the proposed ambition to deliver 100,000 plus homes over the 15-year lifespan of the Strategy?**

As previously stated, the Housing Executive believes that uplifting the 100,000 home target in the dHSS should be considered once updated evidence from the Housing Executive's SHMAs is available in Spring 2022. We strongly support that a third of any target should be delivered as social housing to address social housing waiting lists and acknowledge that this would require an increase in the SHDP budget.

### **5. Do you agree with the proposed indicators to measure the success and progress of the Housing Supply Strategy?**

The Housing Executive supports the proposed indicators but believe there are a number of additional indicators which could be included as set out under question 6. We believe that Housing Indicators from other Strategies should also be considered and published, alongside the specific proposals for dHSS, to provide a comprehensive hub for all housing data. For example, indicators in the Energy Strategy include household energy expenditure relative to all expenditure, households in fuel poverty and greenhouse gas emissions from residential properties which could be important indicators for Objective 5 Decarbonisation.

We note in the dHSS that Land and Property Services can provide 'housing stock figures' data and private and social new build statistics by Council area. However, to obtain a detailed understanding of housing stock, it will be important to monitor the trends in empty homes and the losses of residential stock either

through demolition or conversion to other uses. The new census may be able to provide additional information on vacancies, which can be supplemented by the HCS between census periods, however, we believe more complete information would be useful. For example, numbers and locations of RHA void properties, second homes and short term lets are important to better understand the availability of dwellings to meet housing need.

We believe there are data gaps which will need to be addressed, in order to have a full picture of regional and local housing issues, and that the dHSS could establish what further information would be important as indicators. We believe that, by clearly setting a data audit of the statistics that are and are not available, actions could be established on how new data could be obtained or collated. For example, research projects could be commissioned or ways of collating data reviewed, to see if a format change would provide more useful information. It would also allow collaboration between stakeholders to discuss and establish measures of how additional information and knowledge could be provided. Data sharing between organisations can help the preparation of appropriate policies and actions to ensure people's needs are met.

## **6. Are there any additional indicators that you consider would add value in measuring success and progress?**

Some additional and potential indicators are set out under the 5 Objectives, however, some of these indicators will also be useful for a number of objectives.

### **Creating Affordable Options**

- The quantum of available housing land should be recorded, including if a 5 year land supply is available across Northern Ireland. Access to land is crucial to increasing housing supply, including for affordable housing (social and intermediate housing). Mapping public sector land and Council information on LDP zoned land could enable affordable housing providers to acquire land.
- House prices, obtained from Land & Property Services and the Northern Ireland Quarterly House Price Index, can provide an indication of affordability issues at LGD level, Housing Executive Housing Market Areas and for different house types.
- The Housing Executive, Ulster University and Property News publish six monthly reports on the Performance of the Private Rental Market in Northern Ireland. This provides the number of lettings and average rents by Council area, Housing Executive Housing Market Areas and by house type which is a key indicator of housing affordability.

### **Prevention and Intervention**

- The Housing Executive stock and sold properties is reported annually in its Housing Investment Plans, however, it is difficult to obtain RHA stock data, including void properties which is an important indicator of the potential supply of social housing stock to meet needs.

- The Housing Executive's Accessible Housing Register can provide numbers of adapted properties for people with a disability and older people.
- The Housing Executive also receives information from Musgrave Park Hospital on new wheelchair users, including the tenure of their housing and if it is adapted for wheelchair use, which provides information on the number of wheelchair standard units that could be required and supported across all tenures.

### **Quality**

- The Housing Executive's HCS assesses dwelling conditions against the Housing Fitness Standard and the Decent Home Standard criteria, including fuel poverty and thermal comfort and the HHSRS. We believe that, as the current Fitness Standard contains limited criteria and is overdue for review, the additional assessments used in the HCS provide a more comprehensive appraisal of housing standards in Northern Ireland and that the HCS's HHSRS, in particular, can provide a better indicator of housing quality and safety than the current Fitness Standard.
- Housing Executive grants information can provide numbers of adapted housing and on disabled facilities, boiler replacements, repair, renovation and replacement grants.
- DfC's Landlord Registration Scheme could be a valuable indicator of quality standards in the private rented sector, although it is widely recognised that this data needs cleansed and additional fields on property age and standards need to be added.

### **Better Places**

- Council LDP, planning application and housing monitor data can provide information on the supply of housing units in local areas and DfI can also provide this information at Northern Ireland level. Planning application information is an indicator on the housing market, the appetite for new development and the scale of new development, if there are increasing numbers of major (50+ unit) developments.
- LDP monitoring data can also provide numbers of mixed use and mixed tenure housing sites which can provide the number of sites, those with planning permission and under construction and units provided. This is valuable as an indication of the success of key aims of the dHSS to provide increased numbers of affordable housing units and mixed tenure schemes that can lead to more inclusive neighbourhoods.
- The Place Standard Tool<sup>1</sup> could be an important indicator of the characteristics of a place. This tool can be used by local communities to identify the features in an area, which contribute to a high quality environment, and elements of an area that need further attention or investment. The Housing Executive would

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<sup>1</sup> [Place Standard](#)



like to see the dHSS refer to the Place Standard Tool which can provide evidence on environmental quality in neighbourhoods and which is widely used across Scotland.

### **Decarbonisation**

- The Housing Executive would welcome a more accurate method of modelling energy usage, than the current Standard Assessment procedure, and the added reassurance of measuring in-use operational energy. We would like to see indicators which include an operational energy target (kWh/m<sup>2</sup>/y) and an embodied carbon target (kgCO<sub>2</sub>e/m<sup>2</sup>).

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In addition, from a governance, performance and monitoring perspective, it will be important to include a set of management indicators that could highlight the relative contributions of different Departments, organisations and sectors.

### **Delivery and Oversight**

#### **7. How can we best ensure that key strategic partners such as other Departments, local government, the Voluntary & Community sector, and private sector can participate in the delivery and oversight of the Supply Strategy delivery?**

The Housing Executive believes that the dHSS will help overcome a fragmented housing policy environment which can often act as a barrier to increasing the supply of affordable, high quality and low carbon homes.

We strongly support the promotion of integrated and collaborative working practices that are better able to provide change and improvement. The PFG recognises that inflexible organisational structures, in delivering public services, can restrict the ability to provide a strategic and holistic approach to address often complex and multifaceted issues. We believe that housing can play a key role in meeting all new PFG outcomes and that there is a need for this to be communicated and recognised by lead partners.

The Housing Executive believes that housing is cross cutting and we recognise that partnership working can best achieve the dHSS's Vision and Objectives. We have extensive experience of working with Government Departments, Local Government, RHAs, the Health and Social Care Board, academics, local communities and other stakeholders on a range of housing issues to deliver services that enhance quality of life and wellbeing for all. We, therefore, believe that this familiarity and capacity for joint working will help support the dHSS to develop closer relationships between different organisations and communities.

The Housing Executive is a statutory partner in Community Planning and a statutory consultee within the planning systems. This provides close working relationships with Councils and a range of other public, private and third sector bodies. A key aim of Community Planning and LDPs is to provide partnership working to improve service delivery, influence development and disseminate research and expertise, therefore, we believe there is an opportunity to align some actions with LDPs and



Community Planning groups. We also believe that local level actions, where appropriate, will help provide better engagement with local communities.

While we agree that an integrated housing policy environment is an important principle, we believe that implementation will need to be carefully considered. Barriers to successful implementation could arise from a lack of commitment across organisations, limited resources and conflicting objectives between organisations. We would, therefore, like to see more detail and a clear delineation of roles and responsibilities.

A new Housing Forum, driven by DFC, with a range of actors responsible for implementing actions, can provide a focus on the responsibilities of each organisation and can also allow management and implementation in ways that reduce the need for resources. This Forum should be tasked to bring cohesion to a fragmented policy environment and to provide a formal and holistic approach in the provision of policy, process and the required finance and funding to support housing development.

## Action Planning

### **8. Are there any proven or new approaches you are aware of, that you believe would help us work best with other organisations to develop and deliver the action plans?**

We recognise that the Housing Strategy is a high level document setting out ambitions and principles, therefore we look forward to the development of detailed action plans and in the near future.

The Housing Executive supports the commitment to Co Design the Strategy. Housing is a cross cutting issue and different Departments have different responsibilities; therefore, collaboration is beneficial for the sharing of knowledge and skills and to better support a whole system approach. We believe that the development of the dHSS provides an opportunity to involve all with an interest in housing to develop a comprehensive and inclusive Strategy that can inspire and establish shared aspirations across Government Departments, Councils and housing and planning bodies.

As there are a range of organisations and Departments responsible for different activities, we believe it is important that strong leadership and governance is provided and that actions are agreed at a high level with representatives from organisations who can make corporate decisions and commit resources.

It will also be important to clarify lead organisations for actions and we would like to see the Strategy set out the organisation responsible for each activity. We believe that setting out leading and supporting organisations for each activity will aid openness and transparency.

The Housing Executive would also like to see a Housing Supply Strategy that includes requirements around housing standards, without which the success of Strategy may be diminished. We believe that regulations are needed to support the Strategy's ambitions and to ensure better quality housing solutions that provide innovation and high quality design to support the health and wellbeing of residents.

## Citizen Engagement

### **9. There was broad support in the Call for Evidence for the need to engage local communities in housing supply to create sustainable, thriving, and inclusive communities. In what way do you consider this could best be achieved and do you have any examples of best practice in this area?**

The Housing Executive has a long tradition of working with its tenants and local communities to identify needs and to deliver need based solutions for homes and neighbourhoods. As a partner in new care structures, we would also be able to share experiences of community involvement in service delivery.

We believe that the need for continual and increased community engagement is vital, however, we would like to see the dHSS set out more detail on how a new system would ensure that communities have a say and what mechanisms need put in place to make this happen. Progress should also be publicly communicated and celebrated.

It is also important that the overall aims of the Strategy remain a focus. There can be local opposition to new housing proposals and we believe it is important to find ways to address the concerns of local people to allow developments to be welcomed. This could include informing people and allowing them to be involved, in meaningful way, in the planning of developments in an acceptable way. We believe that developments which are sensitive to local conditions and which provide quality and well-designed housing, enhance the environment and provide facilities, such as open space, would be seen as providing positive outcomes.

Ulster University is leading the Belfast participation in a UK wide project "Community Consultation for Quality Of Life" and an important element of this work is to develop improved tools for community and public engagement. The project recognises that arts-community based events, in both outdoor and indoor public spaces, have been effective in supporting and extending traditional consultation toward more effective engagement. It is anticipated that this, with an online tool, will allow citizens to co-develop and co-deliver outcomes and we believe that recommendations from this research could be valuable to help citizen engagement within housing.

## Equality

### **10. Do you agree with the findings of the EQIA?**

The Housing Executive believes that the EQIA has been conducted on a thorough basis and adopts a model used by the Equality Commission in 2015 to assess inequalities in Housing and Communities in Northern Ireland.

The EQIA also importantly references the Equality Commission Key Inequalities report, however, the dHSS does not draw specifically on the recommendations in the report, although it does encompass them to some degree.

**11. Are there any other inequalities that have not been highlighted in the EQIA that you believe the EQIA needs to note?**

The Housing Executive believes that the EQIA is comprehensive in identifying all aspects of housing inequality.

**12. Do you agree with the immediate next steps as outlined in Section 5 of the EQIA?**

The recommendations in relation to challenging inequality are mainly set out in Objective 2 “Prevention and Intervention”. We believe the recommended actions respond to the inequalities identified but note that this is generalised, given the 15 year nature of the Strategy, and it is not easy, therefore, to gauge the scale or proportion of the response to the degree of inequality.

We believe this is understandable given that it is a high level strategy, however, there are specific references to the impact of Homelessness Strategies, Supporting People and Irish Traveller strategies and we believe some further detail could be given in relation to core inequalities, such as the religion differentials, in relation to social housing and the causes of this, for example, the lack of affordable land in areas more acceptable to Catholic households.

**Rural**

**13. The Rural Needs Impact Assessment outlines that the development of the Housing Supply Strategy is likely to have a positive impact on people on Rural Areas? Do you agree with this assessment?**

The Housing Executive believes that the development of the Housing Supply Strategy will have a positive impact on rural areas and will mutually support the Housing Executive’s Rural Strategy ‘Reaching Rural’ in helping to address rural issues and challenges, which include:

- Existing shortage of social and affordable homes in rural areas;
- Hidden housing need in rural villages and small settlements;
- Often reduced access to basic services, facilities, advice and support; and
- A higher occurrence of less energy efficient homes and fuel poverty.

The Housing Executive believes that the high-level objectives proposed by the dHSS are applicable and relevant to both urban and rural areas and will, therefore, have a positive impact on rural dwellers. Creating affordable housing options, prevention and intervention, improving housing quality, better places and

decarbonisation are all objectives that can benefit rural areas and help address identified challenges.

We believe that the long term policies and interventions, identified under each objective, will have positive impacts on rural areas and we would welcome further engagement and detail on how they will be delivered. We would also welcome further consideration, by the Strategy, on how the provision of intermediate housing products could be encouraged and supported within smaller rural new build schemes and how shared future housing in rural areas could be achieved.

We further believe that specific policies and actions emerging from the Housing Supply Strategy should be subject to Rural Needs Impact Assessments to ensure rural needs are fully considered. Tailored approaches may be required to ensure an equitable delivery of housing related services in rural communities, to address the housing issues faced within rural areas and to contribute to sustainable rural communities.

The Housing Executive has a long history of working with partners for the regeneration of rural areas and support the provision of homes to meet local needs. The Housing Executive's Rural Strategy recognises that collaborative working is essential to help ensure successful delivery and, therefore, welcome the commitment that the dHSS will contribute to the implementation of the Rural Strategy.

#### **14. Is there any other evidence, information or issues you think should be considered in this screening?**

We believe that the screening has considered all relevant evidence, information and issues. In particular, we welcome that the Housing Executive's Rural Strategy has been referred to in the dHSS and associated Rural Needs Impact Assessment.

#### **We would welcome any other comments or suggestions you have that you consider are relevant to developing and delivering the Housing Supply Strategy?**

It is often already understood, from best practice elsewhere, what is needed to produce better quality housing that is located in successful places and which can greatly improve the quality of life for everyone.

It is widely recognised that there are unacceptably high numbers of people across all housing tenures who live in unsuitable, unfit and unsafe housing without security of tenure. We know peoples, current and future, well-being could be greatly improved by adopting ideas in the Call for Evidence, including the provision of affordable, accessible and climate resilient housing.

Perhaps the most important element, to ensure the Housing Supply Strategy is successful, will be to secure the investment, collaboration and integrated action that will be needed from a range of Government departments and stakeholders. We believe that, by securing coordinated actions and consensus, the Housing Supply

Strategy will ensure housing supply that is environmentally, socially, and economically sustainable for the benefit of everyone.

However, we note that the draft Northern Ireland Executive Budget for 2022-25 could impact on housing delivery in the early years of the Strategy. In the NIHE's response to the draft budget, we have highlighted the potential implications of proposed capital allocation for the Social Housing Development Programme, which could result in social housing output being as low as between 600-800 starts in 2024/25. This would materially impact on achievement of the targets set, and importantly have a significant impact on capacity of housing associations to ramp up development in the following years, assuming capital allocations improve.

The Housing Executive welcomes a strong and transformative Housing Supply Strategy and we look forward to playing a central role in the delivery of the Strategy and associated Action Plans.