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Response to the Department of Social Development Facing the Future: Housing Strategy for NI, 2012-2017

The Housing Policy Forum (HPF) is an open network of voluntary sector organisations that have an interest in housing legislation and policy. HPF representation consists of core housing and homelessness organisations working in the Community & Voluntary sector throughout Northern Ireland. The HPF aims to enhance the capacity of the voluntary and community sector to make policy responses and influence policy development in housing and homelessness. Membership includes: Chartered Institute of Housing, Council for the Homeless NI, De Paul Ireland, First Housing Aid and Support Services, Housing Rights Service, NI Council for Voluntary Action, NI Federation of Housing Associations, Save the Children, Shelter NI, and the Simon Community NI.

The HPF has been a strong advocate of a unified housing strategy for some considerable time. We therefore welcome the consultation on 'Facing the Future: Housing Strategy for Northern Ireland 2012-2017' and are grateful for this opportunity to respond and the time extension granted by the Department.

This response is the result of a consultation seminar held by the HPF on 30 November 2012 and is a compilation of the views and comments submitted by the 37 voluntary housing sector organisations which attended.

General Comments

As Minister McCausland states in his introduction 'Housing is a fundamental need and plays a significant role in shaping our lives and communities'. The HPF believe that housing not only plays an integral role in these areas, but also contributes positively to economic growth and wealth creation, determines the wider environment and supports the vision of a peaceful and integrated Northern Ireland.

We are in broad agreement with the Principles and Themes of the Strategy and the overarching aim of developing a stable, sustainable and accessible housing market in Northern Ireland.

However, the Forum are concerned at the lack of detail contained within the Strategy, the focus upon owner-occupation at the expense of other tenures, the scarcity of robust data to underpin the proposals and the absence of any Equality Impact Assessment. Sadly the Strategy, at this stage, appears to be an ad-hoc collection of ideas – many recycled from previous documents. While these have merit in their own right, they do not, at present, form a comprehensive or cohesive Strategy.

Housing is complex and has a significant number of inter-connections with other areas of Strategic responsibility, e.g. health, education, employment. It would be useful to see where this has been given due consideration and some examples of where all relevant government Departments and their agents are working together to underpin and ensure the success of the Strategy.

As identified in the document, there is a substantial amount of transformations taking place which are either directly housing related or which will affect access to housing. We would ask that careful consideration is given to the sequencing of the strategy, so that, as change is incrementally introduced, there are no unintended negative consequences.

The built environment, with housing at its centre, has permanence and relevance over generations. It is therefore important that the decisions are only made following the analysis of sound empirical evidence and that we aspire to long term sustainable solutions- not 'quick wins'.

Finally, it would have been useful to have had sight of any preliminary Action plan, in order to more fully understand the thinking of the Department and provide a more focused response.

Response to the Themes

Theme 1 – Ensuring access to decent, affordable, sustainable homes across all tenures.

The HPF is dismayed at focus on owner-occupation, especially as 19% of tenures, one in six households, are now in the private rented sector and 15% are in Social Housing.

Many people in Northern Ireland will never be able to afford to buy their own home, while those who can also have the option of renting. People on a low income have reduced housing choice which needs to be reflected in the Strategy. While regulation and standards are extremely important, and we welcome their inclusion in the strategy, the issues of affordability and location must also be addressed if we are to provide equitable "access across all tenures".

We would also like to see more emphasis placed on solutions to mortgage arrears and repossession. 'Affordable housing products' are a short term solution to a long term problem, particularly in the current climate of job losses and fewer employment prospects.

How can Government work best in partnership with the private sector to increase the supply of housing and so create long-term stability in the housing market?

The HPF does not believe there to be a causal relationship between increasing the supply of private sector housing and the creation of a stable housing market, as is implied by this question. In fact, as recent years have proved, over-dependence on private house building, either for purchase and rent, was instrumental in leading to the current economic difficulties.

We feel a useful starting point would be an analysis of housing issues facing the NI housing market, which could also act as a benchmark to evaluate the success of the strategy in 2017.

The strategy appears to place an unreasonable expectation upon the Private Rented Sector to meet a role previously held by Social Housing. Most landlords in Northern Ireland own a small number of properties to rent and would be unable to expand their portfolio at present.

We believe that the DSD should support social and private landlords and voluntary housing and support providers to explore partnerships, whether this be through leasing arrangements, estate management or the provision of support to tenants to improve tenancy sustainability.

Rental levels, in the light of Housing Benefit Reform, must be overtly addressed. Tenants in receipt of housing costs, whether in or out of employment, are already finding it increasingly difficult to meet their rental obligations.

The Westminster Government's hope that rents will be driven down to meet reduced housing related income is seldom the reality in Northern Ireland, with our restricted access to mortgages and a vibrant rental market among those who would otherwise aspire to home ownership.

Projects such as SmartMove, illustrate that landlords working in partnership to provide social lettings is a successful model that could be pursued regionally in Northern Ireland. It guarantees sustainable rental income, less property damage and fewer voids and arrears. In fact, landlords are more likely to reduce rents where this type of relationship exists

Do you think there is merit in establishing Housing Supply Forum? If so, who should be involved and what should be its core purpose?

The HPF supports the establishment of a Housing Supply Forum. This forum should also include representatives from Voluntary and Community Sector housing support services, as prevention of homelessness or housing crisis is vitally important.

We suggest that affordability across all tenures is given priority within the terms of reference of this group.

Could self- build play a greater role in increasing affordable housing supply? If so, what role should Government play, if any, in supporting an increase in the number of self-build developments?

While Self-Build has been an option available for some considerable time and highlighted in many housing strategy documents, it has never delivered any significant contribution to meeting housing

need and is unlikely to do so in the future. We believe that for the lifetime of this strategy, focus should be on actions which will have the most impact.

Do you agree with our overall aims within Theme 1 and how we propose to achieve them?

The HPF agrees in principle with the overall aims of Theme 1, however there is no sense of prioritisation or sequencing in the Strategy and we believe it will be impossible to meet all the proposals contained within it.

We welcome a commitment to improving the standards of all housing stock, but would ask that regulation covers not only fitness but also tenancy law and the obligations of landlords. We support the views of **Housing Rights Service** in this area.

There is more detail needed in regard to support for households who are in mortgage difficulties. An economic argument can be made for retaining families in their own homes rather than having to meet the expense or repossession and homelessness.

We agree to improved regulation of houses in multiple occupation. However, the major problem in this area is the inability of supply to meet demand due to the Shared Accommodation Rate, and the sustainability of such accommodation for all single under 35 year olds who are in receipt of social security payments, irrespective of their employment status.

Theme 2 – Meeting housing needs and supporting the most vulnerable

How should housing need be assessed and what factors taken into account in determining priority for the allocation of social housing?

The HPF agrees that the definition of housing need must be revisited, preferably by an inter-agency inter-sectoral advisory group, in order to ensure a non-judgemental definition developed. However, we strongly believe that the allocation of social housing should be on the basis of need, both in terms of physical accommodation but also personal circumstances. When need is defined, this will then shape any social housing allocation scheme.

It is vital that such a scheme would be universal across all social landlords, particularly in light of the review of NIHE. We suggest that it is independently reviewed and monitored and have a robust independent appeal mechanism.

While we understand concerns about the ghettoisation of social housing estates, the HPF would strongly resist any moves to use social housing to artificially change the social structure of local neighbourhoods or 'engineer' communities to the advantage of developers. We would support social housing being integrated into new build developments, the extension of the existing satisfactory purchase scheme, and the promotion of mixed tenure housing.

Should we consider creating an additional form of social housing tenancy which would allow adapted social dwellings not currently required for their intended purpose to be let on a more flexible basis to other households?

HPF believe that this option should be explored to assess, for example, length of tenure offered and options for re-housing and the impact on the social housing waiting list.

Should individual owner-occupiers make a greater contribution to financing the adaptations required to support them to live independently? If so, do you have any views on how this should happen and Government's overall role in the process?

The Disabled Facilities Grant is already means tested. There are particular pressures on people with a disability at present, due the changes within Welfare Reform. Requiring a further contribution may reduce the number of applicants. This would ultimately make it more difficult for people to remain living in the community and would run contrary to the aims of current Health and Social Care policy.

Do you agree with our overall aims within Theme 2 and how we propose to achieve them?

HPF agree with the aims of Theme 2 in principle but would seek further detail and prioritisation of actions based on achievability and impact. While access to housing or maintenance of current housing is key in homelessness prevention, increasing unemployment and Welfare Reform will make affordability the key determinant of homelessness in coming years. This needs to be reflected in

policy. We welcome the commitment to establish a private rented sector access scheme for Northern Ireland.

Theme 3 – Housing and Welfare Reform

Do you agree with our overall aims within Theme 3 and how we propose to achieve them?

The HPF welcome the attention paid to Welfare Reform in the Strategy. Our membership is comprised of advocacy, landlord and housing support agencies who are universally concerned about the effect that Welfare Reform will have on the ability of thousands of people in Northern Ireland to access/maintain their housing. The nature and location of our housing stock, the continuing recession, with subsequent job losses and poor employment prospects, the reduced availability of mortgages and our overall lack of financial capacity, will place considerable strain on the housing and specialist advice sectors.

The HPF support the administrative flexibilities already secured by the Minister on our behalf, however we believe these need to go further.

The HPF believe careful consideration should be given to further increasing the Discretionary Housing Payment (DHP) budget. It is vital in maintaining tenancies. Many private landlords would not rent to benefit recipients without this safety net. DHPs are key in supporting the resettlement of homeless people, ex-prisoners and others leaving institutions. We therefore urge the Minister to ensure the proposed budget for DHP is not reduced in line with the Chancellor's recent announcement for England and Wales.

In spite of the commitment to increase DHP in Northern Ireland we know that these payments will be unable to meet all the shortfalls in housing costs. To date it has been suggested they cover shortfalls in regard to:

- Shared room rent
- Disabled tenants
- Foster carers
- Under occupation in social tenancies

It is obvious that there will need to be a prioritisation in terms of need. We ask that this be based upon a vigorous analysis of need, options for alternative accommodation and impact upon the individual and therefore welcome the undertaking to conduct research in this area.

The HPF suggest that DHP continues to be administered by Housing professionals who understand housing need and the housing market, rather than Social Security staff and that stakeholders are included in the development of any new scheme.

We also recommend that housing costs be ring-fenced within any new Social Fund.

The HPF are pleased to see a commitment to provide support and assistance services which we anticipate will promote financial inclusion. These should be integrated into existing provision of specialist housing advice, including social housing providers, who, with comprehensive knowledge of and access to their tenants, can make timely intervention, thus preventing eviction and homelessness.

What other aims and measures should we be considering within Theme 3?

The HPF note, with regret, that there is no mention of home-owners in the context of Welfare Reform. We would urge that a mortgage rescue scheme be developed

Theme 4 – Driving regeneration and sustaining communities through housing

What more can be done to encourage owners to bring empty homes back into use.

The HPF recommend that a more comprehensive count and analysis of vacant properties is carried out. To date the current method appears to be an exercise in obfuscation rather than illumination, with the numbers of properties available to be occupied fluctuating widely.

While we believe the promise of loans to owners will help, we believe it will not go far enough. The application of rates to vacant properties also did not have the impact anticipated and we suggest a more aggressive strategy must be adopted.

Vesting should now be considered as an option and perhaps further subsidising the purchase of Existing Satisfactory properties.

What role might social housing landlords play in supporting tenants to enter training or work?

HPF agrees that there is a role for social housing landlords in this area. We suggest that more flexibility should be given to enable them to explore community development and job creation.

The Department should give consideration to any legal barriers and how these may be addressed. In the short term however, a lessening of regulation may enable some elements of the proposal to happen.

The introduction of Social Clauses to construction contracts has also been successful elsewhere.

Do you agree with our overall aims within Theme 4 and how we propose to achieve them?

HPF agrees with the themes in principle; however a number of issues were raised at the HPF seminar.

Underdeveloped land

Attendees felt that while there may be problems in regard to anti-social behaviour this is not universal. A lack of green spaces has an impact on mental health and physical wellbeing. Government both central and local should explore better use of this land, primarily as a facility which works with local communities, and promote multi-use of under-developed land in urban areas e.g. allotments, sporting facilities, urban farms etc. Such land use in Inner London Boroughs has had positive impacts on anti-social behaviour, drug use and community morale.

Shared Space

Recent research showed overwhelming support for the retention of 'peace walls' in Belfast, and only serves to illustrate continued division in terms of housing. We believe there needs to be a concerted effort to look at the underlying reasons for not sharing space.

Theme 5- Getting the Structures Right

The HPF agrees in principle with the arguments for separating the landlord from the strategic function of the NIHE.

Any change however must have the support of tenants and thus be given on the basis of sound information, a presentation of options and full transparency.

The HPF believe that any new Regional Housing Authority should be staffed by housing professionals, stand alone from local councils, be accountable to the DSD and have responsibility for the delivery of the Housing Strategy. There is a wealth of knowledge, experience and practical expertise within the NIHE that should not be squandered.

It is our opinion that enhanced regulation and inspection should be independent from Government and separate from the DSD policy function. This body would put the concerns of 'customers' before interests of the administration and ensure equality and objectivity.

Equality

The HPF consider it essential that an EQIA is conducted on the strategy. There are particular housing issues for a number of section 75 groups.

- Disabled people
- Families with children
- Single people
- Travellers
- The elderly
- Rural households
- Segregated, single identity estates

Conclusion

The HPF wish to thank the Department for this opportunity to contribute to this consultation. We look forward to working with the Department to ensure N.I. has a Strategy that will deliver tangible improvements in housing over the coming years.