



Chartered
Institute of
Housing
Northern Ireland

Response to the draft Housing Supply Strategy | Call for Evidence

By the Chartered Institute of Housing Northern Ireland

This is a response to the call for evidence by the Department of Communities on the draft Housing Supply Strategy.

How this response is formed

The Chartered Institute of Housing (CIH) have surveyed our members ahead of our submission to the Department for Communities (DfC) to ensure that a range of voices from across the sector is reflected in this 'call for evidence'.

The valued input of housing professionals in creating Northern Ireland's next Housing Supply Strategy is crucial to its overall success; not only by tackling the chronic issue of under-supply, but also ensuring that we are building sustainable communities through the provision of the right homes in the right places.

Whole System approach

CIH firmly supports the department's intention to take a 'whole system' approach in delivering the Housing Supply Strategy. Given the complexities of housing that exist over and beyond lack of supply, only a multi-faceted approach can create transformative and lasting change.

The implementation of a 'whole system' approach will help to avoid a narrow focus on the issue of undersupply alone. It is our view that the title of strategy be changed to reflect this approach; by citing 'supply' in the title, the department risks creating the perception that the strategy relates solely to the building of new homes and nothing more. In the department's [easy read version](#), it refers to the strategy as 'A plan for housing for people in NI'.¹ Adopting a similar title that reflects the much broader aims of the strategy will help to ensure maximum engagement from across all levels of the sector and individuals with lived experience of housing stress and homelessness.

¹ Housing Supply Strategy – call for evidence (easy read) [PDF file] *Department for Communities* p. 1. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-housing-supply-strategy-call-for-evidence-easy-read.pdf>

We would also like to take this opportunity to reiterate our concerns in regards the absence of a specific housing outcome in the draft outcomes framework document. The omission of a housing outcome was regrettable given the commitment set out in the New Decade, New Approach (NDNA) deal which stated that ‘the Programme for Government outcomes framework will be augmented with a new outcome and indicators to provide specific focus on ensuring every household has access to a good quality, affordable and sustainable home that is appropriate for its needs’.² It is our view that a ‘whole system’ approach would be best served by including housing as a specific outcome in the programme for government (PfG), with its own delivery plan and associated key priority areas, co-designed by a variety of stakeholders.

Co-design

CIH welcomes the commitment by the department to the process of co-design. It is our firm view that the voices of those who have lived experience of housing stress and homelessness be invited to feed into the development of the strategy. The inclusion of these voices must be cross-tenure to ensure both social and private market experiences are reflected in the strategy. **We would also like to take this opportunity to reaffirm CIH’s commitment in supporting the department in this process of co-design.**

Proposed timeframe

CIH supports the department’s proposed timeframe of 15 years given the significant, deep-rooted structural challenges it aims to address. We recognise how

² The New Decade, New Approach Deal (2020) [PDF file] *Assets Publishing Service* p. 9. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf

this corresponds with associated plans such as the Regional Development Strategy (2035) and aspirations within other jurisdictions, such as Scotland’s 20-year housing strategy with a vision to build 100,000 new homes within the next decade.³

We also note that the department anticipates that the strategy will be ‘underpinned by a high-level delivery framework supported by multi-year action plans’.⁴ It is crucial that multi-year action plans are included in the final strategy to ensure measurable outcomes, accountability and a collective understanding of the direction of travel across the sector.

Proposed vision

CIH agrees with the proposed vision of the strategy that “every household has access to a good quality, affordable and sustainable home that is appropriate for its needs.” We welcome the department’s reference to the New Decade New Approach deal and its commitment to housing as an Executive priority. Should housing become a specific outcome in the PfG, the wording of the proposed vision may need to be altered to ensure the approach within the strategy is reflective of the wording of the final outcome in the PfG.

Proposed objectives

Housing stress, homelessness and housing solutions

While CIH broadly agrees with the department’s aspiration to ‘reduce housing stress and homelessness and improve housing solutions’, we believe the strategy

³ Housing to 2040 (2021) *Scottish Government* Available at: <https://www.gov.scot/publications/housing-2040-2/>

⁴ Housing Supply Strategy: Call for Evidence (2021) [PDF file] *Department for Communities* p.10. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-housing-supply-strategy-call-for-evidence.pdf>

must be more ambitious and that the wording must reflect that ambition. To do that, measurable targets need to be set against the objective of reducing housing stress. Aside from the human impact of homelessness, the cost to the public purse is considerable. Therefore, we consider the objective of homeless 'reduction' to be unsatisfactory and call upon the department to ensure the objective focuses on 'prevention'.

Increasing housing supply and affordable options across all tenures to meet current and future demands

CIH agrees that increasing housing supply is critical to transforming our housing system and tackling chronic levels of housing need in Northern Ireland. Given that there are 43,971 on the current waiting list and 30,288 of those are considered to be in housing stress, the need for increased supply is fundamental to the overall success of this strategy.⁵

However, building more houses alone will not solve the problem of chronic housing need if individuals and families cannot afford to live in them. The department must also consider not simply the capacity of tenants to pay rent, but tenants' financial means by which to live comfortably and with dignity. Consideration must be given to households dependent on social security to meet their housing costs; particular attention should be given to those who live in the private rented sector where options are limited by the Local Housing Allowance (LHA) cap to the lowest 30th percentile of the market. Such policies continue to make the private rented sector an undesirable choice for those in housing need, placing additional pressure on an already over-subscribed social housing sector to meet that need.

Barriers to delivering the objectives for the strategy

⁵ AIMS Portal, *Northern Ireland Assembly* (2021) Available at: <http://aims.niassembly.gov.uk/questions/printquestionssummary.aspx?docid=335269>

Political instability

To ensure the overall aims of the strategy are met within the proposed timeframe, it is imperative that the Northern Ireland Assembly continues to function, that the Executive continues to govern, and that the department is led by an elected minister who can be held accountable. Any return to the political stalemate of 2017 which saw the collapse of the institutions and the absence of ministerial direction for three years, with civil servants being forced to implement decisions based on previous ministerial direction with little to no flexibility to deliver decisions in an agile manner reflective of the current context, would have a devastating impact on housing and to the overall success of this strategy.

Housing Selection Scheme

CIH has consistently called for changes to be made to the current housing selection scheme used to allocate social housing in Northern Ireland. As previously stated, supply is but one element of this strategy and should the department fail to reconsider how social homes are allocated, many individuals and families living in housing stress will remain unable to benefit from an increased supply of social homes.

As reiterated in our [response](#) to the department's fundamental review of social housing allocations, we believe that the process should reflect an applicant's time spent on the waiting list through the implementation of a banding system. The benefits of a banded allocation system would help determine priority for households with a similar level of need. It is also vital that the department revise intimidation points and instead recognise the needs of intimidated households in a more fair and proportionate way. Inaction in tackling how we allocate our homes will continue to fail applicants who, despite having a level of high housing need, are continuously 'leap frogged' by those being awarded points for intimidation.

CIH continues to call upon the department to work with the housing sector to develop a selection scheme rule to support the delivery of pre-tenancy activity that prioritises supporting people into sustainable tenancies. The rate of tenancy failure continues to plunge some of the most vulnerable tenants with additional complex needs into housing stress, with many stuck in a continuous cycle of taking on new tenancies only to fail to sustain them in the long term.

From a social landlord's financial perspective, tenancy sustainment means avoiding costly evictions, expenses associated with re-letting properties, and having much-needed social homes sitting empty for periods with lost rent. For society it means that public funds are not needlessly used for homelessness, health and support services for vulnerable households, which may be exacerbated where tenancy breakdown triggers a spiral of deprivation and a cycle of homelessness. Pre-tenancy engagement, such as affordability checks, ascertaining the appropriateness of the accommodation and its locality for the tenant, and ensuring they have the appropriate support means in place prior to taking up the tenancy, can be simple, but effective measures to avoid tenancy breakdown and the risk of homelessness.

An absence of cross-departmental working

It is the view of CIH that cross-departmental working is critical to the overall success of the strategy. Housing is inextricably linked with health and infrastructure. The success of the strategy is also linked to multi-year budgets; therefore, the Department of Finance (DoF) is essential to ensuring the strategy receives the investment it needs to succeed.

It is important to note that whilst DfC is the statutory body responsible for social and affordable housing in Northern Ireland, the provision and maintenance of new social and affordable homes requires the co-operation of the Department for

Infrastructure (DfI). Any co-operation with DfI is critical especially given the barriers facing new social and affordable housing developments due to the ongoing difficulties with wastewater infrastructure. Therefore, we feel it appropriate that the Department for Infrastructure, alongside DfC and DoF be named as a responsible department.

It is well-evidenced that poor housing costs. The Covid-19 pandemic has brought this actuality into stark focus, clearly displaying the inter-relation between health and housing. Therefore, it is our view that the Department of Health be named as a department responsible for achieving housing outcomes where key priority areas appropriately fall under its remit. Cross-departmental co-operation is vital if we are to achieve a whole-system approach to delivering good quality, affordable and sustainable homes.

Lack of access to land in areas of need

Our members cite lack of access to land in areas of need as a barrier to supply of social housing. We anticipate affordable housing policies in emerging local development plans will lever more of this land for social and affordable housing provision. However, we should ensure that all policy tools at our disposal are used. While it does not represent a silver bullet, this should include a strategic use of public land for housing. To achieve this, fundamentally a transparent view of public land holdings is needed to inform decision making on land use. Executive buy-in of this strategy is needed to ensure all relevant public bodies digitise their land holdings to support this aim.

Supporting People, Shaping Places and Building Communities

Shared housing

CIH believes an increase in shared housing developments has a role to play in increasing supply and better integrating communities in Northern Ireland. The

current way in which we allocate social homes, in part, maintains segregation which adds to our chronic housing waiting lists.

Shared housing in the department's own words, is a programme which exists to "improve the choices that are available by tackling the barriers that prevent individuals from opting to live in shared neighbourhoods".⁶ However, we are not building nearly enough of it to feel its intended impact. Beneficial as it may be for those who have settled in shared communities, those still living separately are not experiencing its value. It is our view that the strategy should include an increase in shared housing to ensure it promotes more choice for those who wish to live in it.

Housing should be an integral part of the care and support system

It is well evidenced that housing is the foundation upon which individuals and families build their lives. Whether an individual or family lives in a house unsuitable to their needs or they have found themselves without a home has a direct correlation to their health, financial and social well-being. To reiterate the previous point made regarding the need to revise the allocation scheme, implementing an element of pre-tenancy engagement before allocating social homes is a vital enabler to ensuring applicants have the adequate care and support that they need to ensure tenancy sustainability and to prevent tenancy breakdown.⁷ To do this successfully will mean more than simply offering shelter but delivering homes where individuals and families can thrive.

Our [Rethinking Social Housing NI](#) report (2018) highlighted how social housing with support services improves the lives of people with specialist and complex needs

⁶ 10 New Shared Housing Developments – T:BUC Contributes To Shared Neighbourhood Programme, *Community Relations Council* (2019) Available at: <https://www.community-relations.org.uk/news-centre/10-new-shared-housing-developments-tbuc-contributes-shared-neighbourhood-programme>

⁷ Rethinking Social Housing: the Next Steps report (2020) [PDF file] p. 13. Available at: <https://www.cih.org/media/c1llh25j/next-steps-northern-ireland.pdf>

and enables them to live independently. The Housing First model is recognised internationally as a model which aids people with complex needs that are experiencing chronic homelessness. CIH supports the expansion of the service due to its success; locally, Housing First service users report better health and social networks; a majority maintain their tenancies; and there is a reduction in levels of alcohol use and in the use of PSNI and emergency services. Such results show that expanding this service should ensure that those who are most vulnerable will be offered the required levels of support that they need to sustain their tenancies.

Inclusion of mixed-tenure housing developments

CIH supports the inclusion of mixed-tenure housing within the strategy. While it is positive that we have seen the gradual introduction of mixed-tenure policies within local development plans (LDP), it is important that we do not allow a sole focus on supply to undermine the importance of rolling out a widespread policy of mixed-tenure housing developments.

As reiterated throughout the response, the strategy must be broader than just supply. CIH have previously cited the lack of mixed-tenure as a contributor to the stigma of social housing and the residualisation of communities where social housing is the sole tenure. The implementation of mixed tenure has the potential to tackle the mistaken perception that the presence of social housing decreases the value of private homes and provides a guarantee that affordable housing and high-quality homes can be one of the same.

Planning

A level playing field between new social and private developments should be provided at community consultation stage

CIH believes that to transform housing supply for the better changes must be made to the planning legislation that currently allows for an additional layer of community consultation to take place ahead of the building of new social homes that is not required for the development of private housing developments.

In our Rethinking Social Housing: the Next Steps [report](#), we advocated for a level playing field between new social and private developments at the community consultation stage.⁸ Although consultation at the community planning stage is important, the views of existing residents need always to be balanced with those of people who need social homes. Its existence suggests new social housing requires 'more of a say' from communities than other tenures, which reinforces negative perceptions and misplaced fears surrounding social housing. The removal of this unique requirement from the planning system will help to reduce the stigma associated with social housing and help in the pursuit of creating parity between tenures in Northern Ireland.

Finance

Revitalisation of the Northern Ireland Housing Executive

In November 2020, CIH welcomed the department's announcement signalling substantial changes to housing policy in Northern Ireland that included the reclassification of the Housing Executive's landlord arm as a mutual or co-operative allowing it to borrow, invest in its homes and ultimately build again. At the same time, this change would promote the involvement of tenants being involved in their housing service. Failure to deliver upon this vital element of revitalising the Housing Executive will have a considerable impact on the supply element of this strategy.

⁸ Rethinking Social Housing: the Next Steps report, (2020) [PDF file] p.10. Available at: <https://www.cih.org/media/c1llh25j/next-steps-northern-ireland.pdf>

Financial Transactions Capital

As part of our Rethinking Social Housing: the Next Steps [report](#), one of our 12 recommendations included the piloting of additional intermediate rental products to meet the housing needs of people locked out of home ownership within the general market. Therefore, we were pleased to see the £38.8m allocation of Financial Transactions Capital (FTC) in the DoF's draft budget, a funding stream that will support additional intermediate housing in future years, while allowing the continuation of co-ownership affordable housing in 21/22. This is in line with the minister's commitment that funding streams be maximised to meet intermediate housing shortages, and that a binary choice between investment in social and intermediate housing need not have to be made. We would welcome the utilisation of FTC, where and when appropriate, to ensure additional affordable products for those locked out of homeownership is adequately financed.

Climate change/net zero

Transitioning to low carbon homes

As we continue to improve the energy efficiency of our homes in a bid to tackle rising consumption levels, decarbonisation must be scaled up to change how our homes are heated through the implementation of renewable technologies across all housing tenures; this change will come at a cost. It is the firm view of CIH that this cost must not be passed on to low-income consumers, which risks pushing households into poverty.

Alongside the Department for the Economy, it is vital that the department ensure that any adverse policy impacts are mitigated at an early stage, particularly for tenants who privately rent or for property owners who are heavily mortgaged. CIH would ask that consideration be given to financial measures, similar to that of the

boiler replacement and warm homes scheme which saw an £117m investment into privately rented homes,⁹ be built into any financial package moving forward.

In order to communicate any change to tenants and homeowners, CIH suggests that a similar approach to that taken by the department regarding the 'Make the Call' service, which supports people in accessing benefits and services to which they are entitled but have not been previously claiming, should be explored when helping people to ascertain which funding is available to them.

Skills

Housing Supply Strategy could act as a stimulus to improve and modernise skills

Given the scale of our housing shortfall, and the need to build more homes at speed, modern methods of construction (MMC) has become an increasingly attractive means of delivering this. MMC has improved in terms of the quality of the product but requires support to drive forward scale so that the industry could have confidence to continue to invest and deliver more homes. In order for this to work effectively, significant investment would be required in the first instance to ensure the success and sustainability of MMC and to secure the buy-in from the local construction industry.

An upskilled workforce is broader than constructions skills. As the professional body for housing, CIH provides training and qualifications in areas including housing management. We believe that good quality housing management is central to providing homes and communities where people want to live; another reason why this strategy should be broader than supply.

⁹ House Condition Survey (2016) [PDF file] *Northern Ireland Housing Executive* p.17. Available at: <https://www.nihe.gov.uk/Documents/Research/HCS-2016-Main-Reports/HCS-Main-Report-2016.aspx>

Broader skills also include those required to support the zero-carbon agenda. There is an acute need for an increase in installers to retrofit existing buildings with energy efficiency and clean heat measures. The success of zero-carbon technologies will also depend on behavioural change. People will have to operate their heating in completely different ways. Education and training will be crucial in preventing some of the current experiences where homes are built to high energy efficiency standards, but residents and/or contractors may not have the knowledge to effectively work with the technology.

About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals and their organisations with the advice, support, and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: www.cih.org.

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