Housing Supply Strategy

Call for Evidence Summary Report

December 2021

Contents

General Information

Purpose of the report

This report provides a summary of responses to the Housing Supply Strategy Call for Evidence ('CfE') as well as information gathered through consultation events that were undertaken in parallel to the CfE.

Carried out over eight weeks, from 19 May 2021 until 16 July 2021, respondees and event attendees were invited to provide evidence, data and views on a selection of housing supply issues.

The CfE was the first formal stage in a programme of work to develop a new long-term Housing Supply Strategy. The responses and evidence gathered have informed the draft Housing Supply Strategy (The draft Housing Supply Strategy document can be found **here**) that has been published alongside this report.

The substantial stakeholder engagement and activity that took place, during the CfE period, generated a wealth of important information. We wish to thank everyone who contributed and look forward to hearing your views on the draft Strategy.

For further enquiries on this report or the Housing Supply Strategy, please contact: **DfCHousingSupplyStrategy@communities-ni.gov.uk**

Introduction

Context for this Call for Evidence

As part of Minister Hargey's comprehensive and ambitious programme of work to increase housing supply and address housing stress the Department for Communities ('DfC' or 'the Department') has developed a draft Housing Supply Strategy. The foundation of this Strategy is the vision that: "Everybody has access to a good quality, affordable and sustainable home that is appropriate for their needs located within a vibrant and inclusive community".

Realising this vision will make a major contribution to the achievement of the strategic outcomes in the draft Programme for Government outcomes framework, New Decade New Approach[1] and the Department's Strategic Plan 'Building Inclusive Communities'.[2]

The CfE, and associated consultation events, were undertaken to ensure the draft Strategy was supported and informed by a strong evidence base and to provide a robust platform for the development and delivery of interventions to increase housing supply and reduce housing stress.

CfE Process

Developed in collaboration across government (including the Departments for Infrastructure, Economy and Agriculture, Environment and Rural Affairs and the Departments of Health and Finance) DfC launched an eight week on line CfE programme on 19 May 2021.

The CfE sought data and evidence in relation to:

1) Maximising the potential for housing to deliver wider positive outcomes in terms of supporting people, shaping places and building communities; and,

2) Unlocking the levers for increasing housing supply. Respondees were asked to comment on 7 specific levers. These included: land and property, planning, infrastructure, finance, innovation, skills and Climate Change/Net Zero (which was identified as both a driver for housing need/demand and a lever for supply).

Stakeholder Engagement Sessions

As part of the CfE process the Department also hosted (as detailed at Annex A), thirty-five stakeholder workshops and consultation sessions including four public engagement sessions.

The workshop sessions typically ran for up to 2 hours and opened with Departmental personnel providing an overview of context and purpose of both the CfE and wider Strategy development processes. All events were conducted via a virtual platform in line with prevailing COVID-19 restrictions.

Timeline

Following the conclusion of the CfE programme the DfE analysed all responses to inform the draft Strategy published alongside this report. This draft Strategy is now open for consultation with the aim of publishing the final Strategy by the end of the current mandate (Spring 2022).

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1   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade__a_new_approach.pdf
2   https://www.communities-ni.gov.uk/publications/department-communities-building-inclusive-communities-strategy-2020-2025

Media and wider interest

The CfE was promoted widely via the Department's Twitter page and hosted on a dedicated Departmental webpage. A number of organisations also referenced or promoted the CfE on their respective websites. We would like to thank these organisations for publicising the CfE to their users as this was an important factor in securing responses.

Call for Evidence – Summary of Responses

As outlined in the chart below 74 CfE responses were received in total: - 16 (or 22%) from individuals and 58 (or 78%) from organisations. Organisations included: housing associations and others in the wider housing sector; professional bodies; private developers; local government; academia and research bodies.

Chart One: Responses to the Call for Evidence by stakeholder type
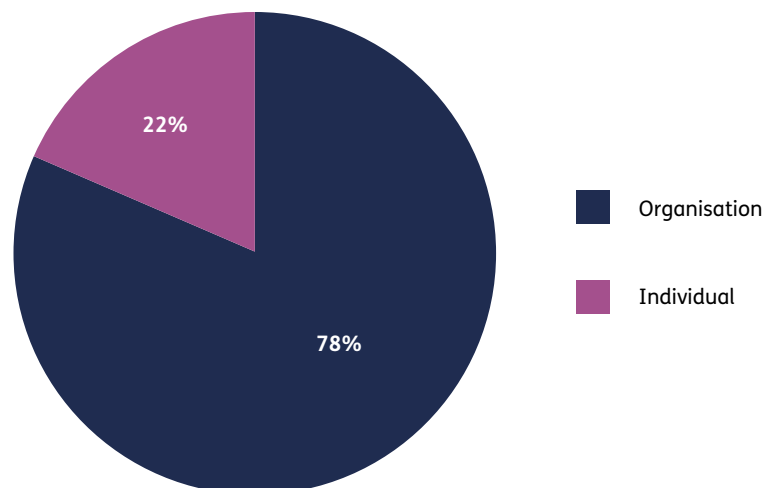
Responses to the CfE ranged from short personal opinions on specific topics, academic reports and research, and detailed evidence from housing related organisations. The next sections of this report summarise these responses.

01
Whole System
Approach

Whole System Approach

The issues outlined in the first section of the CfE included:

- The important contribution that good housing makes towards achieving social, economic and environmental outcomes;

- A synopsis of the key trends impacting on the housing market;

- Availability of evidence in relation to housing stock and constituent elements; and,

- The need – in addressing these issues – for a "whole system approach" (to reflect the changing housing supply context and deliver transformative outcomes)

Whole System Approach

A 'whole system' based approach was proposed for the Strategy in recognition of the complex and interconnected nature of the housing supply system. The 'whole system' approach was explained with reference to Figure One (below) which summarises the key "drivers" of need and demand (including demographic, social and economic factors) and key "levers" for supply (such as, land and property, finance, skills and infrastructure). Crucially, as also illustrated in Figure One (and the accompanying CfE narrative), this approach recognised the central role of people, places and communities in housing supply policy.

Figure One: Whole System Approach

In the above context CfE respondees were asked:

> **"Do you agree that a 'Whole System' approach given the challenges, is the right one?"**

61 (or 82%) of respondees replied to this question with 57 (or 93%) agreeing with the 'whole system' approach. Reasons for such agreement included:

- A Programme for Government housing outcome is an essential component to the delivery of our housing needs

- Housing supply issues and challenges cannot be considered in isolation;

- There are no simple solutions to addressing such a multi-faceted issue;

- It will improve the chances of a durable, long term and transformative Strategy; and,

Other supportive comments identified the conditions required for this approach to be successful including: executive support/endorsement; buy-in of other key stakeholders to deliver; and, linking the Housing Supply Strategy to other strategies (such as the Anti-Poverty Strategy, the Energy Strategy, the Programme for Government and the Homelessness Strategy).

Other specific comments (illustrated in Table One below) also identified various issues which will need to be considered in taking forward this approach.

Table One: Specific Responses to the Whole System Approach

Responses	Specific Response
Community and voluntary sector	Needs to be a consideration of and a 'whole person' as well as a 'whole system' approach from the outset.
Banking and finance	A whole system approach should recognise the role and contribution of private finance in enabling housing supply and purchase.
Rural community	The diagram needs to include profit and tax regulations as these influenced/distorted the market, particularly in areas of high demand
Building industry	The approach as described does not address the tax treatment of property.
An independent housing rights charity and one local political party	Both highlighted the need to prioritise addressing issues in the private rented sector and homelessness prevention.
A local political party	The 'whole system' approach needs to afford greater focus to areas of housing stress outside of the social housing sector.
Two independent housing charities	The title of the Housing Supply Strategy should be amended, noting that the easy read version of the CfE refers to the Strategy as: "A plan for housing for people in NI".
One local council	There should be an update of the Addison Act for the 21st Century, with housing needs addressed as housing developments rather than estates or housing units.

Similarly, suggestions were also made in relation to what should also be added to the 'whole system' approach (as outlined in Figure One previously), namely:

- Climate change should be given even more prominence, given its growing importance;

- A legal lever (to cover issues, such as, health and safety) should be included;

- As the majority of housing supply will be existing units, perhaps the condition of housing should be included; and,

- There is a need to highlight both planning and the wider community planning aspects

Further analysis of the 4 respondees (all individuals) who disagreed with the 'whole system' approach showed that two did not fundamentally object to this approach but rather had concerns about how social care support and family and carer involvement would be reflected, (with one of them specifically asking that Human Rights and The United Nations Convention on the Rights of Persons with Disabilities[3] be noted as a key driver for change).

Of the remaining 2 respondees who disagreed with the 'whole system' approach, one linked their objection (and all their responses in the CfE) to the potential closure of the House Sales Scheme,

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3   https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html

while the other respondee objected because they considered that such a 'whole system' approach could result in "no accountability".

Timeframe

Under this heading the CfE proposed that the Housing Supply Strategy should have a 15-year timeframe given:

- The significant, deep-rooted structural challenges which need to be addressed; and,

- This timeframe is similar to other relevant strategic plans, such as, the Regional Development Strategy 2035 (which is potentially scheduled to run for up to another 15 years) and Local Development Plans. It was also noted that the Strategy would potentially be underpinned by a high-level 'Delivery Framework' supported by multi-year action plans

> **"Do you agree with the 15 year timeframe proposed for the Housing Supply Strategy?"**

In addition to the question above, respondees were also asked if they did not agree - to provide a a response to indicate if they considered the timeframe should be shorter or longer.

55 (or 74%) responded to this question, 36 or almost two-thirds agreed with a 15 year or longer timeframe for the Housing Supply Strategy whilst 19 (or 35%) respondees disagreed.

Respondees who agreed, highlighted a number of reasons including the need for this timeframe, given the scale of proposals, and the need to provide certainty to delivery partners. The majority of these respondees also emphasised that there

should be shorter review periods or action plans (of between 3 – 5 years), with specific targets, set milestones and lines of accountability. It was also noted that there must be some "quick wins" in the earlier years of the Strategy.

Local councils agreed with the 15 year timeframe but highlighted that this is in contrast with the Energy Strategy, Green Growth Strategy, Environment Strategy and the Climate Act which are set within the UK Climate Committee target years of 2030 and 2050.[4]

Of the 19 respondees who disagreed with the 15 year timeframe, 14 thought the timeframe should be shorter, whilst 5 thought it should cover a longer period. With regard to the former 14 respondees 9 were individuals, most of whom believed that this timeframe is too long given the pressing need for increased housing supply. Of the latter, 5 organisations only one fundamentally objected to a 15 year Strategy, specifying the need to urgently address sewer capacity and expedite zoning in areas where foul sewer connections can be made.

Of the remaining 5 respondees, who felt the timeframe needed to be longer, 3 were individuals and 2 represented organisations. Of the 3 individuals, 1 provided no explanation, 1 advised there should be a 20 year Strategy (in steps of 5 years) to take full account of COVID, BREXIT and changing demographics. The remaining respondee suggested that the Strategy should have a slightly longer timeframe, highlighting that the new Scottish Housing Strategy does not end until 2040. The 2 organisations both suggested a longer timeframe is necessary in order to tackle deep-rooted housing problems (while also recognising the need for shorter term targets and plans).

4   It is also worth noting that the linkage, or need to link, with the Energy Strategy, Green Growth Strategy and/or Climate Action Plan/Act is a recurring theme across a number of responses and areas in the CfE.
5   https://www.gov.scot/publications/housing-2040-2/

Vision

The proposed vision for the Housing Supply Strategy in the CfE is that: "Every household has access to a good quality, affordable and sustainable home that is appropriate for its needs." This vision followed the wording set out in the New Decade New Approach (NDNA) for a proposed Programme for Government (PfG) housing outcome that encompasses issues such as affordability, accessibility, sustainability, quality and security of tenure.[6]

"Do you agree with the proposed vision for the Strategy?"

61 (approx. 82%) responded to this question, the majority of whom (53 or 87%) agreed with the proposed vision whereas 8 (or 13%) respondees disagreed. As indicated, in Table Two below, 32 respondees (i.e. 23 who agreed with the vision and 9 who did not) also made additional comments on the vision.

Table Two: Responses to Vision Statement

Number of Respondees	Specific Response
Agree with Vision	
4	Important to ensure the wording remained linked to any wording used for a standalone PfG outcome, should this be forthcoming.
4	Need to include wording around 'suitable' or 'accessible' or in meeting 'current needs'. These comments were mainly reflective of a desire to address the needs of people with disabilities and to ensure changing life circumstances are included in the vision. One organisation also agreed that there was a need to include something to encompass changing needs over time.
3	The vision should reflect the importance of housing within its broader neighbourhood/community/place context.
2	Inclusion of 'safe' as one of the descriptors in the vision and expanded further to suggest either references to 'energy efficient' and 'digitally enabled' or 'supporting life opportunities'.
1	Framing the vision to focus on fully meeting the right to adequate housing and prioritising supply to those in greatest objective need.
1	The term 'every household' should be replaced with 'every person'.
1	The vision and objectives did not make explicit reference to tackling key inequalities across the Section 75 categories of the Northern Ireland Act 1998, nor advance equality of opportunity and good relations.
Disagreed	
7	Retained the fundamental wording of the proposed vision but also recommended additional wording.
1	The vision in its current form is unachievable and the focus should simply be on increasing supply and ensuring affordability of all homes.
1	Disagreed with the vision in its entirety and proposed completely alternative wording.

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6   At the time of publication of the CfE, no decision had been made on a standalone Programme for Government (PfG) housing outcome.

Objectives

CfE respondees were asked to consider five key objectives:

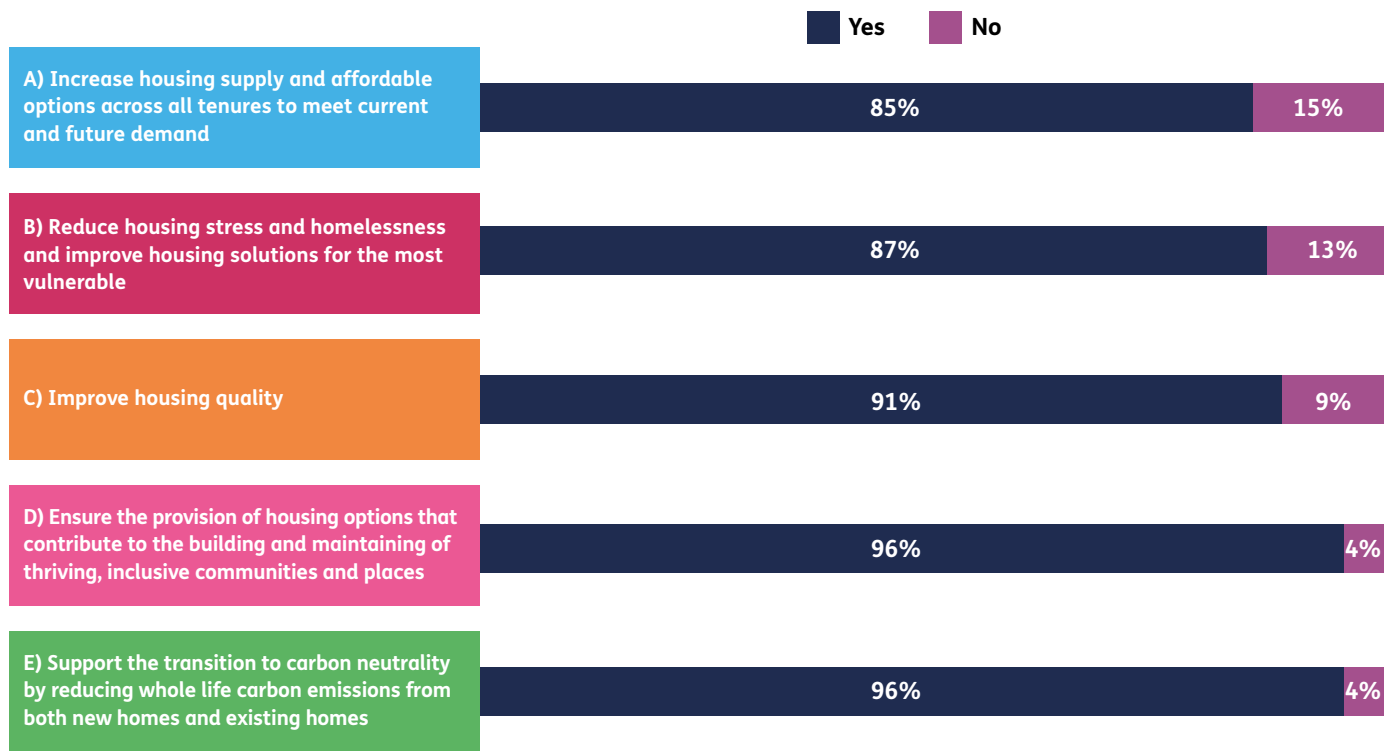> **"Do you agree with the following proposed objectives for the Strategy:**
>
> **a) Increase housing supply and affordable options across all tenures to meet current and future demand.**
>
> **b) Reduce housing stress and homelessness and improve housing solutions for the most vulnerable.**
>
> **c) Improve housing quality.**
>
> **d) Ensure the provision of housing options that contribute to the building and maintaining of thriving, inclusive communities and places.**
>
> **e) Support the transition to carbon neutrality by reducing whole-life carbon emissions from both new homes and existing homes."**

Respondees were also asked to explain their answer if they did not agree with the proposed objectives.

There were 55 responses. Figure Two summarises the split between positive and negative response levels to each objective.

Figure Two : Objectives Responses

Yes | No

A) Increase housing supply and affordable options across all tenures to meet current and future demand — 85% / 15%

B) Reduce housing stress and homelessness and improve housing solutions for the most vulnerable — 87% / 13%

C) Improve housing quality — 91% / 9%

D) Ensure the provision of housing options that contribute to the building and maintaining of thriving, inclusive communities and places — 96% / 4%

E) Support the transition to carbon neutrality by reducing whole life carbon emissions from both new homes and existing homes — 96% / 4%

Objective A – Increase housing supply and affordable options across all tenures to meet current and future demand

There was strong overall support (85%) for this objective (although a few more respondees disagreed with this objective when compared to the others). Table Three below summarises responses in terms of potential amendments and adjustments.

Table Three: Suggestions in relation to Objective A

Response Type	Suggestion
Various	Affordability, referring not just to the initial (purchase) cost of the home, but to on-going costs.
Housing Charity	Reference to the Private Rented Sector and limitations for those households dependent on benefits in accessing this sector.
Housing and voluntary and community sectors	Change housing 'demand' to 'need' to reflect: the needs of changing demography; the needs of young people; and, that 'demand' in a given point in time may be unachievable.
Human Rights organisation	Reword to: 'Increase housing supply and affordable options across all tenures -- prioritising social homes for those with the greatest objective need and guaranteeing equality of opportunity in access -- to meet current and future demand.'
Housing Associations	Add: "unblock the issues with mixed tenure"
Individuals	A number of individuals disagreed with the objective (based on issues such as the House Sales Scheme or social housing allocations issues). Others noted the need to make use of empty homes before building new homes and one respondee recommended adding: 'suitability of housing'

Objective B – Reduce housing stress and homelessness and improve housing solutions for the most vulnerable

While there was strong support for this objective (87%) as illustrated, in Table Four below, 8 organisations and one individual recommended the word "reduce" - as applied to homelessness - should be changed to "prevent".

Table Four: Suggestions in relation to Objective B

Response Type	Suggestion
Various (8 organisations and one individual)	Substitute "reduce" - as applied to homelessness - to "prevent". Many of these respondees made this suggestion as a way to link the objective more closely to other strategic objectives, such as those in the NIHE homelessness Strategy.
3 Organisations	Under 'housing solutions for the most vulnerable' it will be necessary to ensure the most vulnerable were clearly identified.
Human Rights Organisation	To focus the objective on prioritising the most vulnerable suggested rewording to: "Reduce housing stress and homelessness and improve housing solutions for the most vulnerable, prioritising their greater objective need and the obligation to fulfil their right to adequate housing through equal access to a sufficient supply of social homes to meet local demand".
Human Rights organisation	It is important to highlight that the term 'housing solutions' (if meant in the general sense) should not be confused with the 'Housing Solutions' programme delivered by NIHE.
Two housing organisations and a local political party	The importance of delivering wraparound services (or incorporating support for the most vulnerable) alongside any housing solutions delivered to ensure they can have the most impact.
Rural voluntary and community sector	Reword to "Reduce housing stress and homelessness by increasing the supply of social and affordable housing and improve housing solutions for the most vulnerable".

Objective C – Improve housing quality

There was strong support for this objective (91%). Several organisations, and a local political party, highlighted the low housing quality of many houses in the Private Rented Sector. Directly linked to this, is the view of many organisations that the current Housing Fitness Standard is too low and lagging behind the rest of the UK. Other specific comments and suggestions are outlined in Table Five.

Table Five: Suggestions in relation to Objective C

Response Type	Suggestion
Human Rights Organisation	Suggested rewording : "Improve housing quality by ensuring all homes meet the habitability and services standards set out in the General Comment on the right to housing, and through appropriate monitoring, data collection and public transparency on housing quality."
Three organisations and two individuals	Recognise the specific needs of households to improve the suitability of housing.
Two housing organisations and a local political party	The importance of delivering wraparound services (or incorporating support for the most vulnerable) alongside any housing solutions delivered to ensure they can have the most impact.
Rural voluntary and community sector	Proposed rewording to: "Improve housing quality and safety to ensure housing can meet the needs of all across our communities".
Two individuals	Suitability of housing was mentioned with particular reference to adults with learning difficulties and autism.
3 organisations	Design and safety: through either the addition of: 'design, safety and sustainability' or including the word 'safety' somewhere in this objective.

Objective D – Ensure the provision of housing options that contribute to the building and maintaining of thriving, inclusive communities and places

Given that 96% of respondees agreed with this objective there were only limited suggestions as to how the objective might be adjusted, including:

- Identifying the value of age-friendly/intergenerational housing;
- Encouraging people to seek homes suited to their needs, e.g. for downsizing;
- Opportunities for stronger focus on provision of shared housing schemes; and
- Focusing on homes and communities that people want to live in

Objective E – Support the transition to carbon neutrality by reducing whole-life carbon emissions from both new homes and existing homes.

96% of respondees agreed with this objective. Additional comments focused on the importance of recognising the cost of such transitions and ensuring that incentives, grants and access to upgrades/ retrofitting should allow for "just" or "equitable" transition. The importance of uplifts to building regulations was noted as vital, whilst one respondee specifically highlighted the Passive House standard.[7]

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7   The Passive House Standard is designed to continuously heat the dwelling to temperatures in excess of 20°C, whilst simultaneously providing eight air changes per day (therefore ensuring good indoor air quality) and exceptionally low heating costs. See for example: https://www.passivhaustrust.org.uk/

Definitions

This section of the CfE sought respondees views on various concepts underpinning the proposed Strategy vision, namely:

> **"The terms good quality, sustainable and affordable mean different things to different people - how would you define these terms?"**

Good Quality

50 respondees provided their views[8] on how "quality" in the context of the vision might be defined. Overall various common and consistent views were expressed, namely that the term "quality" should capture or reflect:

- Long lasting build and reducing the need for long term upkeep and maintenance;
- The type of materials and construction processes used;
- The quality of design of homes (including meeting multiple uses and changing household lifetime needs) and place (including, for example, access to open space, development density and services);
- Safety and security; and
- Thermal efficiency, insulation and (related) health and wellbeing benefits

Other more specific comments in relation to the term "quality" are summarised in Table Six.

Table Six: Specific "Quality" Comments

Observations
Good **quality spaces** for living means spaces that provide adequate shelter, light and ventilation.
Good **quality construction** should be durable, to last at least 200 years without major reconstruction.
Quality can only be defined from the perspective of the end user. Therefore measures for **quality housing** can only be truly defined by co-producing measures of quality with those who will use the housing.
Requirement for design competitions for exemplar projects to demonstrate how **high quality, sustainable, low energy, low carbon** housing can be provided in a range of situations from small villages to cities.
Development of a contemporary fitness standard will be a vital part of continuously improving **housing quality,** along with use of the Decent Homes Standard and the Housing Health and Safety Rating System (HHSRS).
That the focus on quality cannot just be on new build but needs to look at addressing issues with **existing stock.**
A home that is well designed and constructed in terms of **'fabric first'** approach (so its thermal value is high).
Optimum internal layout that enables **multi-use** in terms of home, work and play taking into account the importance of light, space and storage.
To develop an effective and properly **age-friendly housing** Strategy these terms must relate to established international best practice. In this context "technology" was also identified as important to ensure safety and convenience for older people's housing.
In terms of construction quality, the **Passive Housin**g approach was noted, in particular the Passive House Standard ensures good quality for indoor air quality, energy consumption and comfort in accordance with internationally recognised standards including ISO7730 and BS EN 16798.
IMPROVING HOUSING QUALITY IS A PROFOUND NEED WITHIN THE **PRIVATE RENTED SECTOR** WHERE POOR FITNESS STANDARDS ONLY SERVE TO EXACERBATE AFFORDABILITY ISSUES.

8   In this context a number of respondees also cited:
- The Homes and Communities Agency (HCA) housing quality indicators: https://www.gov.uk/guidance/housing-quality-indicators; and,
- The Mayor of London recently consulted on 'Good Quality Homes for All Londoners' https://consult.london.gov.uk/good-quality-homes-for-all-londonersguidance

Sustainable

In total 44 comments relating to "sustainable" were provided. Common themes stressed that sustainability should:

- Be defined around the build quality of a home in relation to environmental credentials, ability to meet low carbon requirements, durability over the long-term and the subsequent impact on running costs;

- Include the ability of the home to meet the changing needs of the household over the long term;

- Be considered in the context of the wider place and community in terms of proximity and accessibility to services, amenities, employment and recreation;

- Encompass re-use and re-purposing of existing buildings and future-proofed new builds; and

- Include the ability of households to sustain their tenancies, regardless of tenure

Affordable

47 respondees provided comments on how "affordable", in the context of the vision, might be defined (with many noting that 'affordability' is context specific - in terms, for example, of region, tenure and individual household level). General comments included:

- Affordable homes, (for rent or for sale) should be defined as being accessible to those on low income (for example, for those on minimum or average wage) and/or benefits;

- Alternatively, affordability should consider "whole life" housing costs to ensure such costs do not compromise a household's quality of life (for example, causing them to fall into debt or having to sacrifice other life essentials to meet mortgage or rent payments);

- Affordable new homes should be built in a way that ensures they are energy efficient with low running costs. For example Passive House/ zero carbon homes have low energy consumption thus reducing the risks of fuel poverty; and

- Homes should be located in areas with access to: affordable transport, essential services and employment opportunities

Other specific comments are captured in Table Seven.

Table Seven: Specific "Affordability" Comments

Observations
Some respondees defined 'affordable housing' with reference to specific income and housing cost ratios (e.g. 30% - 40% of household income). Other respondees, however, highlighted the somewhat arbitrary nature of these ratios and believed that they do not provide an adequate understanding of individual affordability.
Other factors that impact on affordability include: deposit requirements; mortgage availability, tax changes (i.e. Stamp Duty Land Tax); regulation (such as building standards); and whether rental accommodation is furnished or unfurnished.
Affordable housing should not be confused with cheap housing that does not meet needs of individuals, as this leads to expense in other parts of the system e.g. health and criminal justice.
There needs to be better funding and systems in place for adults with learning disabilities and/or autistic adults trying to secure Disabled Facilities Grants for a housing solution.
Need to consider "Help" for older people to transition to more comfortable, desirable and affordable homes.
'Affordability' is strongly connected with help available through the social security system but cuts to Local Housing Allowance rates have had a significant impact on affordability. Moreover, there is a perception that there are lower level standards and prevalent disrepair complaints within the Private Rented Sector. Groups particularly impacted were identified as lone parents, who are predominately women, and those with disabilities.
Affordability is often an exclusionary factor for young people and within the current selection scheme/points system, there are very few points awarded in a way that reflects the wide-range of factors impacting young people's ability to enter employment or education without them having to present as homeless.
Affordability is linked to market supply and demand.
Need to avoid the paths of many cities (Dublin, Manchester and London being examples) where only those who are either "very rich" or living in "supported or social" housing, can afford to live thus squeezing people on "middle incomes" out.
Local government representatives cited the Strategic Planning Policy Statement which defines affordable housing with reference to social and intermediate housing products. Other respondees mentioned particular affordable housing products, including 'Shared Ownership', 'Rent to Buy' and 'Housing for Key Workers'
'Social' and 'affordable' do not mean the same thing (e.g. the difference between the rents charged by the NI Housing Executive and the much higher rents charged by Housing Associations).

Barriers to Achieving Objectives

Respondees were asked:

> **"What do you believe are the three main barriers to delivering the objectives for the Strategy?"**

There were 53 responses to this question. A number of common themes emerged, including barriers such as:

- The funding and investment needed to deal with the scale of housing challenges , including persistently high levels of housing stress and homelessness;

- The lack of a cohesive approach to tackling big and multifaceted challenges, including the tendency to rely on the status quo (i.e. lack of innovation);

- The lack of a joined up and holistic approach to planning and delays in developing and implementing Local Development Plans;

- The high cost of and difficulties in accessing land, especially in areas of high need and demand;

- Public land is not being used productively;

- Political instability and the lack of shared vision/ambition/commitment amongst political parties;

- Lack of an Executive Strategy with strong lines of accountability;

- Limited choice of affordable and accessible housing options for those who are older and/or those who have disabilities or who have other particular housing needs;

- Limitations of current infrastructure and, in particular, water and wastewater infrastructure and how this continues to hamper housing development;

- The current operation of the waiting list, housing selection and the points system; and

- The quality, affordability and security of the Private Rented Sector

Other barriers highlighted are detailed below in Table Eight.

Table Eight: Other Specific "Barriers"

Other Identified Barriers	
Cost and access to materials	Current fitness standard is outdated
Space in towns for social housing, with ground floor access and green spaces	Air B&B's are more lucrative for town/city centre landlords
Current building regulations (as these are lagging behind the improvements made in other jurisdictions	Availability and affordability of homes in rural areas
Construction skills shortages	Lack of transparency of land ownership
Poverty levels and the potential ending of Welfare Reform Mitigations	Uncertainty over the impact of BREXIT/COVID
Stigma attached to social housing and lack of cross community support for building new social homes	Resistance to utilising old sites/homes
Continuing community division/segregation	The market excluding those most in need
Inclusion phobia against those who are disabled, especially those with learning disabilities and/or autistic	Lack of ownership and accountability
A lack of understanding about the needs of NI Citizens and difficulties in determining housing need and demand	The need to prioritise and fund preventative measures
Failure to unlock opportunities with new financing opportunities such as Social Impact Bonds	Gaining agreement and support of stakeholders
Centralised nature of housing and procurement which results in a limited number of delivery partners	The fact that the NIHE cannot build new homes

Data

For the Strategy to address supply issues in a variety of housing contexts (tenure, location, condition) a consistently defined view not only of the total housing stock but also its component parts, is highly desirable. The CfE provided an overview of the improvement in the quality of evidence regarding housing stock over the last 50 years. The 2018 Housing Market Symposium Report[12] was also referenced in relation to the material opportunities for improving further the data and metrics relating to housing provision. The questions asked in the CfE were therefore:

> **"To what extent do you agree that there is a need to establish a more robust understanding of NI Housing Stock, e.g. by tenure, location, condition, etc.?"; and**
>
> **"Are you aware of any specific data sources or methodological approaches to estimating existing housing stock, e.g. by tenure, location, condition, etc.?"**

There were 52 (approx. 70%) respondees to this question, the majority of whom (45) either 'strongly agreed' or 'agreed' there is a need to establish a more robust understanding of the NI Housing Stock. 6 respondees neither 'agreed' nor 'disagreed' whilst 1 did 'disagree'.

Responses, indicating strong agreement or agreement, included the need for a strong evidence base on: "what we have"; conditions (including thermal efficiency); and, where stock is located. Without this data it will be difficult to understand the challenges and the gaps in provision, what type of future delivery will be required and how this will complement existing stock. A number of respondees also highlighted the need to be "more realistic" about the length of life of housing stock in order to better inform future requirement projections.

A number of respondees also specifically highlighted the requirement to better understand the needs of those with disabilities and the housing solutions they require.

Of the 6 respondees who neither agreed nor disagreed, 2 do not give a reason why, 3 go on to indicate that they are supportive of measures to establish a more robust evidence base and the remaining respondee provided some suggested evidence sources. Finally, the respondee who disagreed, explained that this is because they believe there is "a plethora of data", the key challenge is pulling it together.

Table Nine indicates the data and other information sources that respondees suggested could be adopted.

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12 https://www.communities-ni.gov.uk/publications/housing-market-symposium-report

Table Nine: Existing and Potential Data Sources

Existing Sources	
UU & QUB data	Building survey conditions
NIHE and Private Tenants Forum and Renters' Voice surveys with private renters[13]	Asset management data and land ownership register
House Conditions Survey	DfC Housing Statistics
Census	Building Control - New Dwelling Statistics
Domestic Valuation List	NIHE Commissioning Prospectus,
Housing Association Stock Records and Stock Condition Surveys	LPS data – NI Housing Stock by Super Output (April 2021 – OpenDataNI)
Potential Sources	
Densities reporting to support mixed tenure policies	
Better use mapping (based on experience of rationalising public sector estates and portfolio management)	
NI register that would allow housing stock to be 'drilled down' to streets, tenure and condition and also to record the price when it was last sold or it's rental level.	

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13   Although one respondee cautioned the approach of only using local feedback/research as this results in housing strategies that tend to maintain the status quo.

02
Supporting people, shaping places & building communities

Supporting People, Shaping Places and Building Communities

The preface, in this CfE section, emphasised that an overarching objective to addressing housing supply challenges is to contribute to the delivery of a fair and inclusive society by helping to transform support for people, communities and places to improve lives and deliver generational change.

This section was then sub-divided into four sub-sections:

- Equality and Human Rights;
- Sustainable Communities and Homes;
- Housing Supply in Rural Areas; and
- Housing and Poverty

Sustainable Communities and Homes

Issues considered in this section included the importance of embedding a place shaping approach to housing supply with specific references to: housing-led regeneration; mixed tenure/mixed use development; diversity of tenure types; and, shared housing.

Ten questions were posed in relation to these issues, the first of which was:

> **"How can housing supply help create and maintain sustainable communities?"**

Several definitions of sustainable communities were offered including: active, inclusive and safe; well run; environmentally sensitive; well designed and built; well connected; thriving; well served; and fair for everyone.

Respondees identified various benefits from secure, sustainable, safe and affordable homes. These included the positive well-being and wider economic benefits of access to a well-designed, attractive, secure, safe, warm, sustainable energy efficient, digitally enabled, tenure blind, barrier free and affordable home, that is positioned close to amenities, retail and key services.

While there was a strong message that such homes can contribute to building vibrant and thriving neighbourhoods and places, many respondees believed that this can only be achieved by having an adequate supply of housing across all tenures in a range of settlements to support a range of household sizes, ages and incomes. Such a mix of housing units could help foster balanced communities, provide housing choice, benefit health and wellbeing, reduce social exclusion and help tackle area-based deprivation.

Similarly, access to education and addressing poverty was highlighted as fundamental to creating sustainable, peaceful and inclusive communities as well as providing 'soft infrastructure' (such as mobile health and care services, well-being services and community transport).

The former Mackies site in West Belfast was identified as a potential location to prototype a model of sustainable neighbourhoods.

Many stakeholders believed that mixed tenure and mixed-use developments are key to the creation and maintenance of sustainable communities by helping to:

- Reduce social exclusion and concentrated poverty, especially in areas with high levels of social housing; and

- Counteract the effect of mono-tenure estates therefore helping to create sustainable communities

Involving local people in place shaping activities (e.g. community planning and Local Development Plan structures) was also identified as important. In particular: "a children and young people, older people and gender perspective" should be taken in both planning neighbourhoods and designing homes. Others suggested seeking more sustainable approaches to contemporary place making.

Additional housing supply in rural areas can contribute to the sustainability of local small businesses and, with improved broadband connectivity, rural living can be much more carbon efficient than in previous decades. Housing supply in rural settlements, therefore, needs to consider the development of appropriate infrastructure and services. It also needs to consider rural mobility issues and how housing can link into active and public transport networks, to allow people to access the employment and the services they need.

Another respondee noted that good quality housing supply will lead to longer tenancies/a permanent home with a reduction in turnover: 'established' tenants/occupants are more likely to contribute to the local community and engage with their neighbours.

Others stated that homes need to be built in the right places and be sympathetic to the needs of different target groups and ages. An overhaul of solutions for adults with learning disabilities and autism was identified so that they have long-term

safe solutions based in the community and not in institutions. Also having homes that are suitable for people with disabilities could keep the personal budgets (Self Directed Support) in their communities thus contributing to a circular economy and wider employment opportunities locally.

For those working with people in the justice system there was a strong message around the need for supported/ community and independent living options for people who wish to turn away from crime and who need safety away from gangs who would look to re-engage them in illegal activities.

In addition there was a view among many respondees that working in partnership with safe, sustainable neighbourhoods may diminish issues of division, segregation, crime/fear of crime, and pave the way for a more diverse and enriched environment.

There was general consensus that there needs to be a diversity in the size of houses built as well as the tenures available. The need for security of tenure was seen as crucial. The needs of older citizens need to be borne in mind in new developments with one and two bed properties required to reflect this demographic. A mixed tenure development that reflects a mix of privately owned, privately let, affordable and social accommodation can help increase the diversity of people living in an area.

A number of respondees discussed the need for an adequate supply of quality, affordable and sustainable accommodation in order to tackle the underlying root causes of homelessness and to provide support to those transitioning from the care system including the need for additional residential opportunities for 16–25year-olds.

It was noted that some LDPs in liaison with the NIHE are currently progressing work on the delivery of affordable housing planning policies which will require a percentage of affordable housing to be delivered on all housing sites over a certain threshold.

Another comment was that the success of the Empty Homes Strategy using Financial Transaction Capital funding, demonstrates that where blight is removed, a positive effect on the community and surrounding environment can be achieved.

A number of respondees called for the cessation of the mandatory House Sales Scheme which can contribute to the residualisation of Housing Executive estates and undermine the delivery of sustainable communities.

Other respondees commented that the Common Selection Scheme in its current form, does not assist in creating and maintaining sustainable communities as it does not provide the appropriate balance between the rights of new tenants with the rights of settled tenants and is open to abuse with concerns raised regarding intimidation points. In particular, social landlords need to be given the power to remove tenants who engage in Anti-Social Behaviour.

Finally, while there was strong acknowledgement (as reflected by the above) that housing has a key role to play in the creation of sustainable communities, many also stated that housing supply cannot on its own create or maintain sustainable communities. It needs to be part of a much wider whole systems-based approach that recognises the interrelationships between housing and other hard and soft infrastructure investment:

- In this context the RDS[14] and SPSS[15] were widely referenced but many respondees believed that much more action needs to be undertaken to support these Strategies

- In keeping with the "whole systems approach", the Housing Supply Strategy should be closely aligned with the aims, objectives and policies set out in the Local Development Plans and Community Plans of the 11 Councils. For example, one respondee noted that housing conditions can be improved through a combination of policies and services and the linking of health-sector led initiatives with the wider social economy (and to establish the economic values of improved health)

How do we engage communities more effectively in place making?

A strong message was that "people like and need to be engaged". Many also stated that engagement needs to be meaningful and feedback is properly considered and actioned[16] (Ask, Listen, Feedback and Act). Engagement should proactively increase throughout a development process to build relationships and trust.[17] Engagement approaches suggested by respondees included:

- Surveys and more online discussions, via social media and digital tools;

- Bespoke events with communities like 'housing clinics' in town halls;

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14 A growing regional economy will benefit from strong urban and rural areas. This needs a co-ordinated approach to the provision of services, jobs and infrastructure and a focus on co-operation between service providers. Balanced regional growth Building a Better Future and tackling regional imbalance are critical issues for the region." Regional Development Strategy RDS 2035 Building a Better Future.

15 Strategic Planning Policy Statement (SPPS) for Northern Ireland, 4.14, highlights the role of the planning system supporting Government to addressing sustainable communities, through its influence on the type, location, siting and design of development. As well as mixed use developments and mixed tenure housing schemes, the planning system should also encourage strong neighbourhood centres; temporary uses in interface locations; active street frontages; buildings that provide public services, including education, healthcare and recreational facilities; public paths and cycle ways; and passive spaces such as civic squares and public parks.

16 With some respondees noting in contrast that the area plan development process is technical, time consuming and dominated by developers, landowners and statutory consultees.

17 deliveringlargescalehousingpracticeadvice2019.pdf (rtpi.org.uk)

- Advertising targeted at 'harder to reach' and 'harder to hear' groups;

- Talking to individuals directly affected, instead of community spokespeople[18];

- Involving people at the decision-making and planning stages;

- Regular, collaborative engagement with communities and stakeholders, via community groups, schools and citizen workshops; and,

- Local music and food festival events, school and college mentoring groups and communities outside of the local area, particularly in rural areas

Digital technology, used in addition to traditional methods, can make public consultation more efficient and can reach a wider sample of the community. Using community development and creative approaches to engage children and young people, families and older people in the planning and design processes can empower tenants with a sense of ownership and responsibility for the community.

Examples of engagement mechanisms cited included the Belfast City Council 'citizen space' consultation platform and a new engagement platform, called "Your Say Belfast" (using a system called Engagement HQ). Similarly, the Newry, Mourne and Down District Council DEA fora and the NMD Strategic Stakeholder Forum engage the community voluntary sector and an online engagement tool and citizens panel are being developed with the aim of engaging residents on a range of community planning issues.

A number of respondees suggested the need to create more opportunities for community-led housing projects. Consideration should be given to replicating Community Land Banks or encouraging more Community Benefits Society-led housing projects.

Currently the majority of housing options are statutory-led projects. More independent housing organisations would allow minority interests to be represented "more fairly and proportionally". Suggested changes included legislation to allow Community land trusts to be set up and a planning framework that encourages and supports non-governmental, community organisations to set up new housing projects and a range of finance options that can support such schemes. For example one respondee discussed the concept of Community Wealth Building, an umbrella term for a range of strategies to democratise the local economy.[19]

Many respondees highlighted the need for particular consideration to be given to how to ensure marginalised communities and groups such as racial minorities, persons with disabilities and LGBT+ communities can be included and considered in consultation exercises. There was also a strong call to ensure the increased and effective engagement of women in place making and in the creation, and maintenance of sustainable communities.

> **"To what extent do you agree that housing led regeneration policy contributes to reversing the physical, social and economic decline of: (a) areas of deprivation (b) town and city centres (c) rural areas (d) suburban areas?"**

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18 Some respondees discussed issues associated with gatekeepers and the need to also engage directly with users and not only through community groups in every step of the design of new housing communities.

19 "It is about the power of small companies as opposed to large multinationals. About cooperative banks as opposed to large financial institutions, about decent working conditions as opposed to precarity and flex jobs. About collective land ownership as opposed to land barons. And about new economic models, beyond the outmoded concepts of 'the market' and 'the state'".

a) Areas of deprivation

36 of the 74 respondees (49%) did not respond to this question. Of the 38 who did respond 14 (37%) strongly agreed and 20 (61%) agreed. Only 2 disagreed or strongly disagreed and the rest (2) neither disagreed nor agreed.

There was a strong recognition that housing led regeneration policy contributes to reversing the physical, social and economic decline of areas of deprivation but that in many respects it is only one part of the regeneration challenge. Other challenges include physical and mental health, education, leisure and welfare.

Many respondees noted the ongoing cycle of deprivation and that many areas of deprivation are synonymous with one side of the community or the other. Intimidation can still be a challenge and a lack of social or community cohesion is commonplace in such areas.

A number of respondees stated that the public sector should continue to add value to land and assets where there has been market failure. This can be addressed by creating places for communities to live where they can also work, be educated, socialise and have access to public services.

In short "housing led regeneration" - with its associated focus on concerns around good housing and neighbourhood management, physical improvements and regeneration, in education, training and employment is key to tackling long term deprivation and improving peoples' lives.

b) Town and city centres

While only 35 of the 74 respondees provided a response to this question, 15 strongly agreed and 16 agreed with only 3 respondees who disagreed or strongly disagreed and 1 neither disagreed nor agreed.

Residential development within town and city centres helps to contribute to the creation of compact and vibrant centres. Many advocated the value of housing being close to services, jobs, amenities, transport and this especially suits those who, for example, do not have their own transport. Good broadband is also important. Others demonstrated the importance of changing the perception of city living and making cities living, working, vibrant places.[20]

Having residential areas within town centres by replacing/re-purposing obsolete buildings can regenerate and revitalise these centres. A number of respondees pointed to the importance of re-zoning and re-purposing retail buildings to create intergenerational living in the town and city centres including provision of smaller dwellings from which services are readily accessible.

In order to deliver this sustainable 'mix' in city centres it was suggested that that the Common Selection Scheme is urgently reviewed and city centre waiting lists established that are welcoming to everyone. In addition many focus group respondees pointed to the importance of understanding the additional requirements in terms of effective 'service' management of apartments including the costs of CCTV, and concierge and other services.

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20 For example a key principle and policy area within the Belfast City Centre Regeneration and Investment Strategy (BCCRIS) is to increase the residential population in the city centre. Similarly the recently published Innovation and Inclusive Growth Commission 'Reset for Growth' report suggests for the city and wider region to prosper, the city centre needs to create a "re-imagined, liveable and resurgent" city core (noting that that in most successful urban areas, residential development is a core element of the mix).

c) Rural areas

A total of 41 of the 74 respondees (55%) did not respond to the question. Of the 33 who did respond, 9 strongly agreed and 16 agreed (16). Only 2 disagreed or strongly disagreed and the remaining , with 6 respondees neither disagreed nor agreed.

While many believed that the provision of housing is an important factor, in addressing physical, social and economic decline in rural communities, it was recognized that housing on its own cannot address the social and economic decline in the most deprived rural communities.

To enable sustainable economic development there is a need to integrate the development of housing with a more equitable spread of services and employment opportunities (including remote working). This requires continued investment in broadband and mobile phone networks and policy that supports small business development. The approach to transport and rural mobility of citizens that reduces households' carbon footprint also needs to be designed into the re-development of rural communities based on just transition principles.

Respondees noted the importance of the provision of affordable housing, and support for rural transport and services in rural areas. Whilst this is often seen as too expensive it pays off if the intent is to support employment opportunities (in, for example, farming, forestry, new industries, commerce, recreation and tourism).

Similarly, the retention of the rural living spaces provides young people with options to be able to stay and underpins the retention of local services such as schools, post offices, village shops and churches, all of which are crucial to the maintenance of community life.

The Rural Housing Association's design guide[21] was identified as a valuable tool for use in rural place-making, considering landscape, settlement, heritage, types of community (e.g., dispersed) settlement size and appropriate building styles.

Finally the impact that second homes can have on affordability/availability was raised with one respondee suggesting a tax on second homes that could be re-invested into the host community.

d) Suburban areas

While 42 of the 74 respondees (57%) did not respond to the question, of those who did respond, 9 strongly agreed and 15 agreed. Only 3 disagreed or strongly disagreed and the remaining 5 neither disagreed nor agreed.

There was a strong recognition that housing led regeneration policy contributes to reversing the physical, social and economic decline of suburban areas. Suburban areas are traditionally housing focused and re-investment in those which are in decline may be valid. However, it is important to consider what the underlying cause for the decline is, for example, too often suburbs have been built in the past without adequate community facilities, and services and poor public transport links, making them unattractive. Investment in these areas may be best focused on addressing services to support housing rather than housing directly.

One respondee suggested that suburban development should be controlled, urban housing development fostered, and public transport

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21 http://ruralhousing.co.uk/rural-design-guide/

provided to minimise car use. This submission also noted the cost of suburban housing to the public purse and the risks to health of car dependency. Examples of good practice elsewhere noted included Create Streets[22], Strong Towns[23] and Project for Public Spaces and Gentle Densities.[24]

> **"How can we change the approach to housing led regeneration and ensure that it is more integrated in delivering wider policy outcomes?"**

A whole system approach was the focus of many responses although this was manifested in different ways:

- Some respondees noted the importance in this context of greater joined-up working across Departments - including Economy, Health and Education – where the quality, design and location of housing all have immediate as well as long term impacts. For example housing needs to be at the centre of the Government's Programme to deal with wider outcomes such as:
  - Addressing poverty;
  - Ensuring 'Buy Social' targets are being met;
  - Delivering Corporate Social Responsibility;
  - The Fundamental review of Allocations to achieve more balanced communities; and
  - The presumption to approve social housing planning applications as a means of fast-tracking housing-led regeneration

- Other respondees noted that regeneration powers were originally proposed to transfer to Councils along with Planning in 2015. Progressing this transfer should, therefore, be a priority for central government, enabling a more joined-up approach aligning with the Council's Community Planning and Local Development Plan and enhancing Councils' abilities to address physical, social and economic decline within their urban areas;

- Local authority respondees also recognised that housing led regeneration goes beyond the provision of social housing developments to include mixed use, mixed tenure developments providing a range of housing options to meet local need and growing demand;

- One respondee recommended that the holistic approach of RIBA2030 and the Passive House Standard be considered as a benchmark for all residential development and be incentivised in the Housing Supply Strategy; and

- In addition another respondee noted the capacity issues of the Northern Ireland Electricity Grid and therefore the importance of an 'efficiency first' approach. They suggested that the Passive House approach can help but that it would need incentives, compliance and awareness raising and that the Housing Supply Strategy could become a vehicle through which real innovation is demonstrated in the achievement of policy outcomes

Other specific comments raised are summarised in Table Ten below.

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22 https://www.createstreets.com/
23 https://www.strongtowns.org/
24 https://mb.cision.com/Public/19081/3120813/972a556ba01f0b3f.pdf

Table Ten: Other specific Housing Led Regeneration Comments

Comments
RIBA2030[25] and the Passive House Standard should be considered as benchmarks for all residential development and be incentivised in the Housing Supply Strategy.
Given capacity issues of the Northern Ireland Electricity Grid requires an "efficiency first approach". The Housing Supply Strategy could become the vehicle (using incentives, compliance and awareness raising) through which real innovation is demonstrated in addressing this issue.
A review of the current allocations system and support for current homeowners in settled areas facing anti-social behaviour due to tenants placed in homes adjacent to their properties.
Data provision needs to be significantly enhanced to ensure more effective benchmarking of the impacts of housing on the economy, on health and on education.
Establishing location specific baselines and monitoring/evaluating the impacts of housing within district council areas would provide a powerful evidence-based tool for policy makers.
The need for good engagement with a wide range of stakeholders, including communities and scholars (who are experts in the field of community planning, architecture, anthropology and oral history).
The Strategy must recognise specific challenges faced by rural communities in terms of infrastructure, internet access, road conditions, provision of water, electrical and sewage connection and land access.
Housing development policy should cater for the needs of rural towns and surrounding areas and should recognise the needs of different target groups, as a 'one-size-fits-all' approach is inappropriate and should recognise the needs of different target groups.

> **"To what extent do you agree that it should be a priority to deliver more shared housing developments throughout NI?"**

While 33 of the 74 respondees (45%) did not respond to the question, of those who did respond 13 strongly agreed and 20 agreed. Only 4 respondees disagreed or strongly disagreed and the remaining 4 respondees neither disagreed nor agreed.

Significant issues remain in terms of the segregation of housing and a lack of integration. Some commented on the fact that single-identity housing estates often strengthen and perpetuate the grip of paramilitary organisations. So while single identity communities often reflect the values and culture of its constituent community as such they may not be truly sustainable communities and may foster inward and backward-looking communities often blighted with deprivation[26]. One respondee suggested that shared housing could be achieved through the reform of the Housing Selection (allocation) Scheme to allow priority for social cohesion rather than only for housing need.

It was also noted that across Northern Ireland 90% of Housing Executive estates are segregated (94% in Belfast). Consequently there is clearly a need to deliver more shared housing developments which will complement and contribute to the ongoing peacebuilding process between and within communities.

Reference in this context was made to the Executive's Together: Building a United Community (T: BUC) Strategy[27] and vision.

25 https://www.architecture.com/about/policy/climate-action/2030-climate-challenge

26 For example one respondee noted that **the discriminatory and sectarian patterns of the past stubbornly persist**. Social housing need and homelessness continue to be overwhelmingly concentrated in poor Catholic communities, while peace walls continue to mark the sectarian demography of Belfast City. Acres of empty land adjacent to peace walls preclude housing by policies designed to secure sectarian fault lines drawn during the conflict. These same underdeveloped interfaces, effectively designed to act as buffer zones, attract sectarian disturbances over and over again It was strongly suggested, however, that ongoing sectarian disturbances across the city are not grounds to maintain the policies of the past. - They should have no place in shaping policies determining who can live where.

27 https://www.executiveoffice-ni.gov.uk/topics/good-relations-and-social-change/together-building-united-community-tbuc

In particular it was suggested that the success of T: BUC Housing for All has proved the concept that people would prefer to live in shared housing rather than single identity areas. On the other hand one respondee expressed their concerns of inertia due to: "ineffective government policy from allocation lists to political objection to planning applications".

The term 'shared housing' needs to be defined in a way that not only reflects the importance of a mix of political and religious views in local areas but also gives consideration to shared housing amongst individuals with different levels of income, from different ethnic backgrounds as well as groups considered under section 75 of the Northern Ireland Act. The creation of mixed communities which come from a wide range of incomes and backgrounds - could enrich society and would help erode stigma around particular areas. The Local Development Plan process will help achieve mixed communities.

There was a call for the NI Executive to be much more ambitious around the delivery of new homes for all tenures throughout Northern Ireland and that collaborative work is undertaken with local community and elected representatives to support all new homes being safe and welcoming for all, irrespective of community background.

Finally one respondee suggested that while segregated housing in Northern Ireland is not the way forward people need to feel safe where they live. Consequently the actions needed to encourage and incentivise integration should go beyond a narrow focus on community background and cover all Section 75 grounds as well as a range of public policy domains such as shared education, employment, shopping and places of leisure.

> **"How can more shared housing developments be delivered here?"**

A number of respondees agreed[28] that shared developments should form a key component of reforming the housing allocation system, with suggested changes including:

- The creation of a 'shared housing' option should be included in the application process for all new applicants;
- Undertaking more in-depth consultation with communities and working at a pace with which they are comfortable with; and,
- Promoting inclusive growth in local areas and clustering in rural areas in settlements where there are high levels of residential segregation by clustering small settlements that are largely single identity from both sides of the community

It was also suggested that the definition of "shared" should be expanded to various target groups such as:

- The elderly, in care and assisted living;
- Communities of interest (rather than communities of culture);
- Linking housing solutions to social issues (e.g. safe houses for women; community living for single men; supported housing/community living, micro developments for transitional independent living[29]);

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28 Although it is important to note that one respondee raised the question of whether shared housing should be promoted at all: "are we certain it is actually desired, however desirable? What have we learned from and what does the experience of our current shared housing schemes tell us about whether we should or how far we should?"

29 However, it was noted by one respondee that Councils in England have decided that new mixed developments, which don't have the support staff and assistance obtainable in many of the existing, purpose build developments, are not the place for people with complex needs.

- Access into private rented sector for those on the housing list (by capping private rents/ providing rent bonds/ creating models of floating support alongside private renting);

- Mixed tenure developments which include a mix of transitional, student, social and supported housing alongside family accommodation; and

- Developing a set of shared spaces principles: for example, the shared spaces principles developed as part of Belfast City Council's Good Relations Strategy namely welcoming, accessible, good quality and safe.[30]

One respondee suggested: increasing the target and funding for the T: BUC - Housing For All programme; the need to pay more attention to communities as a whole as opposed to selected community 'representatives'; the importance of taking a strong stance on flags/painted kerbstones/ murals[31]; and, engaging in wider political work to engage with community representatives to break down barriers to shared housing.

Finally, one respondee suggested that while recognising the huge challenge of moving away from a 'decades old policy' of the sectarian segregation of housing, a shared approach needs to be mainstreamed so that all new schemes are presumed to be shared housing. Stronger sanctions for those who break the ethos of shared housing schemes may be necessary. The unwillingness of the authorities to intervene could mean that private developers view mixed and shared schemes as being "too high risk".

> **"To what extent do you agree that housing should be an integral part of the care and support system?"**

While 35 of the 74 respondees (47%) did not respond to this question of the 39 who did not respond, 23 strongly agreed and 12 agreed. Only 1 respondee disagreed, 3 others neither disagreed nor agreed.

Overall respondees emphasised that independent living should be supported wherever possible. As a result, the development of the Housing Supply Strategy needs to be linked to the reform of health and social care in Northern Ireland, particularly if initiatives and policies such as intermediate care progress and the treatment and care of (older) people are delivered in non-hospital settings. Any investigation of health-based issues (either physical or mental) needs to inform housing-based issues and will require a joined-up approach with other government Departments, local councils and various specialist support groups.

In relation to disabilities the right housing (e.g. adaptations for the disabled), in the right place (close to services, amenities, public transport, family and friends etc.) is an integral part of the care and support system. Frustrations are often experienced by those with a disability in trying to work with two to three statutory players in order to access an agreed and adequate care package and the impact of delays on the wellbeing of those waiting for decisions. Streamlining the housing allocation function and assessment of care packages under the remit of one statutory body could help to address these delays.

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30 Welcoming - Shared Space should be welcoming, where people feel safe to visit and to take part in activity within that space, increasing an overall sense of shared experience and community - Activities within the public spaces will respect diversity and promote inclusion; Accessible - There will be equality of opportunity afforded to all those using public spaces and accessing goods, facilities, and services - Public expressions of identity will be respected and respectful - Shared Spaces should reflect the values of diversity and inclusion; Good quality - Shared Space should be good quality, with attractive, high quality services and well-designed buildings and spaces; and Safe - Shared Space should be safe for all.

31 The publication and recommendations of the Flags, Identity, Culture and Tradition (FICT) report is still outstanding, the recommendations within which are an important part of developing sustainable shared housing.

Another submission noted that children and young people experiencing homelessness often leads to: "an overwhelming sense of displacement... (resulting in) a number of practical, emotional and behavioural challenges," and can: "cause severe emotional trauma leading to emotional stress, anxiety and problematic behaviours." The potential impact of dislocation and insecure housing on mental health, attitudes and behaviours, educational attainment and access, social networks, access to health and hygiene facilities as well as clothing and possessions all inherently link housing to the care and support system.

For young people, the experience of being homeless is distinctive in that they are often leaving or are forced to leave relationships based on social dependence (e.g. a parent or guardian) and are required to handle the challenges of adulthood before gaining the necessary skills or experience to do so. This means youth homelessness solutions must be tied to social care support and the Strategy will need to acknowledge and promote the integral role housing plays in creating contexts where children and young people can access care and support when needed.

One respondee suggested that with an aging population a grant should be available to both cover and encourage adaptations of homes for older people. Specific housing for over 60's, 'empty nesters' should be supported and encouraged to free up family homes for the next generation. The promotion of adaptations - with associated leisure, care and social facilities - should be given planning gain status.

Others referenced the 2017 Expert Advisory Panel on Adult Care and Support[32] which noted that extra care, retirement villages, and forms of supported housing:

- Combine the benefits of maintaining your 'own front door' with preventative intervention and improved outcomes for people; and

- Create a hub within communities to provide access to social events, information and advice

A number of respondees also discussed the wide range of benefits and savings of increasing housing options for older people particularly in relation to the health and social care budgets.[33]

Local government responses concurred with a "whole system" approach to housing and public health. In particular, providing early intervention support creates benefits in the long term. This could be best achieved if the focus was more on prevention with the appropriate resourcing and funding to housing providers/partners. Also, given advances in technology, reference was made to housing organisations[34] embracing new ways of engaging with vulnerable residents so that they are safe in their homes.

Finally a number of respondees proposed that all ten recommendations outlined in the Bamford Review (Equal Lives) in 2005[35] continue to be relevant today in 2021 and should be taken into consideration as evidence for the future Housing Supply Strategy.

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32 https://www.health-ni.gov.uk/publications/experts-report-adult-care-and-support
33 Moving to more suitable accommodation has the potential to reduce domestic maintenance for the householder, offer financial savings through lower household bills, release funds for future property maintenance and repair costs, and possible care needs. It also has the potential to help us maximise and capitalise on the huge contribution that older people make to families and wider civic society.
34 e.g. : https://www.hcil.com/
35 https://www.health-ni.gov.uk/publications/bamford-published-reports

> **"What challenges do you see in delivering a wider range of housing types, e.g. housing more suited to the needs of older people or those with disabilities and how can these be overcome?"**

Challenges identified for delivering a wide range of housing types included: funding and viability; effective leadership, with a commitment to developing new types of housing schemes; political stability; and flexibility of housing type. Specific challenges included:

- Gaining the agreement and support of stakeholders such as the construction industry, landlords and the wider public;

- Achieving effective collaboration across government departments, local government, and bodies such as the Housing Executive;

- Procuring investment for large-scale, medium-term building programmes;

- Effectively promoting a cultural shift away from remaining in cold, ill-adapted and poorly maintained homes;

- Shifting the perception of houses as an asset to be left to family members (i.e. state-sponsored programmes which assist older people to move easily and still retain equity in a property, should be considered to allow for greater access to housing options); and,

- Ensuring all housing stock is 'age-friendly' from design to construction given that as we age, almost all of us will at some point require accessible housing and adaptations. (so duties to recognise this need should be introduced for all new buildings and within reason for all renovations)

As per previous responses various comments also focused on the need for reform of the allocations system. For example, vulnerable groups need floating support and housing providers should be given funding to deliver this. Support to the community and voluntary sector to deliver adequate provision should be promoted although there was a call to review the way in which the housing and care needs of those with a learning disability or autism are assessed by trusts, including a review of communication mechanisms used by professional staff.

Reform of the Self-Directed Support / personal budgets was also highlighted. This would mean disabled people could remain in their family home and community with familiar support. The same applies to older people who are given a personal budget for support that can be used flexibly. Similarly for disabled people, living in the communities where they have grown up, is generally the best place to keep them safe from abuse, oversee that they are receiving quality care and support, have their rights upheld, and increase the possibility for inclusion.

In addition, housing that can be more readily retrofitted so as to remain disability accessible would have a number of benefits. It would help in ensuring rights to equal access and suitable provision for the disabled. It would also help future proof housing stock for a population that is increasingly ageing and will require easily accessible housing as they age. It would also alleviate the upheaval and emotional stress caused when a tenant must move to more accessible accommodation from a home they may have lived in for a long time and feel comfortable in. The NI Human Rights Commission (NIHRC) recommends the supplementing of the

DfC target of 10% of new build housing being disability accessible by making more new build houses easily adaptable to become disability accessible in the future.

Whilst DfC/NIHE has supported the delivery of accessible social rented housing, to date there has been no requirement for the private sector to deliver on this need. Currently, under disability discrimination legislation, landlords and managers of rented residential premises must make reasonable adjustments to the disabled person's home. In addition, they cannot unreasonably refuse permission for disability-related alterations to be carried out.

Landlords, however are not required to make disability-related alterations to the physical features of the common parts of let residential premises, such as stairs and hallways, even if they are reasonable to make and paid for by a disabled tenant. It was recommended, therefore, that disability discrimination legislation is extended to require landlords to make disability related alterations to the physical features of the common parts of residential properties, such as stairs and hallways.

Individuals with high support needs who are homeless can also find maintaining a tenancy challenging. However, in many cases, with the right support, these individuals can be supported to stay in a home and build flourishing lives[36]. 'Housing First'[37] for example, was cited as a "highly effective" means of intervention for individuals with high support needs and serious consideration should be given to expanding the number of 'Housing First' schemes in operation.

Local Development Plans (LDPs) can seek to improve the adaptability and accessibility of new housing through the requirements for all new housing to meet a number of criteria intended to improve adaptability and accessibility of units, as well as a proportion of all new homes across all tenures to be wheelchair adaptable.

Many respondees noted that Lifetime Homes standards or equivalent have been widely used in other UK jurisdictions to address many of these challenges, but in Northern Ireland such standards only currently apply to new social housing. In other jurisdictions, the Lifetime Homes standards are now being amalgamated into building regulations and it is argued that similar changes to the Northern Ireland Building Regulations probably represent the best mechanism to achieve flexible and adaptable housing consistently in the future. Many called for Lifetime Homes or an equivalent standard as a requirement for all new homes and buildings as well as a standard for wheelchair housing, similar to that included in the Department for Communities' Housing Association Guide developed within Building Regulations.

If these standards were adopted by the Department of Finance this would better allow LDPs to include a proportion of wheelchair standard housing as a requirement. This would also help ensure that knowledge and skills in the building design and the construction industry are developed. In addition an increase of accessible buildings would reduce costly, disruptive and carbon emitting adaptations, and would reduce the need for Disabled Facilities Grants, saving public money.

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36 In this context one respondee "strongly advised" that the Department seeks to engage with children, young people and their families who have experienced homelessness or are at risk of homelessness/experiencing housing stress to assess their needs with regards to housing types, particularly individuals who have high support needs due to mental health or substance use.

37 For example: https://homelessnetwork.scot/housing-first/ and https://www.homelessdublin.ie/content/files/Housing-First-Implementation-Plan-2018-2021-final.pdf

Finally since 2008/09 funding from Supporting People has been frozen. Many respondees noted the difficulties associated with the Supporting People Programme noting the commissioning process is "overly complex", it is "very difficult" to plan in specialist housing, and the lack of surety of funding going forward is detrimental to planning for these requirements.

> **"How important is mixed tenure to addressing housing supply issues in NI?"**

While 31 of the 74 respondees (42%) did not respond to the question, of the 43 who did respond 25 stated it was very important 16 fairly important. Only 2 respondees said it was not at all important.

Mixed tenure is residential development which combines a range of tenure options, which can include owner-occupier housing, shared ownership housing and rental properties (social, intermediate and private). The focus of mixed-tenure development is fostering a greater social, economic and community mix to support thriving and sustainable communities[38].

Many respondees noted that the advantage of mixed tenure in new or existing housing developments is that it creates a balanced social mix and as a result, the communities are likely to be more diverse and as a result more tolerant of one another. It can help to lessen the stigma attached to social housing and if well-designed can lead to the creation and maintenance of sustainable, thriving communities.

Respondees indicated, however, that provision of housing supply in smaller settlements in rural communities has had a mixed impact. What has been missing is a need for affordable housing in many rural settlements where people will not be eligible for social housing but cannot afford to buy in the private market.

There is a large number of young people who have either been in care or have complex family circumstances. These young people would benefit from community, shared or support housing and some of them would benefit in being able to create space between their previous community and their new housing options. There are positive models of housing (MACS / Triangle / Simon Community / Larche / Extern) but these need to be replicated elsewhere and new models introduced.

There was a cautionary note about mixed tenure from one respondee who noted that, while purposeful mixed tenure designed housing developments that include other forms of tenure is becoming increasingly an aspiration, most new mixed estates are not characterized by inclusive social networks. The hope is that: "the current models of mixed tenure estates will foster widespread mutual support between people from different economic groups and or introduce role models into an area appears largely misplaced." (Jupp, 1999, p.11[39]). Mix is, therefore, a necessary but not a sufficient precondition for sustainable communities: "tenure mix by itself will not guarantee the success of a development" (Allen, et al., 2006, p.4 [40])

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38 Many respondees noted the DfC/NIFHA think piece that pointed to five "potential and economic benefits of mixed tenure": reducing 'place and tenure-based' stigma; reduced levels of crime and anti-social behaviour; improved sense of community and social cohesion; better job prospects and improved school attainment; and improved physical and mental health of residents https://nifha.org/site/wp-content/uploads/2020/01/MTR-FINAL-Hi-Res-single-page-070618.pdf

39 Jupp, B. (1999) Living Together: Community Life on Mixed Tenure Estates. London: Demos.

40 Allen, C., Camina, M., Casey, R., Coward, S. and Wood, M. (2005) Mixed Tenure Twenty Years On: Nothing Out of the Ordinary. York: Joseph Rowntree Foundation

A collective local Government response noted that Council Local Development Plans and associated policies seek to nurture the development of balanced local communities by achieving an appropriate mix of house types, sizes and tenures, to secure mixed tenure housing developments and to build strong, inclusive and cohesive communities for people of all backgrounds. Mixed tenure development is seen as vital in achieving these aspirations and in avoiding many of the problems now associated with large areas of single identity social housing. Delivering more mixed tenure housing schemes will make a significant contribution to tackling affordable housing issues e.g. as in the case of Belfast LDP.[41]

Finally, one respondee challenged the Strategy to be visionary in its approach to sustainable housing, eliminating income thresholds and support across all tenures and income levels. It was noted that existing European models have demonstrated the effectiveness of this approach by creating mixed tenure communities where anyone who is in need can apply for social support based on their household income.

> **"What challenges do you see in progressing mixed tenure developments, and how could these be overcome?"**

Many respondees acknowledged that local councils' Local Development Planning will be key to progressing the mixed-tenure agenda in Northern Ireland. One respondee noted that more work needed to be done and further policies will need to be developed in relation to the provision

of affordable housing so that there is operational guidance as to how this will work in practice. The issue of developer contributions under section 76 of the Planning Act (NI) 2011 is of crucial importance to the delivery of the affordable housing envisaged in the Local Development Plans.

Many respondees noted that it is accepted that there are real challenges in progressing mixed tenure developments (as cited, for example, by the six challenges identified in the Chartered Institute of Housing report "Rethinking Social Housing").[42] One of the strongest challenges identified by respondees was the need to address the stigma associated with social housing. However, if shared and public ownership were developed and maintained at a higher standard, this issue could be overcome. Consequently, many respondees believe that there is a need to re-educate both the development industry, and indeed the wider community, on the benefits of mixed tenure development. Similarly 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 and the same.

Mixed tenure development appears, however, not to be an attractive proposition for private housing developers. They see social housing as a potential property value deflator. There is, however, little evidence to substantiate this view and many case studies to demonstrate that the provision

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41 Belfast City Council Local Development Plan draft Strategy includes Policy HOU5 (Affordable housing) requires that "affordable housing should be provided as an integral part of mixed-use development, integrated with general needs housing and not readily distinguishable in terms of external design, materials and finishes...... Affordable housing will be secured by way of section 76 planning agreement, which should be in place in advance of planning permission being granted." Policy HOU6 (Housing mix) - Planning permission will be granted for new residential developments on sites greater than 0.1ha and/or containing 5 or more dwelling units where the proposed development provides a suitable mix of house types and sizes to promote choice and assist in meeting community needs. Provision should particularly be made for smaller homes across all tenures to meet future household requirements.

42 "Adopt a common definition and understanding of the role and purpose of social housing; Ensure that tenants have a voice; Increase the supply of genuinely affordable homes; Ensure everyone can afford a place to call home; Make sure that existing homes and neighbourhoods are of good quality and well managed; and Challenge the stigma and stereotyping attached to social housing". https://www.cih.org/publications/rethinking-social-housing-northern-ireland-final-report

of 'tenure blind' developments, overcomes many of the issues which arise delivering successful neighbourhoods. A number of councils also believe that there is sufficient flexibility in design standards to enable tenure blind development to be achieved whilst meeting the differing requirements. Also a number of respondees noted that the right to buy for NIHE dwellings should be stopped in areas with less than 50% social housing to prevent existing social housing in desirable areas becoming solely private ownership.

The high cost of land means that profit-maximising tenures tend to be prioritised in developments. If land were available at a more reasonable rate – for example, existing use value plus a 20% premium then developers would have more opportunity to deliver a diversity of tenures within a given development.

From a public sector perspective if local councils had well-resourced land management teams and the ability to borrow or raise their own funding, the inherent value of their land banks or Compulsorily Purchased land could be leveraged to deliver housing and infrastructure. In NI a few councils have land management resources, and this is a factor in their deciding to sell council owned land directly to private developers to deliver housing. With added land management capacity, councils could maintain control of their land and have more control over the type and tenure of housing delivered.

One Housing Association respondee noted that if the stated objective of more mixed tenure development is to be achieved there is a pressing need to remove the legal uncertainty concerning the extent of the powers given to Registered

Housing Associations (RHA) under the current regulations (as set out in Article 15 of the Housing (NI) Order 1992). These regulations are adversely impacting on the delivery plans of associations. While there are a range of legal views on this, which adds to the uncertainty, housing associations believe by making that through a small number of changes/additions to the existing regulations, this issue could be resolved.

One council observed the great variation in the planning ratios for mixed tenure developments across council areas, some have no requirement, some 1:20 units, and some 1:50 units. It stated that a planning requirement for one social housing unit for every 50 built is completely inadequate. Additionally, some developers have submitted plans for 49 houses to avoid the requirement to include social housing in the build.

There was a view that co-ownership should be extended, with people given an option to purchase a 10% stake as opposed to the minimum of 50%. A few respondees suggested that the purchase limit of £165,000 should be lifted or removed as prices are rising.

Other specific comments in this context included the:

- Potential impact COVID might have on future eviction rates. As society opens again there may be a number of households who have stressed loans and who face eviction. These people are most likely to live in settled communities.[43];

- Need to work with the Private Rented sector and landlords to avoid evictions at all costs;

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43   In the Republic of Ireland iCare Homes exists which has already saved 400 households from losing their homes through a combination of support from banks, government and Approved Housing Bodies (Housing Associations) www.icarehousing.ie

- Concept of Equity Sharing in the Private Rented sector by allowing existing tenants to buy a stake in the property similar to Co-ownership rules (and this could be managed by a local housing organisation). Landlords could exit gradually, and tenants would be buying a stake in a property where they are settled in an area where they want to live; and

- Current inexperience of local councils in the provision of social housing and their small scale in comparison to councils in other parts of the UK is leading to the suggestion that a regional approach could be adopted to the establishment of appropriate quotas of social housing in the emerging LDPs

Equality and Human Rights

Overview

The introduction of this CfE identified that housing problems are a major contributor to inequality and insecurity and therefore that equality and human rights considerations[44] are fundamental to achieving the ambitions set out for the Strategy.

The first question posed in this section of the CfE was:

> **"The Equality Commission has framed local housing demand and supply in relation to three constructs – accessibility; adequacy; and sustainability. Are you content with this framework or are there other issues that may warrant inclusion?"**

Summary of Key Points

42 (or 57%) of respondees answered this question, 32 of whom concurred with the framing of local housing demand and supply in relation to the three constructs of accessibility; adequacy; and sustainability (per the Equality Commission framework). The other 10 respondees did not agree with this framework.

For the minority who do not agree with the framework, it is possible that some of their "objections" could be accommodated in the development of more detailed/ updated definitions of what is meant by each of the three constructs. Similarly, even for those who are supportive of the three constructs as a framework, it is widely viewed that there is a need to explicitly set out what is meant by accessibility, adequacy and sustainability[45].

One respondee noted, for example, that there was a need for a construct, or additional narrative, around an evidence-based/needs-based approach that can also accommodate the specific needs of some Section 75 groups, particularly where there are gaps/shortfalls in provision.

Other points raised included:

- A greater focus on the human rights perspective within the constructs and updating of the sustainability construct to include considerations such as well designed, technology enabled, energy efficient, lifetime design;

- The critical importance of quality/ failure to deliver quality in housing with supporting narrative that could be reflected in an updated definition under the 'adequacy' criteria; and

- How the organisations delivering housing within this reference framework will be held accountable for performance against each construct

> **"In addition to the inequalities or data gaps already identified in the Equality Commission's Statement and the Wallace Report, are there any other issues that should be considered?"**

Over half (55%) of the 74 respondees did not answer this question. Of those who did respond to the question, there were around twice as many who felt there were additional inequalities/ data gaps to focus on, rather than not.

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44 As detailed in the Equality Commission NI (ECNI) statement "Key Inequalities in Housing and Communities": https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/HousingCommunities-KeyInequalitiesStatement.pdf

45 For reference the existing definitions of each in the ECNI (2017) Statement on Key Inequalities in Housing and Communities are **Accessibility** of housing – the opportunities to secure housing; **Adequacy** of housing – the housing meets cultural, physical or other needs and is safe; and, Sustainability of housing – the tenure is secure and affordable in the long term.

One submission highlighted concerns that: 'there remain significant and specific data gaps across a number of themes in relation to a number of equality categories, specifically: gender; gender identity; religion; race; political opinion; and sexual orientation. In addition, there is a lack of data disaggregation in relation to: ethnicity; disability status; marital status; and, dependency status'.

Similarly, another submission highlighted the need for better visibility of housing stress and homelessness by Section 75 groups, which is presently constrained by the availability of suitable data.

In contrast one of the council submissions suggested that data gaps and how they relate to inequalities have been better highlighted through an increased use of the Outcome Based Accountability (OBA) approach to community planning. This in turn, has increased the ability to extract knowledge and insights from structured and unstructured data that: 'is becoming central to how we apply actionable insights across a broad range of policy areas'.

Fnally, over and above the points of concern/ inequalities cited in the Wallace report, Table Eleven below, summaries respondees views of other additional issues/ specifically defined groups experiencing inequalities.

Table Eleven: Other noted inequality examples

Comments
Women and men who are victims and survivors of domestic abuse (giving rise to risk of homelessness)
Single males (often not treated as a priority group)
Deterioration in gender equality for women in recent years (that can make women more vulnerable to issues around housing availability and affordability
Lack of suitable housing/ accommodation for learning disabled and/or autistic people (exacerbated by COVID)
Access to appropriate accommodation for Irish Travellers (albeit that NIHE have recently completed research/ plans on this)
Young people aged 16-25 (particularly those with vulnerabilities). Young people who work with the youth justice system. Young people (under 21) leaving care.
More insights needed of housing impacts on children and child poverty
Absence of data in respect of transgendered people and their housing needs
Difficulties faced by asylum seekers in temporary accommodation
Victims of intimidation
Individuals subject to paramilitary control
Individuals in receipt of Housing Benefit or Universal Credit (with 'No DHSS' remaining a feature of the NI private rental market)

> **"In relation to the issue of using multivariate analyses (Multivariate analysis is analysis that considers the impact of more than one Section 75 characteristic), are you aware of any work already undertaken that would be useful?"**

With the exception of 2 consultees all other respondees were either not aware of any work in this field or did not answer the question. The key points raised by the 2 responses were:

- Within the field of equality there is an increased focus on multivariate analysis, related to intersectionality (intersectionality recognises that individuals can experience discrimination on the basis of multiple and intersecting identities);

- That the women's sector in NI has long stressed the need to consider intersectionality as disadvantage and discrimination based on gender is inextricably linked to other identities, factors and experiences such as age, race, disability, sexual identity, etc; and,

- The importance of intersectionality is addressed in a number of international human rights treaties

Housing Supply in Rural Areas

This section of the CfE initially highlighted some of the key challenges of living and working in rural areas, most notably, that: services are often less accessible, housing is more unaffordable; and basic needs are hidden. The greatest barrier to increasing supply in rural areas was identified as accessing land, with partnership planning and community led housing highlighted as potential vehicles to deliver much needed affordable homes. The first of the three questions posed in this section was:

> **"To what extent do you agree that the Housing Supply Strategy should address the need for affordable homes in rural areas?"**

There was a general agreement that the Housing Supply Strategy should address the need for affordable homes in rural areas. While 25 of the 74 respondees (34%) did not respond to the question 22 respondees strongly agreed and 17 agreed that there was a need to address the need for affordable homes in rural areas. Only 1 respondee disagreed and the remaining 9 neither agreed or disagreed.

Overall the provision of affordable housing options is perceived as critical in securing the future of rural communities. In particular, the lack of housing options for young families, first time buyers, and low-income households is causing people to relocate to where they can access a home that they can afford. This has the potential to adversely affect the sustainability of local services, primary schools, and local businesses.

Other factors identified included: a shortage of social and affordable homes[46] 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.

While some respondees believe that the Housing Supply Strategy can mutually support the Housing Executive's Rural Strategy, others suggest that there is a need for a sustainable Rural Housing Development Strategy that would facilitate a more sustainable, affordable, and inclusive model for future housing provision within rural communities.

There was also a view that the Department should actively seek the participation of rural communities in the design, framing and implementation of housing strategies in rural communities and that it should work with District Councils to ensure that community planning processes fully recognise the need for appropriate housing strategies and access to affordable housing in rural areas. Others highlighted the importance of meeting the targets for new build social homes in rural areas and the need to identify innovative mechanisms in achieving these targets.

In contrast, several respondees cautioned against over-development or unsustainable development in rural areas that potentially could have a detrimental effect on the environment explaining that housing in rural areas should be carefully managed to prevent "sprawl" which has

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46   CfE responses, and some of the focus groups, outlined issues associated with a lack of affordable homes in rural areas including social isolation, declining social cohesion as people struggle to afford housing in areas with which they have a natural affinity, mental health issues, a growing lack of services, rural poverty, fuel poverty and a rise in house prices or rents across many rural areas.

a negative impact on the countryside, on climate change, and makes it inefficient and expensive to provide public services.

Fuel poverty was noted as a significant issue for many in rural areas (In 2016, 31.5% of all households were in fuel poverty). Other related issues cited were that many homes in rural areas are older, solid wall properties with poor insulation and use non-regulated fuels to heat their homes. One respondee noted that there has been a significant rise in "unfitness in private sector housing stock" in rural areas from 4% in 2006 to 9% in 2011 and 5% to 14% in isolated rural areas. Opportunities to retrofit older homes and addressing carbon related issues were also identified.

Homelessness in rural areas was also cited as a sometimes less visible issue in rural areas with one respondee indicating that between 2016 and 2020, around 12% of households presenting to the Housing Executive as homeless came from rural areas.

There was also comment about the effectiveness of the requirements to set aside a percentage of developments over a certain size for affordable homes in relation to rural areas. In most rural areas, developments of the size to trigger a percentage requirement for affordable housing do not take place. Consequently, this requirement does not generally generate more affordable housing in rural areas.

Other comments related to the lack of awareness among some rural dwellers about their eligibility to access social housing pointing to the need for a potential overhaul in the way in which latent demand is currently assessed. Misunderstandings over eligibility are common amongst young

people in general and more common amongst rural residents. Clearer communication on how the social housing system operates amongst these target groups should be addressed

A number of initiatives were suggested as a way of addressing affordable rural housing need including Equity Share Schemes, Rural Community Land Trusts (e.g., Glendale Gateway Trust); Housing Co-operatives, particularly in relation to poverty and self-build initiatives. One respondee highlighted a good practice initiative in Wales ie the Rural Enablers Project[47] - which has demonstrated some success in increasing the number of social homes in rural areas.

Many respondees highlighted the lack of affordable rent in many rural areas and the need to increase the range of intermediate housing and mid-market rents options.

Infrastructure issues in many rural towns was cited by several respondees as a barrier to addressing rural housing supply generally. This included issues associated with accessible, convenient and frequent public transport, the lack of appropriate Wastewater Treatment infrastructure in some towns and villages, broadband access and broadband black spots. One respondee also believed that modular new builds would work well for rural areas. Others pointed to the need for an uplift in Housing Association Grants (HAG) in rural areas.

One set of respondees cited research which highlighted the lack of temporary accommodation in rural areas for those in need with much of what is available located in clusters around Belfast and Derry/ Londonderry. This is a particular issue for those who need to be close to local and family support networks.

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47 https://gov.wales/sites/default/files/statistics-and-research/2018-12/140117-evaluation-rural-housing-enablers-summary-en.pdf

Many submissions also highlighted the limited availability of affordable housing options for target groups like older people or those with disabilities in rural areas, young people, LGBTQ+, while also outlining that the private rented sector is longer viable.

> **"To what extent do you agree that community led housing should be supported and enabled in rural and urban areas across NI?"**

Community-led housing is a localised approach where the community leads the delivery of affordable homes to address housing needs within their area. These are affordable to local people and are often innovatively designed to maximise energy efficiency and thermal comfort and to minimise the impact on the environment. Community-led housing can take many forms including:

- A Community self-build scheme with groups of local people building homes for themselves with external support;

- Co-housing schemes where people come together, often as a Housing Cooperative, to provide self-contained, private homes for themselves, but manage their scheme together and share activities, often in a communal space; and,

- Communities working in partnership with a housing association, local authority, or private developer to provide homes for affordable rent or home ownership

There was a general agreement that community-led housing should be supported and enabled in rural and urban areas across NI. While 53% (39) respondees did not respond to the question,

of the 35 who did respond, 11 strongly agreed and another 18 agreed. No-one disagreed but 6 respondees neither disagreed nor agreed).

Some of the main issues and opportunities highlighted included:

- Developing innovative, co-operative models of shared ownership could lead to housing affordability for many people in rural areas;[48]

- The 'cohousing' model where homes are developed for sale or private rent and tenants/owners are members of a cooperative; and

- Intermediate housing products delivered in a joint venture between a community group/nominated housing association and local architect/contractor with experience of designing/delivering low carbon homes

There was, however, caution raised by a few respondees who highlighted the need for capacity building of communities embarking on such schemes, particularly where this capacity was currently weak. Another concern was the need to acknowledge that invisible divisions exist in rural areas between people of different community backgrounds and traditions which may limit access to services for residents of some areas or create duplication of services in others. As such, support is required to contribute to the development of safe, cohesive and engaged rural neighbourhoods across NI.

> **"How can additional innovative multi-agency projects (or approaches such as 'Tackling Rural Poverty & Social Isolation') be created to deliver more affordable housing supply in rural areas?"**

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48   The "Cost Rental Vienna model" was cited - the cost rental model is a way in which a state or local authority can provide affordable, high-quality rental accommodation to low or middle-income earners. The rent charged only covers the cost of delivering, managing and maintaining the home and, therefore, the rent is not driven by market movements.

Additional multi-agency projects may be able to draw down funding to meet other policy delivery objectives e.g. in relation to older people, women, people with disabilities, fuel poverty that require services to be wrapped around social housing. In this regard respondees highlighted:

- Multi-agency projects such as TRPSI[49] could be used in future to support additional service delivery alongside the development of social and affordable housing in rural communities. Housing Associations stated that small

numbers of social houses in small settlements dispersed over a wide rural hinterland, are not necessarily more expensive to build but are more expensive to manage. Additional multi-agency projects may be able to draw down funding to meet these requirements; and

- Developing local housing co-operatives similar to the Welsh Government, the Wales Co-operative Centre and the Confederation of Co-operative Housing working together[50]

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49 "The Tackling Rural Poverty and Social Isolation (TRPSI) Framework is a rural initiative led by the Department of Agriculture and Rural Development (DAERA) which aims to tackle poverty and social isolation in rural areas through organisations working in partnership to design and implement measures which target the needs of vulnerable people". https://www.daera-ni.gov.uk/articles/tackling-rural-poverty-social-isolation-new-framework

50 www.cch.coop; https://www.cch.coop/clh-case-studies/

Housing and Poverty

This section of the CfE outlined the linkages between housing and poverty - as housing is a major part of household expenditure it often has a direct effect on material deprivation. It also highlighted that there are many social, educational, financial and economic drivers that push increasing numbers of households into housing stress – which in turn puts increased pressure on supply. In this context, a key issue identified for consideration was how to take a holistic approach to addressing these challenges. Five questions were then posed in relation to such an approach, the first of which was:

> **Is there a need for this Housing Supply Strategy to play a role in reducing poverty?**

42 (57%) respondees indicated that the Strategy should play a role in reducing poverty, 3 respondees indicated that it should not and the remainder of the respondees (29) did not answer the question.

Overall respondees anticipate that the Strategy has the potential to reduce poverty if bold steps

are taken to ensure a fairer system and realise ambitions such as having 'no such thing as homeless people' and 'ensuring no households are left behind'.

Many of the responses also highlighted the need for the Strategy to be strongly linked to the ongoing development of the Anti-Poverty Strategy (APS). It was noted that housing has been included as a cross-cutting issue in the Expert Advisory Panel's recommendations to DfC

for an Anti-Poverty Strategy. Consequently, the concurrent development of a new HSS and Energy Strategy, alongside the APS and plans for a new Fuel Poverty Strategy presents an opportunity for greater policy alignment and the creation of a whole system approach to supporting the vulnerable in poverty, addressing fuel poverty and substandard living conditions and improving health outcomes.

In addition, responses referenced the extensive data and research material that exists to evidence the clear links between inadequate housing (homelessness, housing conditions, fuel poverty) and increased poverty. In effect, poor quality housing exacerbates and intensifies the issues faced by people experiencing poverty. The issues and actions considered in the report by the Committee on Climate Change and its Adaptation Committee[51] was cited as a key reference point for many of the relevant considerations in this area.

Over and above housing quality, the location of housing was also cited as a factor that can play a part in reducing poverty. Locating affordable housing close to local services - and in easy reach of affordable public transport - can also reduce travel poverty and give communities better access to a choice of affordable services

In this context there is also the requirement (in any given location) to ensure there is an appropriate mix of owner-occupation, private renting, and social housing. However, respondees highlighted that a lack of social housing has created an unbalanced housing system and shifted demand onto the private sector, pushing

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51 https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/

up prices and reducing the affordability of home ownership and private renting. On this basis social housing stock must be substantially increased with appropriate mix of unit sizes to meet forecast needs.

It is also noted, given the above, that while the CfE rightly highlights the impact of issues with housing costs and low incomes on social tenants, there is insufficient focus on the relationship between housing costs and poverty in the private rented and home owner sectors as:

- Evidence from Universal Credit (UC) claims suggests that Private Rented Sector tenants have been in a more precarious position with regard to paying for their housing costs than social tenants were;

- Three quarters of the COVID-19 related calls to 'Housing Rights' Helpline were from people living in the Private Rented Sector with affordability being one of the key issues raised;

- Evidence from the NIHE Housing Condition Survey 2016 that: "the tenure with the highest proportion in fuel poverty in 2016 was the private rented sector"; and,

- The loss of rented accommodation consistently being one of the top causes of homelessness

Other specific comments included:

- Reference to the needs for additional housing provision/ options for individuals leaving the criminal justice system, where lack of provision currently hampers efforts to reduce poverty and can perpetuate the risk of involvement in criminal activity;

- Substituting "homeless people" (as homelessness does not define people who experience it). to "individuals/ households experiencing homelessness"; and

- Considering practice elsewhere in GB to increase stability and security for people in poverty including actions by social housing providers and local authorities to:

  - Offer stable tenancies across the social and private rented sectors;

  - Work with local authorities to offer housing to homeless individuals, and promote a Housing First programme;

  - Help tenants whose circumstances change to switch their tenure status, e.g. from home ownership to shared ownership or renting; and

  - Ensure any proposals to regenerate estates involve existing residents, and link to wider economic development strategies

> **"Currently housing stress is identified as 'those experiencing intimidation, insecurity of tenure, housing conditions, health and social wellbeing issues'. Do you have any comments on this definition of housing stress or are there other causes of housing stress that need to be considered?"**

28 respondees had additional comments to make on the above definition with the remainder being either content with the definition or they did not answer this question.

Several of the additional comments referenced the fact that the definition is too broad and could benefit from specificity (e.g. what exactly is meant by 'health and social wellbeing issues). Other suggestions included the need for the definition to:

- Also reflect financial stress arising from lack of affordability by including dimensions such as fuel poverty;

- Move beyond a view of intimidation that is sectarian only, to include for instance victims

of domestic abuse, homophobic abuse and stresses from anti-social behaviour;

- Recognise the stress that can be caused by inappropriate housing for adults with disabilities and their carers;

- Better reflect the needs of individuals leaving the criminal justice system;

- Be broadened to include the specific housing stress factors experienced by the 16-25 age group and the more vulnerable groups within this age-range;[52] and

- Include reference to overcrowding / under occupation as household compositions change

Various responses questioned whether the subsequent Strategy will reflect the current practise of a person being deemed to be in "housing stress" if they are awarded 30 or more points[53] under the Common Selection Scheme. If not an alternative will need to be considered and subject to further consultation. Finally, for whatever approach is adopted it was suggested that data gathered on those in housing stress should be disaggregated across all Section 75 groups.

> **"To what extent do you agree that more needs to be done from an interdepartmental perspective to improve the lives and life chances of those who are homeless or at risk of homelessness?"**

37 responses (50%) either strongly agreeing / agreeing and almost all other respondees not providing any comment. In summary there was strong agreement on the need for more inter-departmental working in relation to the prevention and alleviation of homelessness both by building on existing policy initiatives and introducing new measures to enhance a whole system approach to this issue.

It was also noted that failure to invest in preventing (not reducing) and alleviating homelessness is not cost neutral. In addition to the human cost, homelessness has significant[54] financial implications across the public sector as adequate funding for homelessness prevention will save spending across a number of departments including Communities, Health and Justice.

Existing positive developments that can be built upon in this regard include the advent of the Homelessness Strategy Steering Group (HSSG); the Interdepartmental Working group on homelessness; and joint working between the Department of Health, the Department for Communities and the homelessness sector, around responding to the Covid-19 pandemic through the Multi-Agency Group.

Suggestions for building upon the above included:

- Commitment by the Northern Ireland Executive PfG to a 'standalone' housing outcome with relevant indicators included which are relevant to homelessness and the alignment of Executive budget to ensure delivery;

- The introduction of a legal duty to co-operate put on Executive Departments and statutory bodies to prevent and reduce homelessness to develop more effective inter-departmental working and provide for greater accountability;

- Treating the HSS (as DfC intends) as a cross-cutting Strategy for the whole Executive, not solely DfC;

- Focus on prevention for particular groups, for instance, individuals leaving the criminal justice system, people with a disability and those people facing homelessness in the event of death/ illness of ageing parents; and

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52 such as young care-leavers, disabled young people, young carers/young adult carers, young people in rural areas, young members of the LGBTQ+ community, young members of BAME communities as well as those impacted by the high levels of youth unemployment.
53 Points are awarded under categories which include "intimidation, insecurity of tenure, housing conditions and health and social wellbeing issues."
54 Northern Ireland Audit Office (NIAO) 2017 report on Homelessness in Northern Ireland.

- Better joining -up of policy in respect of mental health, alcohol and drug addiction support services with the prevention (and alleviation) of homelessness

How do we help homeless people transition from temporary accommodation to long term homes?

Reference in the CfE was made to the work commissioned by NIHE in 2020 in relation to a [55]strategic review of its Temporary Accommodation portfolio, which outlines a number of barriers which impact on the ability of households to transition from temporary accommodation to long term options[56].

In this context several responses highlighted the need to explore and commit funding to delivering a Housing First Model that provides people who are homeless with tailored and sometimes intensive care and support as they move and transition to permanent housing.

It was also suggested that the Housing First model could be extended to those who do not have acute needs, so that no one should be living in temporary accommodation for longer than is necessary. Thereafter responses highlighted that transition from temporary accommodation into longer term homes, requires support not only to access but to sustain long term tenancies (particularly in the private rented sector, where tenants do not have access to the same support infrastructure provided by social landlords).

Finally, several responses cited examples of supported living arrangements:

- 'Foyer Federation Schemes'[57] for young people which improves their ability to maintain tenancies;

- Active housing management interventions such as 'concierge provision';

- Community living and move on accommodation (e.g. Emmaus UK[58], Ipswich Council, Social Bites[59]); and

- The Settled Homes for All[60] service aimed at helping people experiencing homelessness into long term homes

"To what extent do you agree that housing plays a significant role in reducing economic inactivity/enabling individuals to take up employment?"

34 responses to this question were received all of which either agreed or strongly agreed with the statement above. In essence, high-quality, safe and affordable housing is viewed to be critical to maximising people's life opportunities to access and sustain employment. The lack of a fixed address can be a barrier to securing a job particularly for certain groups (e.g. those leaving the criminal justice system).

More generally it was noted that housing can play a key role in economic development and consideration in the new Strategy should be given to improving the use of housing as an enabler of economic growth. Finally, several responses highlighted the importance of social enterprises and social clauses in this regard, both of which make an important contribution to combatting poverty by driving and delivering inclusive economic growth.

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55   https://www.campbelltickell.com/2021/02/09/northern-ireland-housing-executive-strategic-review-of-temporary-accommodation/
56   One barrier cited is that in some cases households in temporary accommodation are not 'tenancy ready' due to particular complex needs they may have. For those households who were 'tenancy ready' the main barrier was a "lack of suitable housing" to move to, which in turn highlights the importance of increasing the supply of genuinely affordable housing options while also addressing issues such as: the need for deposits, rent in advance, delays in receiving welfare payments and a lack of furniture provision.
57   https://www.foyer.net/
58   https://emmaus.org.uk/
59   https://social-bite.co.uk/
60   https://www.weareac.org/settled-homes

03
Land and property

Land and Property

Overview

This section of the CfE initially highlighted that the availability of land cannot be viewed in isolation from the availability and accessibility of infrastructure and amenities and viability of development. Key issues for consideration included: the availability of public land and the processes for its disposal; adaptation and re-use of land and buildings; changing patterns of need and demand; and, linked to these issues, the more equitable distribution of resources. Finally, as a potential mechanism to help transform housing supply, there was support for an opportunity to introduce a new organisation to focus on land reform and land assembly activities (as in other jurisdictions including Scotland, England and the Republic of Ireland[61]). Three questions were asked on this topic, the first of which was:

> **"Are there changes to land & property legislation, policies, processes or procedures that could transform housing supply for the better?"**

In relation to increasing land availability various suggestions were provided including:

- Zoning more land in each local council area;

- Supporting a joined up approach across the public sector to identify and collate land ownership details and identify land with potential for housing;

- Optimising the existing DoF LPS surplus land disposal process in favour of housing;

- Increased use of vesting/compulsory purchasing powers in selected circumstances by DfC and/or NIHE thereby enabling government to provide "spade ready" sites;

- The need for a more joined-up approach aimed at bringing forward public sector land (local and central) for housing of all tenures; and

- Creating a database of all public sector land and property holdings (local and central) and undertake full digitisation of the Land Registry

In addition - in order to improving market efficiency, risk management, performance management, and managing negative equity, helping banks "move debt" and bolstering evidence based decision-making - various suggestions were made in relation to data and digitisation to improve: access to house price data, valuation data, development outturn cost data, Total Cost Indicator data, data on public land holdings (local and central), price paid data, information on planning permissions granted and future housing development plans.

Many respondees also commented on existing statutory rules and referenced: increased use of vesting powers in selected circumstances; streamlining and concurrence of legislative instruments and the requirement to update the Northern Ireland building regulations (e.g. they should be aligned to the UK Climate Change Committee (CCC) Ultra Energy Efficiency Standard). The opportunity to review the powers of registered housing associations to ensure that housing associations can undertake a modern role in the development of housing supply in NI was also highlighted.

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61   Specifically: The Scottish Land Commission; The Homes and Community Agency; and, the ROI Land Development Agency

A number of comments were also received in relation to planning, including a statement suggesting that the: "planning system fosters flawed planning proposals that do not honour the ambitions of the LDP". More than one respondee indicated that a plan-led, adequately funded planning system that delivers consistent outcomes efficiently is crucial to generating confidence and ensuring the right type of houses are delivered in the right places. There was also a suggestion that the 'plan-led system', which was introduced by the Planning Act 2011, is not operating as expected.

Some respondees suggested that disincentives/incentives are required to help the housing system perform correctly including, for example:

- Amendment of the twelve-month developer exclusion so that councils can apply up to 100% of council tax once the exemption period lapses, whether remedial work is completed or not; and,

- Derelict or vacant property should be identified for purchase or redevelopment (and presumably made publically visible)

Finally, a number of suggestions to bring forward new approaches were advanced including supporting:

- Community land trusts;
- A wider range of finance options to set up community housing;
- A housing allocation system that recognises vulnerability in single males within the criminal justice system; and
- A wider variety of housing options

"Should the options for making public sector land (local and central government) available to support a wider variety of housing options be explored?"

The majority of respondees responded 'yes' to this question with only a small number objecting, or responding 'yes' with a condition that the land should be exclusively for public housing. Specific responses included:

- That even if land is not in areas of stress it should not be dismissed as not suitable for housing more generally (i.e. the need to think beyond affordable tenures when reviewing public sector land holdings);

- The Stormont Regulation and Government Property Act (NI) 1933 acts against government using property and land holdings to deliver policy outcomes such as improved housing because of the requirement for 'best consideration';

- Land availability could be addressed by government through the disposal/transfer of public land or land assembly activities, but is not, with sites being master-planned and sold to developers in smaller parcels to minimise risk and encourage faster build-out rates;

- Where public sector land is being disposed/transferred for the public good (providing social housing), then the requirement to achieve market value should be waived and the asset use value (or public value) protected through an asset lock; and

- Transfers to a single developer should be avoided, and that transfer of public sector land should only be for public sector housing

"Are there land & property practices adopted in other UK or European jurisdictions that you believe would transform supply if adopted here?"

It was suggested that land interests across Europe are more actively managed. For example, public bodies in the Netherlands acquire land and hold this until such time as it is required for housing. In the interim, basic infrastructure is installed by the public sector so that plots can be sold with planning permission to house builders who are ready to develop them without the often challenging upfront costs associated with providing infrastructure.

Other suggestions in this context included:

- Develop (or adopt) procurement rules, which allow public bodies to work collaboratively with housing partners and stakeholders on mixed-use developments;

- Consider the opportunities associated with local authority house building companies and innovative financing and partnership delivery models; and

- Reviewing: grant arrangements; planning relaxations tax rates for the conversion of redundant office space and retail to residential; and, Strategic Land Partnerships

04
Planning

Planning

Overview

This section of the CfE provided an overview of responsibilities for planning in terms of the roles and responsibilities of central and local government and highlighted the opportunities offered by the Community Planning and Local Development processes to meet the needs and aspirations of the local community. The question was also raised of whether the current planning system will allow for transformations in the quantity, quality, sustainability, viability and suitability of housing supply.

Key issues highlighted for consideration included: the role and materiality of land banking; bonds, agreements and bond reductions; planning resources (and their potential impact on timelines for large schemes); the need for a sustainable rural development model and wider issues around the sustainable modes of transport, as well as matters relating to planning approvals and planning conditions. The first question posed to respondees in this section was:

> **"Are there changes to planning legislation, policies, processes or procedures that could transform housing supply for the better?"**

A number of respondees highlighted the need to increase accountability for officers and Councils to reply and to make decisions on applications within designated timescales. The absence of accountability and enforcement of timescales impacts delivery, generating costs and risk for the private sector.[62]

To address these issues various suggestions were made, including:

- The Pre-Application Notice (PAN) process timeline needs to be reduced in line with England as 12 weeks is felt to be excessive. In addition, it was suggested that the threshold for applications subject to PAN in NI is too low and the threshold for major applications should be reviewed;

- The introduction of a two-stage process (LDP Plan Strategy & Local Policies Plan) following the transfer of planning powers was intended to speed up 'Plan' production and that this has not been achieved. Central government needs to review the LDP process and consider how the process can be streamlined if a Plan-led system is to be achieved;

- External 'statutory consultees' are significantly under resourced and unable to effectively support the development management process[63]. To support a properly resourced system, it is suggested that the current fee structure is updated so that local planning authorities are much closer to cost neutrality. In parallel, legislative changes are recommended to enable statutory consultees to charge their own PAD fees with the income ring-fenced to improve capacity and responsiveness;

- A review of the current system and structure of central and local government planning in NI. Whilst planning powers were largely transferred to local government in April 2015, this did not include key responsibilities such as transport, regeneration, or listed buildings

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62   However, as recognised by most respondees, delays are caused by all parties –applicants, statutory consultees, and Planning Authorities - due to poor communication, poor quality submissions and conflicting views, all of which result in stalled approvals.

63   The Department of Infrastructure's Planning Forum was recognised as an attempt to resolve some of these issues through implementation of the "John Irvine" report, which makes recommendations on improving the role of statutory consultees in the planning application process.

Similarly in relation to housing, the housing authority operates as an independent body (NIHE) linked back to a responsible central government Department (DfC), which is separate from the planning structures;

- Review the "significant upturn" in pre-commencement conditions applied to planning permissions in the last five years as the volume of 'less' significant pre-conditions cause dis-proportionate delays to commencement activity; and

- Digitisation as an opportunity to improve delivery, joining up a fragmented multi-party system, improving accountability and transparency, providing real-time performance data, accelerating communication and making clear the performance of applicants, statutory consultees and Councils respectively

A number of specific new approaches we also highlighted:

- Developers may be willing to pay statutory consultees for PAD advice if it would improve the quality of their applications and significantly improve processing times;

- Develop transparent and proportionate developer contributions, as part of a transition to a performance based service;

- Planning Authorities should take a more flexible approach to pre-commencement conditions and only require them when necessary. Standardised / model planning conditions were also flagged as an opportunity, potentially helping to create a consistent and more flexible approach to pre-commencement conditions; and,

- More consideration to be given, with appropriate funding, to the commencement of Part 3 of the Waste and Contaminated Land

(NI) Order 1997, which would ensure that, where possible, those who pollute the land will pay for its remediation so that it is suitable for use.

> **"Are there planning practices adopted in other UK or European jurisdictions that you believe would transform supply if adopted here?"**

18 respondees said 'yes', 9 respondees said no with the balance not answering this particular question. From those that did respond various examples were provided of practices from other jurisdictions that might help transform supply in NI including:

- Planning Performance Agreements that are largely used in England and allow for more effective engagement between the applicant and the Local Authority;

- City wide planning frameworks that consider a range of issues including land release, infrastructure and delivery;

- Wider regulations around permitted development rights has brought forward a larger number of homes through the re-purposing of existing buildings;

- In designated regeneration areas in Germany, municipalities freeze existing land values allowing them to acquire land at these values, install infrastructure and sell the land on to developers in parcels, or maintain ownership of the land and bring in a house builder to build houses;

- In Holland land use plans are prescriptive to the extent that when a local authority sells land to a developer by the terms of the sale the developer must build out according to the agreed land/mixed tenure use plan;

- Councils in Holland also make a significant profit on any land sales through a front-funding mechanism. Councils also borrow from the international bond market to front fund infrastructure including transport; and

- The 2021 Affordable Housing Bill in Ireland will recognise Community Land Trusts[64] to facilitate the delivery of another type of outside market housing

"Is land banking hindering housing supply here?"

22 respondees answered 'yes', 12 respondees said 'no', and the balance provided no response. A number of different perspectives were advanced within the responses received:

- On the one hand it was suggested that in, and of itself, land banking is a necessary component of large developers' business models (and the appropriate response to this is to increase the supply of housing from other sources such as outside market and SME builders in particular – rather than creating policy that attempts to reduce such banks and reduce private developer investment); and,

- By way of contrast, others suggested that land banking does make a significant contribution to the constrained supply of land for housing, especially within larger urban areas with evidence was presented in relation to Belfast suggesting that circa 21,500 units are land banked

Finally, one respondee suggested addressing any negative effects of land banking by using Section 64 of the Planning Act (NI) 2011. A rarely enacted power allowing planning authorities to serve a completion notice on a landowner, withdrawing planning permission, should the Council believe that development is not be completed within a reasonable period, or a period has elapsed without the development having been completed.

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64 A community land trust is a non-profit corporation that holds land on behalf of a place-based community, while serving as the long-term steward for affordable housing. Currently, there are 263 legally incorporated CLTs in England and Wales, with over 300 new groups in development. The movement currently involves 17,000 members and has 17,000 units of housing completed or in the pipeline for development. https://www.communitylandtrusts.org.uk/about-clts/

Finance

Overview

Key issues identified for consideration in the CfE included sources and constraints in accessing finance for the development and acquisition of homes and the potential impact of Covid-19 on lender risk. Some potential financial solutions were also identified, most notably, capital markets financing (bonds) for affordable housing and increase in demand for Ethical Social Governance (ESG) investments. The section concluded by highlighting that the Department was particularly seeking evidence as to how new approaches to financing the housing market could drive supply of homes for those most in need, including, for example, through routes providing incentives to Registered Housing Associations, restructuring existing approaches (eg changing the current Housing Association Grant model) and changes in Financial Transactions Capital funding.

Three questions were posed in relation to this topic:

> **"To what extent do you agree that the NICS could better utilise existing funding (e.g. Block Grant, Financial Transactions Capital, Housing Association Grant, Reinvestment and Reform Initiative) to leverage greater levels of private finance for housing development?"**
>
> **"Are there other ways the private and voluntary community and social enterprise sectors can leverage other forms of funding to increase housing supply?"**
>
> **'Are there any other areas of market failure that need public and/or private intervention?'**

The majority of responses to all these questions highlighted the need for more affordable / social housing and confirmed that access to the necessary finance is a key barrier to many individuals in NI being unable to secure a home. Many respondees called for the establishment of a Housing Investment Fund supported by public finance.

There was strong support for the extended and better use of Financial Transactions Capital (FTC) to be deployed to support the development of intermediate and affordable housing (in particular, to assist the growing number of individuals and families that can afford small rental costs but cannot secure a mortgage due to insufficient equity capital). The general view was that FTC has not been utilised to achieve its maximum potential.

The current Housing Association Grant (HAG) structure is important in delivering the continued supply of housing. Changes that might be considered in this structure included:

- Increase the grant available to recognise the recent inflationary cost rises and the requirement for additional expenditure to meet net-zero targets and any improvement in standards resulting from this Strategy;

- Longer-term security over budgets rather than the current single-year capital budgeting process;

- More innovative use of FTC for affordable / intermediate housing – in particular, the amendment of Article 15 of the Housing (NI) Order 1992 to allow Registered Housing Associations (RHAs) to use FTC to build homes for direct sale; and,

- Support to broaden of the sources of finance available to RHAs

It was also noted by a number of different respondees that a wider range of sources for financing the development of housing would be welcomed. Suggested sources included:

- Charitable trusts and foundations;

- Credit Union Loans;

- Capital markets: from the sale of long-term bonds;

- ESG[65] Investors; and

- Developer contributions

The benefits of housing co-operatives were also mentioned a number of times with a number of examples cited including: North Belfast Housing Cooperative; Portaferry CoHousing; O'Cualann Cohousing Alliance (Dublin); and Coin Street Community Builders (London)

Finally, a number of respondees referenced initiatives introduced in Republic of Ireland to encourage social / affordable housing development, including:

- The Enhanced Long Term Social Housing Leasing Scheme[66] – Local Authorities lease from institutional developers and investors to provide housing. This provides a long term secure income for investors and an increase in available housing for the Local Authorities; and.

- The Irish Council for Social Housing[67] has established a sector-led Special Purpose Vehicle fund for delivering private financing for AHBs providing social housing

65 "ESG stands for Environmental, Social, and Governance. Investors are increasingly applying these non-financial factors as part of their analysis process to identify material risks and growth opportunities". https://www.cfainstitute.org/en/research/esg-investing
66 https://www.gov.ie/en/service/82338-enhanced-long-term-social-housing-leasing-scheme/
67 https://icsh.ie/

06
Infrastructure

Infrastructure

Overview

Infrastructure in the CfE is defined in terms of the essential systems and facilities that support the economy and enhance the standard of living for citizens i.e. hard, soft, and critical infrastructure all impact our social, environmental and economic well-being.

Key issues identified included the need to upgrade our drainage and wastewater treatment, energy and digital network and transport infrastructure (including the particular challenges associated with meeting the needs of rural communities). Another key issue is the need to protect our existing housing supply as well as providing new supply. This includes protecting homes from flood risk, the provision and maintenance of sustainable transport and addressing the long term viability challenges of the Housing Executive. Four questions were asked in relation to this topic area, the first was:

> **"Are there changes to infrastructure legislation, policies, processes or procedures, such as the establishment of an Infrastructure Commission, that could transform housing supply for the better?"**

A notable number of respondees indicated that an Infrastructure Commission would be beneficial (in terms of joined up planning' and 'expertise' to challenge/advise and address the long-term under-investment resulting in areas such wastewater, rail, and sustainable and active travel). There were divergent views regarding remit , authority, financial powers, ability to act in the absence of an Assembly, and powers to challenge central government agencies.

Other specific suggestions included:

- Government should provide Local Authorities with land management teams that can leverage land values' to deliver infrastructure;
- To inform better capacity, new data analysis of approved planning applications; and,
- The opportunity for 'pump away' systems and SUD systems was highlighted as an alternative to adding to and investing in the current infrastructure systems

> **"To what extent do you agree that coordination of housing provision and infrastructure services need to be better aligned?"**

Summary

24 respondees strongly agreed, 15 agreed, 3 neither agreed nor disagreed and 29 provided no response. Although the majority of respondees felt that housing provision and infrastructure services need to be aligned, there were few suggestions as to how this could be achieved beyond simply stating that government should fund the historic investment deficit, and join up contributions from statutory consultees.

> **"To what extent do you agree that a Housing Supply Strategy should consider both the provision of new homes and protecting existing supply?"**

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68   For example one respondee suggested the 'top down governance of the Built Environment' as a whole, rather than infrastructure which is a subset of the built environment.

In response to this question 21 respondees strongly agreed, 12 agreed, 4 neither agreed nor disagreed, 33 provided no response and 1 disagreed. Specific responses included:

- Incentivise and support in practical ways adaptations to homes into 'homes for life' or making a move to a more suitable home to retain housing of a suitable scale for other households;

- Ensuring that policies such as House Sales Scheme/ Right to Buy (RTB) do not erode new social housing provision; and,

- Better use of analytics, data and evidence to better match the current quantity and (whole life) quality of supply against current infrastructure provision to determine where there is a need/opportunity

'How do we ensure that our housing supply integrates and brings together all the essential infrastructure (hard/soft & critical) required to create thriving homes and communities?'

Specific responses included:

- The need for a phased strategy after a careful stocktake of current assets and their conditions, plus an assessment of future needs, over 5/10/15/20/25 years;

- The need for new governance that avoids excessive processes and potential blockers, and to shape the role of expert advice;

- Ensuring that the Strategy integrates and brings together all essential infrastructure required to create thriving homes and communities, including the full commitment of all Departments;

- Review the approach to Housing Growth Indicators (HGI) to sharpen forecasts;

- Address issues associated with 'unadopted roads and developments'; and

- Ensuring the Local Development Plans act as intended

07
Climate change/net zero

Climate change/net zero

Overview

This section of the CfE outlined the linkages between climate change and housing supply, including how the current ways of constructing new homes - and continuing to heat less thermally/energy-efficient homes generates pollutants which are contributing to the acceleration of global warming.

Key issues identified included how to: put sustainability at the heart of the design and development process; reduce carbon emissions during the construction; and, encourage and support achieve standards above that are required by regulation. The need to ensure a just transition to net zero carbon was also emphasised as the move to net zero carbon housing will need to focus on addressing inequalities rather than exacerbating them. Three questions were asked on this topic area, the first of which was:

> **'Are there changes to climate, sustainability and environmental legislation, policies, processes or procedures could transform housing supply for the better?'**

Summary

 A number of clear themes surfaced when this question was answered:

- For both new and existing properties, Building Regulations and Planning standards need to be uplifted in relation to energy efficiency and zero or near-zero carbon heating requirements. Consideration should also be given to setting minimum energy performance standards across the different tenures. Examples cited in the responses included:

  - The energy efficiency-based Fuel Poverty (England) Regulations 2014, which ensures fuel poor homes in England, achieve a minimum energy efficiency rating of Band C by 31 December 2030; and

  - Adopt Net Zero (passive by default) for all new development. Brussels is cited as implementing a Passive House Standard for all new buildings from 2015

- Any uplift in standards should be realistic and deliverable and take into account supply chain readiness, property types, routes to consumer redress (across different needs and circumstances), consumer awareness/understanding, as well as the need for blended public and private finance and for consumers to pay for any retrofit measures required to their properties;

- Create taxation incentives/disincentives to encourage developers and owners to upgrade and integrate new technologies in new and existing properties;

- Develop new business/social enterprise opportunities in manufacturing new materials and training people in their use in construction as well as a new Repair, Maintenance and Improvement (RMI) programme/plan in line with the Construction Leadership Council's (CLC) National Retrofit Strategy ; and

- A 'fabric -first' approach to address fuel poverty by minimising the need for home heating

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69 https://www.constructionleadershipcouncil.co.uk/news/national-retrofit-strategy-v2-launches/

"Transitioning to low carbon homes will require significant behavioural changes by householders. Is support required to aid the necessary behavioural changes?"

39 respondees felt that transitioning to low carbon homes will require significant behavioural changes by householders while 32 respondees expressed no opinion on this matter. Suggestions as to the type of support required to aid such behavioural changes included:

- The One Stop Shop envisaged in the DfE Energy Strategy policy options could help implement new standards or retrofit requirements associated with the Housing Supply Strategy;

- A scheme which provides interest free loans by Government directly to owner occupiers for a large range of net-zero measures;

- Dedicated legislation given the devolved nature of energy policy;

- More campaigns (in schools, with consumers and across industry) demonstrating benefits (including the use of demonstrator housing and other projects); and

- Reflecting the needs of different equality groups (for instance, encouraging active travel for older or disabled people may be inappropriate in some circumstances)

'Taking into account social impact, what incentives or disincentives could be introduced to positively impact the current and future delivery of low carbon homes?'

There were few responses and of those received, these broadly fell into three camps: 'the polluter pays' model; support for those who cannot pay; and finally those measures which are not devolved and therefore beyond the direct control of the Assembly.

08
Innovation

Innovation

Key issues identified in this section of the CfE included how Modern Methods of Construction[70] represents the opportunity to address productivity issues and increase capacity and investment in the residential construction sector, while also driving greener more sustainable industry practices and helping to reduce and manage risk.

The need for, and benefits of, adaptive reuse was also identified including the potential for regenerating older areas (without negatively impacting on local character); enhancing social value of existing buildings for local communities; and, achieving both operational carbon and significant embodied carbon savings.
Two questions were asked, the first was:

> **"Should existing buildings, including our heritage assets, play an enhanced role in transforming housing supply?"**

38 respondees indicated that existing buildings, including our heritage assets, should play an enhanced role in transforming housing supply, 4 respondees indicated they should not, and the balance of the respondees indicated no preference.

Overall, the responses received were supportive of the idea that to help transform supply existing non-domestic buildings and heritage buildings should be 're-purposed' when appropriate to do so. Based on the responses received it would be 'appropriate to do so' when such an approach:

- Addresses a clear need for housing;

- Helps avoid additional embodied carbon through new build;

- Allows for an innovative approach to be applied/realised;

- Brings forward 'hybrid models', combining living and working, or live-work hubs;

- Supports quality design, environmental credentials, connectivity and accessibility;

- Creates a new sustainable community; and

- Addresses asset under-utilisation, dereliction and/or redundancy

Examples of "good practice" to progress attractive and cost effect adaptive reuse of existing buildings included:

- Emmaus UK as a model demonstrating how heritage assets can combine retail/ tourism/ housing and social impact;

- NIHE and DAERA through the TRPSI programme Village Catalyst Pilot development of heritage buildings in rural communities as community assets;

- Creating Places for People: RIAI Town and Village Toolki[71] ;

- 'Housing Justice'[72], an initiative which aims to release surplus land or buildings from churches of all denominations in England and Wales for affordable housing; and

- CIOB's Conservation Certification Scheme

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70 "Shaping the future of the construction industry by using: digitally designed houses where the computer code feeds directly to the production floor and the best automation and assembly-line production techniques. This industrialisation of housebuilding offers a unique opportunity to drive affordability into the sector which can then, in turn, be passed on to the house buyer. Economies of scale mean that the bigger the orders placed with modular businesses such as this, the better they are able to plan ahead and price competitively. This means that in the long-term, Modern Methods of Construction can be a large scale solution for every tenure: social housing, home ownership, build to rent and market sale".
https://www.gov.uk/government/speeches/modern-methods-of-construction
71 https://www.riai.ie/whats-on/news/creating_places_for_people_riai_town_and_village_toolkit
72 https://housingjustice.org.uk/

"Are you aware of any innovations relating to housing including design, construction, procurement, contracting and commissioning that could help transform supply?"

24 respondees indicated that they are aware of innovations relating to housing including design, construction, procurement, contracting and commissioning that could help transform supply, with 13 respondees indicating they are not aware of such innovations with the remainder of the respondees having no preference on the matter.

Examples of innovations or new ways of working cited in the responses included: 3D printing; Passivhaus technologies; Modern Methods of Construction; and, encouraging biodiversity (biotecture). It was also suggested that the Department's Social Housing Development Programme (SHDP) represents an opportunity for advancing and unlocking the benefits of innovation.

09
Skills

Skills

Overview

Key issues identified for consideration in the CfE included the need to attract more young people into construction and build new skills (including those required to deliver industrialised construction and zero carbon housing), with an immediate requirement identified for more apprenticeships to match higher skilled job requirements in the future as well as more vocational routes into the sector in areas such as engineering or civil engineering. Five questions were posed in this section, the first of which was:

> **"To what extent do you agree that the Housing Supply Strategy could act as a stimulus to improve and modernise construction skills and increase the importance of the sector?"**

39 respondees strongly agreed or agreed that the Housing Supply Strategy could act as a stimulus to improve and modernise construction skills and increase the importance of the sector, 1 respondee disagreed, 4 neither agreed nor disagreed, with the remainder not responding.

Respondees suggested that the net zero challenge offers various opportunities:

- To smaller firms in the Repair, Maintenance and Improvement (RMI) sector with the need to retrofit homes to meet higher environmental standards;

- Via Digitisation creating the potential for collective efficiency gains through small improvements ;

- Adoption of Modern Methods of Construction by bringing forward and catalysing modern skills;

- Government support: support for clients, designers, contractors and developers to ensure they choose to embrace new opportunities rather than rely on out-dated but predictable and financially understood methods;

- Clarity on the road ahead: the point was made that government needs to signal clearly to the construction industry how and when the transition to zero carbon housing will occur, and the nature and form of the support government will provide to aid the transition;

- Through using locally sourced building introduce new eco-friendly building materials like hemp Crete which could be grown and manufactured locally; and,

- Increased demand for traditional skills and heritage skills (e.g. through existing programmes such as the South West College, National Trust and Princes Trust)

In taking these opportunities forward and more generally it will be critical that government signals clearly to the construction industry how and when the transition to zero carbon housing will occur, and the nature and form of the support government will provide to aid the transition.

Other roles for Government included:

- The use of government spend to drive and catalyse change (e.g. the recent requirement in England for Registered Providers (Social

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73 One example cited in relation to digital efficiency gains was the adoption of Enterprise Resource Planning (ERP) software by hundreds of small and micro firms with the knowledge and skills required to adopt digitalised processes and management tools, resulting in improved performance and delivery.

Landlords) to deliver 25% of the English social housing development programme via Modern Methods of Construction (MMC) to attract Homes England grant funding);

- Training programmes targeted at and tailored for the 16-25 age group; and,

- As the biggest client of the construction sector it could provide a clear, long-term pipeline of construction projects and coordinate and phase demands on the construction sector across all Departments

> **"Does the Construction Sector in NI need support to skill up in digital technologies, Modern Methods of Construction, low carbon construction and the whole life performance of house building etc.?"**

When asked this question, 33 respondees answered yes, 2 responded no and the balance provided no response. Broadly speaking, the responses received endorse the view that that the Construction Sector in NI will need support to up skill in digital technologies, Modern Methods of Construction, low carbon construction, retrofitting and the whole life performance of house-building.

The role of the Government Client (and Client purchasing power) was again mentioned in supporting and advancing change. The role of the professional bodies in advancing and promoting change was also highlighted as was the suggestion that government needs to work in partnership with organisations across the housing sector including NIHE, Housing Associations and Construction as well as the Private Rented Sector.

> **"Does the age profile and make- up of the construction sector (older workers/ self-employed) require a specific intervention to support our housing supply in the future?"**

When asked this question, 27 respondees said 'yes', 3 said 'no' and the balance provided no response.

Responses received in relation to the age profile of the current industry suggested that there is a need for more apprentices who are paid appropriately and incentives for companies to take them on. Equally, older workers should be seen as a benefit/asset because of their experience. In this regard, training and support is required to enable people to up-skill, irrespective of their age or employment status.

Similarly given (pre-Covid) labour supply issues[74] more effort is required to ensure vocational training schemes / apprenticeships are attractive and accessible. This must be supported by a strategic approach to ongoing (lifelong) learning, including those within the sector who are self-employed. In particular:

- The Construction Industry Training Board's 'Go Construct' portal, which informs children and parents about the array of careers and opportunities in construction and the wider built environment, from trade-based opportunities through to professional careers in construction management, surveying and architecture, was cited as a good example of 'reaching out and educating' potential sector entrants; and

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74 The Training in the Construction Industry 2018 report found that one in six (17%) construction employers did not have enough skilled workers. Nearly half (47%) of employers had trouble in recruiting skilled direct or self-employed staff.

- Transforming the long-term pipeline of talent must be supported by a shift in the content of built environment courses to reflect the skills needs of the future

"Does NI need some large Green Building Projects such as those being developed elsewhere to help create momentum for a changed skills agenda here?"

26 respondees said 'yes', 4 said 'no' and the balance provided no response. Specific suggestions included: a comprehensive government programme to eradicate fuel poverty; Identifying a site in each council area for a green building project competition; and low carbon retrofitting pilots

10
Other Areas

Other Areas

The final question in the CfE asked:

> **"Are there any other areas that could impact on the development of the housing supply strategy that you feel have not been covered in this Call for Evidence?"**

12 respondees replied to this question including 8 organisations and 4 individuals. In relation to the organisations:

- An asset managing company to the public sector noted there is an opportunity to look at the delivery of healthcare in the community, what these environments could look like, services that could be delivered (to bring closer to the need) and how they integrate with housing developments. They also suggested that the impact of Covid and the rise of localism has yet to be fully realised and that consideration towards designing homes to factor in changing work environments, would be beneficial;

- An organisation working with people who find themselves homeless said they agreed with Boyle and Pleace when they said in the evaluation of the 2012-2017 Homelessness Strategy that: "Housing remains fundamental to delivering an end to homelessness. Ensuring that adequate, affordable housing with reasonable security of tenure is available, is essential to delivering an end to homelessness.";

- A leading training board in the construction industry wants to see mainstream training provision aligning with the aims of modernising the construction industry, including both green

and digital skills. They would also like a review of how the construction training network operates in NI. They note the imbalances of availability of tutors and courses across NI and in some areas, they say that Further Education (FE) courses are oversubscribed while courses in other areas cannot attract the numbers of candidates to make courses viable. They say the coordination of delivery between FE Colleges and other providers (commercial and 3rd Sector organisations) is poor at times and needs to work better to bring individuals into the sector at entry level and provide pathways for them to develop skills and competencies in the core skills and continue into upskilling;

- This organisation also highlighted the disconnected funding system for skills development from unemployment into employment stating that ongoing upskilling is an inhibitor to effective development of the workforce and at times represents poor use of public funding (since some students may drop out and may never continue with the construction journey, due to gaps in financial support both personally and educationally);

- An organisation for the Co-ownership sector pointed out that consumer protection in relation to homes that are built, has not been covered. They believe it is important for measures to be in place to protect home buyers. They also want protection for tenants renting a property as they will need to know that any property they are planning to rent, meets the fitness standards and that there are measures to protect them (e.g. tenancy deposit protection and rent increase limitations). They also mention the importance of having

structural warranties for new build and up to ten-year old homes as well as the having a balanced and fair relationship between the developer and the customer. This organisation says that it is supportive of initiatives such as a Consumer Code for home builders and say that the Joint Memorandum on Improving Communications between Professions provides clarity on the roles of each of the professionals involved in the home buying process. They would like opportunities to be availed of, in relation to the creation and operation of the New Homes Ombudsman, and point out the importance of management companies and protection in relation to apartment developments and properties with common areas. They stress the importance of roads and sewers being bonded and adopted within a reasonable period of time and highlight issues with leasehold properties. Finally they recommend that key functions in the home buying process e.g. the Land Registry maintains its vision to have continually improving digital services that are easy to use by customers and staff, are stable, secure and fully integrated across LPS;

- Councils throughout NI are broadly satisfied that the Call for Evidence and questions provide a comprehensive analysis of the key issues that could impact upon the development of a Housing Supply Strategy. However they point out that Covid19 has and may well continue to have a destabilising effect upon the economy for some time and consider it imperative that DfC is aware of the positive impact Housing-led Regeneration at scale can make to driving inclusive growth in local areas, particularly our cities, after the significant economic shocks that have recently been experienced; and,

- A response from a group representing women from disadvantaged and rural areas refers DfC to the Feminist Recovery Plan for Northern Ireland which details many long-existing gender inequalities that have impacted on women that have only been worsened by the Covid19 pandemic

Additional responses submitted from 2 individuals focused on: rising sea levels and the possible impact of a shrinking population on housing need. Another response focused on the issue of urban density and its relationship with mixed use and mixed tenure was submitted by a leading academic in NI.

The remaining individual respondee suggested that a number of issues had not been covered. They were listed as: the issue of changing demographics with people living longer and the increased need for housing and support to retain people in their homes; behavioural changes such as the race for space; working from home and providing for that redistribution and introducing co-operatives and self-build and allowing housing associations and housing providers from other parts of the UK and Ireland to help build capacity for investment by including their own housing associations in wider group structure. This individual also suggested that NIHE should be allowed to borrow privately to attract much needed investment in its own stock, build new energy efficient carbon-friendly homes and raise private money from a Green Investment Strategy. Finally they suggested that more attention could have been given in the Call for Evidence to alternative methods of construction.

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75   https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020.pdf

Summary of Stakeholder Engagement Sessions

A series of workshops and meetings were held with a range of organisations and individuals representing various s.75 groups, as well as professional organisations from across the housing sector.

Many of the comments below were originally made in reference to specific s.75 groups, however, these were commonly stated by a range of groups/organisations and so have been brought together to help understand the main issues.

The points captured below are broadly consistent with evidence submitted by other stakeholder groups and, as such, indicate the areas that any proposed strategy will need to address if supply is to be transformed in the longer-term.

> **"What are the main barriers facing the group you represent in accessing housing supply?"**

- **Lack of choice of housing** – including different types of housing and in particular to meet a range of different needs and the changing demographics in the country; also leading to a lack of security of tenure and affordability issues. Mismatch between type of social housing stock and that which is required for size of household

- **Water & wastewater infrastructure** – noted by many as the biggest challenge to supply

- **Allocations process and waiting lists** – Noted regularly around issues with length of housing waiting lists as well as the allocations process itself, in particular for those with particular individual needs. Issues with perception

of social housing availability and access particularly in rural areas

- **Private rented sector** – barriers to access include costs, not delivering the quality and fitness of accommodation required, regulation of landlords around costs and deposits

- **Affordability** – a barrier to access across all sectors but particularly private rental (shortfall between rent and LHA); issues of fuel poverty and increasing running costs

- **Homelessness transition** - Lack of single let accommodation, lack of support during transition, stigma and lack of suitable temporary options

- **Challenge of climate change** – Appropriate resources must be directed at this issue. Need to consider the impact of costs to achieve this on equality across a range of homeowners and particularly the most vulnerable

- **Finance** – access to finance for both the construction/development sector as well as homeowners; also increasing material/supply costs are a challenge

- **Communication** – there is lack of understanding of housing options and housing rights due to language barriers

- **Safety and Intimidation** – Intimidation from local communities and/or paramilitaries. Reluctance to complain/report hate crimes in case they put themselves in more danger

- **Training & Skills** – in both construction & housing sector more broadly. There are training retention difficulties as well as issues around attracting tradespeople. Need to deliver enhanced skills to deliver on new methods of construction and carbon reduction ambitions

- **Pipeline of work** – needs to be managed to ensure there is a steady stream and not an overload; particularly post-pandemic. Also need to balance with quality work

- **Building Regulations** - implications of forthcoming changes to Building Regulations on private developers

- **Current methods of projecting future housing need (HGIs) and rating energy performance** - View expressed suggests both methods are flawed

- **Land** – issues around zoning land and bringing land forward

- **Culture for community-led housing** – suggestion there is not enough here, lack of encouragement, funding, knowledge, capacity building, infrastructure and support

"What do you consider are the main opportunities facing the groups you represent in accessing housing supply?"

- **Adaptable and accessible homes** – More options and flexibility around design standards/regulations would open opportunities to improve the quality of supply and accessibility for a range of individuals

- **Re-use of empty buildings** – particularly in inner-city areas there are unused buildings and opportunities should be sought to re-purpose these

- **Planning and design** – with particular reference to the pandemic impact – an opportunity to change how homes are designed in that a home could become a place to work as well as a place to live. Also an opportunity to improve access to open space

- **Transportation** – important to have a service that is available at convenient/frequent times and can connect communities to services

- **Improved broadband access** – with particular reference to those in rural areas, would represent a key opportunity in accessing supply

- **Modular new builds and MMC** – opportunity to deliver on new housing supply

- **Temporary Accommodation** – to provide suitable options for those transitioning from homelessness

- **Legislation** – various opportunities to consider amended legislation to impact on a range of issues

- **Use of new technology and innovation** – need for more awareness and use of the latest adaptive/assistive technologies which could improve quality of life

- **Public Sector procurement/ Finance** - opportunity to have access to contractors who can offer projects at affordable levels

- **Greenfield/brownfield sites** – opportunity to do more to increase attractiveness of brownfield sites including costs and access to land

- **Self-build** – opportunity to provide more advice and assistance needed for those wishing to self-build

- **Public Sector procurement/ Finance** - Conversation around the opportunity to have access to contractors in NI who can offer projects at affordable levels

"How can housing supply help create and maintain sustainable communities and how can we engage communities more effectively in place making?"

- **Mixed tenure** – broad support for the benefits of mixed tenure in delivering sustainable communities; place shaping and mixed tenure are key interlinked challenges; importance of design/layout and learning from other jurisdictions

- **Support** – lack of wraparound support to help people stay in their homes, support for community groups; need to look at how accessible support and services can be incorporated as part of any sustainable community. Use of community incentives to encourage people to move somewhere where support is available

- **Stigma of social housing** - opportunity to create sustainable communities by addressing stigma sometimes associated with social housing. In terms of mixed tenure, it has to be a model that does not stigmatise or separate those in social housing from their owner-occupier neighbours, simply because they rent their property

- **Creating a community** - self-built co-operatives where tenants are involved in creating a community. Community-led housing may offer an opportunity to deliver on localised needs

- **Safe & accessible** – safety of housing and the space around it, provision of safe public open spaces and public transport all crucial to creating communities where people want to live

"Should and how could more shared housing developments be delivered here?"

- **Choice** - More choice needed so that people are not forced back into divided areas again. Mixed communities including housing that caters for the needs of a range of different backgrounds and needs

- **Investment** – shared housing positively noted as beneficial but requires investment and engagement; design and layout also crucial

- **Integration** - Social housing to be 'pepper potted' throughout any new developments. Requirement for legislation and policy here

- **Alternative housing models** - Shared community where communal facilities, transport and associated costs are shared.

- **Meaning** - shared housing to some people does not necessarily mean mixing of communities/backgrounds – can mean a shared tenancy

Summary of Engagement with Developers

A series of one to one conversations were conducted with established developers in order to ascertain their views. The themes below emerged from these conversations, many of which duplicate points raised in the main CfE returns. However, in recognition of the significant and important part played by this stakeholder group in transforming supply, this section has separately detailed these views

> **"Current policies, processes, legislation, financing arrangements which discourage developers"**

- Lack of funding from main banks

- Planning delays and the absence of a 'planning fast track mechanism'

- Lack of flexibility on delivering 20% social housing

- Viability, the housing Total Cost Indicators (TCI) are no longer reliable and have been lacking in sensitivity

- Developers would welcome more clarity and consistency regarding listed buildings and conservation areas as the current approach is neither good for housing supply nor the historic environment

- Definition of social, affordable and private housing needs clarity and different treatment in terms of planning

- Greater cohesion is also required between Planners, NIHE, DfI and DfC

- Additional design requirement needs compensated if schemes are to be feasible

- The viability and feasibility of schemes is fragile and delays can mean investors move on to more 'oven ready' schemes

- The industry needs simplification of policy that has more standardisation and consistency of application

- The planning system is slow and cumbersome, NI Water infrastructure is a huge problem and in general there is a lack of coordination across the public sector

- Often elected councillors and MLAs are not aligned with officials and vice versa regarding planning decisions

- The slowness of the creation of Local Development Plans is another major factor in this and of course the whole thing has been aggravated by Covid-19 restrictions

> **"Ideas, options from elsewhere"**

- Move to modular building

- Think about how land is used, for example, consider alternatives locations for golf courses

- Poor definitions of affordable housing which could for example be linked to salary brackets and targeted at key workers which in turn would assist in creating mixed tenure developments of social, affordable and private housing

- Everywhere else seems to have a proper policy and definitions on tenure linked to things like disposable income. The government could create a more straightforward system such as mandating that statutory consultees should have a maximum period for responses otherwise deemed approval is given

- In England in a build to rent scenario local authorities require a percentage of affordable/social units at a discounted rent e.g. 20% reduction in market rent. We need to be a bit more flexible here

- In England there are a number of banking acts such as revolving credit or other providers of finance such as Homes England

- More support/subsidy should be given to the green agenda and passive energy homes, air source heat pumps etc – this is a practical way to address fuel poverty

"Barriers"

- Lack of joined up government to address the area plan process and infrastructure

- Biggest barrier is land and land zoning

- Too much public land is not being used productively

- There should be a 'use it or lose it' policy with strict time limits such as is the case in Manchester

- Statutory consultees and contributors, such as Planners, should be trained in the viability of developments so that they have a better understanding of the impact of their decisions and also have an overall objective of enhancing well-being, the economy and the environment

- Alternatively private sector partnerships could be sought with government putting their land into schemes

- NI Water drainage issue is a massive issue which the government needs to address by finding a way of allowing investment into the infrastructure

- Rates in Belfast for city centre living are a major barrier for investment. The rates on student accommodation has increased sufficiently to kill that market, rates on 800 units in Titanic Quarter could add £18m to the development

- In the build to rent sector the biggest problem is that the landlord is required to pay the rates which affects the viability of schemes. When rates of say £100-1200 are capitalised that equates to £20 to £25k per unit

- Failure to unlock opportunities with new financing opportunities such as Social Impact Bonds

"Areas of market failure"

- Subsidise the land costs either directly or by making public owned land available at a discount

- Need to address certain people in difficult areas i.e. paramilitaries

- We need a new model to underpin affordable housing for starter homes, key workers and so on

- The social housing allocation policy is a barrier to creating integrated communities which has a negative impact on sales price

- Public owned or acquired land should be used in these areas to overcome market forces thus making schemes deliverable

- Total Cost Indicators (TCI) should be tailored to allow some cross subsidy between areas with above average sale prices and those with below average prices. It costs more to develop in some areas more than others

- Take long leases e.g. 20 units for 20 years would help development in such areas

- Compulsory purchase of land which can then be sold/let at a discount to ensure development goes ahead

- Create cross subsidy from more profitable developments through allowing a percentage offsetting for social/affordable schemes either as a cash contribution or actually building the houses

Annex A – Details of Stakeholder Workshops/ Consultation Sessions

Date	Sector
28 April	DFC Housing Policy
10 May	Finance Sector
17 May	Housing Associations Sector
26 May	Skills and Training Sector
28 May	DFC social Strategies
1 June	Rural Residents Sector
3 June	Homeless Sector
8 June	Public Engagement Event 1
8 June	Minority and Inter Ethnic
9 June	Women's Sector
10 June	Mental Health Sector
11 June	LGBTQ+ Sector
15 June	Construction Sector
15 June	NIHE
15 June	Public Engagement Event 2
16 June	Supporting Communities
16 June	Carers and Parents Sector
16 June	Independent Living Sector
17 June	Learning Disability Sector
21 June	Young People's Sector
21 June	Private Rented Sector
21 June	Community and Voluntary Sector
21 June	Rural Community Sector
22 June	Urban Community Living Sector
22 June	APG on Construction Sector
23 June	Homeless Sector
23 June	Young People's Sector
28 June	Voluntary and Community Sector

Date	Sector
29 June	Older People's Sector
29 June	Public Engagement Event 3
30 June	Men's Sector
1 July	Men's Sector
6 July	Planning Sector
7 July	Public Engagement Event 4
7 July	Older People's Sector
7 July	Social Enterprises Workshop
8 July	Children and Young people's Sector
9 July	Men's Sector
14 July	Young People (Care Sector)

Annex B – Organisations that Responded to the Call for Evidence

	Organisation
1	Action for Children
2	Age NI
3	Apex Housing Association.
4	ARC NI
5	Armagh City, Banbridge and Craigavon Borough Council
6	Belfast City Council
7	Braidwater Ltd
8	Construction Employers Federation (CEF)
9	Chartered Institute of Building.
10	Council for the Homeless NI (CHNI)
11	Belfast Central Mission (BCM)
12	Choice Housing Ireland Limited
13	Clanmil Housing Group
14	Commissioner for Older People for Northern Ireland (COPNI)
15	Construction Industry Training Board (CITB)
16	Co-Ownership
17	DePaul
18	Derry City & Strabane District Council
19	Drains for Development
20	Equality Commission NI
21	Forum for a Better Housing Market NI
22	Fraser Houses (NI) Ltd
23	Historic Environment Division
24	Housing Rights NI
25	Institution of Civil Engineers
26	Lagan Homes
27	Mid Ulster District Council
28	Mid-East Antrim Borough Council

	Organisation	84
29	National Energy Action NI	
30	National House Building Council	
31	NI Human Rights Commission	
32	NI Rural Residents' Forum	
33	NI Federation of Housing Associations (NIFHA)	
34	NI Housing Executive (NIHE)	
35	NI Local Government Association	
36	Newry Mourne & Down District Council	
37	Northern Ireland Women's European Platform (NIWEP)	
38	Participation & Practice Of Rights (PPR)	
39	Passive House Association of Ireland	
40	Positive Futures	
41	Propertymark	
42	Public Sector Plc	
43	Renters' Voice Response	
44	Royal Town Planning Institute (RTPI)	
45	Royal Society of Ulster Architects	
46	SDLP	
47	Sinn Féin	
48	St. Martin in the Fields	
49	Supporting Communities	
50	Tarasis Ltd	
51	The Brain Injury Foundation	
52	The Chartered Institute of Building	
53	The Irish League of Credit Unions (ILCU)	
54	The Turnaround Project	
55	UK Finance	
56	VELUX Company Ltd	
57	Women's Regional Consortium	
58	Youth Justice Agency	

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