Sustainable Housing and Communities: How the Housing Sector can be Involved

A Response to the Consultation on the Sustainable Development Strategy and Implementation Plan by the Chartered Institute of Housing in Northern Ireland

October 2010

Chartered Institute of Housing (CIH) Northern Ireland is the professional body for people involved in housing and communities. It is a registered charity with a diverse and growing membership of over 22,000 national and international members. The CIH in Northern Ireland has over 500 members working for public, private and voluntary organisations and educational institutions. Our primary aim is to ‘maximise the contribution that housing professionals make to the wellbeing of communities’. The CIH seeks to achieve this by supporting a network of
professionals in the sector through the development of policy and practice solutions, research, publications, training, events and professional qualifications.
Key Points

- The Commission on the Future for Housing identified a number of key roles for housing in Northern Ireland, all of which are integral to the principles of sustainable development;

- CIH believes that there is much more that housing can contribute to the priorities, objectives and actions of the Sustainable Development Strategy and Implementation Plan;

- We would suggest that there are several key principles that housing and planning policy can and should focus on in order to build more sustainable housing and communities;

- CIH would contend that well-designed, mixed-tenure, mixed-income and mixed-identity housing is a critical success factor in creating sustainable communities;

- We would encourage government to give thought to how support and guidance can be rolled out and made easily available across the housing sector in Northern Ireland in relation to working towards the targets on low carbon/Level 6 housing;

- CIH would suggest that the Northern Ireland Civil Service sustainability database should include all best practice in relation to sustainable development from across the public, private and third sectors;

- In dealing with carbon emissions from existing housing stock we believe that a comprehensive retrofit scheme should be introduced in Northern Ireland;

- CIH believes that there is significant potential for planning policy to make a greater contribution to the sustainable development agenda and would welcome further discussion of planning’s role; and

- We welcome and support the commitment to adding sustainable benefit clauses to procurement contracts.
Introduction

The Chartered Institute of Housing in Northern Ireland (CIH) warmly welcomes the publication of the Northern Ireland Executive’s Sustainable Development Strategy and Implementation Plan for consultation. Both the overarching strategy and the implementation plan demonstrate a clear commitment to sustainable development and provide both a coherent vision with strategic priorities and objectives and the actions that must be taken in order to realise that vision. CIH commends the comprehensive approach to policy-making that has informed the strategy and implementation plan.

At the heart of the strategy is the acknowledgement that sustainable development must be ‘mainstreamed’ and this core principle is extremely encouraging. Sustainable development is not a ‘special interest’ or simply about protecting the environment, it is fundamental to the ongoing strength and success of our society.

The development of sustainable homes and communities is a key priority for CIH. A holistic approach to sustainable development can seek ways to:

- address the legacy of segregated housing;
- promote equality and diversity within our communities;
- tackle social exclusion and deprivation; and
- mitigate the impact we have on the environment.

The Commission on the Future for Housing placed considerable emphasis on the significance of housing for Northern Ireland in its final report, published in May 2010. The Commission identified a number of key roles for housing, all of which are integral to the principles of sustainable development:

- Housing as an Enabler for Economic Growth;
- Housing as Key to Addressing Climate Change and Easing Fuel Poverty;
- Housing’s Role in Achieving Social Cohesion; and
- Housing’s Significance in Tackling Poverty and Social Exclusion. ¹

Housing is ideally placed therefore to play a major part in the sustainability agenda and indeed is already doing so. CIH would like to see a similar emphasis on housing in the Northern Ireland Executive’s Sustainable Development Strategy and Implementation Plan as it moves forward and this paper will suggest some ways in which the

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¹ These roles are explored in detail in Section 3 of the report of the independent Commission on the Future for Housing in Northern Ireland (2010), http://www.cih.org/northernireland/housingcommission/
implementation plan in particular could encompass more housing-related actions. Investing in sustainable housing and communities will generate real returns for the people of Northern Ireland, our economy and our environment.
Everyone’s Involved – where does housing fit in?

There is much to be welcomed and endorsed in the Sustainable Development Strategy, not least the fact that it is genuinely strategic, with a clearly defined and articulated vision, aims and objectives. CIH is supportive, in particular, of the proposals to:

- See sustainability as a benefit rather than a cost;
- Mainstream sustainable development in government policy and practice;
- Carry out ‘sustainability scans’ on all new strategies and policies;
- See public sector procurement expenditure as an opportunity to support sustainable development;
- Find ways to encourage greater stakeholder participation and information sharing;
- Work more collaboratively with the private sector, community and voluntary sectors and the wider public; and
- Develop robust mechanisms for the implementation and monitoring of the objectives outlined in the strategy.

The six priority areas for action provide an effective framework with which to move forward and we would envisage housing having a key role to play in relation to each of the areas identified. CIH appreciates the strategy’s acknowledgement that a policy environment which supports sustainable development has to look beyond government and include other public sector organisations, the community and voluntary sector, the private sector and civic society. The sharing of best practice is a crucial step in taking forward the strategy and implementation plan as there is much to be celebrated and emulated in our own experience of what the housing sector in Northern Ireland is doing to promote greater sustainability.

There are several strategic objectives that fall under each priority area for action that are housing specific, namely to:

- Increase the sustainability standards of social housing;
- Improve the quality of life of our people by planning and managing development in ways which are sustainable and which contribute to creating a better environment;
- Reduce greenhouse gas emissions; and
- Implement energy efficiency measures, particularly for vulnerable groups.

We recognise that within an overarching strategic framework like the Sustainable Development Strategy, it is not always possible to go into detail about specific policy areas, thus it is encouraging to see housing and planning policy highlighted in the strategic objectives. However,
there is much more that housing can contribute to the priorities and objectives of the strategy. In the interests of informing the implementation plan to reflect the significance of housing to sustainable development we will expand upon the areas identified in the strategy.

In recognising and realising the full potential of housing’s role in the development of sustainable communities, it is important to note one inherent difficulty in maximising that potential. Housing powers and functions stretch across several government departments, each with its own priorities and, as the Commission on the Future for Housing pointed out, “this can make it difficult to map out and pursue a long-term coherent housing policy”. The fact that sustainable development is a priority for the Northern Ireland Executive as a whole should make it easier for the departments involved to adopt a joined-up approach to sustainable housing and communities. The current structure of the implementation plan does not necessarily suggest, however, that actions will be grouped across priority areas rather than against individual departments and organisations. It may be that the final version of the implementation plan will draw together all actions that relate to each objective and CIH would be supportive of this approach rather than one which reinforces the division of policy responsibilities.

**Sustainable Housing and Communities - Key Principles**

There are several key principles that housing and planning policy can and should focus on in order to build more sustainable housing and communities.

**Housing should be mixed tenure and mixed income**

CIH strongly believes that we must actively encourage the development of more balanced and diverse communities. Although mixed-tenure and mixed-income housing is not the only factor in creating sustainable communities, there is evidence to suggest that it can:

- Enhance stability and cohesion;
- Reduce the stigma that is often attached to mono-tenure housing estates; and
- Encourage innovative design and place-making that enhances ‘liveability’.3

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Although mixed-tenure housing and sustainable communities are policy priorities for government, the fact remains that there are still many existing mono-tenure estates and mixed-tenure development remains the exception rather than the rule. There are a number of factors which contribute to this and not all are within government’s control; however, there are steps that government could take to ensure that mixed-tenure and mixed-income housing is more than an aspiration.

One of these is the introduction of a developer contribution which has advantages in terms of supplementing public investment in social housing, providing social housing in desirable areas where housing is in demand but land is often not available for the development of social housing and avoiding the development of ‘residualised’ housing estates. If the Northern Ireland Executive is serious about creating sustainable communities that are “more tolerant, inclusive and stable and permit[s] positive progress in quality of life for everyone” (Priority 2) then facilitating a developer contribution is one measure that could enable this to happen.

Housing should be ‘shared’ wherever possible

CIH has already submitted a response to the consultation on the draft Programme for Cohesion, Sharing and Integration that affirms our belief in the need for shared and sustainable communities to become the ‘norm’ in Northern Ireland. Segregation is simply not sustainable, from a social or economic perspective. The housing system and planning policy need to be transformed in order to meet the stated preference of people in Northern Ireland for mixed housing in terms of religious identity and cultural background.

Good Design and Place-making are vital

“Housing providers must consider how the places they are responsible for can be designed and managed to encourage people to live sustainably”. The environment in which houses are built is every bit as important as the houses themselves. For example, for a community to be sustainable then people’s lifestyles need to be sustainable - so there should be shops and community facilities nearby, high-quality public realm and green space, good transport links, consideration given to biodiversity etc.

The right design and spatial planning will create communities that everyone wants to live in. Government policy must then ensure that

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5 Christoph Sinn and John Perry (eds.), Housing, the environment and our changing climate (Chartered Institute of Housing Policy and Practice Series, 2008), p,26
everyone has access to these communities, no matter their income, tenure status, religion or cultural background. There should be a place in well-designed communities in a good location with great amenities for everyone. Bearing these principles in mind is important, as housing’s role in sustainable development does extend beyond the construction of houses. Zero carbon build and retrofitting can run the risk of eclipsing the broader concepts of sustainability in relation to housing and communities and although they are crucial measures in mitigating the environmental impacts of housing, we must also bear in mind people and place. There is a difference between housing developments that aim to be truly sustainable and those that seek to mitigate some of the worst impacts of the construction and maintenance of housing.

The houses themselves

One of the objectives of the Sustainable Development Strategy is to increase the sustainability standards of social housing. CIH would like to see the strategy consider the need to increase the standards for both social and private housing, reflecting the role of the Department of Finance and Personnel (DFP) in producing building regulations that govern the standards of house building in the private sector. We would also like to see greater emphasis in the strategy and the implementation plan, on how to address the issue of carbon emissions from existing housing stock.

Newbuild

We note that the Department for Social Development (DSD) has already identified what actions it will undertake in the implementation plan and that this includes:

- Building all new social housing units to level 3 of the Code for Sustainable Homes; and
- Keeping the introduction of level 4 under review.

DSD also states that “funding for those Housing Associations that can already build to level 4 is now available as an incentive to embrace the higher standard on a voluntary basis”. Encouragingly the Housing Association Guide signals DSD’s intention to “ensure that all new social dwellings constructed after 2016 are constructed to the Code for Sustainable Homes rating level 6 star ‘zero carbon’”. This would ensure that social and private sector house building are in line, as DFP has identified that it will amend the Building Regulations (Part F) in 2011 and 2013, to move towards zero carbon new homes by 2016 when both the

[^6]: [http://www.dsdni.gov.uk/index/hsdiv-housing/ha_guide/hag-index/hagds-design-standards-contents/hagds-energy-sustainability-services.htm](http://www.dsdni.gov.uk/index/hsdiv-housing/ha_guide/hag-index/hagds-design-standards-contents/hagds-energy-sustainability-services.htm) It is noted however, that this date may be subject to change.
private and public sectors will be required to meet Level 6 standards of the Code for Sustainable Homes.

However, meeting these targets will be a challenge for both the social and private sectors. Although there are a number of exemplar models in Northern Ireland, rolling this standard out for all new housing will require considerable planning and skills. The current spending environment is unlikely to make this challenge any easier. It is clear that providing guidance and support for housing providers, contractors and suppliers and also homeowners and tenants will be crucial in moving towards low carbon housing in 2016. Thought should be given at this stage to how that support and guidance can be rolled out and made easily available across the housing sector in Northern Ireland.

So in terms of new house building the outlook is very promising, with environmental sustainability taking priority in the regulations for the development of all new private and social homes. In actual fact house builders in Northern Ireland are already utilising low impact methods of construction, natural building materials and renewable technologies in both private and social sector developments. CIH recently gathered information on sustainable development from its members in Northern Ireland and the input we received clearly demonstrated that this is a growth industry for those involved in housing. Housing associations building to levels 4 and 5 of the Code for Sustainable Homes, timberframe houses that require no central heating, Passivhaus projects, heat recovery ventilation systems, biomass fuelled district heating systems, photovoltaic tiles and the use of materials such as sheep’s wool and hemp were just a few examples provided of innovation across the housing sector.

The Sustainable Development Strategy’s proposal to create a sustainable development information database which is accessible to all is a positive one; however, CIH would suggest that rather than simply reporting and informing on strategic developments across the Northern Ireland Civil Service, this should include all best practice in relation to sustainable development. Although many instances of environmentally sustainable housing would be reported by DSD or the Northern Ireland Housing Executive, there would be many others in the private sector that would not be captured by the proposed database. In order to provide a truly representative picture of sustainable development that involves everyone, there should be some way of recording the work that goes on outside the public sector.

Existing Stock

With regard to existing housing stock, DSD has stated in its input to the implementation plan that it “will continue to invest in the quality of this
stock to see what can be done to improve its environmental sustainability”. CIH welcomes the recognition in the plan that action needs to be taken to improve the environmental sustainability of existing housing stock, but would suggest that the scale of the problem merits a comparable response.

Housing is responsible for almost 30% of the UK’s carbon emissions. Ambitious targets are already in place to build to low/zero carbon standards in the private sector and housing associations in Northern Ireland are meeting increasingly higher levels in the Code for Sustainable Homes. However, as 80% of the existing housing stock will still be in use by 2050, it is clear that it is here that government needs to focus interventions if carbon emissions targets are to be met. Northern Ireland’s existing housing stock, across all tenures, is also subject to the highest levels of fuel poverty in the UK, with current figures indicating that around 44% of households here are in fuel poverty. As energy inefficiency is a key factor in fuel poverty it makes sense to suggest that tackling carbon emissions and fuel poverty could be more strategically and sustainably addressed with one policy intervention.7

We accept that this is not necessarily a straightforward suggestion and demands a new approach; however CIH would agree with the argument that:

> What is required is a radical shift in policy towards a programme of housing refurbishment which can both eradicate fuel poverty and make a significant impact on the sector’s total CO2 emissions. This will necessitate a new perspective, with policies and incentives aimed at improving the housing stock for the more affluent ‘able-to-pay’ householders as well as for the vulnerable groups.8

The Commission on the Future for Housing has called for a Retrofit Scheme for Northern Ireland that would directly address energy efficiency and reduce carbon emissions. CIH believes that a comprehensive retrofit scheme could have a number of advantages. Providing a more focused approach on energy efficiency, a strategic objective in the Sustainable Development Strategy, is one, but it would also help to tackle the high levels of fuel poverty in Northern Ireland.

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7 It is worth noting that the Building and Social Housing Foundation’s recent submission on the Spending Review referred to a report published by Consumer Focus in 2009 that found that large-scale investment in a retrofit programme targeting energy inefficiency could virtually eradicate fuel poverty in England within seven years. As well as tackling fuel poverty this type of investment would significantly reduce household carbon emissions and create new jobs. BSHF, Submission to the Spending Review (2010)

8 Christoph Sinn and John Perry (eds.), Housing, the environment and our changing climate (Chartered Institute of Housing Policy and Practice Series, 2008), p.135
and increase the number of jobs in the low-carbon economy - another strategic objective.

The need to address carbon emissions by improving the existing housing stock is widely recognised. A retrofit scheme for existing stock would complement the work that DSD and DFP are doing to promote low/zero carbon newbuild housing in the social rented and private sectors. If addressing the need to reduce carbon emissions is combined with the programme to improve energy efficiency and tackle fuel poverty, government could have a real opportunity to make a difference on a number of levels. It has been argued convincingly that:

Both the climate change targets and the social housing objectives [i.e. fuel poverty] can be met, but only if we raise the ambition of the policy objectives, clarify the real potential and look beyond grants for one-off measures such as cavity wall insulation, which meet a narrow definition of cost effectiveness. A new system and infrastructure for a whole-home carbon audit and refurbishment is needed to make UK homes fit for the twenty-first century.9

The Northern Ireland Housing Executive (Housing Executive) has recently assumed responsibility for the administration and management of the Warm Homes Scheme. It is also the Home Energy Conservation Authority for Northern Ireland. It is feasible therefore to assume that the Housing Executive could work with all key stakeholders - developers, social landlords, providers of renewables, local councils - to oversee a retrofit scheme across Northern Ireland. A national retrofit scheme could incorporate a wider range of measures and renewable technologies than the Warm Homes Scheme and could replace this scheme as energy inefficiency-the aspect of fuel poverty targeted by the Warm Homes Scheme- would necessarily be alleviated through retrofit.

Addressing the sustainability of existing housing stock is perhaps where the housing sector could make the greatest difference to:

- Reducing greenhouse gas emissions (5.1);
- Implementing energy efficiency measures, particularly for vulnerable groups (5.3);
- Increasing the number of jobs in the low-carbon economy (1.1); and
- Reducing deprivation and the incidence of social exclusion and poverty... (2.1) – with regard to fuel poverty.

9 Ibid, p.135
A targeted retrofit programme could significantly reduce carbon emissions, encourage investment, innovation and interest in renewable technologies, low-carbon construction and natural building materials, make a real impact on levels of fuel poverty and create jobs and skills in the construction sector and related industries.

**Planning and Procurement**

**Planning Policy**

As mentioned above, there is significant potential for planning policy to make a contribution to the development of mixed-tenure, mixed-income and mixed-identity communities through the introduction of a developer contribution. Further information on the role that a developer contribution could play in creating sustainable and mixed communities can be found in CIH’s Key Principles paper on Developer Contributions in Social and Affordable Housing. ¹⁰

The Commission on the Future for Housing recommended that the Regional Development Strategy should “position matters relating to housing as a central ingredient in the overall Northern Ireland framework” given that housing is of such importance to economic growth and stability, community well being and cohesion and environmental concerns – the three pillars of sustainability. The Commission also recognised that planners have extensive powers that could be used to greater effect to “secure good quality housing with high standards of design and accessibility”. Land use planning reform was one of the Commission’s key recommendations with regard to planning as the current system is “held to be disappointing” on a number of levels. However, an effective planning system is vital in pursuing the sustainable development agenda.

To that end CIH welcomes the Department of the Environment’s intention as stated in the implementation plan to “have a fit for purpose suite of Planning Policy Statements prepared by 31st March 2011” in order to promote sustainable land management and look forward to seeing more detail on how those planning policy statements will facilitate sustainable development in due course.

The Commission on the Future for Housing also suggested that:

> Through the conditions they impose when granting planning approvals, planning authorities exert considerable influence not

just on the numbers of new homes that get built, but on the standards of design and the quality of those homes.\textsuperscript{11}

Although mention is made in the implementation plan of the roles that DSD and DFP have in improving sustainability standards in social and private sector housing, the role that planning policy and practice can play in ensuring that sustainability is placed at the heart of all new housing developments has not been explicitly considered. PPS 7: Quality Residential Environments does note that it embodies the Government’s commitment to sustainable development; however, these guidelines were published in 2001 and may require a degree of updating in light of new policy commitments and advances in design, methods of construction, new materials and technologies etc. Even when biodiversity and sustainable design and methods of construction are referenced in policy guidelines (as they are in PPS 7), how firmly these considerations are enforced in practice is another issue.

Echoing the recommendations of the Commission on the Future for Housing, CIH would like to see the implementation plan reflect the importance of the planning system in Northern Ireland adopting approaches that improve sustainability standards in housing.

Procurement

CIH, along with other housing organisations in Northern Ireland, has advocated that social benefit clauses should be written into procurement contracts to enable housing associations in particular to play a greater role in regeneration projects, employment schemes etc. CIH welcomes therefore the fact that DFP “will seek to integrate sustainable development priorities within the public procurement process”. Ensuring that sustainable development is a key factor in procuring services should provide a greater incentive for housing providers to ‘mainstream’ social, economic and environmental sustainability.

Although it must be acknowledged that many housing associations and also the Housing Executive are proactive in embedding environmental considerations in their development and management of housing, CIH would particularly like to see greater emphasis placed on sustainable maintenance and whole-life cycle costs in relation to procurement contracts. The Code for Sustainable Homes provides guidance and regulations in relation to the development of new homes, but there is scope for more environmentally sustainable

\textsuperscript{11} Planning and Land Use is covered in Section 4.4 of the report of the independent Commission on the Future for Housing in Northern Ireland (2010),
http://www.cih.org/northernireland/housingcommission/
approaches to the landscaping and ongoing maintenance of housing schemes.
Conclusion

CIH welcomes the publication of the Sustainable Development Strategy and Implementation Plan and is encouraged by the coherent vision and clear objectives and actions that emerge from each of the priority areas.

Collaboration, partnership working and involvement are key tenets throughout the strategy and we trust that as the implementation plan progresses CIH, as the professional body for housing, can support government and the private sector in developing the role that housing can play in sustainable development.

We hope that the comments contained within this paper are of use in taking forward the implementation plan, but would be happy to follow up on any individual issues if that would be helpful.

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