



Consultation Response

Facing the Future:

*Housing Strategy for Northern
Ireland*





Who we are and what we do

The Chartered Institute of Housing (CIH) is the professional body for people involved in housing and communities. We are a registered charity and not-for-profit organisation with a diverse and growing membership of over 22,000 people - both in the public and private sectors - living and working in over 20 countries on five continents.

CIH is the only professional organisation representing all those working in housing. Our purpose is to maximise the contribution that housing professionals make to the well-being of communities.

Overview

CIH welcomes the publication of *Facing the Future: Housing Strategy for Northern Ireland* and the opportunity to comment on the principles, themes, aims and proposals within the strategy. The housing system in Northern Ireland is facing significant challenges that will place increasing pressure on housing providers, tenants, residents and communities both now and in the future.

This strategy is an important opportunity to take a considered, co-ordinated and proactive approach to facing those challenges and addressing some of the problems and inconsistencies in our housing system.

Ownership of the strategy

Housing is something which crosses a number of departmental boundaries and policy areas with finance, regional development and planning all integral to the funding, design and delivery of housing. Similarly health, education, justice and the labour market all benefit from better housing outcomes.

- CIH believes that the housing strategy needs to belong to the Northern Ireland Executive as a whole, with the Department for Social Development leading on the development and delivery of the strategy.
- We trust that *Facing the Future* was produced in partnership or with involvement from other government departments to help facilitate the joint working that will be necessary to achieve housing outcomes that benefit all government departments.
- The housing strategy must be seen within the context of the Programme for Government 2011-2015, Northern Ireland Economic and Investment strategies, the draft Programme for Cohesion, Sharing and Integration, planning reform and the Urban Regeneration and Community Development Framework. It is vital to have an integrated strategy embedded within the wider public policy context.

The vision

In May 2010 the Commission on the Future for Housing articulated a ten-year vision for housing in Northern Ireland with 14 outcomes that would demonstrate an effective housing system.

In addition, Richard Best the Chair of the Commission said:

"Maybe this is the moment for a Housing Strategy that looks ahead to how everyone concerned with the future of Northern Ireland's housing can work together: a strategy that removes barriers, opens up opportunities for co-operation and partnership, breaks down artificial divisions."

Facing the Future is a positive step in drawing together a number of key policies and programmes either currently underway or planned in the near future. However, CIH would welcome a more expressly outcome-focused vision statement which gives a clear sense of where the housing system should be at the end of the five year period of the strategy.

The five-year time frame may in itself prove too short a period to deliver all of the aims of the strategy. A longer time frame for the strategy or perhaps a more focused vision on several key priorities may be necessary if the strategy is to be deliverable. CIH appreciates the difficulty in formulating a vision for housing and securing buy-in for that vision at this moment in time. The challenges facing the sector at a strategic level as well as operationally are significant and we do not underestimate the complexity of bringing forward a housing strategy in the current landscape.

Detail and delivery

Whilst we appreciate that this is a draft strategy and a high-level document, it is important that there is a sufficient level of detail on what *Facing the Future* will enable over the next five years and beyond.

- CIH would welcome more detail on proposals around increasing supply, reducing grant, how much funding will be available for specific programmes and initiatives etc.
- Timeframes are also important in relation to when key proposals and pieces of work will be taken forward. More detail on proposals and processes would help the housing sector form a considered view of where and how it fits into government's strategic agenda.
- CIH would also suggest that consideration is given to introducing targets across a range of areas within the strategy, again to provide a focus on what outcomes are to be achieved and when.

- Deliverability is an increasingly important aspect of policy-making and implementation considerations need to be factored into strategies and policies from the outset. SMART objectives and properly costed proposals are necessary to determine what can be delivered by the strategy over the next five years within the existing budget for housing and would inform future bids for funding.
- CIH believe that the housing sector needs to be closely involved in detailed discussions about these proposals, how they might work and how they can be progressed, to ensure that the strategy is deliverable.

Monitoring and evaluation

It is vital that mechanisms for measuring the success of the housing strategy are built in at this point in its development.

- CIH would welcome additional information about how the strategy will be monitored throughout its lifetime and evaluated at the end of the five year time frame.

Ensuring access to decent, affordable, sustainable homes across all tenures

CIH welcomes the housing system approach that has been adopted by *Facing the Future* and the recognition that housing must be viewed holistically rather than on a tenure basis.

Evidence base

CIH would suggest the first step in addressing this theme lies not with increasing supply, improving standards or securing more finance, but in ensuring that we have the right evidence base to inform decision-making. We must ensure that we are planning based on the correct assumptions.

Without adequate and accurate intelligence on the housing market and long-term forecasting, it is difficult to make decisions that will prevent future market volatility. Up to date information on supply and demand as well as robust and consistent data across the tenures and better measures in some cases (e.g. measuring housing completions rather than starts) will be key.

Housing Supply Forum

One of the recommendations of the Commission on the Future of Housing was to create a Housing Market Panel. In 2010 CIH endeavoured to bring together a group of housing and research professionals to identify -

- What information was gathered by each of our organisations;
- How that information was used / could be used better;
- What the information/intelligence gaps were (if any) and how they could be filled; and
- Whether there was scope/need for a single location for information for the whole sector, and, if so, how this could be achieved.

This may prove a useful starting point for the proposed Housing Supply Forum.

CIH believes that the Housing Supply Forum should actually be a sub-committee of a broader Ministerial Advisory Group on Housing or Housing Advisory Forum, given the diverse range of other issues which need to be addressed.

The scope and scale of the challenges facing the housing sector and the structural changes outlined in the strategy indicate that there would be considerable value in establishing an advisory group with a broader remit. This group could prove instrumental in securing a number of the aims of this theme (and others) by facilitating better understanding and partnerships between public and private sector providers; increasing access to housing through new delivery models; and seeking new sources of finance and investment for housing.

CIH does not wish to propose a new system of bureaucratic structures that become unwieldy to manage and exist simply for the sake of being in place. A Ministerial Advisory Group/Housing Advisory Forum and attendant sub-committees/forums would need to have a clear role, terms of reference and time-limited remit.

Shared housing

CIH would suggest that the issue of shared housing could more usefully be addressed within this theme of the strategy rather than in connection to regeneration. This theme helpfully raises the question of how to produce better partnerships between government and the private sector; however, we would suggest that the strategy needs to go further, not just in relation to the partners, but to what is being delivered.

CIH believes that:

- We must move away from housing supply that is developed on an individual tenure basis.

- Similarly, we need to move away from housing aimed at distinct markets or groups and create more integrated housing developments that encompass a range of housing products/tenure options for a range of ages, identities and abilities.
- New supply is not necessarily about newbuild. It may mean more creative use of existing housing stock or tenures such the private rented sector and shared ownership¹.
- Similarly we would suggest that affordable housing should not be confined to homeownership but include different forms of affordable rent.
- Increasing supply and access must lead to a wider range of housing options and new products and the provision of independent and tenure neutral housing advice and support.

Place-making

Planning and design are important elements of a housing strategy, but largely absent from *Facing the Future*. Both are fundamental to the creation of decent, affordable and sustainable homes, sitting within streets and communities that also contribute to the concept of 'home'.

There has been consideration of these themes in the local housing landscape. The [Happy to Live Here](#) exhibition of 2005 asked a number of interesting questions around how we plan and design places, rather than just houses, and this project has been updated for 2012 with a second report to be published shortly.

Place-making is by no means a new concept, but it is an important one and CIH would welcome greater consideration of the wider built environment and how different approaches to planning, design and density might also meet the aims of this theme. A clearer picture of what is wanted/needed in different areas and for different demographics and the capacity within different communities to take a positive role in community build, community land trusts and co-operatives might also better inform the implementation of this aspect of the strategy.

Financing social housing

The financing of social and affordable housing in particular is one that CIH's Housing Investment Think Tank has been considering and we will submit a separate response to the strategy on behalf of this group. We would like to see clarity on the long term funding

¹ See for example our thinkpiece – *Making the Most of Northern Ireland's Private Rented Sector to Meet Housing Need* – for our thoughts on how to improve access, affordability and sustainability within the private rented sector produced in partnership with DSD and SmartMove NI.
<http://www.cih.org/resources/PDF/NI%20policy%20docs/Making%20the%20most%20of%20NI%20private%20rented%20sector%20to%20meet%20need.pdf>



environment for social and affordable housing in Northern Ireland, taking into account the current financial realities and regulatory environment.

In addition to the public subsidy provided for social housing, government and/or the new strategic housing authority could potentially play an important role in facilitating greater access to private finance and investment for social and affordable housing. This could mean providing loan guarantees to de-risk development, building relationships with private investors on behalf of Northern Ireland housing plc. and enabling better use of collective assets across the social housing sector to achieve shared objectives. Although there is currently only a small number of developing associations there could be considerable gains in terms of new supply and cheaper borrowing rates (especially in the capital markets) by leveraging new private finance from the wider Northern Ireland asset base. There is considerable scope to access new forms of private finance through formal partnership arrangements working in pursuit of a shared social objective.

Housing Association Grant

CIH supports the principle of enabling housing associations from other jurisdictions to compete for housing association grant and develop social and affordable housing in Northern Ireland within the same operating environment as local housing providers. This could lead, not only to increased supply, but to the introduction of new approaches to delivery and there is potential for greater partnership working and sharing of expertise and experience across the UK and further afield. We would welcome further scoping work on what this might look like in practice and if there is potential for more collaborative working with housing associations from Great Britain as a precursor to straightforward competition for grant.

Development programme

A more immediate solution to blockages in the delivery of social housing would be to permit a three year social housing development programme as the current one year cycle discourages flexible and constructive approaches to development. Even with a three year cycle it must be recognised that it is difficult to assemble sites and to get planning permissions and other statutory approvals in place.

We would suggest that consideration is given to establishing a trouble-shooting unit designed to assist in resolving any issues with planning and other aspects of development that can potentially slow down the delivery process and mean targets are not met. We are aware that the Homes and Communities Agency has adopted this approach in England and set up a unit staffed by specialists (usually former practitioners) who will go in and work with local authorities and housing associations. A unit or team like this could also work proactively with all housing associations to ensure that they are in a position to develop and

take steps to incentivise development.

Procurement

We would also suggest that consideration is given to streamlining the existing procurement system – perhaps with just one procurement group for housing in Northern Ireland.

Specifications and standards

The current regulatory environment is an issue often raised with CIH by our members. CIH believes in the need for proportionate, risk-based and outcomes focused regulation so that housing associations have the flexibility to be innovative, take measured risks and consider new investment and delivery models. In the case of building specifications, we welcome the removal of prescriptive elements of regulation such as the Code for Sustainable Homes. However, we would suggest that performance outcomes might be useful to ensure that social housing providers are working to a shared standard if not specifications.

Energy efficiency

CIH's final comment on this theme is in relation to energy efficiency. We echo the Commission on the Future for Housing's call for a universal retrofit scheme that would provide environmental, social and economic outcomes. Despite the emphasis placed in *Warmer Healthier Homes* on insulation – with 153,800 homes requiring wall insulation and over 400,000 dwellings that could benefit from loft insulation top ups - too little has been done in Northern Ireland to improve the fabric insulation of the housing stock.

CIH would support a fabric first approach that focuses on low-cost interventions that result in significant benefits for homeowners, tenants and the environment. This could incorporate a social procurement element with relatively little training required to involve people who are unemployed in providing small-scale retrofitting measures. We would also welcome support for local products and manufacturers within such a scheme.

Responses to Consultation Questions

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

CIH would suggest that the most effective way that government can work in partnership with the private sector, and indeed the wider housing sector, to create long term stability in the housing market is to create a Ministerial Advisory Group or Housing Advisory Forum to consult and advise government on long-term, sustainable policies that will enable all contributors to the housing system to play their role effectively. This will ensure that government develops an understanding of the key players, the dynamics of their business

model and their priorities as part of an on-going conversation.

It must be noted that there is not a direct correlation as this question suggests, between a stable housing market and increased supply.

One of the key challenges to private sector engagement is the level of risk involved, whether that relates to private developers, financiers or landlords. Government could look at how they can de-risk the development of new housing, particularly in relation to new affordable housing models. This is not necessarily about simply increasing levels of grant subsidy.

Approaches to new affordable housing models in Scotland have endeavoured to de-risk delivery by using some grant subsidy and providing loan guarantees to quickly release developer capital for reinvestment in new sites. There may be value in government exploring some of these options to see if they are possible in the Northern Ireland housing context. Another approach that may be of interest is that taken by the Irish Government which has created 'serviced sites'. Government funds the provision of utilities on development sites to encourage building.

The private rented sector is, and will increasingly be, a key player in housing supply. Potential and existing tenants often have negative perceptions or experiences of private tenancies and we welcome the work of the Department for Social Development in addressing this through enhanced regulation. The landlord registration scheme and tenancy deposit scheme are positive steps towards a better regulated private rented sector with safeguards for tenants and support for landlords. Similarly we believe that the development of a private rented sector access scheme will further open up this form of tenure for low-income and vulnerable households and build on the success of the schemes such as SmartMove NI.

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

We believe a Housing Supply Forum would have merit in enabling the sharing of expertise between key stakeholders and government policy makers, with the core purpose of working together to identify and overcome obstacles to increasing housing supply. To maximise its focus and effectiveness, we would focus membership on core representative groups – amongst others the Chartered Institute of Housing (CIH NI), Northern Ireland Federation of Housing Associations (NIFHA), Construction Employers Federation (CEF), Strategic Investment Bank (SIB) and private lenders.

However, there is a need for ongoing, structured stakeholder engagement in housing policy

issues, beyond simply housing supply, in order to deliver the best outcomes. Our recommendation would be to create a wider Housing Advisory Forum or Ministerial Advisory Group on Housing, of which the Housing Supply Forum could be a sub-group. This would have the benefit of increasing the effectiveness of both government strategies and collaborative working between stakeholder groups in the housing sector.

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

Self-build projects bring significant personal benefits, in terms of developing skills, a sense of purpose, self-confidence and employability – all of which emphasise the social impact that such projects can have within an economic downturn. However, the realistic number of houses that can be produced by self-build schemes means that they will not make a significant impact numerically on housing supply.

We would suggest that self-build projects would more effectively support the delivery of Theme 4 in Driving Regeneration and Sustaining Communities Through Housing within the final housing strategy and action plan. Government could play a role in looking creatively at whether it can make small sites within the public sector land bank available for self-build projects perhaps within certain criteria; support the financing of these schemes; and develop mechanisms for support and specialist skills to be provided to people and communities considering self-build projects in light of the wider personal and community regeneration impact. There are a number of different routes to self-build procurement and a number of different organisations providing advice and support for all forms of self build and community self-build. Government may wish to consider bringing some of this information together on a Northern Ireland specific self-build website and linking in to other advice and support forums.

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

CIH would broadly agree with the overall themes. Additional thoughts are outlined above.

What other aims and measures should we be considering within theme 1?

We have suggested several other aims and measures that should be considered within this theme. Most significant of these is the need for shared housing to be integrated into

considerations of future housing supply as a major factor in facilitating creation of stable and sustainable housing markets.

Meeting housing needs and supporting the most vulnerable

CIH welcomes the opportunity to reconsider the way in which the allocation of social housing currently functions; it is appropriate to address the core question of what social housing is there to do. Is social housing to be open for all regardless of income or only for those most in need? Another question is whether housing need must be addressed through social housing?

Exploring other tenure options

It would be our view that housing need can be met in other housing tenures and that more consideration should be given to how best to support low income and vulnerable groups in exploring options such as the private rented sector, in time other forms of affordable rent and affordable ownership. This may mean considering the sort of tenancies that are currently available in Northern Ireland with longer tenancy agreements and greater security of tenancy albeit for a time-limited period.

We would welcome the introduction of the housing options approach that can be seen in Scotland and Wales. This model allows for a comprehensive assessment of an individual/household's housing needs, income and expectations at the point of application and presents them with a current and realistic picture of the options open to them. It is not weighted toward any one particular tenure and focuses on the needs of the individual/household as the determining factor. Linked in to this is the provision of independent housing advice and support.

Assessing housing need

CIH believes that social housing must be for those most in need and that the waiting list should reflect this. Social housing currently offers a strong and valuable safety net for low-income and vulnerable households and should continue to do so. Social housing should support those who need it most for as long as they need it. In addition, social housing also has broader social and economic roles in terms of area renewal and economic renewal, supporting strong communities, and tackling worklessness and unemployment.

There is an issue around the residualisation of social housing; however, more mixed tenure/income approaches to development would help alleviate this.² There is considerable

² John Hills (2007) [Ends and means: the future roles of social housing in England](#). Centre for Analysis of Social Exclusion, London School of Economics and Political Science

work to be done in marketing this form of development and redressing some of the more negative perceptions of social housing.

The current system, however, has the potential to incentivise certain behaviours and situations which lead to the accumulation of points and higher positions on the waiting list for social housing, whilst those most in housing need find themselves waiting to be adequately housed. We would support a review of how housing need is assessed and measured and how that translates into a waiting list – for social or perhaps other forms of housing.

Allocations

More flexible approaches to allocations policy may also help to overcome the correlation between social housing and deprivation and help the system to work better, allowing wider groups of people to access the sector. CIH would support approaches that enable some of the broader roles of social housing outlined above to be taken into account alongside housing need when allocating social housing. Approaches such as choice-based lettings could help enable those in the greatest need to be housed whilst also considering what would help build strong, sustainable communities.

Whatever new policy is developed it must at the outset be clear about the role of social housing, definition of housing need, how need can best be addressed and wider public policy priorities such, for example, as delivering social change. The systems should be developed to meet these objectives.

CIH has produced a number of guidance and best practice documents that may help to inform government's thinking in this area:

- [Allocating Social Housing: Opportunities and Challenges](#)
- [How to...consider new approaches to allocations and lettings](#)
- [Allocations and Local Flexibility](#)

Making best use of stock

When it comes to making better use of stock CIH would suggest that government's focus should be on removing barriers rather than just setting targets. The changed policy environment in relation to housing benefit/support for housing costs and the attendant financial drivers will of themselves focus social landlords on proactively managing stock. CIH, funded by the Department for Communities and Local Government, has established a [Making Best Use of Stock Team](#) in England to work with social landlords to tackle under occupation and tenancy fraud amongst other aspects, to support better use of existing social

housing stock. This may be an approach that government in Northern Ireland could consider within *Facing the Future's* additional focus on making better use of adapted homes.

We do not consider that an additional form of social housing tenancy for this purpose is either necessary or practical. The requirement for adapted social dwellings often develops mid-tenure, as a transitional need due to ill-health, old age or an accident, rather than being a need that presents itself at the commencement of the tenancy. The proposed new tenancy would therefore frequently be ineffective in addressing the issue.

We would suggest that it would be more effective to simply incentivise a move once the adaptations were no longer required by the household. We would suggest that this would be more positively received, is much more likely to be effective and does not undermine the security of tenure within social housing. We are concerned that the proposal to require owner-occupiers to make greater contributions to adaptations creates unjustifiable inequity based solely on housing tenure.

Housing for older people

CIH welcomes the commitment within the housing strategy to commission research intended to establish the housing aspirations of older people. We would suggest that this is addressed within the context of theme one rather than presuming housing for older people necessarily means supporting the most vulnerable. Supported housing, sheltered housing and homes suitable for older people – including those proactively choosing to move to more suitable homes at a younger age – should be encompassed into a discussion of future supply and demand. Housing for older people should be tenure neutral and be located within mixed (in all its forms) developments to encourage independence without isolation. There is a clear role for housing, health and social care professionals to work together to ensure that older people, particularly those in vulnerable situations, get not only the support they need, but well-designed homes that meet their needs at this point in their life.

Responses to Consultation Questions

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

As noted above, CIH would support a review of housing allocations policy that addresses some of the questions we have highlighted. There is a clear argument in favour of a more flexible approach to the allocation of social housing that still ensures that housing need being met is paramount but that also bears in mind the need to create viable and sustainable communities. There are sensitivities around any changes to allocations policy in particular and any review should be done in a careful manner that allows for full discussion

and debate across a wide range of stakeholders on proposed changes.

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

We do not consider that an additional form of social housing tenancy for this purpose is either necessary or practical. The requirement for adapted social dwellings often develops mid-tenure, as a transitional need due to ill-health, old age or an accident, rather than being a need that presents at the commencement of the tenancy. The proposed new tenancy would therefore not necessarily have an impact in addressing the issue.

We would suggest that incentivising a move once adaptations are no longer required by a household would more positively received, is much more likely to be effective and does not undermine the security of tenure within social housing.

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

We would be concerned that this proposal creates unjustifiable inequity based solely on housing tenure. Disability affects individuals just as greatly if they are an owner-occupier and they are not necessarily any more capable of financing the adaptations required to support them to live independently. This proposal carries two risks:

1. Private home ownership is undermined and seen as a less attractive housing option than social housing, due to the added benefits and support received; and
2. Owner-occupiers become unable to afford the required contribution to continue living without the necessary adaptations, with a negative impact on their health and a shortened ability to live independently.

The outcome in both cases would be greater reliance on government provision, whether in housing, health or care services. The current approach, whereby means-tested contributions are required across all housing tenures, would seem more equitable and effective.

Do you agree with our overall aims within theme 2 and how we propose to achieve them? What other aims and measures should we be considering within theme 2?

CIH would broadly agree with the overall aims and measures within this theme and has made additional comment above.

Housing and Welfare Reform

CIH would note that the assumption that welfare reform will make work pay is not universally the case as evidenced in our recent research report [Making Work Pay](#).

Many low income families will not see a discernible improvement in their financial situation under universal credit and for some they will actually be worse off. We appreciate that this is not a Northern Ireland Executive policy, but it is important to bear in mind that many people in low-paid work will be affected by the changes to housing benefit in particular and will not find that work always pays.

We welcome the commitment in the housing strategy to carry out research to better understand the impact of the housing-related changes and publish that as soon as it is available. CIH's work in supporting the housing sector in Northern Ireland with specific modelling work has been challenging due to the differences in how and what data is collected. Any steps which can now be taken to ensure that a more complete data set can be compiled and interrogated are positive. We trust that in addition to carrying out this baseline research, the Department for Social Development will continue to monitor the impact of the housing-related changes and use this to inform future housing policy decisions.

A strategic and targeted focus on how to manage (not mitigate) the impact of the housing-related changes will be important and we understand that some work is already underway to enable this planning to happen. CIH has found that our learning network on the direct payment demonstration projects has been an invaluable forum for shared discussion on the housing-related welfare reforms more generally and the different approaches that social landlords are taking. Although the housing sector in Northern Ireland is relatively small, a



similar learning network may be of use in helping the sector here to share information and generate ideas.

Housing advice

We agree with the focus on providing housing advice but would like to see that broadened to incorporate financial and digital inclusion and be linked in to other strategies/approaches within the Northern Ireland Executive such as the work of DFP's Digital Inclusion Unit. There are a number of initiatives both across government, the housing sector and the community and voluntary sector aimed at the provision of debt advice and financial inclusion as well as a number of providers, such as credit unions, who are already making affordable credit available to low income households. CIH believes that there is an opportunity, however, to take a more integrated, holistic and targeted approach to advice and support in relation to welfare reform.

Under occupation

Under occupation is the next significant change to the current housing benefit and we would echo the call from NIFHA that consideration be given to delaying the introduction of this measure in line with universal credit in order to allow for more time between the primary legislation and regulations coming into effect and the immediate implementation of the social size criteria. If this is not possible, CIH would suggest that phasing in the under occupation penalty, beginning with two-bedrooms or more, could allow housing associations and the Housing Executive more time to alert tenants to the changes and help support them in assessing their options.

Discretionary Housing Payment

We welcome the strategy's commitment to increase funding for Discretionary Housing Payment (DHP), although it is not clear if this is in line with the increases already announced or an additional local increase from the Northern Ireland block grant. Additional funding for DHPs would be welcome as the demand for this support is likely to continue to increase. In particular, DWP's decision to allow DHP to support disabled tenants to stay in adapted homes they are under occupying, whilst welcome, will place additional strain on this budget. In order to ensure that DHPs are used to best effect, CIH would suggest that a more targeted approach to the awarding of this payment will need to be considered with a Northern Ireland wide approach, clear priorities, guidance for staff administering the payments and better promotion of this support amongst tenants. It is not clear from the housing strategy where this will sit within the Discretionary Support Policy recently published for consultation and we would welcome clarification on how DHPs will be managed in the future.

CIH has been focused on helping landlords plan and prepare for the changes in housing benefit and introduction of universal credit and provided a wide range of resources to that

end:

- [Making it Fit: A guide to preparing for the social size criteria](#)
- [Preparing for the Bedroom Tax and Beyond](#)
- [Welfare Reform Impact Tool](#)
- [Direct Payment Learning Network](#)
- [How to support tenants to find a lodger](#)
- [How to help tenants manage their money](#)

We will continue to work with social and private landlords on practical steps that they can take to support their tenants and adapt their business models to meet the challenges of welfare reform.

Driving regeneration and sustaining communities through housing

CIH believes that there is a strong role for housing associations, amongst other housing providers, in leading regeneration and place-making. Regeneration is a long-term process and housing providers, with their links to local communities and long-term funding model, are ideally placed to see through the regeneration of local areas. Housing should be the means to an end rather than the end product in itself, with the ultimate goal creating dynamic and sustainable communities.

This links back to the point we raised under the first theme in this strategy about place-making and the importance of planning, design and the wider built environment in regenerating and sustainable communities and creating homes rather than just building houses.

Within the auspices of this theme it would be useful to look at the integration of housing, workspace and recreational space, often within the same city block in cities across Europe. There is a wealth of research and best practice already available on how to use housing as a cornerstone for imaginative and integrated development that can regenerate areas and ensure that they remain vibrant and sustainable. CIH would suggest that some of this work could usefully inform more detailed iterations of the housing strategy and action plan under this theme.

A more joined-up approach to regeneration within the Department for Social Development and recognition of the importance of housing in physical and community-led regeneration is extremely welcome. We look forward to seeing further detail on the broader principles of this policy and would urge that it is not confined simply to dealing with empty homes.

Social procurement through housing

Whilst we understand that there have been successes to date through the provision of social clauses for the social housing development programme, there is still scope for improvement. CIH has undertaken extensive work in Wales on social procurement through housing contracts and believes that a similar focused and properly resourced approach could deliver additional results in Northern Ireland:

- This approach has delivered 2581 jobs and training opportunities over a three year period through the use of a Can Do Toolkit and housing specific support for housing associations and contractors.
- Importantly this is not just about development contracts, but maintenance and pretty much any other service that housing associations procure.
- It has been funded by the Welsh government and this was crucial to its success in ensuring that very detailed toolkits could be developed and promoted and that hands on advice and support was readily available.
- The benefit of this approach is that it is EU procurement compliant and therefore easily transferrable to other jurisdictions and indeed other sectors.

The following links provide a comprehensive account of what can be achieved through social procurement with the right support as well as all the resources necessary to embed this approach and remove potential barriers across the social housing sector. Colleagues in CIH Cymru have also indicated that they would be more than happy to share their expertise and experience in exploring whether this approach could help yield even greater outcomes through social procurement in Northern Ireland.

- [3 years since the Can Do Toolkit was launched](#)
- [The Can Do Toolkit Resource 1: Introductory Guide](#)
- [The Can Do Toolkit Resource 2: Comprehensive Guide](#)
- [The Can Do Toolkit Resource 3: Model Material](#)
- [SME friendly procurement : Can Do Toolkit 2](#)
- [Resource 2: Can Do Toolkit 2](#)
- [Resource 3: Can Do Toolkit 2](#)

Responses to Consultation Questions

What more could be done to encourage owners to bring empty homes back into use?

Any efforts to tackle the issue of empty homes must be based on clear information about the prevalence and location of empty homes in Northern Ireland and examination of the reasons why these properties are empty. On this basis, policy makers can assess what

benefits can be achieved by tackling this as a strategic priority and whether, for example, the empty homes are in areas of housing need/demand and can make a significant contribution to housing supply.

A lot of best practice guidance exists from Scotland, England and Wales, where empty homes agencies have already been established to tackle this issue. Again they reiterate the need for accurate statistics, often engaging local people in identifying empty properties in their local area and establishing a local advisory group (which could form a sub-group of a Housing Advisory Forum) to drive forward and inform the agenda.

As the reasons for empty homes are varied, this will require a multi-pronged strategy combining incentives, engaged support and enforcement to achieve maximum effect. Initiatives used elsewhere which could be considered include:

- providing assistance to enable owners to rent or sell their properties
- creating incentives through loans or grants to encourage owners to renovate inhabitable properties
- enforcement through compulsory purchase orders (Empty Homes Dwelling Management Orders) or works notices requiring owners to carry out repairs

It may be useful to consider the [partnership approach to tackling empty homes](#) adopted in Scotland and their [action plan](#) when considering next steps on this proposal.

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

The Welsh Government and CIH Cymru have developed a highly effective scheme in Wales, the i2i Project ('inform to involve'), that has demonstrated how social landlords can ensure that housing investment contributes to wider social and economic regeneration. The i2i project helps create new employment and training opportunities for tenants and local people by embedding this requirement into Contract Tenders. Importantly, a second stream of their work has focused on ensuring that local SMEs can compete with bigger national companies to secure these contracts and help keep the financial benefits in the local economy. CIH would be very keen to facilitate further dialogue to explore how this government-funded initiative could be replicated in Northern Ireland. In its first year this approach generated 487 employment and long-term training opportunities and it has gone from strength to strength with 2581 employment and long-term training opportunities created over a three year period.

What barriers or opportunities exist for social housing landlords who become involved in such initiatives?

Experience in Wales has shown the significant amount that can be achieved through a smart, social outcome focused approach to procurement. However, this was only achieved through providing a high level of support to both social housing providers and potential contractors, educating them on how to embed social outcomes such as training into their Tender Contracts and supporting small local businesses to be able to meet these contract requirements, in partnership with local training providers. All parties identify this support as a key enabler.

The primary barrier will be a lack of guidance and support. In order to make any significant contribution to developing work and training opportunities, government should be prepared to invest in establishing support services and advice until this becomes an established mode of working. This is particularly the case if small local employers are to be able to bid successfully for these contracts, with the wider economic benefit of keeping the pound local.

Getting the structures right

CIH has provided initial comment to the Department on the PwC proposals on the future of the Northern Ireland Housing Executive and without additional detail on the new structures outlined in that report it is difficult to significantly add to what has already been said.

We would note that form must follow function and that the new structures must be established in such a way as to enable the aims and proposals within this strategy to be implemented and achieved.

We strongly support the separation of the strategic and landlord roles currently held by the Northern Ireland Housing Executive. CIH believes that the new Strategic Housing Authority must be an enabling body with a remit that encompasses unlocking public land and looking at supply, facilitating greater investment in the housing sector in Northern Ireland by actively building relationships with lenders and institutional investors and promoting housing-led regeneration. It should have sufficient powers to enable it to do all of these things and be focused on creative and innovative approaches to housing.

Independent housing regulator

CIH would also take this opportunity to restate our thinking on the need for an independent housing regulator in light of the potential creation of new housing associations/social enterprises from the Housing Executive's landlord role.

- The housing sector needs a regulator suitable for the very challenging environment that it faces, both on a global scale and in the midst of significant social policy change and structural re-organisation.
- Regulation needs to be proportionate and effective – it must also be progressive. CIH would like to see a new regulatory framework that is proportionate, risk-based, outcomes-focused and with a greater emphasis on what is being delivered for tenants.
- Essentially we would ask the Department to work towards the introduction of co-regulation.
- CIH has considerable experience of working with government on the development of appropriate regulatory structures and frameworks and have been closely involved in the recent reviews of regulation and subsequent new approaches in England, Scotland and Wales.
- We would welcome the opportunity to engage with the Department on the subject of regulation as part of the development of new structures.
- This in no way discounts the fact that there are issues that remain to be addressed within the housing association movement, particularly with regard to governance, but looks to the next iteration of regulation as part of the new housing landscape.

Rent-setting

On the issue of rent setting, the current rent formula across the UK provides huge assurance to lenders. Housing benefit is integral to this and provides steady and safe rental income streams.

The fact that housing association grant is subordinated to private borrowing by housing associations is also a key factor to lenders. In most cases the regulator does not have rent setting powers; however, a number of jurisdictions are looking at rent convergence and the idea that a regulator should have a role in setting the parameters for social housing rent.

For housing associations and also lenders the ability to set rents (ensuring that they remain affordable) is intrinsically linked to the ability to service your debts – a steady rental income, predicated in part upon borrowing, is essential. Any significant uncertainties linked to the rental income stream are likely to be of concern to lenders.

Business improvement

CIH has stated on a number of occasions that we do not think that the future of the housing association movement should be a numbers game, but based upon the products, services, outcomes and value it delivers for its tenants and the wider community. We have undertaken a piece of research on mergers and consolidation and refer the Department to its findings in relation to the theme of business improvement in the social housing sector – [Does Size Matter?](#)

Responses to Consultation Questions

What strengths do you see in the outlined strategic direction of travel in a future housing scheme for Northern Ireland? Where and in what ways could this be further improved?

CIH believes that there are considerable opportunities in developing new structures to support the housing system in a landscape that has changed significantly since the Housing Executive was established 40 years ago. Building on the successes of this organisation to ensure that its work can be taken forward and developed to meet the needs of the housing sector in 2012 and beyond is a positive and welcome step. CIH will have many further comments to make on the future structures that are perhaps more appropriately addressed in the context of the Minister's decision on PwC's suggested strategic direction of travel. It is difficult to add much to the comments above in relation to how this can be improved without more certainty, clarity and detail on the proposals. However, we look forward to engaging with the Department on the detailed design of the new structures at the next stage in this process.

Going forward

CIH welcomes the fact that we and other stakeholders have the opportunity to comment on specific proposals to shape the development of the final strategy.

- While there has been some involvement of the sector in developing the consultation paper CIH would welcome an approach that involves key stakeholders in the development of and ultimately the delivery of this strategy– co-production. We believe that greater engagement with the housing sector in Northern Ireland and enabling it to have an enhanced opportunity to shape policy outcomes and delivery mechanisms will ensure the best possible housing strategy for all the people of Northern Ireland.
- The co-production model is important in developing the action plan that will sit alongside the final strategy and in any forums that are established to support the delivery of the strategy's aims and proposals.
- CIH is happy to provide any additional information that would be useful on any of the areas that we have mentioned in our response and looks forward to further engagement with the Minister and departmental officials to create the best housing in Northern Ireland.