

Reaching Rural: Draft Rural Strategy 2021-2025

By the Chartered Institute of Housing Northern Ireland

This is a response to the consultation by the Northern Ireland Housing Executive on the next draft Rural Strategy.

Introduction

The Chartered Institute of Housing (CIH) is the professional body for people who work in housing. CIH draws upon the experiences of housing professionals in Northern Ireland, the Republic of Ireland, Britain and beyond. We have almost 700 individual members across Northern Ireland and the Republic of Ireland. CIH has expertise in analysing housing law, policy and practice in developing professional standards for housing practitioners.

Q. Do you agree with the proposed themes, outcomes and priorities which have shaped this draft Rural Strategy?

CIH welcomes the opportunity to respond to the Northern Ireland Housing Executive's draft Rural Strategy 2021-25 on behalf of our members. We recognise the unique and changing policy context within which the strategy is being developed and we welcome the consideration given to the challenges brought forward by the outbreak of Covid-19, as well as efforts to meet the requirements of our changing work patterns and the challenges brought about by our ageing population. We welcome the draft strategy's strong recognition of the ever-growing requirement for carbon neutral, energy efficient rural homes and the challenges and opportunities presented by the need to achieve net zero carbon.

In relation to the strategic context of the strategy, we would like to note our disappointment in regard to the NI Executive's delay in publishing a programme for government (PfG) in this mandate, and the omission to date of a stand-alone housing outcome in the draft framework for the PfG, despite a commitment made in New Decade, New Approach agreement. We believe that a housing outcome would be good vehicle to help achieve the outcomes set out in this draft strategy.

Q. Will rural housing need tests which incorporate the proposed ‘housing health-check’ service offer an appropriate level of engagement with rural communities to encourage those in need of support to come forward?

CIH support the inclusion of a ‘housing health-check’ service for customers in rural communities which is aimed at helping them sustain existing tenancies, seek alternative suitable accommodation where necessary and ultimately prevent rural households from falling into homelessness.

However, we also believe that more can and should be done in advance of customers taking up a tenancy to achieve the named above. In our *Rethinking Social Housing: The Next Steps* [report](#), CIH recommended that government should work with the housing sector to develop a selection scheme rule to support the delivery of pre-tenancy activity that prioritises supporting people into sustainable tenancies.¹ In the absence of any such rule being introduced as part of the housing selection scheme, we would ask the Housing Executive to consider what pre-tenancy engagement can take place in rural communities prior to any allocation being made to ensure housing need is met appropriately and tenancy failure is kept to a minimum.

Such early and important intervention would help prevent rural customers from ending up in a cycle of homelessness whilst ensuring that households receive adequate financial and social support to maintain their tenancy. Pre-tenancy work should not only identify support needs of individuals but also ensure that appropriate support is provided, to assist practically with sustainment of tenancies in rural areas that arguably don’t have the same support systems in place to the same degree as urban communities. We believe that such pre-tenancy

¹ Rethinking Social Housing: The Next Steps report, September 2020, p. 13.

engagement satisfies housing need through processes that are people-led rather than process-led.

Q. Do you agree with the emphasis on facilitating the development of both social and intermediate housing within mixed-tenure environments to promote cohesion and sustainability in rural areas?

CIH supports the promotion of mixed-tenure developments as a new, key objective of our planning system. It represents a welcome opportunity for partnership working between councils and providers to deliver the right homes in the right places for the people who need them. It our view that the development of wholesale social housing developments does little to tackle the stigma surrounding social homes and those who live in them. By facilitating a mixing of tenures in new developments, we can reduce the residualisation of communities by encouraging people of all different social and economic backgrounds to live together, creating more sustainable communities.

As previously stated in our *Rethinking Social Housing* [report](#), we believe it is also important that, as far as is practically possible, social housing in mixed-tenure developments not be readily distinguishable from private housing in terms of external design. Similarly, the percentage of properties allocated for social housing should be pepper-potted around housing developments to ensure it is not simply a shared space but an integrated one. The implementation of this policy goes to the heart of good practice in design, addressing the perception that the presence of social housing impacts on the sale prices of private homes in mixed-tenure developments. The evidence is that mixed-tenure developments do not reduce property prices, provided the housing quality and the design of the development overall are of a high standard. Similarly, the external design requirements for housing in rural areas should also ensure sensitivity with the surrounding landscape.

In addition, we welcome the inclusion of intermediate rental products as a means of overcoming affordability issues for many households who are unable to buy their own home. Intermediate housing can help to ensure those who wish to stay within their community but have a lower priority for social housing or cannot access homeownership, have other options at their disposal. CIH believes there is a need for additional intermediate rental products; we welcome the work being undertaken by the Department for Communities to explore models for mid-market rental products to meet the housing needs of more people. Although, we recognise that it may be more difficult to deliver viable products in rural locations.

Q. Do you agree with the proposal to examine the potential for community-led housing as an additional way of addressing housing supply issues in rural areas in NI?

CIH agrees with the proposal to examine the potential for community-led housing in rural areas as an additional way to address under-supply. Investment in community-led housing schemes have the added value of driving economic recovery as well as increasing the agency tenants have in building sustainable rural communities to call home. For community-led housing to be more than a tick-box or consultation exercise, participation and consent must be central to the project, with buy-in that extends beyond local community groups or the local council. Community-led housing also has potential, in our context, in instances where available land is contested; having a whole community approach has the benefit of any one side of the community feeling they have ownership of a project.

Q. Have the challenges associated with increasing energy efficiency in rural housing stock, the reliance on carbon based heating systems in rural areas and the measures required to address these issues, been sufficiently considered?

The housing sector in Northern Ireland has a significant role to play in the contribution to the UK's net-zero target by 2050 given that our homes generate around 13 per cent of carbon emissions per annum. As we continue to improve the energy efficiency of our homes in a bid to tackle rising consumption levels, decarbonisation must be scaled up to change how our homes are heated through the implementation of renewable technologies across all housing tenures; this change will come at a cost. It is the firm view of CIH that this cost must not be passed on to low-income consumers, which risks pushing households into further poverty.

As it stands, progress is being made towards improving the energy efficiency of our homes with around 49 per cent achieving an EPC C rating or above. However, this progress is not uniform. 79 percent of social rented homes already achieve this, compared to the 45 per cent of owner-occupied homes and 43 per cent of private rented homes.

CIH believe that EPC ratings should be used to set minimum energy efficiency standards (MEES) for domestic properties in Northern Ireland. It is our view that there should be a uniform standard across all tenures; any differential in standards between those privately renting, domestic homeowners and social housing tenants would be unsatisfactory.

We welcome that the Housing Executive has taken the lead on two projects which aim to test technologies which could improve the energy efficiency and thermal comfort of our stock and reduce energy costs for tenants. It is also welcome that these two projects have been commissioned in the west of the province where reliance on oil heating is higher.

We would ask the Housing Executive to remain cognisant of the fact that there is an acute need for an increase in installers to retrofit existing buildings with energy efficiency and clean heat measures. The success of the strategy will also depend on behavioural change. People will have to operate their heating in completely different ways. Education and training more broadly will be crucial to the success of new technologies, so we prevent some of the current experiences where homes are built to high energy efficiency standards, but residents and/or contractors may not have the knowledge to effectively work with the technology. As the professional body for housing, CIH is willing to engage with the Housing Executive any element of workforce accreditation where recognised gaps appear.

Q. What would you determine to be the main challenges facing the delivery of this strategy over the next four years?

As previously mentioned on page two of this response, CIH is concerned by the failure of the NI Executive to include housing as a standalone outcome in the draft framework of the PfG, despite a cross-party commitment in the New Decade, New Approach agreement that included housing as a priority in any forthcoming programme for government. We believe that a stand alone housing outcome, with its own delivery plan, will better facilitate bringing the rural strategy 2021-2025 to fruition.

CIH are concerned that Supporting People (SP) services have seen no increase in funding over the previous ten years, amounting to a real terms cut of 20 per cent. It is crucial that SP services, commissioned by the Housing Executive and delivered through public and voluntary organisations, are properly funded to ensure their existence and maximise their impact. Analysis carried out by NICVA's Economic Centre for Empowerment previously highlighted that for every £1 spent on SP

services, it saves the public purse £1.90.² A failure to increase SP funding would adversely impact the vulnerable client group it supports and be a missed opportunity to reduce the burden on public finances.

Q. Please provide any other comments which should be considered in the development and delivery of this 4 year Rural Strategy.

The impact of COVID-19 has changed the way in which we live; our homes have become multi-functional particularly in relation to our work. Where many public and private sector companies now encourage employees to work from home, communities in rural areas face a disadvantage of being able to fulfil their role efficiently, due to the inaccessibility to decent broadband speeds across large parts of Northern Ireland.

Research carried out by the Northern Ireland Audit Office (NIAO) found that access to broadband, at speeds of up to 30Mbps, is lower than the UK average and all other UK regions. NIAO noted that only 63 per cent of rural premises had access to superfast broadband compared to the 98 per cent of urban premises.³ Although telecommunications remain a reserved matter, it is our view that the Housing Executive, alongside DfC and the Department for the Economy, should continue to work to ensure homes in the most rural of parts in Northern Ireland receive support from the UK Government to ensure 'project gigabit' is rolled out as speedily and as vastly as possible here.

² Northern Ireland Council for Voluntary Action. *The Financial Benefits of the Supporting People Programme in Northern Ireland*. [online] Available at: <<https://www.nicva.org/resource/financial-benefits-supporting-people-programme-northern-ireland>> [Accessed 22 September 2021].

³ The Northern Ireland Audit Office report by the Comptroller and Auditor general. *Broadband Investment in Northern Ireland*. 2021. p. 16.

About CIH

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

CIH Northern Ireland contact: Heather Wilson CIHM

Policy and engagement manager

P: 028 9078 7734

E: heather.wilson@cih.org

September 2021