

## **Housing Supply Strategy 2022-2037**

### **CIH Northern Ireland response to the Housing Supply Strategy**

This is a response to the consultation by the Department for Communities on the Housing Supply Strategy.

## Introduction

CIH welcomes the opportunity to respond to the consultation on the Housing Supply Strategy. In recognition of a number of notable changes made to the final strategy, we would like to extend our thanks to the department for the consideration given to the concerns and suggestions put forward by the sector in response to the initial draft strategy.

We would ask that the department continue to work with the sector during the lifetime of the strategy to ensure it is responding to the needs of housing professionals and the communities they serve. Similarly, it will be important that the department look at the strategy, not as a *fait accompli*, but as a live document that can be adjusted, added to or qualified if and when necessary, during the lifetime of the strategy.

### **1. The Call for Evidence consultation showed that there was broad support for the proposed vision, objectives, and timeframe for the Strategy. Based on the comments received we have updated these for the draft Strategy - are you content with these?**

Yes. We are content with the proposed vision, objectives and timeframe for the strategy. CIH welcomes the ministers statement within the strategy for the need for housing to be prioritised as a standalone outcome in any forthcoming programme for government (PfG). If parties honour the New Decade, New Approach agreement, and ensure that housing is prioritised in the PfG, with its own delivery plan and key indicators, with commensurate allocations under the 2022-25 budget, it is important that this strategy should act in tandem with housing as a standalone outcome together with the financial support required to meet the strategy's aims.

## **b. objectives**

### Increase housing supply and affordable options across all tenures to meet housing need and demand

CIH welcomes the department's recognition that increasing the pace and volume of the Social Housing Development Programme (SHDP) alone will not meet the current level of housing supply need. Therefore, the consideration of alternative, affordable products, notably intermediate rent by the department is a welcome step to increasing supply across tenures. The development of an intermediate rental product will go some way to increasing affordable homes for those who need them alongside the already established co-ownership model.

Although beyond the immediate scope of this strategy, CIH wishes to take this opportunity to reiterate our support for the revitalisation of the Housing Executive. A tangible increase in housing supply and the refurbishment of the current stock will require reform of the regional authority. Although at the beginning of the process, constituting the borrowing power of the Housing Executive through transformation, enabling it to invest in its current stock and ultimately build again, provides an opportunity to fulfil the objectives of this strategy in the long term.

### Prevent homelessness, reduce housing stress and improve and prioritise housing solutions for those most in need

CIH welcomes the decision by the department to include 'prevention' of homelessness within the strategy as opposed to maintaining a narrower focus on 'reduction'. The successful efforts by the sector during the early weeks of the pandemic to ensure an available supply of temporary accommodation for all who needed it, highlights what can be achieved where the political will and adequate funding exists. The inclusion of 'prevention' is also aligned with the draft Homelessness Strategy and ensures the joined up nature of both strategies. A focus

on prevention in Britain has been shown to create more person-centred outcomes, with more housing solutions achieved that are tailored to people's unique circumstances and contexts. We are pleased that this has been recognised as an objective of the strategy.

#### Improve housing quality

It is important that the increase of housing supply does not overshadow the need to uplift the quality of existing stock. By the Housing Executive's own estimates, much of its existing stock requires additional works to ensure it meets an appropriate standard. Importantly, the increase in fossil fuel prices has highlighted the importance of the retrofit project which recognises the human impact of poorly insulated homes as well as the environmental consequences. The refurbishment and retrofitting of existing stock will require substantial investment; again, it is difficult to talk about improving housing quality without the recognition that the revitalisation of the Housing Executive is paramount to this task.

CIH encourages the department to consider the implementation of a heat and buildings action plan, similar to that applied in England and Wales, to ensure the development of net-zero homes. The department should bid for additional monies to ensure a fund exists for the retrofitting of existing stock beyond the UK Government's current £3.8bn Social Housing Decarbonisation Fund (SHDF) to ensure we can meet the cost of decarbonising our homes. Building new, green, zero-energy homes is vital, but the need to make fabric changes to existing properties within the social market is crucial if we are to reduce domestic carbon emissions, tackle fuel poverty and future proof domestic properties. Political commitment to fund these changes in the long term is required.

Ensure the provision of housing options that contribute to the building and maintenance of thriving, inclusive communities and places;



It remains our view that the development of mixed-tenure communities contributes to the building and maintenance of thriving, inclusive communities and places. While it is positive that we have seen the gradual introduction of mixed-tenure policies within local development plans (LDP), it is important that we do not allow a sole focus on supply to undermine the importance of rolling out a widespread policy of mixed-tenure housing developments. Mixed-tenure brings an end to whole-scale social housing developments that due to outdated aspects of the allocations system can inadvertently contribute to the stigmatisation of social housing itself. By encouraging mixed-tenure, we are bringing people together, creating more diverse communities and avoiding the residualisation of social housing that has taken place over time.

We can no longer take a linear view of housing as simply accommodation. The climate emergency and the rise of new initiatives such as the '20-minute neighbourhood' or '15-minute city' that we have seen develop in places like Melbourne and Paris, show the interconnection between our homes, workplaces and local amenities. An integrated approach is required to think about where our homes are placed, the mix of house type available and the surrounding community infrastructure required.

Reduce whole-life carbon emissions from both new homes and existing homes and support a 'just transition' to carbon neutrality

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

### **c. Timeframe - 15 years**

CIH supports the department's proposed timeframe of 15 years given the significant, deep-rooted structural challenges it aims to address. We recognise how this corresponds with associated plans such as the Regional Development Strategy (2035) and aspirations within other jurisdictions, such as Scotland's 20-year housing strategy with a vision to build 100,000 new homes within the next decade.

## **2. The assessment of the Call for Evidence has enabled us to develop a total of 15 longer term policies and interventions that will provide the basis to develop appropriate action plans. Do you agree with the focus of these 15 high level long term policies and interventions?**

Work collaboratively and innovatively with the private, public and third sectors to address issues around land availability and considering issues such as: local services, infrastructure constraints, sustainable drainage, digital connectivity and transport.

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

Enhance our open data platforms to improve access to housing, land, property and planning data, creating better transparency and unlocking opportunities to transform supply.

CIH would be in favour of enhancing data platforms to improve access to housing, land, property and planning data.

Ensure our housing policy and legislative framework enables us to deliver the housing supply to meet our current and future needs and demand patterns.

It remains the view of CIH that cross-departmental working is critical to the overall success of the Housing Supply strategy. It is important to note that whilst DfC is the statutory body responsible for social and affordable housing in Northern Ireland, the provision and maintenance of new social and affordable homes requires the co-operation of the Department for Infrastructure (DfI). Any co-operation with DfI is critical given the barriers facing new social and affordable housing developments due to the ongoing difficulties with wastewater infrastructure. In similar terms, the inextricable link between housing and health is well-evidenced and has gained further credence since the pandemic and subsequent stay at home message. The co-operation of these departments in a bid to alleviate the housing crisis is vital, but to ensure its success, CIH believes co-operation must be put on a statutory footing.

CIH, alongside NIFHA, Housing Rights and Homeless Connect have campaigned for housing to be made a priority in the next PfG, with its own key indicators and delivery plan. This commitment made by all executive parties in the New Decade, New Approach agreement has not yet been implemented. We believe the prioritisation of housing within the PfG is the best vehicle by which to achieve the objectives laid out in the strategy. It would play a role in driving the budget allocations needed to meet the goals of this strategy.

Support upskilling, reskilling, delivery of apprentices and training for both existing workers and new workers in order to underpin a modern integrated housing system. This will include ensuring that public procurement spend contributes to the Executive's objectives, including creating jobs in deprived areas and ensuring security of our wider supply chain.

It is vital that the DfC, alongside the department for the economy, put a strategy in place, with sufficient funding, to upskill our workforce in NI. There is an acute need for an increase of installers to retrofit existing domestic properties with energy efficiency and clean heat measures.

We would ask the department to ensure they work with professional bodies to identify and address skills requirements for this work to begin taking place at pace. As the professional body for housing, CIH is willing to engage with the department on this element of workforce accreditation. We are also keen to emphasise the importance of the sectoral partnerships to the success of the strategy, and we are keen to ensure our training and qualifications in housing management cover elements of the final strategy where relevant.

CIH welcomes the inclusion of appropriate public procurement spending that helps to create jobs, particularly in more deprived areas of NI. The upskilling and reskilling of workers will ensure growth in the building trade in areas such as modern methods of construction; with the appropriate investment, we can encourage the necessary economies of scale to attract growth within the construction industry as well as advancing Northern Ireland PLC.

Work innovatively to optimise access to alternative forms of public and private finance such as Financial Transactions Capital (FTC) and institutional funding to develop and deliver new and affordable housing products.



CIH supports the inclusion of the need for optimising access to alternative forms of public and private finance to develop and deliver new and affordable housing products. We recognise that public subsidy for social and affordable homes will be insufficient for the scale of housing development required in NI. The private financing of new social developments has been tried in relation to the reclassification of housing associations by ONS. And the use of FTC funding to date has shown what can be achieved without competing with capital for new-build social housing.

It is important to reiterate that public subsidy alone cannot meet the scale of refurbishment and new builds required to meet housing need in NI. The revitalisation of the landlord arm of the Housing Executive to enable it to invest in its current stock and ultimately build again is crucial to the success of this strategy and any further supply strategy in future years. We believe a balance can be found with appropriate governance mechanisms and tenant involvement that ensures this process is a success, both operationally and strategically.

There is a balance to be met in how we fund our housing, and we cannot oversimplify the steps needed to ramp up the building of new homes. It will take investment from various streams of funding.

Deliver housing solutions for citizens who are most in need, recognising the inequalities identified through the Equality Impact Assessment developed to support this Housing Supply Strategy.

Yes, CIH supports this policy/intervention. Secure housing plays a vital role in promoting a good quality of life for citizens who are most in need.

Develop and implement new policies that will support the delivery of a more diverse range of housing types/alternative models of housing to meet all housing needs.

CIH supports the implementation of new policies that will support the delivery of a more diverse range of housing types that meet the needs of a changing demographic and lifestyles across NI. Diversifying our housing stock will also increase choice for applicants. Consideration should also be given to meet the needs of smaller households to avoid instances of underoccupancy where possible.

Improve our response to homelessness with a focus on prevention and learning the lessons from what worked so well during the pandemic as well as innovations from elsewhere.

CIH welcomes the revised inclusion of homelessness prevention within the strategy. The efforts of 'everyone in' during the pandemic shows that with the right financial support, change is possible. We feel that the aim of prevention, though ambitious, is achievable and it is right that the focus has shifted from 'reduction' to 'prevention'. We would ask for the explicit inclusion of the maximisation of the Housing First model in NI; we believe its expansion would help decrease the reoccurrence of homelessness, especially among client groups with complex needs.

In addition to the above, CIH considers an additional tenancy selection scheme rule that supports pre-tenancy engagement through identifying specific tenant needs and offering appropriate support services to meet those needs will bolster tenancy sustainment in NI. This selection scheme rule would help avoid the placement of clients in a tenancy not appropriate to their needs. We would encourage the Housing Executive to work with housing associations, government and CIH to deliver this.

Putting place-shaping at the heart of our actions by developing policies that will support delivery of housing led regeneration, encourage mixed tenure, and promote shared housing.

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

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

‘Shared housing’, as part of the programme overseen by DfC, exists in the department’s own words to “improve the choices that are available by tackling the barriers that prevent individuals from opting to live in shared neighbourhoods”. The shared housing delivered under this programme is very welcome and much needed. However, we are not building nearly enough of it to feel its intended impact. Beneficial as it may be for those who have settled in shared communities, those still living separately are not experiencing its value. In our manifesto for the NI Assembly election 2022, CIH have asked parties to commit to an increase in shared housing to offer more choice for those who wish to live in it, as well as recognising the value mixed-religion neighbourhoods have in building integrated communities. However, it is important that the promotion of shared housing is backed by an ambitious target over the lifespan of the housing supply strategy.

Ensure the planning system, including Local Development Plans, helps support the delivery of the appropriate supply of housing, reflecting changing nature of need

and demand and with consideration to wider policy influences including adaptive reuse and climate change.

In our Rethinking Social Housing: The Next Steps [report](#) we called for a level playing field to be created between new social and private developments at community consultation stage. As it stands, the planning process requires social housing developments to undergo an additional layer of community consultation beyond that asked of other tenures. Community consultation is important, which the planning system facilitates. However, the views of existing residents need to be balanced with those of people who need social homes; the added consultation for housing associations to obtain scheme approval is not representative of this balance. Its existence suggests new social housing requires 'more of a say' from communities than other tenures, which reinforces negative perceptions and misplaced fears surrounding social housing.

Work in new and different ways with local Councils and Community Planning Partnerships to realise opportunities to increase and maintain housing supply and help create sustainable and inclusive urban and rural places.

Meaningful partnerships with local councils are required to ensure each council is living up to the commitments made in LDPs regarding affordable housing targets in all new housing developments. As referenced in our response to the NIHE Reaching Rural: Draft Rural Strategy 2021-2025 consultation, CIH supports 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. This too, will help to create sustainable communities in rural places.

**3. The Strategy includes an enabling principle to: 'Adopt a whole system approach, collaborate with central and local government and the third and**



**private sectors to inclusively transform supply.’ Do you agree with the proposed enabling principle?**

Yes, a whole system approach incorporating collaboration among different levels of government and the third and private sectors is important to transform housing supply.

**4. Do you agree with the proposed ambition to deliver 100,000 plus homes over the 15 year lifespan of the Strategy?**

Yes. We agree with the ministers proposals to deliver 100,000 plus homes over the 15 year lifespan of the strategy. We support the goal that a third of this 100,000 plus target be for new social housing. In this case, the strategy aims to build just over 2,200 new social homes per year, which is a 50 per cent increase upon the average number of SHDP completions 2010-21. This is an ambitious target and will need to be supplemented by appropriate funding both for development and investment into wastewater infrastructure. It is important to reiterate that housing need will not be met by the SHDP alone.

**5. Do you agree with the proposed indicators to measure the success and progress of the Housing Supply Strategy?**

Stress and Supply

CIH agrees that the number of households in housing stress and housing stock figures are appropriate measurables of stress and supply.

Homelessness

CIH agrees that the number of households who are homeless (presentations and acceptances) is an appropriate measurable of homelessness.

Affordability

We are content that the proportion of households spending 30 per cent or more of their household income on housing costs is an appropriate measurable of affordability.

### Satisfaction

We are content with satisfaction measured as proportion of households who report being either “very satisfied” or “fairly satisfied” with their house or flat.

### **Quality and Energy Efficiency**

#### Standard Assessment Procedure (SAP) ratings

Yes, SAP ratings are an appropriate measurement of energy efficiency.

#### Percentage of homes that meet the Fitness Standard

Yes, providing that there is flexibility to measure in future by a new, enhanced fitness standard, which remains an outstanding housing reform.

### **Community & Place**

#### Indicator(s) in development – do you have any suggestions for a suitable indicator?

CIH would suggest the inclusion of engagement with tenants/residents. In the social sector this might be evidenced by performance under the consumer standard of social housing regulation. The need to ensure tenants are content and satisfied with the place in which they live is important. Other considerations such as ‘community infrastructure’ should be measured as a way to help ‘place shaping’. For us it is important that we are creating sustainable communities. Capturing the tenant voice is vital and a body such a Supporting Communities could help deliver this type of qualitative feedback from residents.



### **About CIH**

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