

HOUSING SUPPLY STRATEGY CALL FOR EVIDENCE 2021

Response to Consultation

Key points

- Having good quality, affordable and sustainable housing appropriate to needs is a significant priority for the people of Northern Ireland and there should be a Housing Specific outcome in the Programme for Government (PfG).
- A standalone Housing outcome will underpin delivery of this Housing Supply strategy.
- Housing is a cross-cutting issue and can only be delivered effectively by a joined-up government approach, involving multiple government departments. A specific housing outcome will help to achieve this.

Date 16 July 2021



ABOUT NIFHA

The Northern Ireland Federation of Housing Associations, formed in 1977, is the representative body for Northern Ireland's 20 registered housing associations.

Our members are all not-for-profit organisations. Together, supported by the Department for Communities and the Housing Executive, they provide more than 50,000 social and affordable homes.

Housing associations access private finance to effectively double the number of homes they could build with government housing association grant alone.

Housing associations also deliver high quality care and support to help people stay as independent as possible. Working in partnership with other organisations, they also invest millions each year in community services and facilities.

Our sector employs more than 3,200 people and manages housing assets worth £4.2 bn.

NIFHA welcomes the opportunity to comment on the Housing Supply Strategy Call for Evidence 2021.

SETTING THE CONTEXT

Standalone housing outcome in the Programme for Government

A stand alone outcome to deliver the underpinning of the strategy that aims to ensuring citizens have access to good-quality, affordable housing is fundamental to achieving an equal and prosperous society where no one is excluded. The coronavirus pandemic has brought the "importance of 'home' and the impact of not having one into sharp focus", with homelessness expected to rise, housing need growing and many living in unsuitable housing.

Interdepartmental action

NIFHA recognises that to develop an ambitious and comprehensive programme of work, that the full power of joined-up action across Departments is necessary.

New Decade New Approach (NDNA)

We welcome the commitment to making this Housing Supply Strategy one that fully reflects and responds to the needs of our society and protects the environment in which we live and work. We would welcome the upholding the pledges made in the 'New Decade, New Approach' deal agreed by political parties in Northern Ireland as they formed a new government.

Inclusive society

We want to see an inclusive society in which people of all ages and backgrounds are respected and supported. A society which has no barriers to people living prosperous and fulfilling lives.

1. INTRODUCTION

The Northern Ireland's Executive Office is committed to tackling homelessness and supporting the provision of new social housing while working to ensure the provision of suitable housing for all citizens. However, although housing issues have been identified in key priority areas within the Programme for Government (PfG) in three of the nine well-being outcomes- it is remiss that Housing has not been given an outcome of its own.

A standalone housing outcome will underpin delivery of this Housing Supply strategy.

1. Do you agree that a 'Whole System' approach given the challenges is the right one?

NIFHA agrees with adopting a 'Whole System' approach to this strategy. A whole system approach works with communities and stakeholders to both understand the problem and to support identification and testing of solutions. System change is a long-term endeavour, often delivered through incremental steps and collaboratively with many partners. It will cover social, affordable and private sector development with the ambition is to transform housing supply in Northern Ireland.

2. Do you agree with the 15 year timeframe?

Yes

3. If you answered no to question 2, should this timeframe be shorter or longer?

N/A

4. Do you agree with the proposed vision for the Strategy?

Housing is one of the key material determinants of health and shelter is a fundamental human need. NIFHA agrees with the proposed vision of the Strategy that "Every household will have access to a good quality, affordable and sustainable home that is appropriate for its needs."

5. Do you agree with the proposed objectives for the Strategy which are:

- a. Increase housing supply and affordable options across all tenures to meet current and future demand and [unblock the issues with mixed tenure.](#)

We would suggest the addition of 'unblock the issues with mixed tenure' to this objective.

- b. Reduce housing stress and homelessness [prevention](#) and improve housing solutions for the most vulnerable.

We would suggest a wording change in this objective to 'homelessness prevention.' This would also align the Strategy to relevant Housing Executive (NIHE) strategies such as the Homelessness Strategy and Tenancy Sustainment Strategy and ensure initiatives to prevent homeless are prioritised as soon as, and indeed before, someone finds themselves at risk of homelessness.

A focus on prevention protects people against the human cost of homelessness, and the cost to the public purse of dealing with the impact of homelessness, as the Northern Ireland Audit Office (NIAO) highlighted in their 2017 report on

Homelessness in Northern Ireland.¹ Indeed, the annual cost to the NI public purse of each homeless presentation was estimated in 2015 to range from £4,972.36 to £36,119.34 (depending on the complexity of the situation), with the average deemed to be £15,470.²

- c. Improve housing quality **with excellent design, safety and sustainability**
We would suggest adding design safety and sustainability into this objective.
- d. Ensure the provision of housing options that contribute to the building and maintaining of thriving, inclusive communities and places.
- e. Support the transition to carbon neutrality by reducing whole-life carbon emissions from both new homes **planned to be built, homes recently build** and **retrofitting** existing homes.

We would like to point out that sustainability needs to start now- or we will be building housing that needs to be retrofitted. The assumed barriers relating to retrofitting to proceed at scale and pace are lack of finance, lack of policy, lack of capacity and capability in both the supply chains and skills³.

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

Good quality

high-quality, low-carbon and fire-safe dwellings of excellent design, safe and sustainable.

Sustainable

To be affordable, houses must be designed and built embracing strong principles of sustainability. Ensuring houses are energy-efficient may increase up-front construction costs a bit, including the costs of superior tools and equipment and professional architectural and mechanical engineers services, but the long-term benefits and future cost-efficiency are what matters.

Affordable

The need for housing that is affordable is shared by everyone housing costs that are affordable vary from one household to the next means “affordable” is household income dependant.. Affordable housing is housing that a household can pay for, and still have money left over for food, transportation etc.

Relationship Between Affordability and Sustainable⁴

To be affordable, houses must be designed and built to last. If construction is energy-efficient it will reduce the long-term costs of maintaining a house and improve its durability particularly in terms of issues that are related to damp.

¹ [Homelessness in Northern Ireland Full Report 0.pdf \(niauditoffice.gov.uk\)](#)

² “Calculating the cost of homelessness in Northern Ireland? A desk-based study of the range of costs relating to homelessness” Fiona Boyle, 2015

³ <https://www.osborne.co.uk/wp-content/uploads/Designing-The-Future-Net-Zero-Carbon-Housing-Retrofits.pdf>

⁴ Sustainability and Energy Efficiency are Key to Affordable Housing <https://www.ecomena.org/sustainability-key-to-affordable-housing>

7. What do you believe are the three main barriers to delivering the objectives for the strategy?

Objective 1 Increase housing supply and affordable options across all tenures to meet current and future demand and unblock the issues with mixed tenure.

Barriers to delivering the objectives for this strategy include

- a. Land availability
- b. Infrastructure
- c. funding/costs/affordability

We see opportunities arising from this consultation which include,

- a. this review ensuring the necessary outcomes are identified,
- b. funding to ensure delivery is made available and
- c. the potential for modular building is investigated.

There are points below we feel are important to include,

- We welcome this becoming an Executive responsibility rather than a department one.
- We need joined up strategy for all parties involved in bringing housing forward to understand timings.
- We need to try a new way of doing things rather than repeating the same old actions we have always done,
- We need ring fenced money,
- We need clarity on shortfalls of supply sides,
- However, we cannot sit and wait for the strategy to be produced we need to be making changes now.

It is easy to sign up to a delivery piece what is hard is being part of the delivery therefore as housing falls across all depts all executive ministers need to be on board,

8. To what extent do you agree that there is a need to establish a more robust understanding of NI Housing Stock, e.g. by tenure, location, condition, etc.?

Extremely necessary. A 'whole system' approach and the objectives of this strategy is not achievable without a robust understanding of NI Housing Stock

9. Are you aware of any specific data sources or methodological approaches to estimating existing housing stock, e.g. by tenure, location, condition, etc.?

Not answered

2. SUPPORTING PEOPLE, SHAPING PLACES AND BUILDING COMMUNITIES

2.1 SUSTAINABLE COMMUNITIES AND HOMES

10. How can housing supply help create and maintain sustainable communities?

The Covid-19 pandemic has evidenced the importance of a decent home that is safe, secure, warm, and affordable for all tenants. Good housing improves outcomes in areas like health, education, and homelessness. Pathways can be created to employment through the supply chain.

A more holistic approach needs to be considered, while considering what is important to create and maintain stable communities. Investment in Communities to allow them to thrive – including well designed layouts, green spaces, play parks, community hubs etc.

Secure by Design can help prevent Anti-social behaviour (ASB) issues while the Housing for All programme is helping to break down barriers around traditional segregated / single identity communities.

Good quality housing enhances the built environment and needs to be located in the right place and be the right type to help maintain and sustain communities.

Flexibility is required in design to allow for future adaptation and reconfiguration to meet tenant's future needs and sustain tenants in their homes. Provision of a range of house types to meet current and future needs e.g., Complex needs units.

The home is the foundation however, property attributes, community, infrastructure, and the necessary social supports, all contribute to creating and maintaining sustainable communities.

11. How do we engage communities more effectively in place making?

Engagement needs to be meaningful and evidence that feedback is properly considered and actioned needs to be seen to happen. This requires a commitment of time, training, and resources. Training may also be required to focus on building community capacity and on incorporate community skills development.

The management and challenges arising in existing and new communities should be fully explored to ensure outcomes are considered for future development. Showcasing the benefits of community involvement using case studies e.g. Shared Housing Schemes and setting up of Advisory panels.

By exploring new digital platforms, we can reach out to rural communities for example and the provision of digital / Community hubs also encourage engagement.

12. To what extent do you agree that housing led regeneration policy contributes to reversing the physical, social, and economic decline of:

- a. areas of deprivation
- b. town and city centres
- c. rural areas
- d. suburban areas

We agree that this is the case – The demand for new and additional housing is there and the recent exercise in identifying surplus public land has the potential to provide land that could be identified specifically for housing in all 4 of the above categories. Priority could be given to social housing where there is surplus public land in areas of high housing need. There are opportunities to revisit “living above the shop” as a way to bring greater mixed-use to town and city centres.

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

- Housing needs to be at the centre of the Government’s Programme to deal with wider outcomes such as addressing poverty.
- Ensure Buy Social targets are being met.
- Ensure an element of Corporate Social Responsibility through the Development Programme.
- Fundamental review of Allocations to achieve more balanced communities.
- There should be a presumption to approve social housing planning applications as a means of fast-tracking housing-led regeneration.

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

Shared housing is critical to ending the segregation of housing based on religious background. The success of ‘Together: Building a United Community’ (T:BUC) /Housing for All has proved the concept and research does suggest that people would prefer to live in shared housing than single identity areas.

15. How can more shared housing developments be delivered here?

Continued and enhanced funding for the T:BUC/Housing For All programme. Wider political work required to engage with community representatives and break down barriers to shared housing.

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

Good housing is a critical part of the care and support system. Good housing and the support services that go with it (such as Supporting People) cuts hospital admissions and provides longer-term home-based support that prevents or postpones the use of expensive nursing care. There should be greater integration of Health and Justice departments in housing, and a significant uplift in funding for Supporting People, now that it is evidenced that there is already a 14% gap between need and supply. Supporting People is critical to ensuring that people can be supported at home and to reduce the need for more expensive interventions from health and justice. Warm dry, affordable to heat homes also take the pressure of the health service as good housing can alleviate some underlying health conditions.

Our work at housing is not just about increasing supply it is proving housing services for some of our most vulnerable citizen. Research has shown that for every pound invested in the Supporting People programme, it saves the wider public purse £1.90 by reducing pressure on health services and the justice system, so investing in SP will reduce demand on services elsewhere and provide better value for money. However, if no new funds become allocated to meet pay needs in this sector there will be an inability to recruit and retain staff due to an inability to pay wages at a level that can attract people to the sector.

The Covid pandemic has affected people's health and wellbeing, as a society mental health issues were already increasing prior to the pandemic. Research from previous epidemics and pandemics have shown that lockdowns, while necessary to slow the spread of the virus, can exacerbate mental health issues, people have previously suffered from Post-Traumatic Stress Disorder (PTSD) as a result.

The needs of people most at risk of marginalisation, isolation, and poor mental health are significant issues which must be addressed. We need to ensure that support for mental health can be delivered by housing support services (like supporting people) support needs to be readily available to those who require it- currently access to this service is oversubscribed and there is already a waiting list.

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

Specific targets could be set for specific groups such as older people. Develop specific new sheltered and supported housing targets and look at how these are allocated. Northern Ireland has an aging population so there is a need to request increase in development of sheltered accommodation so perhaps take sheltered out of the common selection scheme.

Again, the Supporting People Programme is vital for supporting older people, those with physical and learning disabilities and in preventing/addressing homelessness.

Article 25 of the Universal Declaration of Human Rights recognises the right to housing. Everyone has the right to a house adequate for their health and well-being. This was agreed in NDNA we now need to move forward and do it.

18. How important is mixed tenure to addressing housing supply issues in NI?

NIFHA welcomes the Communities Minister's commitment to mixed tenure. Our sector believes that a mixed tenure approach is the best way to build and maintain balanced and sustainable communities.

A mixed tenure development combines a range of tenure options, which can include owner-occupier housing, shared ownership housing and rental properties (social, intermediate, and private).

The focus of mixed-tenure development is fostering greater social, economic and community mix to support thriving and sustainable communities. It is therefore extremely important in NI that this is addressed in housing supply.

Housing associations are increasingly seeking to provide new homes across the social, affordable, private rented and private for sale tenures. To do this we are working closely with local councils, central government, and the wider construction industry.

19. What challenges do you see in progressing mixed tenure developments, and how could these be overcome?

In NDNA many of the following challenges were identified as key issues and actions needed to address them

- record levels of homelessness and housing stress
- an ageing population and the increasing prevalence of dementia
- the growth of working poverty, fuel poverty and food poverty

- sectarianism, racism, and intimidation
- helping vulnerable people.

To address this, an increase in housing across all tenures and having a mixed tenure approach, i.e., the adoption of Shared Neighbourhoods is needed. Providing a range of affordable housing options ought to mainstream mixed tenure development. Delivery of housing options will require new thinking about design materials, smaller household sizes and the ageing population.

The Minister has a stated objective of more mixed tenure development; however, if this is to be achieved there is a pressing need to remove the legal uncertainty concerning the extent of the powers given to Registered Housing Associations (RHA) under the current regulations, as set out in Article 15 of the Housing Order 1992. These regulations are adversely impacting on the delivery plans of developing associations and will see schemes stalled and homes not delivered. While there are a range of legal views on this, which adds to the uncertainty, NIFHA believes that through a small number of changes/additions to the existing regulations, this will clarify and resolve the matter.

The Minister for Communities believes the targets for social housing are too low and has repeatedly stated intentions to see more social homes delivered in areas of most need, working towards the goal of an increase in the number of social homes built. The Minister for Infrastructure is committed to progressing regional roads initiatives and keen to use space in town centres to maximize active transport and the active travel agenda which promotes mental health and physical wellbeing.

2.2 EQUALITY AND HUMAN RIGHTS

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

The three constructs identified are relative to

- The opportunities to secure housing,
- The housing meets cultural, physical or other needs and is safe,
- The tenure is secure and affordable in the long term,

Segregated residential housing patterns can have the effect of dividing and limiting the operation of a wider housing market.

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

In 2017, DfC as part of its Fundamental Review of Allocation looked at Proposal 7 - The removal of intimidation points from the Housing Selection Scheme this proposal was not actioned. It is NIFHA's view that victims of intimidation should be supported through a holistic, multi-agency approach that looks at each case on an individual basis and provides appropriate support such as emergency accommodation.

However, the current practice of awarding 200 points does not address underlying issues and is detrimental to other applicants on the waiting list with equally urgent housing needs.

22. In relation to the issue of using multivariate analyses (this is analyses that considers the impact of more than one Section 75 characteristic), do you have any suggestions as to how this should be undertaken? Not answered

2.3 HOUSING SUPPLY IN RURAL AREAS

23. To what extent do you agree that the housing supply strategy should address the need for affordable homes in rural areas?

House prices in rural areas of Northern Ireland continue to grow. This is not just the result of a pent-up demand from the Covid-19 pandemic but also a reflection of employers' change to a hybrid working environment, freeing employees to move out of the cities and urban areas.

The drive-up in-house prices in rural areas may continue long after the urban and city prices plateau. It is therefore essential that those on low incomes who cannot compete in the current and future rural housing market are provided with proper alternatives.

Local rural services still need to be maintained and will rely on those employees on lower incomes. If they are forced out of the local community and seek cheaper alternatives in urban areas local services will suffer and sustainability of communities be in peril.

24. To what extent do you agree that community- led housing should be supported and enabled in rural and urban areas across NI?

The pandemic has presented a unique opportunity to rejuvenate our rural communities. There is a realistic prospect for people to live in rural locations and undertake jobs without having to commute into the urban centres on a daily basis. NIFHA is working in partnership with both the NI Housing Executive and the Rural Community Network, on a campaign to promote the benefits of rural homes. If we can enable more people to live in rural areas, we will be in a better position to create and sustain vibrant rural communities.

It is essential that local rural communities are engaged at a very early stage of any housing process. Most importantly the level of demand in rural areas continues to be hidden and it is only through that community engagement that true demand can be measured. Local community groups provide an energy and commitment that can have a big impact in motivating the local communities where they work and as such should be at the heart of any housing decisions made for their area, including working with housing associations to access land, collective self-build projects, involvement in design decisions etc.

25. How can we deliver additional innovative multi-agency projects (or approaches such as Tackling Rural Poverty and Social Isolation (TRPSI)) to deliver more affordable housing supply in rural areas? Not answered

2.4 HOUSING AND POVERTY

A good home is the foundation of social, physical, and mental well-being, and is central to addressing society's most pressing societal challenges – including poverty and inequality.

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

“We need to examine the challenges associated with poverty that drive increased need and consider how to address the issue of housing supply, alongside these issues.”⁵

Many challenges are associated with poverty including.

- housing costs and income,
- poverty,
- housing costs by tenure,

⁵ <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-housing-supply-strategy-call-for-evidence.pdf>

- poverty by tenure,
- fuel poverty,
- financial well-being,
- unemployment,
- economic inactivity,
- intergenerational poverty and joblessness,
- multiple deprivation, disability, and educational attainment.

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

The social housing allocations process often results in new build developments having new tenants with high social needs and low personal capacity. This often results in higher-than-average anti-social behaviour (ASB).

ASB is devastating on the mental & physical health of individuals & communities. Tenants suffer stress & anxiety, sleeplessness, depression and sometimes suicide. While housing associations aiming to reduce incidents and creating improved health & wellbeing for tenants with interventions a change is needed on the allocation of points. ASB creates conflict & tension within communities- people feel unsafe, unhappy, increased harassment, divided communities, and violence.

28. To what extent do you agree that more needs to be done from an interdepartmental perspective to improve the lives and life chances of those who are homeless or at risk of homelessness? (Provide link to interdepartmental plan)

NIFHA strongly agrees that more needs to be done from an interdepartmental perspective. Additionally, a standalone Housing Outcome is needed in the Programme for Government, in order to ensure that relevant Departments and Statutory bodies are able to appropriately prioritise their time and resources to deliver the objectives of the Strategy, including homelessness prevention.

29. How do we help homeless people transition from temporary accommodation to sustainable homes?

People must be supported not only to access but to sustain long term tenancies, particularly in the private rented sector where tenants do not have access to the same support infrastructure provided by social landlords.

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

A decent home is the cornerstone of addressing social and economic deprivation and disadvantage. As part of helping the economically inactive to get a job, it is important that they have somewhere to call home within a supportive community.

3. LAND AND PROPERTY

31. Are there changes to land and property legislation, policies, processes or procedures that could transform housing supply for the better?

It is imperative that the work of DfC and NIHE on creating a database of public land is completed in the near future, to better enable the use of suitable public land for housing in areas of identified need. As above, surely social housing planning applications should be fast-tracked.

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

If you answered yes to the above question, what do you see as the main barriers to achieving this?

Public Bodies in Northern Ireland are not permitted to donate land, and any land/property must be sold or transferred at the market value. The transfer of surplus land must comply with the Stormont Regulation and Government Property Act (NI) 1933, which states that any sale, exchange or lease of land must be 'at the best price' It should be noted that land transferring or sold by a public sector organisation to an Association must be valued at market price using RICS 'Red Book'.

The overarching conclusion of a review of the three largest land-holding Departments: Health (DoH), Education (DE) and Infrastructure (DfI) found that the quantity of public land (central government land not local government land) within areas of housing stress is limited, with much of the land identified as suitable for housing being located outside the areas of housing stress.

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

The NI Executive suspended work on a s105 or Part V equivalent many years ago, and the requirement for any private scheme to have a social or affordable element is slow to come through the local development planning process. But the latter would significantly contribute to Social Housing Development Programme (SHDP).

4. PLANNING

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

Conor Mulligan, director at Lagan Homes, said: "We need to build more homes now but planning permission is complicated and even if approved, there is no possibility to build due to a lack of foul sewer capacity⁶.

Recognition from planners that housing associations are working to end of financial year deadlines and that staff absences in last few months of a financial year can have a detrimental effect on social housing delivery, the effects of which can impact future housing delivery numbers.

⁶ <https://www.belfasttelegraph.co.uk/business/northern-ireland/underfundingof-ni-wastewater-network-holding-up-new-homes-40623099.html>

Planners across NI to have a consistent approach to seeking all possible consultee responses at a very early stage in the planning approval system to ensure that the timeframe for a decision is as short as possible.

Planners to recognise the benefits of using Zoom meetings to facilitate attendees so that narratives re issues can be started earlier (lessens number of car journeys so environmentally responsible).

Planning system to recognise that multiple copies of hard copy information is now no longer viable / desirable in an age when sustainable practices are encouraged. DfC NIW / Roads to re-consider their practices as electronic storage of adoption information appears inevitable.

Recognition that minimum space standards for houses are required in all planning applications. Suggest using standards in social housing as a guide as the quality of all new homes (re space standards) cannot be impacted by a desire to lessen the inevitable costs associated with zero carbon delivery.

Natural light is a free commodity. Encourage discussions about natural light in planning applications (and embed in Building Regulations) so that this aspect of design is as much a part of delivery as streetscape discussions.

Rainwater is a free commodity. Encourage the use of simple rainwater harvesting methods by way of water butts in all new houses to water plants.

Embed biodiversity requirements in planning legislation as this will lead to better homes, better places to live and settled communities.

35. Are there planning practices adopted in other UK or European jurisdictions that you believe would transform supply if adopted in NI?

As above, fast-track social housing planning, require private developers to include social homes, etc.

36. Is land banking hindering housing supply in NI?

Yes

If yes, what could be done to address it?

Access to land in locations where there is housing need is the number one issue along with government finance to deliver more social homes. To encourage landowners to release land incentives should be considered. Public sector land banking is also an issue.

5. FINANCE

37. To what extent do you agree that the NICS could better utilise existing funding (e.g., Block Grant, Financial Transactions Capital (FTC), Housing Association Grant (HAG), Reinvestment and Reform Initiative) to leverage greater levels of private finance for housing development?

100%

The Minister for Communities indicated her desire for more social and affordable homes to be built for this to happen an increased budget is needed. There have been numerous increases in costs in the past year, but funding via Total Cost Indicators (TCI)/HAG has either not increased, or the increase is only marginal.

We appreciate that FTC has funded the delivery of intermediate housing primarily with shared ownership housing delivered by Co-Ownership. In January, an additional £13 million was allocated to Co-Ownership to deliver a further 422 homes. And while an allocation of £145 million was announced for the delivery of 4,000 much needed homes over four years, there needs to be more FTC accessible to provide people and families with a greater range of housing options.

The implications of the Housing Amendment Act need to be considered in the context of HAs being able to deliver affordable homes. NIFHA welcomes an overall increase in the money available for SHDP to provide the required new homes across different tenures. With houses being built where they are needed, this increase in construction will act as an economical multiplier for the regional economy.

Increasing the SHDP numbers would also require a commitment to infrastructure. Without the necessary infrastructure, the Communities Minister's ambition around building social and affordable homes will not be possible.

In NIFHA's Overcoming Barriers to Delivery of the SHDP research we identified that

- investment in infrastructure is needed not just water but roads as well and
- surplus public land needs to be Identified so that it can be used for social housing land.

Housing Associations require the TCI/HAG rates to be set earlier.

Rent level need to find a balance between affordability and viability for the HAs to build/maintain.

Economic recovery- Building housing, retrofitting older houses can stimulate the NI economy.

Supply issues caused by Post Brexit certification rules ⁷

38. Are there other ways the private and voluntary community and social enterprise sectors can leverage other forms of funding to increase housing supply?

Yes,

The creation of support for NI funding vehicle for social housing could be an option to allow all sizes of HA's to access long-term cost-effective finance on the capital markets. Aggregators have proved beneficial in GB however the NI market is sometimes not favoured by credit committees due to concerns around political stability, lack of knowledge of regulatory regime etc.

Private Placements can now also be accessed from c£40m + so this should now hopefully become more accessible to a wider pool of associations.

There needs to be progress on using FTC for affordable homes for sale or mid-market rental.

⁷ <https://www.building.co.uk/news/post-brexit-certification-rules-threaten-to-bring-supplies-to-grinding-halt-cpa-boss-warns/5111778.article>

39. Are there any other areas of market failure that need public and/or private intervention?

We understand that capital funding increases only marginally and that the Departmental budgets have largely been rolled over. NIFHA would suggest that to kick-start a strong economic recovery we need to be building. We welcome that the NI Executive has already highlighted this as key driver in kickstarting the region's economic recovery. The positive impact of building new homes or refurbishing and retrofitting older ones, is not just social but will be economic as well. Building homes can result in a number of profound economic multiplier effects, with the construction output generating local economic activity as well as supporting the broader economy.

6. INFRASTRUCTURE

Infrastructure is more than water supply and wastewater management, it includes a number of areas that construction crosses over with such as roads, transport (including airports and airways, telecommunications (Internet connectivity, broadband access), Power generation and transmission such as electric and gas. If infrastructure is not in place, then building new homes is not possible.

The economy needs reliable infrastructure to connect supply chains and move goods and services. Clean energy and public transport can reduce greenhouse gases. This same economic logic applies to broadband networks, water systems and energy production and distribution.

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

An Infrastructure Commission would allow all relevant bodies to work together in a way that paves the way for developers to secure planning consents and appropriate connections to all aspects of the required infrastructure when required.

It should not exist to fire-fight problems as they arise; rather it should be visionary and require participants to deliver for tomorrow's needs.

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

Without urgent alignment between housing provision and infrastructure services -building will completely stop. The NI Water situation has been known about for some time and resolving this issue will not be a quick fix. Infrastructure Minister Nichola Mallon told the Assembly it could take 12 years to address issues within water and waste-water infrastructure.

The Utility Regulator has identified an investment requirement of £2 billion over the next price-controlled period (six years).

There are many articles published regarding this situation attached are some from this week.

Underfunding of NI wastewater network 'holding up new homes'⁸

⁸ <https://www.belfasttelegraph.co.uk/business/northern-ireland/underfundingof-ni-wastewater-network-holding-up-new-homes-40623099.html>

Conor Mulligan, director at Lagan Homes, said: 'New homes still can't be built as many of Northern Ireland's wastewater treatment works and sewerage systems are chronically underfunded and nearly, if not already, at capacity'.

Call for Stormont to urgently address 'waste water infrastructure crisis'⁹

A group of house builders have said the development of "much-needed new homes is being prevented until urgent upgrades are made", which they said is particularly impacting first time buyers and the social housing sector.

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

Yes absolutely, we need government support for climate change retrofit investment, use of vesting powers to enable vacant properties to be brought back into use, removal of right to buy for NIHE tenants.

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

A simple Vision Statement should be made, and the Infrastructure Commission needs to be headed up by a visionary person who believes in the need for change and maintains a simplistic mantra that 'we owe it to future generations to fix our problems'.

7. CLIMATE CHANGE/NET ZERO

44. Are there changes to climate, sustainability and environmental legislation, policies, processes or procedures that could transform housing supply for the better?

There is an urgent need to address the many challenges of climate change and our sector is determined to play its part. This means building new homes in an energy efficient way and retrofitting existing homes, with the support of government. The availability of green space not only can help to reduce carbon emissions but also is a proven benefit for both the mental and physical health of those who have access to it.

NIFHA agrees with the policy objectives of the Climate Change Bill¹⁰, which is currently being consulted on, and suggest that they need to include the following mitigation strategies-

- retrofitting buildings to make them more energy efficient.
- adopting renewable energy sources like solar, wind and small hydro or tidal stream generator.
- helping develop more active and sustainable transport including public (hydrogen buses), electric vehicles, and promoting cycling or walking as active transport.
- promoting more sustainable uses of land Establishing net-zero carbon target for Northern Ireland.

Northern Ireland has been the only part of the UK without its own climate legislation, though it is contributing to wider UK reduction targets. This legislation is needed to establish statutory targets, assign clear duties and responsibilities, and provide clarity about the long-

⁹ <https://www.belfasttelegraph.co.uk/news/northern-ireland/call-for-stormont-to-urgently-address-waste-water-infrastructure-crisis-40621857.html>

¹⁰ <https://consultations.nidirect.gov.uk/northern-ireland-assembly/climate-change-bill/>

term ambitions and coordinating actions to reduce greenhouse gas emissions and increase resilience.

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

Australian research found transitioning to low carbon communities requires an understanding of community practices and resultant emissions, along with the technologies, infrastructures and institutions associated with and accessed by communities.¹¹

Support will be needed to deliver programmes designed to attain practice or behaviour change in households to gain less carbon intensive lifestyles and focuses on the factors that shape human behaviour and influence householder energy consumption.

Understanding individual psychological factors as well as the systems, standards and norms for individuals is fundamental to the development of successful strategies to shift towards low carbon communities.

Government has a critical role to coordinate and integrate current approaches to both the technical and social transitions to address climate change.

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

Tenure is important for considering barriers and incentives to climate change mitigation and adaptation measures.¹² The UK Committee on Climate Change has found different types of tenure need different approaches:

- A person in rented accommodation is more likely to be in fuel poverty, which may mean they have limited resources for measures such as energy efficiency and property-level adaptation.
- Many landlords have little incentive to invest in improvements to their property given that for most measures, the tenant would receive the reward for this through reduced energy bills and better comfort.
- Social landlords can be well-placed to oversee mitigation and adaptation action. They are driven by the social and charitable objectives of providing decent and affordable housing that complies with regulation, have control over whole estates and have better access to capital.
- an upcoming report by Sustainable Homes has found that UK social housing is not fit for 2050.¹³ Long-term strategies do not exist to make homes ready for 2050, despite it being within reach of most landlord financial planning cycles.
- Owner occupiers are often able to make changes most easily and see the direct benefit of investments. However, there is a lack of advice on improvements needed to bring homes up to appropriate standards.

Tenure can also affect the type of adaptations that can be made. Most low-carbon heat options would not currently be attractive without public subsidy or incentives.

¹¹ https://www.researchgate.net/publication/223647631_Transitioning_to_low_carbon_communities-From_behaviour_change_to_systemic_change_Lessons_from_Australia

¹² <https://www.theccc.org.uk/wp-content/uploads/2019/02/UK-housing-Fit-for-the-future-CCC-2019.pdf>

¹³ Sustainable Homes (2019) Housing 2050 – How UK social housing can meet the challenge of climate change.

8. INNOVATION

47. Should existing buildings, including our heritage assets, play an enhanced role in transforming housing supply? If you answered yes, please provide evidence as to how this may be achieved.

There is a role to play, but HED/NIEA needs to adopt a pragmatic approach which sees provision of homes as the desired outcome.

Existing buildings, many of which are empty, should be brought back to use if the end product gives a home that presents an acceptable standard of living. This premise is sound as it also ensures embodied carbon is intact.

Empty office buildings converted to emergency housing units (without a requirement for planning consent) such as those currently in use in London / Kent are not good models as the buildings cannot cater for living needs in a way that sustains a community. This fact is often iterated by those forced to live in such buildings.

Living over the shop is a concept that should be brought back into common use as there are new ways of looking at living in this type of accommodation. Upper floor private amenity spaces can easily be created over lower floors – there are numerous examples of this in areas of high housing need (e.g. in London). This type of approach will revitalise towns and villages.

The often quoted ‘death of the high street’ could be looked at as an opportunity to repopulate towns and villages with homes in former commercial premises as this injection of life will lead inevitably to a resurgence of commercial activity in an appropriate manner when the conditions are favourable. The planners would have to endorse this strategy as a fluid policy re change of use represents a sea change in how towns / villages could evolve in the coming decades. To do nothing seems to endorse the inevitability of dereliction.

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

SHDP needs to promote change in housing design to meet householder requirements post-pandemic plus sustainability agenda, we need a multi-year SHDP capital programme to give MMC a chance (as this relies on pipeline and more certainty of demand), continued support for competitive Design and Build (D&B) (or even full D&B) as permitted elsewhere in these islands), and support for contractor skills development as the range of available/interested SHDP builders is getting smaller year-on-year.

9. SKILLS

Materials shortages and cost increases threaten viability of construction sector¹⁴

‘Current material shortages and price increases in the sector mean that construction businesses are reporting once in a generation cost increases and pressures that, if left unaddressed, threaten sustainable businesses and, ultimately, jobs and livelihoods.’

¹⁴ <https://www.cefni.co.uk/news/materials-shortages-and-cost-increases-threaten-viability-of-construction-sector>

Northern Ireland companies (with a combined annual turnover of £1.5 billion) say demand for materials has inevitably risen, but supplies have slipped, and prices are rising.

For example, in December a tonne of steel averaged £500. By February that had doubled to £1,000, yet today can cost in the region of £1,400¹⁵

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

There is a huge opportunity to grow the construction industry and create new jobs if the HSS are implemented.

However, the current material shortages and cost increases must be addressed to ensure the stability of the construction industry.

There are the long-standing hurdles on new supply such as the length of time planning might take availability of land and wastewater infrastructure.

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

While many in the sector have already long embraced the move to digital it will only be by knowing that the Construction sector have a market and government that embraces this move that will see them move forward on areas like MMC (Modern Methods of Construction) and heat pumps, for new housing stock. De-carbonisation of existing housing stock will need to be attractive to consumers for success.

By dealing with both new and existing housing proactively, then it is likely that Construction sector will be able to achieve the skills revolution that is potentially before them.

Changes in Building Regulations can be a driver– when done so in a well-planned manner.

51. Does the age profile and makeup of the construction sector (older workers/self-employed) require a bespoke response to protect housing supply in the future?

Encouragement of young worker into the sector would be welcomed, as well as any intervention that would remove the upper age limit of 24 for new apprentices so that they could receive government support and understand, through DfE and CITB.

52. Does NI need some large Green Building Projects such as those being developed in other jurisdictions to help create momentum for a changed skills agenda here?

Low-carbon houses are more easily achieved in new-builds¹⁶, However, most of the homes being lived in by 2050 have already been built. This provides an opportunity to deliver low-carbon houses by retrofitting existing stocks. Retrofitting would include upgrading components of the houses, such as insulation and cladding, as well as everyday appliances to a higher energy efficiency standard, and installing renewable energy generation equipment, such as solar panels. BRE research for NIHE indicates that it could cost an

¹⁵ <https://www.irishnews.com/business/2021/07/08/news/materials-shortages-causing-major-pain-for-construction-sector-2379637/>

¹⁶ <https://futurecities.catapult.org.uk/housing-innovation-map/low-carbon-houses/>

average of £12,300 per social rented home to bring an estimated stock of 82,000 poorer EPC rated homes up to an EPC band B¹⁷.

In New Zealand there is a Green Star – Communities rating tool¹⁸ that helps both governments and development teams aiming to deliver sustainable communities around New Zealand to:

- a. provide diverse, affordable, inclusive, and healthy places to live, work and play.
- b. protect, maintain, and restore the natural environment by reducing developments' ecological footprints.
- c. receive recognition for demonstrated leadership and commitment to sustainability.
- d. achieve real value for money through demonstrated whole-of-life cost savings.
- e. encourage opportunities for business diversity, innovation and economic development.

Submitted on behalf of NIFHA by:

Name Tracey Ellis

Position Policy and Practice Officer

[email](mailto:tellis@nifha.org) tellis@nifha.org

[phone number](tel:07498621530) 074 9862 1530

¹⁷ Building Research Establishment (BRE) on behalf of the Northern Ireland Housing Executive. 'Cost of carbon savings in Northern Ireland's housing stock' published 31 Mar 2021, p12
<http://www.nihe.gov.uk/Documents/Research/Single-Downloads/Cost-of-carbon-savings-in-NI-housing.aspx>

¹⁸ [New Zealand Green Building Council \(nzgbc.org.nz\)](http://www.nzgbc.org.nz)