

Response ID ANON-QQZJ-AMS6-W

Submitted to Housing Supply Strategy - Additional Questions
Submitted on 2022-02-09 10:51:14

Introduction

Please confirm whether you are replying as an individual or submitting an official response on behalf of an organisation.

Organisation

If you said organisation, please give us the name of the organisation:
Rural Community Network/Rural Residents' Forum

Strategic Framework

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?

No

If no, please explain why.:

RRF agrees with the broad direction of the vision, objectives and timeframe but as in our response to the Call for Evidence we believe that what constitutes affordable housing needs more careful definition. What is affordable for one household is not necessarily affordable for the next. Also, the use of the term “affordable” may pigeon hole the strategy as a supply strategy for affordable housing instead of a strategy which will be looking at the issue of affordability across all tenures.

Yes

If no, please explain why.:

We agree to an extent with the focus of the 15 long term policies and interventions.

However, we believe that a missing long term policy area that needs to be included is further regulation of the Private Rented Sector and the need for protection of PRS tenants. The Minister has taken some steps in the right direction with the recent Notice to Quit consultation and we welcome the enabling activities outlined on p27 of the HSS in relation to strengthening enforcement powers to uphold standards in PRS.

However, in many rural communities the PRS is the only option available to tenants. The high demand in many communities for PRS tenancies has led to the development of a landlord's market where landlords can pick and choose tenants and tenants are less likely to assert their rights due to fear of their tenancy ending. In this context we believe the HSS should state that strengthening enforcement powers to uphold standards in PRS is a high-level long-term intervention.

Yes

If no, please explain why.:

Yes

If no, please explain why.:

Yes

If no, please explain why.:

Yes

If no, please explain why.:

Yes

If no, please explain why.:

We agree with the 15-year timeframe for the Housing supply strategy due to the deep-seated structural issues that need to be addressed. The HSS proposal to implement enabling action plans over 1-3 year periods would align with the objective for the NI Executive to move to a 3 year budget cycle and would allow interim targets to be developed and monitored.

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?

Yes

If no, please explain why.:

Yes

If no, please explain why.:

Yes

If no, please explain why.:

Yes

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Yes

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Yes

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Yes

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Yes

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Yes

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Yes

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Yes

If no, please explain why.:

Yes

If no, please explain why.:

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

If you don't agree, please explain why not:

We agree with the concept of a whole system approach but in our response to the call for evidence we raised the issue of ensuring that the whole system approach considers how profit and tax regulations influence the housing market and can distort it in areas of high demand for housing. By including these underlying drivers specifically in the whole system diagram the NI Assembly, the wider public and private sector and citizens can begin to discuss the steps that need to be taken to use taxes to control excess profit making from land speculation and house building.

Measurement

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

No

If you don't agree, please explain why not:

RRF would like to have seen a commitment to a higher level of provision of social homes. The "at least 1/3rd commitment" sets a target of approximately 33,000 social homes to be provided over the next 15 years which averages out to 2,200 social homes per year. We acknowledge that this is an improvement on the current level of delivery which has seen an average of approximately 1600 new social homes delivered per annum over the past decade. However, this is in a context of over 30,000 households in housing stress on the social housing waiting list and over 43,000 households on the waiting list in total. At March 2021, there were 6,491 applicants on the waiting list for a home in a rural area 4077 of those were in housing stress. Between 2016 and 2021 the number of rural applicants in housing stress on the waiting list has risen by 47.6%. The statistics show the scale of housing need in communities.

The target for new social homes in rural communities in the SHDP is usually in the 10-12% range as this reflects the percentage of rural demand on the waiting list. 12% of an annual new build target of 2,200 homes delivered consistently over 15 years would result in 3,168 new social homes over the life of the Housing Supply Strategy. If delivered this would only house c. 77% of the rural households on the current waiting list in housing stress and makes no allowance for future need emerging.

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

Yes

If no, please explain why.:

RRF largely agrees with the proposed indicators to measure the progress of housing however, there is a need to ensure that data is collected so it can be disaggregated to allow monitoring across rural communities of:

- levels of housing stock,
- new build housing (across all tenures),
- Number of households on the waiting list and those in housing stress,
- Number of homeless presentations and acceptances
- Proportion of households spending 30% or more of household income on housing costs
- Percentage of homes that meet Fitness Standard
- SAP ratings

Yes

If no, please explain why.:

Yes

If no, please explain why.:

Yes

If no, please explain why.:

Yes

If no, please explain why.:

Yes

If no, please explain why.:

Yes

If no, please explain why.:

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

6 Are there any additional indicators that you consider would add value in measuring success and progress?

Yes

If so, please give details.:

An indicator that measures the level of overcrowding in private rented sector should be considered and included in the HSS.

An indicator that measures the rate of increase in rents in the PRS.

An indicator that measures constraints on development in areas such as waste water infrastructure at capacity and requiring investment.

Delivery and Oversight

7 How can we best ensure that key strategic partners such as other Departments, local government, the voluntary & community sector and private sector can participate in the delivery and oversight of the Supply Strategy delivery?

How can we best ensure that key strategic partners such as other Departments, local government and housing delivery organisations can participate in the delivery and oversight of the Supply Strategy delivery?:

Clear communication on progress towards targets in 1-3 year housing action plans is an essential starting point to ensure transparency in public debate on housing issues across all tenures. Ensuring that all strategic partners and Departments understand their role in either contributing to the overall housing target and know where the blockages are that they are responsible for addressing be it planning, infrastructure provision, availability of finance etc. The whole system approach advocated by the Department may facilitate this.

Action Planning

8 Are there any proven or new approaches you are aware of, that you believe would help us work best with other organisations to develop and deliver the action plans?

Not Answered

If yes, please give examples. :

Citizen Engagement

9 There was broad support in the Call for Evidence for the need to engage local communities in housing supply to create sustainable, thriving and inclusive communities. In what way do you consider this could best be achieved and do you have any examples of best practice in this area?

Please provide details.:

Stigma associated with social housing where residents and developers may view social housing tenants as “people on benefits” or even more pejoratively as “problem families”. Stigma can be addressed by providing local leadership through community groups, sporting and cultural organisations and faith communities at the grass roots level.

Where demand for private sector housing is high sites in those settlements are likely to be sold to private developers at prices that housing associations, who may wish to provide affordable housing, are unable to compete with.

The re-using of space “over the shop” in rural settlements may offer opportunities to deliver additional social/affordable homes and act to regenerate town/village centres where retail is struggling as consumer behaviour changes.

Equality

10 Do you agree with the findings of the EQIA?

Not Answered

If no, please explain why.:

11 Are there any other issues or inequalities that have not been highlighted in the EQIA that you believe the EQIA needs to note?

Not Answered

If yes, please explain what these are.:

12 Do you agree with the immediate next steps as outlined in Section 5?

Not Answered

If no, please explain why.:

Not Answered

If no, please explain why.:

Rural

13 The Rural Needs Impact assessment outlines that the development of Housing Supply Strategy is likely to have a positive impact on people on Rural Areas? Do you agree with this assessment?

No

If you don't agree, please explain why not:

It has the potential to have a positive impact on people in rural areas. The RNIA undertaken has a considerable level of detail and is clearly informed by evidence and stakeholder engagement which is positive. However, the HSS ultimately needs to deliver more social and affordable homes in rural communities. This is the outcome rural stakeholders and citizens need to see. As the RNIA states, the target for new social homes in rural communities has been missed in 6 of the last 7 years. The delivery of new social and affordable homes in rural areas where there is housing need is the ultimate indicator to determine whether the Strategy works for rural communities.

14 Is there any other evidence, information or issues you think should be considered in this screening?

No

If so, please give details.:

General

15 We would welcome any other comments or suggestions you have that you consider are relevant to developing and delivering the Housing Supply Strategy.

We would welcome any other comments or suggestions you have that you consider are relevant to developing and delivering the Housing Supply Strategy. :

The strategy states that by 2041 one or two adult households without children will account for 60% of all households. Whilst the bedroom tax has failed to address this issue in social housing and its punitive approach has rightly been addressed by the NI Executive through its welfare mitigations schemes there is a need to consider this issue in the medium to longer term. The numbers of older households who would be willing to move to smaller accommodation that better meets their needs has the potential to make much better use of our current (predominantly 3 bedroom) housing stock. If a way could be found whereby older households could move out of their accommodation which has become too big for them rather than being imposed (like the bedroom tax) it could make better use of our housing stock.

The strategy needs to consider in more detail issues of the financialisation of housing sector more generally and how tax, the rating system and other incentives can be used to address issues around excessive profit making in land and housing.

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