



Department for Communities – Housing Supply Strategy Consultation Response July 2021

1 Introduction

- 1.1 The Commission welcomes the opportunity to respond to the Housing Supply Strategy Call for Evidence, and the engagement the Department for Communities has undertaken with the Commission and other stakeholders.
- 1.2 The Commission’s policy recommendations regarding equality in housing and communities can be found [here](#)¹.
- 1.3 As noted in the call for evidence, housing is explicitly recognised as a priority area under three of the outcomes in the Programme for Government (PfG) draft Outcomes Framework. The Commission responded to the Executive’s consultation on the draft Outcomes Framework² setting out a range of comments and suggestions as regards the relevant priority areas.
- 1.4 The Housing Supply Strategy provides a significant opportunity to maximise equality of opportunity and good relations within housing. The Strategy should be designed to effectively tackle key inequalities experienced by people within Section 75 equality groups that remain persistent and hard to address, and emergent issues as a result of the COVID-19 pandemic.

2 Overarching comments

- 2.1 The Commission welcomes the development of a Housing Supply Strategy. Good quality, affordable housing in safe,

¹ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations](#)

² ECNI (2021) [Response to the Executive’s consultation on a Programme for Government Draft Outcomes Framework](#)

sustainable communities is essential to ensuring health, well-being and a prosperous society.

- 2.2 We support the emphasis on working across Government and on full engagement and co-design with stakeholders. We welcome the recognition that ‘transforming supply will not just involve collaboration across government departments’, and that genuine partnership across local government, the third sector, citizens and the private sector is needed³.
- 2.3 We welcome the proposed ‘whole system’ approach, which draws together demand drivers and supply levers, centralises the role of people, places and communities, involves cross-cutting collaboration and policy co-ordination, and leans on genuine partnership among all actors, including government, third sector citizens and the private sector⁴.
- 2.4 While supportive of the proposed vision and relevant objectives, neither make explicit reference to tackling key inequalities across Section 75 categories nor advancing equality of opportunity and good relations. Likewise, the thematic sections generally do not reference equality considerations.
- 2.5 We recommend that the vision, objectives and any proposals within the Strategy explicitly make a commitment to tackle key inequalities, so as to mainstream equality and good relations.
- 2.6 We welcome the inclusion of a thematic section examining issues of equality and human rights and the engagement that has already taken place with Commission. We strongly support the consideration of housing inequalities within the Strategy, and how these have developed, particularly to take account of the impacts of the COVID-19 pandemic.
- 2.7 The equality impacts of any potential changes to legislation, policies, processes or procedures should be carefully considered, and any negative effects mitigated throughout the Strategy.
- 2.8 We recommend that the Strategy has accountable and transparent monitoring and reporting arrangements. In general,

³ Department for Communities (2021) [Housing Supply Strategy: Call for Evidence](#), p. 12.

⁴ Department for Communities (2021) [Housing Supply Strategy: Call for Evidence](#), p. 11

such an approach has the potential to be transformative and to deliver tangible outcomes, including for people from Section 75 groups. We recommend that all relevant measures are tracked not only in aggregate but also for the impact on individuals from each of the Section 75 grounds.

- 2.9 We look forward to sight of the high-level Delivery Framework, including its timeline, resourcing and monitoring and reporting arrangements.

3 Specific comments

- 3.1 We set out below our specific comments and recommendations in relation to some of the issues raised in the Call for Evidence. Where we have not made specific comment, it is not to detract from the importance of mainstreaming equality throughout all themes and objectives in the Strategy.

Supporting People, Shaping Places and Building Communities

Sustainable Communities and Homes

- 3.2 The Commission restates⁵ its view on the value of shared housing and that segregated housing in Northern Ireland is not the way forward for our society. We also recognise that people need to feel safe where they live, and consider that actions are needed to encourage and incentivise integration.
- 3.3 The Commission considers that actions to advance sharing should also extend beyond a narrow focus on community background. We reiterate our recommendation⁶ that the focus of actions to advance sharing should be across all Section 75 grounds; and across a range of public policy domains. Shared communities should include shared housing, as well as shared education, employment, shopping and places of leisure.
- 3.4 The Commission has made a range of recommendations⁷ which we believe would help to ensure that everyone has

⁵ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations](#), paras 4.1-4.14

⁶ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations](#), paras 4.1-4.14

⁷ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations](#), para 5.

access to a sustainable home and enjoys the right to independent living. In particular, we suggest a number of areas for consideration.

- 3.5 **Accessible standards** - We consider that more needs to be done to ensure that all new builds in all types of private tenures comply with accessible standards, so as to better facilitate individuals to secure a home and remain in it. Over time, the universal application of accessible standards would significantly reduce the need for formal care services and costly home adaptations in the future⁸.
- 3.6 Action is required to ensure that accessible properties are available in the private rented sector, which has grown significantly in the past decade.
- 3.7 The Commission welcomes the commitment in the Call for Evidence to ‘providing housing that reflects demographic change, most notably, our ageing population’⁹.
- 3.8 Whilst the Lifetime Homes Standard was adopted for all social housing in 1998, Part R of the Building Regulations - ‘Access and Facilities for Disabled People’¹⁰ has applied to all new private sector builds since 2001, providing basic access standards in dwellings. However the Building Regulations do not include the ‘Lifetime Homes Standard’.
- 3.9 The benefits of amending Part R to include the lifetime homes standards for privately owned housing could include¹¹:
- savings on future adaptations, heating and costs associated with household accidents;
 - delaying moves into residential care;
 - reduced need for temporary residential care; and
 - savings in healthcare and re-housing costs.
- 3.10 We therefore continue to recommend that accessible housing standards are applied to all new builds. Ensuring that all new builds in all sectors meet accessible standards would increase

⁸ Wallace, A. (2015) [Housing and Communities’ Inequalities in Northern Ireland](#), pg. 141

⁹ Department for Communities (May 2021) [Housing Supply Strategy. Call for Evidence](#). Pg 19

¹⁰ [The Building Regulations \(Northern Ireland\) 2000, Part R](#)

¹¹ Northern Ireland Housing Council (2010), [Why the private sector should build to Lifetime Homes standards: A business case by the NIHC](#) as quoted in ECNI (2012) [Response to DSD consultation on the Housing Strategy: Facing the Future](#)

the ability of people, particularly older people and people with disabilities, to secure and remain in their home.

- 3.11 Consideration of the impacts of COVID-19, which required people to stay at home and/or self-isolate, highlighted the need for accessible homes. Learning from the pandemic should be built into the Housing Supply Strategy.
- 3.12 **Adaptations** - A person with disabilities may require adaptations to their existing or prospective home, irrespective of tenure type. We consider that ensuring the availability of housing adaptations is essential, not least given the emphasis within government policy - particularly Transforming Your Care - on the delivery of social care within the home.
- 3.13 **Law reform – Disability Discrimination Act** - Currently under disability discrimination legislation, landlords and managers of rented residential premises must make reasonable adjustments to the disabled person’s home. In addition, they cannot unreasonably refuse permission for disability-related alterations to be carried out. Landlords however are not required to make disability-related alterations to the physical features of the common parts of let residential premises, such as stairs and hallways; even if they are reasonable to make and paid for by a disabled tenant.
- 3.14 We continue to recommend¹² that disability discrimination legislation is extended to require landlords to make disability-related alterations to the physical features of the common parts of residential properties, such as stairs and hallways.
- 3.15 **Independent living** - Article 19 (the right to live independently) of the UN Convention on the Rights of Persons with Disabilities¹³ makes clear that disabled people have the right to determine how to live their own lives, particularly with respect to personal decisions regarding their living arrangements, including with respect to personal care and support. We continue to recommend access to adequate, sustainable and long-term independent living provision for all people with disabilities for whom it is a viable housing option.

¹² ECNI (2019) [Equality in Housing and Communities: Policy Recommendations](#), paras 5.17-5.20

¹³ [UN Convention on the Rights of Persons with Disabilities](#)

- 3.16 Research into housing needs and preferences, and geographical patterns of need may assist the Department; Northern Ireland Housing Executive; Housing Associations; and the nine councils in assessing the demand and supply needs for future social housing. 2019 research¹⁴ has reported that ‘whilst sheltered housing may initially meet residents’ needs’ it can become increasingly difficult to maintain the very frail elderly in such accommodation as they age’¹⁵. However, it is also the case that sheltered housing has become less attractive to fit, active older people¹⁶ and further research in 2019 found that participants in a focus group aged 55-69 were ‘particularly determined to remain in their own homes’¹⁷.

Equality and Human Rights

- 3.17 The Commission is of the view that the three broad headings (accessibility, adequacy and sustainability) used in our Statement of Key Inequalities in Housing and Communities remain helpful in setting out key inequalities in housing and communities. We restate our concern that there remain significant and specific data gaps across a number of themes in relation to a number of equality categories, specifically: gender; gender identity; religion; race; political opinion; and sexual orientation. In addition, there is a lack of data disaggregation in relation to: ethnicity; disability status; marital status; and, dependency status¹⁸.
- 3.18 Since the publication of the Wallace Report and our Statement on Key Inequalities, a number of relevant pieces of research and papers have been published. This includes references to be found within our Housing and Communities Policy Priorities and Recommendations which have been shared previously with the Housing Supply Strategy team.

¹⁴ Fiona Boyle Associates (2019) [Housing and Older People: Housing Issues, Aspirations & Needs. A report for the Northern Ireland Housing Executive.](#)

¹⁵ Fiona Boyle Associates (2019) [Housing and Older People: Housing Issues, Aspirations & Needs. A report for the Northern Ireland Housing Executive.](#) Pg 61

¹⁶ Professor Paris, C, Emeritus Professor of Housing, Ulster University (Mar 2013) [Future need and demand for appropriate models of accommodation and associated services for older people Pg 66](#)

¹⁷ Fiona Boyle Associates (2019) [Housing and Older People: Housing Issues, Aspirations & Needs. A report for the Northern Ireland Housing Executive.](#)

¹⁸ ECNI (2017) [Statement on Key Inequalities in Housing and Communities](#), at para 1.6

3.19 Please find below a number of publications which we have noted. It does not include relevant Department for Communities publications and reports.

- ECNI (2020) Hate Crime in Northern Ireland: Policy Recommendations & Supporting Rationales (<https://www.equalityni.org/HateCrimePolicy>)
- Ipsos MORI (2021) Public Opinion Survey on Equality in NI Winter 2020) - Full Report (<https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/PublicOpinionSurvey-FullReport-Winter2020.pptx>)
- Judge D. Marrinan (2020) Hate Crime Legislation in NI - An Independent Review (<https://www.justice-ni.gov.uk/sites/default/files/publications/justice/hate-crime-review.pdf>)
- Housing Rights (November 2020) The 'Perfect Storm': The impact of Covid-19 on private renters in Northern Ireland (<https://www.housingrights.org.uk/sites/default/files/policydocs/The%20impact%20of%20Covid-19%20on%20private%20renters%20in%20Northern%20Ireland.pdf>)
- Joseph Rowntree Foundation (2020-21) UK Poverty 2020/21 (<https://www.jrf.org.uk/report/uk-poverty-2020-21>)
- Housing Rights (2020) Using the Private Rented Sector to discharge the statutory duty to homeless households (<https://www.housingrights.org.uk/sites/default/files/policydocs/Housing-Rights-discharging-homeless-households-into-PRS-Nov2020.pdf>)
- NIHE (Oct 2020) COVID-19 housing and the housing market: synopsis of events and evidence to date, with a focus on Northern Ireland ([https://www.nihe.gov.uk/Documents/Research/Housing-Market-Analysis/COVID-19-housing-and-the-housing-market.aspx?ext=.\)](https://www.nihe.gov.uk/Documents/Research/Housing-Market-Analysis/COVID-19-housing-and-the-housing-market.aspx?ext=.)))
- NIHE (2020) Chronic Homelessness Action Plan (<https://www.nihe.gov.uk/Documents/Chronic-homelessness/Chronic-Homelessness-Action-Plan.aspx>)
- Crisis (2020) [The Homelessness Monitor: Northern Ireland](https://www.crisis.org.uk/ending-) (<https://www.crisis.org.uk/ending->)

[homelessness/homelessness-knowledge-hub/homelessness-monitor/northern-ireland/the-homelessness-monitor-northern-ireland-2020/](https://www.nihe.gov.uk/homelessness/homelessness-knowledge-hub/homelessness-monitor/northern-ireland/the-homelessness-monitor-northern-ireland-2020/))

- Fiona Boyle (2019) Housing and Older People Housing Issues, Aspirations and Needs (<https://www.nihe.gov.uk/Documents/Research/Health-and-welfare/housing-and-older-people-issues-aspirations-needs.aspx?ext=.>)
- NI Audit Office (2019) Welfare Reforms in Northern Ireland (<https://www.niauditoffice.gov.uk/sites/niao/files/media-files/Welfare%20Reform%20Report%202019.pdf>)
- NIHE (2019) The Potential Impacts of the Bedroom Tax in Northern Ireland if Mitigations End (<https://www.nihe.gov.uk/Documents/Research/Bedroom-Tax/Potential-impacts-bedroom-tax-mitigation-ends.aspx>)

Housing Supply in Rural Areas

- 3.20 The Commission recommends that the equality impacts of any policies specifically targeting the need for affordable homes in rural areas should be carefully considered, and any negative effects mitigated.

Housing and Poverty

- 3.21 The Commission agrees the Housing Supply Strategy should play a role in reducing poverty. Whilst socio-economic disadvantage is not a specified ground under the equality legislation in Northern Ireland, the barriers and inequalities experienced by equality groups can be exacerbated by poverty and social exclusion. The Commission consistently highlights the link between poverty and social exclusion, and the inequalities faced by individuals protected under the equality legislation across a number of areas of public policy, for example, education, housing and social protection.
- 3.22 No-one should be unfairly disadvantaged because of who they are; and protected equality grounds or characteristics should not be a predictor of outcomes.

- 3.23 Regarding the current identification of housing stress as ‘those experiencing intimidation, insecurity of tenure, housing conditions, health and social wellbeing issues’, we restate¹⁹ our view that data gathered on those in housing stress should be disaggregated across all Section 75 grounds.
- 3.24 The introduction of Universal Credit provisions relating to Pension Credit²⁰ will have an adverse financial impact on low income couples where one partner is aged below the State Pension Age²¹. Under the provisions couples on low income will not be able to claim Pension Credit until both parties reach the State Pension Age.
- 3.25 Fuel poverty impacts most on older people across both social and private housing tenures in Northern Ireland²². Similar to 2006 and 2011, 57% of households, in 2016, who were fuel poor were headed by persons aged 60 or more. In 2016, 25% of people aged 60 to 74 years were in fuel poverty, rising to 38% of those aged 75 years and over, compared to 17% for households headed by persons aged between 40 and 59 and 13% for persons aged between 25 and 39²³.
- 3.26 The ‘Age-friendly Belfast Action Plan 2018-2021’ reported that , despite a decrease in fuel poverty across the Belfast City Council area, ‘38% of households living in fuel poverty are headed by people aged 75 years +’²⁴.
- 3.27 Given the impact of fuel poverty on older people, we **recommend** actions to further advance energy efficiency and to implement a fuel-brokering scheme across all tenures.
- 3.28 While progress has been made, including improvements in energy efficiency through the Affordable Warmth Scheme and the requirements of an Energy Performance Certificate²⁵,

¹⁹ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations](#), para 8.2.

²⁰ Pension Credit is income-related and provides a ‘top-up’ on weekly income if below the ‘Guarantee Credit’ income. At August 2017 – Pension credit tops up weekly income to: £159.35 if single and £243.25 if a couple.

²¹ The provision came into effect on 15 May 2019

²² Public Health Agency, 2013

²³ NI Housing Executive, the Research Unit. [House condition survey: Main Report 2016](#)

²⁴ Belfast City Council (2018) [Draft Age-friendly Belfast Plan 2018-2021](#). Fuel poverty levels in Belfast fell 24 percentage points between 2006 (39%) and 2016 (15%).

²⁵ From 2008 all properties, including new builds and properties for sale, are required to hold an Energy Performance Certificate. The EU Performance of Buildings Directive (Part F) has been introduced in stages into NI building requirements.

addressing fuel poverty should remain a priority for action, as highlighted in the Active Ageing Strategy 2016 – 2022²⁶.

Climate Change/ Net Zero

- 3.29 Flexible and adaptable housing, if it ensures adequate, sustainable and long-term independent living provision, is likely to benefit older people and those with disabilities, as previously recommended by the Commission²⁷.
- 3.30 The Commission has also previously noted²⁸ the effects of fuel poverty on older people and recommended measures to further advance energy efficiency. This may include the encouragement of oil buying clubs, or retrofitting.
- 3.31 Any support to encourage behavioural change should consider the needs of different equality groups. For instance, encouraging active travel to older or disabled people may be inappropriate in some circumstances, and providing support to access energy efficient modes of travel may be more important for these groups.
- 3.32 The Commission recommends that a co-design process is used to ensure that people with particular equality characteristics can articulate any support they require to aid necessary behavioural changes, and to raise any equality concerns / considerations raised by such changes.
- 3.33 The equality implications of any incentives or disincentives introduced should be carefully considered. For instance, any measures that will increase housing costs may negatively impact groups disproportionately struggling with the cost of housing, for example, people under-35 and households with dependent children in the private rented sector²⁹. Any policies should mitigate against negative impacts on these groups.
- 3.34 Any incentive packages should consider all tenures. For instance, minority ethnic groups and migrants are more likely to

²⁶ Department for Communities (Nov 2020) [Active Ageing Strategy 2016-2022](#)

²⁷ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations](#), para 5.21-5.29.

²⁸ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations](#), paras 5.30-5.35.

²⁹ ECNI (2017) [Statement on Key Inequalities in Housing and Communities in Northern Ireland](#), paras 4.15- 4.20, 5.5-5.7, 12.9-12.5. Most single people under-35 can only claim the shared accommodation rate of Housing Benefit and Universal Credit, and have to make up the difference in private rentals. Both lone parent and female reference households are more likely to experience relative poverty in the private rented sector after housing costs have been deducted.

be private tenants³⁰, so a lack of incentives for private landlords to provide low carbon housing may negatively impact on these groups if private rentals are less likely to have fuel efficiency measures.

Skills

- 3.35 The Commission has previously recommended³¹ targeted action to reduce the proportion of young people who are Not in Education, Employment or Training (NEET), and the Strategy may present an opportunity to support this group.
- 3.36 Mentoring, targeted careers advice and wider support for those at, or approaching, school leaving age could help match aspirations to job prospects; encouraging actions to gain required skills and/or deal with any wider issues. A close match between the available training courses and labour market opportunities may also support more direct access to employment.
- 3.37 As noted in the Call for Evidence³², women are underrepresented in construction. The Commission has identified³³ women experiencing industrial segregation as a key inequality in employment, noting the construction sector as an example where men are highly overrepresented³⁴.
- 3.38 With any training scheme or apprenticeships, we recommend co-ordinated action is needed to provide effective targeted action and support to young people. The Commission has noted³⁵ the potential for the COVID-19 pandemic to exacerbate existing inequalities. In this regard, targeted action and support is needed for those who may face additional barriers to training and the labour market due to their particular Section 75 identities. For example lone parents, who are predominately women³⁶, may require assistance with childcare, while disabled people may require support in relation to transport, additional costs and/or securing reasonable adjustments.

³⁰ Wallace, A. (2015) [Housing and Communities' Inequalities in Northern Ireland](#), p. 110.

³¹ ECNI (2017) [Age Equality: Policy Priorities and Recommendations](#), paras 5.3-5.14.

³² Department for Communities (2021) [Housing Supply Strategy: Call for Evidence](#), p. 63.

³³ ECNI (2018) [Key Inequalities in Employment](#), paras 5.52 – 5.72.

³⁴ ECNI (2018) [Key Inequalities in Employment](#), para 5.57.

³⁵ ECNI (07.07.20) [Data is a key component in tackling the impacts of COVID-19 pandemic](#)

³⁶ Dr Russell, R. (Jun 2014) [Census 2011: Key Statistics at Northern Ireland and LGD level](#)

4 Conclusion

- 4.1 We welcome the development of a Housing Supply Strategy as having the potential to advance equality of opportunity and good relations.
- 4.2 We **recommend** that the vision, objectives and any proposals addressed in the Strategy explicitly makes a commitment to tackle key inequalities, so as to mainstream equality and good relations considerations.
- 4.3 We **recommend** that any equality impacts of potential changes to legislation, policies, processes or procedures are carefully considered, and any negative effects mitigated throughout the strategy.
- 4.4 We **recommend** that the Strategy should have accountable and transparent monitoring and reporting arrangements. We further **recommend** that all relevant measures are not only tracked in aggregate but also for the impact on individuals from each of the Section 75 grounds.
- 4.5 We trust that the proposals and recommendations set out in this response are of assistance. We recognise that this is the Call for Evidence and look forward to further engagement on the Strategy. If further discussion would be useful, please do not hesitate to contact us.