



Department for Communities – Housing Supply Strategy 2022-2037 Consultation Response January 2022

1 Introduction

- 1.1 The Commission welcomes the opportunity to respond to the Department for Communities' draft Housing Supply Strategy 2022-2037 and acknowledges the consideration given to our [Statement on Key Inequalities in Housing and Communities](#) during development of the draft Equality Impact Assessment consultation document (EQIA)¹.
- 1.2 While supportive of the acknowledgement of the establishment of monitoring systems for the EQIA and Rural Needs Impact Assessment², we are disappointed that the draft Strategy's proposed vision, objectives and long term policies and interventions, make no explicit reference to tackling key inequalities across Section 75 categories nor advancing equality of opportunity and good relations.
- 1.3 We **recommend** that the vision, objectives and long term policies and interventions within the final Strategy explicitly make a commitment to tackle key inequalities, and mainstream equality and good relations.
- 1.4 In addition, we repeat our **recommendation** that comprehensive equality data should be collected to identify equality impacts and shape targeted actions to advance equality.

¹ Department for Communities (2021) Housing Supply Strategy: Draft Equality Impact Assessment Consultation Document.

² Department for Communities (2021) Housing Supply Strategy 2022-2037 page 34

2 Overarching comments

- 2.1 The Commission's response to the Call for Evidence³ supported the emphasis on working across Government and on full engagement and co-design with stakeholders. We continue to 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.
- 2.2 Changes to legislative, policies, processes or procedure should be carefully considered for equality impacts and negative effects mitigated throughout the Strategy. In addition, we acknowledge the proposed work streams as they relate to the following Strategies; Energy, Green Growth, Anti-Poverty, Children and Young People's 2020-2030, Mental Health 2021-2031 and 10x Economy⁵. However, we suggest consideration to the inclusion of the Department's social strategies, Gender, Disability, LGBTQI+ and the Race Equality Strategy.
- 2.3 The Commission welcomes the proposal for a strategic review every five years, with the publication of annual progress reports⁶, incorporating identified metrics and monitoring of progress. In general, 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.
- 2.4 In addition, the draft Strategy and associated action plans should have a clear commitment to stakeholder involvement, not only in co-design but in the rolling monitoring and review of impacts, particularly across the Section 75 equality categories.
- 2.5 We look forward to sight of the first action plan and suggest the incorporation of timelines, resourcing, monitoring and reporting

³ ECNI (2021) Consultation response to the Department for Communities' [Housing Supply Strategy: Call for Evidence](#)

⁴ Department for Communities (2021) Housing Supply Strategy 2022-2037 page 17

⁵ Department for Communities (2021) Housing Supply Strategy 2022-2037 page 33

⁶ Department for Communities (2021) Housing Supply Strategy 2022-2037 page 34

arrangements is included. In addition, we await the publication of the first progress report covering the period to March 2023.

3 Objective 1: Creating Affordable Options

Intermediate Rent

- 3.1 The Commission welcomed the proposal to provide security of tenure and more options for people on the Common Waiting List through the provision of the Intermediate Rent model⁷. However, we restate that during development, policy should be designed to effectively tackle the persistent inequalities experienced by people within Section 75 equality groups.

Support upskilling, reskilling, delivery of apprenticeships and training

- 3.2 We welcome consideration to support within the workplace when creating affordable housing options. The Commission's response to the Department for the Economy's draft Skills Strategy for Northern Ireland⁸ highlighted inequalities experienced by people protected under equality legislation. In particular:

Young People

- 3.3 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 noted⁹ 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 women¹⁰, may require assistance with childcare, while disabled people may require support in relation to transport, additional costs and/or securing reasonable adjustments.

⁷ ECNI (2021) Consultation response to the Department for Communities' [Intermediate Rent Development and Policy and Model](#).

⁸ ECNI (2021) Consultation response to the Department for the Economy's [draft Skills Strategy for NI: Skills for a 10x Economy](#)

⁹ ECNI (07.07.20) [Data is a key component in tackling the impacts of COVID-19 pandemic](#)

¹⁰ Dr Russell, R. (Jun 2014) [Census 2011: Key Statistics at Northern Ireland and LGD level](#)

Disability

- 3.4 The Commission **recommends** that the Government take positive steps to close disability equality gaps in employment¹¹. People with a disability are less likely to be working or actively looking for work (economically inactive) than people without disabilities; consequently, they are much less likely to be in employment than people without disabilities. In addition, the gap in the employment rate between people with and without disabilities is persistent, with an employment rate gap in 2020 of 42.2 percentage points¹².
- 3.5 Among people with disabilities, people with mental health issues and/or a learning disability are less likely to be employed compared to people with hidden disabilities, progressive or other disabilities, physical disabilities and / or sensory disabilities¹³.

Over 50s age group

- 3.6 In Northern Ireland the share of people classed as long-term unemployed is higher for the over 50s age group. Targeted action is needed to tackle perceived and actual barriers facing older people in returning to, and remaining in, work – including with regard to stereotypes; life-long learning and education; training and development opportunities; and pathways to work.
- 3.7 The Commission awaits the outcome of a proposed ‘new pilot shared ownership scheme aimed at assisting those who are over 55 ..’, within the enabling activities for this Objective¹⁴.

Young Carers

- 3.8 Research undertaken in England¹⁵ showed that young carers obtained lower levels of educational attainment at GCSE level, equivalent to nine grades¹⁶ lower than their peers. This disadvantage has been found to continue with 75% of 16-18 year old carers spending time not in education, employment or training (NEET), compared to 25% of their non-carer peers¹⁷.

¹¹ UK Independent Mechanism: [Disability Rights in the UK](#), paragraph 54, pages 17-18.

¹² NISRA (2021) [Disability Employment Gap in Northern Ireland 2020](#)

¹³ ECNI (2018): [Key Inequalities in Employment](#), paragraphs 4.13-4.14, page 27.

¹⁴ Department for Communities (2021) Housing Supply Strategy 2022-2037 page 22

¹⁵ Children’s Society (2013) [‘Hidden from View : the experience of young carers in England’](#)

¹⁶ ‘the difference between 9 Bs and 9 Cs’

¹⁷ Audit Commission (2010) [Against the odds: Targeted briefing – Young carers. London: Audit](#)

There is no reason to suggest that Northern Ireland is different from the rest of the United Kingdom.

4 Objective 2: Prevention and Intervention

Lifetime Homes Standard

- 4.1 Whilst we welcome the intent to ‘encourage council planners to incorporate the requirement that all new build housing should meet lifetime home standards ...’¹⁸, and ‘support the timely uplift of building regulations of new homes ...’¹⁹, we consider that more needs to be done to ensure that all new builds in private tenures comply with accessible standards, so as to better facilitate individuals to secure a home and remain in it. While Part R of the Building Regulations - ‘Access and Facilities for Disabled People’²⁰ has applied to all new private sector builds since 2001, providing basic access standards in dwellings, the Building Regulations do not include the ‘Lifetime Homes Standard’ that were adopted for all social housing in 1998.
- 4.2 We therefore, continue to **recommend** the need to ensure application of accessible housing standards to all new builds. Over time, the universal application of accessible standards would significantly reduce the need for formal care services and costly home adaptations in the future²¹.
- 4.3 As referred to in para 1.2 above, we are disappointed that whilst the draft Strategy’s activity proposes to ‘progress work to better understand the housing experiences of Section 75 groups’²², there is however, no explicit reference to the proposed work to be undertaken to advance equality of opportunity and good relations.

Adaptations

- 4.4 The Commission welcomes the continuation of prioritising and improving housing adaptations to both social and private

¹⁸ Department for Communities (2021) Housing Supply Strategy 2022-2037 page 24

¹⁹ Department for Communities (2021) Housing Supply Strategy 2022-2037 page 26

²⁰ [The Building Regulations \(Northern Ireland\) 2000, Part R](#)

²¹ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland](#) at page 141

²² Department for Communities (2021) Housing Supply Strategy 2022-2037 page 25

homes²³, as older people are far more likely to live in poor housing conditions²⁴ and the significant issue of availability of housing adaptations for people living with a disability²⁵. We thus continue to **recommend**²⁶ the provision of easy to access and affordable adaptation services across all tenures - including by streamlining existing processes and reducing waiting times. We also **recommend** that action is taken to reduce waiting times for occupational therapy assessments in support of requests for housing adaptations.

4.5 **Law reform – Disability Discrimination Act** – We continue to **recommend**²⁷ 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.

4.6 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.

Independent living

4.7 Article 19 (the right to live independently) of the UN Convention on the Rights of Persons with Disabilities²⁸ 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

²³ Department for Communities (2021) Housing Supply Strategy 2022-2037 page 25

²⁴ Department for Communities (2021) Housing Supply Strategy: Draft Equality Impact Assessment Consultation Document. Section 4: Assessment of the Impact. page 51

²⁵ Department for Communities (2021) Housing Supply Strategy: Draft Equality Impact Assessment Consultation Document. Section 4: Assessment of the Impact. page 53

²⁶ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations, paras 5.1-5.4](#)

²⁷ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations, paras 5.17-5.20](#)

²⁸ [UN Convention on the Rights of Persons with Disabilities](#)

provision for all people with disabilities for whom it is a viable housing option²⁹.

Homelessness

- 4.8 The Commission welcomed the NI Housing Executives proposal in the draft Homelessness Strategy 2022-27: Ending Homelessness Together to implement early intervention to prevent homelessness happening, and suggested that a definition of at what stage early intervention should occur would assist in clarification of the types of services required in the provision of this service.
- 4.9 We however note that within the draft Housing Supply Strategy the associated Indicator for Objective 2 proposes to monitor homelessness by ‘presentation and acceptances’. The Commission would suggest that any actions taken to provide early intervention services are also included when monitoring progress.

Welfare Reform

- 4.10 The EQIA identified that the number of single males presenting as homeless was almost twice that of females³⁰. The Commission continues to **recommend**³¹ addressing the needs of single tenants / prospective tenants aged 35 years old and under when renting in the private sector, as entitlement is only to a shared accommodation rate of the housing element of Universal Credit. This is lower than the full rate.
- 4.11 Account should be taken on the long-term impacts of welfare reform as they relate to housing when implementing prevention activity. The Executive’s mitigations package cushions the impact of Welfare Reform implementation; however, the Commission is concerned at the long-term implications of the Welfare Reform on a number of equality groups. For example, there are not only particular issues for young people and people with disabilities, but across all those who receive benefits.

²⁹ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations, paras 5.21-5.29](#)

³⁰ Department for Communities (2021) Housing Supply Strategy: Draft Equality Impact Assessment Consultation Document. Section 4: Assessment of the Impacts. page 51

³¹ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations, paras 5.38-5.39](#)

No recourse to public funds

- 4.12 The EQIA identified homelessness caused by domestic violence, which ‘appear to dis-proportionately affect females’³². In addition, the Commission would **recommend** access to social protection for those (mainly minority ethnic women) subjected to domestic violence with no recourse to public funds.
- 4.13 Some minority ethnic people who are not from the UK and with insecure immigration status have ‘no recourse to public funds’ that is they cannot claim benefit or use services paid for by public funds. This means that victims of domestic and sexual violence, mainly minority ethnic women, can be left financially dependent on their abuser, whether partner, other family member, employer or trafficker³³.

5 Objective 3: Quality

- 5.1 As the activities for Objectives 2 and 3 are linked with regard to quality and design we would request that in addition to the comments below, our previous comments are taken into consideration during development of this objective.

Notice to Quit

- 5.2 The Commission welcomed the proposal to extend the Notice to Quit period for tenants in the private rented sector, providing tenants with more time to find suitable alternative accommodation³⁴.
- 5.3 Legislative amendments to notice to quit periods will provide greater security to tenants. We however **recommend** that information be provided in methods and formats accessible to tenants and landlords both in terms of language and dissemination channels to ensure greater awareness of rights and responsibilities.
- 5.4 We **recommended** that the extension to notice to quit period incorporates monitoring and a schedule for evaluation and

³² Department for Communities (2021) Housing Supply Strategy: Draft Equality Impact Assessment Consultation Document. Section 4: Assessment of the Impacts. page 51

³³ ECNI (2016) [Gender Equality Policy Priorities and Recommendations](#). page 49

³⁴ ECNI (2021) Consultation response to the Department for Communities’ [Notice to Quit](#)

review. In addition, we **recommended** that actions are tracked not only in aggregate but also for the impact on individuals from each of the Section 75 grounds.

6 Objective 4: Better Places

Inclusive communities

- 6.1 The Commission considers that actions to advance sharing should also extend beyond a narrow focus on community background. We reiterate our **recommendation**³⁵ 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.
- 6.2 We **recommend** actions designed to incentivise and advance safe, shared housing and communities based on equality, dignity and respect.
- 6.3 **Fear of Crime** – We **recommend** action to address the fear of crime among older people. Actions must not only focus on tackling crime but also the perception of the prevalence of crime against older people³⁶.
- 6.4 The Commission welcomed the 2019, Commissioner for Older People’s research report³⁷ on crime against older people, which acknowledges that a common theme amongst older people is the fear of crime. Actual and perceived safety, evidence suggests that delivery is dependent on adequately resourced and targeted actions across Government policy. Delivery of commitments within action plans is therefore essential.
- 6.5 When assessing future housing need and places in which homes are located we refer you to 2019 research carried out on behalf of the Northern Ireland Housing Executive³⁸. It reported that ‘whilst sheltered housing may initially meet residents’

³⁵ ECNI (2019) [Equality in Housing and Communities: Policy Recommendations paras 4.1-4.14](#)

³⁶ ECNI (2017) [Age Equality: Policy Priorities and Recommendations paras 9.24-9.30](#)

³⁷ Commissioner for Older People for NI (2019) [Crime and Justice: The Experience of Older People in Northern Ireland](#)

³⁸ Fiona Boyle Associates (2019) [Housing and Older People: Housing Issues, Aspirations & Needs. A report for the Northern Ireland Housing Executive.](#)

needs' it can become increasingly difficult for people to remain in such accommodation as they age³⁹. However, it is also the case that sheltered housing has become less attractive to fit, active older people⁴⁰ and further research in 2019 found that participants in a focus group aged 55-69 were 'particularly determined to remain in their own homes'⁴¹.

Prejudicial attitudes and hate crime

- 6.6 The Commission continues to highlight the need to tackle prejudicial attitudes, behaviour and hate crime. It is essential that steps are taken to ensure that workplaces, services, public spaces and communities are free from harassment and/or discrimination across the equality grounds.
- 6.7 Further, it includes action aimed at tackling hate crime experienced by Section 75 equality groups, including sectarian, racist, homophobic, transphobic, and disability hate crime. It also involves challenging gender stereotypes and gender based violence⁴².

Waiting lists for social housing

- 6.8 The Commission highlighted the particular impact on households with a Catholic religion household reference person⁴³, and welcomes the acknowledgement in the EQIA⁴⁴. The development of improved housing options is welcomed, however we reiterate the importance of ensuring that housing need is met on the basis of objectively assessed need. Where stock availability (supply-side factors) differs from individual housing needs and preferences (demand-side factors), longer waiting lists can ensue.
- 6.9 The Commission has **recommended** action to consider for example, how appropriate stock and land for development can

³⁹ Fiona Boyle Associates (2019) [Housing and Older People: Housing Issues, Aspirations & Needs. A report for the Northern Ireland Housing Executive.](#) page 61

⁴⁰ 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 page 66](#)

⁴¹ Fiona Boyle Associates (2019) [Housing and Older People: Housing Issues, Aspirations & Needs. A report for the Northern Ireland Housing Executive.](#)

⁴² ECNI (2020) [Hate Crime in Northern Ireland: Policy Recommendations and Supporting Rationale.](#) page 9

⁴³ Wallace, A. (2015) [Housing and Communities Inequalities in Northern Ireland.](#)

⁴⁴ Department for Communities (2021) Housing Supply Strategy: Draft Equality Impact Assessment Consultation Document. Section 4: Assessment of the Impacts. page 51

be made available to ensure that objectively assessed housing need is more effectively met in areas of high demand. We thus welcome the acknowledgement in Objective 1⁴⁵ of the need to increase land availability in areas of need and demand. On the demand-side, steps which might both widen areas of preference for those in housing need and sharing more generally could serve to expand housing markets and increase opportunities to both meet objectively assessed housing need and advance increased sharing. We also **recommend** joint working, including with those working and living within communities, so as to further build trust and confidence between divided communities.

7 Objective 5: Decarbonisation

Fuel poverty

- 7.1 The Commission welcomes the proposed activity within this objective to deliver a new Fuel Poverty Strategy. 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 tenures⁴⁶.
- 7.2 Fuel poverty impacts most on older people across both social and private housing tenures in Northern Ireland⁴⁷. 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 39⁴⁸.
- 7.3 While progress has been made, including improvements in energy efficiency through the Affordable Warmth Scheme and the requirements of an Energy Performance Certificate⁴⁹,

⁴⁵ Department for Communities (2021) Housing Supply Strategy 2022-2037 page 20

⁴⁶ ECNI (2017) [Age Equality: Policy Priorities and Recommendations paras 7.29-7.36](#)

⁴⁷ Public Health Agency, 2013

⁴⁸ NI Housing Executive, the Research Unit. [House condition survey: Main Report 2016](#). Research is currently being updated for the 2022 House Condition Survey.

⁴⁹ 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 – 2022⁵⁰.

8 Conclusion

- 8.1 We welcome the development of a Housing Supply Strategy as having the potential to advance equality of opportunity and good relations.
- 8.2 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.
- 8.3 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.
- 8.4 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.
- 8.5 We trust that the proposals and recommendations set out in this response are of assistance. If further discussion would be useful, please do not hesitate to contact us.

February 2022

⁵⁰ Department for Communities (Nov 2020) [Active Ageing Strategy 2016-2022](#)

