



# Submission

## Housing Supply Strategy

January 2022

[homelessconnect.org](http://homelessconnect.org)

# Homeless Connect Consultation Response to the Housing Supply Strategy

## Introduction

1. Homeless Connect (previously known as Council for the Homeless NI) has been working to prevent and alleviate homelessness in Northern Ireland since 1983. As a membership body, we represent organisations working with people experiencing homelessness or at risk of becoming homeless and provide direct support to service users through our projects.<sup>1</sup>

2. We welcome the opportunity to respond to this consultation on the Housing Supply Strategy. Our response will not seek to answer every question posed in the consultation, but will focus on the areas where we believe we have particular expertise.

## Strategic Framework

### Question 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?

3. We are content with the proposed vision, objectives and timeframe for the Strategy. Regarding the vision of the strategy, it is welcome that the Minister for Communities and her Department acknowledge the need for the inclusion of a standalone housing outcome in the PfG. Ideally, the vision set out for the Housing Supply Strategy would have dovetailed with a standalone housing outcome in the PfG. It is a matter of regret that the Executive has failed up to now to introduce a Programme for Government (PfG). At this stage, it appears likely that no such programme will emerge in this mandate.<sup>2</sup> Nonetheless, it is accepted that we are where we are and it is right and appropriate for the Department to continue with the introduction of the strategy in spite of the failure on the part of the NI Executive collectively to introduce a PfG with a standalone housing outcome. It would be hoped that if and/or when a PfG is brought forward that it includes such an outcome and that it marries up with the vision set out in this strategy.

4. We support the introduction of the additional language in the vision outlined here of “and is located within a thriving and inclusive community.” People experiencing homelessness often feel marginalised and excluded from society. The language of “inclusive community” in the revised vision suggests a desire to ensure marginalised groups are considered. In pursuing the implementation of this vision in the years ahead, we would urge the Department to keep the needs of those at risk of or experiencing homelessness in view.

5. In terms of the objectives, we are content with the redrafted objectives set out in the draft strategy. We especially appreciate the change which has been made to objective two to move the emphasis on to the prevention of homelessness. This was something we called for in our response to the Call for Evidence.<sup>3</sup> The reworded objective lines up with the aims of the Housing Executive in this area.

6. We also welcome the inclusion of the language of seeking to “support a ‘just transition’ to carbon neutrality” as set out in Objective 5. In our response to the call for evidence, we outlined that “it is important that the costs involved in supporting the transition to carbon neutrality are equitably shared.”<sup>4</sup> Consequently, we support the inclusion of this language.

7. We are content with the timeframe outlined in the strategy. In our response to the call for evidence, we indicated that “15 years is the minimum length of time the strategy should look to consider.”<sup>5</sup> While we believe there may be a strong case for a longer time frame in line with the proposals of the Scottish Government in their “Housing to 2040” document, we accept that fifteen years is an acceptable period for the strategy to run.

## Question 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?

8. In responding to this question, our response will only focus on the areas where Homeless Connect has expertise. This is not to imply that we disagree with the actions on which we do not comment. In those areas, we believe other organisations are better placed to provide detailed feedback. Speaking generally, we are broadly positive about the high-level long-term policies and interventions which have been included in the strategy and the accompanying “existing and new enabling activities”. It is evident that the strategy has been informed by the Call for Evidence run by the Department which is to the Department’s credit.

9. With that said, while we are broadly positive about what has been included, we believe that a number of important actions which would improve the strategy should be added to those which are incorporated in the draft strategy. We would also highlight that in some areas there is a lack of detail as to how the long-term policies will and interventions will be implemented. We accept that much of the detail will come in the action plans flowing from the strategy, but we will highlight in our response areas where greater clarity would be appreciated.

## Objective 1- Creating Affordable Options

10. We welcome the inclusion of the following as a long-term policy: “Ensure our housing policy and legislative framework enables us to deliver the housing supply to meet our current and future needs and demand patterns.”<sup>6</sup> This is a solid high-level policy goal. The detail of how it will be implemented will be all-important.

11. We strongly welcome the commitment to “build more social houses, especially where they are most needed. This includes ring-fencing Housing Association Grant funding and seeking the prioritisation of water infrastructure for new housing in areas of most acute housing need.”<sup>7</sup> While we welcome this action and the commitment to “ring-fencing Housing Association Grant funding”, for this to be possible funding needs to be provided in the budgets due to come forward throughout the life of the strategy. We are encouraged by the statement of the Finance Minister on the floor of the Assembly that funding for the

building of social housing under this strategy “has been budgeted in” and that his Department “want to make sure that [the house building programme] gets off on target and on schedule.”<sup>8</sup> This will need to be continued throughout the life of the strategy.

12. It is positive that the Department plan to “Commission work aimed at critically evaluating current measures of affordability with reference to best practice in other jurisdictions and, if appropriate, recommending a measure or measures best suited to the NI context.”<sup>9</sup> No timeline is provided in the draft strategy for when this work would be completed. A number of the actions in this section incorporate specific timelines. This should also be the case for this action.

13. Regarding the action “ensure that rents are fair for tenants as well as landlords across all tenures,”<sup>10</sup> we believe this should be one of the long-term policy goals (or incorporated in to one of the long-term policy goals) rather than an “activity.” This particular action is unique in this section in not having any concrete and specific measures to implement it. If this course was adopted, then additional actions should be included to help to achieve this goal in the final strategy. We will comment further on this below.

14. The action to bring “new affordable housing products to the market, such as, Intermediate Rent by 2023” is confusingly worded.<sup>11</sup> Is the aim here to bring the ‘Intermediate Rent’ product to market by 2023 or to bring it and other affordable housing products by that year? This section should be redrafted in the final document.

15. It is positive that the strategy includes an action to “commence a research project to determine the housing data we need that will establish a ‘whole system’ view of housing supply, including a more granular picture of the different types of homes we need to meet the different needs of our citizens.”<sup>12</sup> The draft strategy does not provide a timeline for when this research will be initiated. The final strategy should include a timeline.

16. Regarding the question of fair rents, we are cognisant of the fact that this is a hugely complex area. We would advocate for the Department to include specific actions in the final strategy on this. Some possible options in this regard would include the following: Commissioning of research to investigate what constitutes a “fair” rent in this jurisdiction for both landlords and tenants; investigate the possibility of introducing a body similar in nature to the Residential Tenancies Board in the Republic of Ireland to regulate the rental sector and allow tenants to appeal against unreasonable rent rises; consideration of the introduction of a rent-setting policy for social housing (across the whole of the sector)<sup>13</sup>; and the inclusion of an action in relation to the further reform of the PRS due to be brought forward in the next Assembly mandate.

17. It should be noted that we are aware that Departmental officials outlined five actions “regarding future work to ensure that rents are fair” during the Committee stage of the Private Tenancies Bill. These actions were to “conduct research into rental markets in other jurisdictions; conduct further analysis into rent prices from the perspectives of the landlord and tenant respectively; consider the implementation of new policy ideas and how they might achieve objectives; engage further with stakeholders in the Private Rental Sector; and engage in ongoing consultation.”<sup>14</sup> It may be appropriate for these actions to be incorporated in this section.

## Objective 2- Prevention and Intervention

18. We are broadly supportive of the first two long-term policy goals set out under this objective. We warmly welcome the inclusion of a specific goal related to equalities. In our view, homelessness is an “equalities issued rooted in poverty”<sup>15</sup> which evidentially has differential impacts on those who experience it depending on their personal circumstances. Regarding the third goal set out, “Improve our response to homelessness with a focus on prevention and learning the lessons from what worked so well during the pandemic as well as innovations from elsewhere,” we would submit that this should be reworded.<sup>16</sup> We would propose the following alternative text: “Prevent and reduce homelessness and learn the lessons from what worked so well during the pandemic as well as innovations from elsewhere.” The current wording is inherently subjective and difficult to pin down. How would an improved response to homelessness be assessed? Our alternative proposed wording fits with the overall objective set out and provides some empirical basis for assessing the success of the strategy. The Department in conjunction with the Housing Executive already produces a wide variety of statistics related to housing and homelessness and these should be utilised to assess success under this objective.

19. Turning to the actions set out under this objective, it is positive to see the first action set out as supporting the Housing Executive in the delivery of the Homelessness Strategy 2022-2027. We are aware of and commend the collaborative working between Housing Executive and Departmental officials on the Homelessness Strategy and the Housing Supply Strategy. We submit an additional sentence should be added to this action to note the fact that the Housing Executive will be legally required to publish two further Homelessness strategies during the life of this strategy for 2027 to 2032 and 2032 to 2037.<sup>17</sup> It would be hoped that the Department of Communities would seek to similarly support the Housing Executive in the delivery of these two strategies.

20. The second action set out in the strategy relates to the Interdepartmental Homelessness Action Plan (IDHAP). We have had the opportunity to feed in to the process around the development of the latest IDHAP action plan and while we would push the Departments to go further in many regards, we welcome the constructive engagement we have had. In terms of the wording of the action, we would recommend specific mention is made of the need for effective education programmes around homelessness. As the Department for Education is one of the partners included in the IDHAP, it seems incongruent to fail to mention their role in this action.

21. We welcome the commitment to “support the development and implementation of a 3-year Strategy for the Supporting People Programme, in partnership with delivery agents and users.”<sup>18</sup> It is regrettable that the Supporting People Strategy has not been published for consultation to date as in practice it would be hoped that the Supporting People Strategy will dovetail with the Homelessness Strategy and the Housing Supply Strategy. That said, it is acknowledged that the Department is running to a very tight timeline in producing the Housing Supply Strategy. We further welcome the two actions related to the Older People’s Housing Strategy and the Irish Travellers Accommodation Strategy.

22. We would submit that specific indicative timelines should be provided for all of the actions set out below. While we support each of these actions, we believe a timetable for delivery contained in the text of the strategy would be beneficial. Other actions contained in this strategy include specific timetables for when they will be delivered:

- “Examine options for alternative models of supported housing that addresses anticipated and emerging need. The current model of delivery of Supported Housing has remained unchanged since the mid-1990s. This work will include an examination of ‘what works’ in other jurisdictions, including evidence or learning from or changes to service provision because of the COVID-19 pandemic.”
- “Progress work to better understand the housing experiences of Section 75 groups, with reference to multiple identities and intersections between different equality categories.”
- Ensure an effective and fair social housing allocations system based on objective need through implementing the 18 recommendations of the Review of the Common Selection Scheme and examining further options on the issues of intimidation points and interim accommodation points;
- Bring forward a consultation on the future of the Housing Executive House Sales Scheme”<sup>19</sup>

23. The final action included in this section, “Work with local government and housing delivery partners to ensure that plans and policies support the delivery of a range of housing types and sizes, to meet the needs of a changing demographic and lifestyles” is in our view probably better considered as a “long-term policy goal” rather than as an action. Unlike many of the other actions, it is difficult to see how success against this action would be assessed due to the wide array of measures which could be taken to fulfil it. In our estimation, this action would be better suited as a long-term policy goal with additional more specific actions included to seek to meet this goal. Further comment on this will be made below.

24. We would submit that a number of additional actions should be included in this section. Firstly, we are concerned about the failure to include an action specifically related to temporary accommodation in this section. It is noted that in the introduction reference is made to the “need to have a continuum of support from temporary to permanent accommodation.”<sup>20</sup> However, none of the existing and new enabling activities in the draft strategy directly refer to temporary accommodation. While it is acknowledged that some of these activities can be read as indirectly referring to temporary accommodation, we believe a specific action(s) should be incorporated regarding temporary accommodation considering its importance in terms of delivering on this outcome.

25. Unfortunately, the temporary accommodation system remains under enormous pressure at the current time with 3402 households in temporary accommodation in August 2021, an increase of 65% since January 2019.<sup>21</sup> As the representative body for the homelessness sector, we are aware of the significant impact this has had on providers and those experiencing homelessness. In our estimation in the short to medium term additional capacity in temporary accommodation will be necessary until a greater supply of suitable housing becomes available. We would again particularly highlight the lack of suitable temporary accommodation outside of Belfast and Derry/Londonderry where temporary accommodation provision is “sparse.”<sup>22</sup> The Housing Executive’s recently published Rural Strategy for 2021-2025 outlines the following with regard to temporary accommodation provision in rural areas: “It is evident that the existing offer of temporary accommodation must be increased to reduce the requirement for non-standard options and we should look strategically at where accommodation should be located in order to address the needs of those who present from both urban and rural locations.”<sup>23</sup> At a minimum, reference to support for the implementation of the Strategic Action Plan for Temporary Accommodation currently being developed by the Housing Executive should be incorporated in to the final strategy.

26. Secondly, we believe activities which help households to access and sustain homes should be incorporated in to the strategy. None of the activities included in the draft strategy directly address what

is a crucially important aspect of preventing homelessness. For example, some households at risk of homelessness may believe a suitable option for them would be accessing the Private Rental Sector. However, they may face difficulties in accessing a suitable tenancy due to a lack of capital for a deposit or to pay rent-in-advance. Policy options are available to support households in this situation. Households who are able to access a tenancy or who have suitable accommodation will struggle to sustain it if they do not have enough money to heat their home or for food to eat. With steep rises in the cost of living caused by a wide range of factors, without significant support some households will sadly find themselves unable to sustain a tenancy and may become homeless.

27. It is acknowledged that responding to poverty goes far beyond issues of housing supply. However, without question considering the role housing plays in expenditure for most households, it is a major contributing factor to this issue. We submit that the final strategy should in this section incorporate specific mention of the Anti-Poverty Strategy currently under consideration by the Department.<sup>24</sup> The strategy should further include a commitment to at least consider but ideally implement policy measures to assist households access the Private Rental Sector and/or sustain tenancies.

28. Thirdly, we believe a specific action should be incorporated in the final strategy related to support for the introduction of Housing-led and Housing First approaches in NI. It is noted that specific reference is made in the draft Strategy to Housing First and a definition of the approach is helpfully provided. In our view, as we put it in our manifesto for the 2022 Assembly election, “the international evidence in support of the use of ‘Housing First’ for those experiencing chronic homelessness is overwhelming.”<sup>25</sup> However, no action is included to support the provision of the expansion of ‘Housing First’ for the cohort who would benefit from its use. It may be that this is one aspect of what is in view with regard to the action to “work with local government and housing delivery partners to ensure that plans and policies support the delivery of a range of housing types and sizes, to meet the needs of a changing demographic and lifestyles.” However, this is not expressly stated.

29. We also believe consideration should be given to the introduction of ‘Housing-led’ approaches. Housing-led “designates a broad range of policies and services that prioritise the provision of stable housing to homeless households as the first action to take.”<sup>26</sup> ‘Housing First’ is a kind of housing-led approach but which is narrowly focused on the cohort experiencing chronic homelessness. ‘Housing-led’ approaches, which can take a variety of forms, can be effective for a wider cohort of those experiencing homelessness. We submit that a specific action should be incorporated in relation to the introduction and utilisation of ‘housing first’ and ‘housing led’ approaches in seeking to prevent and ameliorate homelessness in the final strategy document.

30. Fourthly, we believe a specific activity should be included in relation to reform of the legislation governing homelessness in this jurisdiction. We are aware that the Department for Communities is currently reviewing the current legislative framework. During the second stage debate on the Private Tenancies Bill currently going through the NI Assembly, the Minister for Communities stated the following: “[Members] raised the homelessness point. I recently asked officials to review the existing legislation to ensure that it is fit for purpose, and they will come back to me before the end of this mandate with proposals or recommendations on what we need to do. We are looking at that urgently.”<sup>27</sup> We welcome this review of the homelessness legislation as we believe it is clearly evident that the legislation governing this area is no longer fit for purpose for a wide variety of reasons. Neighbouring jurisdictions have all reformed their homelessness legislation in recent years and we believe Northern Ireland should follow

suit. We submit that a specific activity should be included referring to this review and actions which flow from it. This should include a commitment to legislative reform.

31. Fifthly, and finally, in our estimation the final strategy document needs to incorporate reference to the importance of listening to those with lived experience of homelessness and practical actions to ensure this takes place. The voices of those with lived experience of homelessness must be at the centre of the response to homelessness here. It is acknowledged that the draft strategy recognises that “the lived experiences of those ‘in the system’ need to help us shape the solutions.”<sup>28</sup> This is a welcome recognition. However, no practical actions are incorporated in the draft strategy to see this become a reality. The Department should actively take steps to ensure that the voices of those with lived experience are heard in the policy development process around the Housing Supply Strategy. It is acknowledged that this is not necessarily straightforward, but in our view the development of a consultation mechanism with those with lived experience of homelessness would pay dividends in terms of policy development over time.

### Objective 3: Quality

32. We are supportive of the two long-term policies and interventions set out under Objective 3. We believe it is vital that new and existing policies lead to the delivery of better-quality homes across all tenures. Poor-quality housing can have deeply detrimental consequences. As Baker et al put it, “poor condition housing appears to have a measurable and statistically significant impact on self-assessed mental, physical, and general health.”<sup>29</sup> Unfortunately poor-quality housing can impact on tenancy sustainment.

33. In terms of the activities outlined to fulfil these long-term policies, we warmly welcome the commitment to “undertake a comprehensive review of fitness standards applicable for all tenures.”<sup>30</sup> However, no detail is provided in the draft strategy as to when this “comprehensive review” would begin or when it would be envisaged to be completed. We would submit that the Department should incorporate a timeline in the final strategy document as to when this would take place.

34. We welcome the activity included around new legislation to improve “the safety, security and quality” of the PRS. However, it would be hoped that by the time the final strategy is implemented that the Private Tenancies Bill which will introduce the four changes included here will either have been passed in to law by the Assembly or be close to final passage. Consequently, there is a possibility that this action may actually have already been completed by the time the strategy comes in to operation. Little detail is provided as to what the Department believes should be included in the second stage of the PRS reform. In the final strategy, we would submit that the Department should provide more detail as to what it believes will be incorporated in this legislative proposal.

### Objective 4: Better Places

35. We believe that other organisations are better placed to comment in detail on this objective. We do have some brief comments to make regarding the content of Objective 4. Firstly, we welcome the inclusion of considerations around the impact of poverty in relation to housing affordability and sustainability in this objective. We had called for this in our response to the Call for Evidence.<sup>31</sup> Secondly, we would welcome further detail on what is envisaged under the action to “research and investigate how

best to work with multiple agencies and other stakeholders to develop innovative demonstration projects to address the housing needs of those most in need.”<sup>32</sup> Would this incorporate the development of housing-led and Housing First approaches? Thirdly, we would submit that specific reference should be made in the final strategy to the need to reduce the stigma attached to social housing in some quarters and to actions to seek to achieve this end.

### **Objective 5: Decarbonisation**

36. We believe that other organisations are better placed to provide detailed comment on this objective. Briefly, we support the change the Department has made to the wording of this objective to incorporate the need to support a ‘just transition’ to carbon neutrality. It is accepted that housing needs to be a part of our response to the phenomenon of global heating but the change which needs to come must be done, as the draft strategy puts it, with “careful consideration (and tailored support)... to those most in need, including those disadvantaged and/or marginalised groups.”<sup>33</sup>

### **Question 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?

37. Yes, we believe this is a positive and welcome enabling principle. We agree with the ‘whole system approach,’ collaborative approach outlined and the need to ‘inclusively’ transform supply.

### **Question 4**

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

38. The proposed ambition to deliver 100,000 plus homes throughout the life of the strategy will be challenging to accomplish but it does reflect the very real need that is out there for additional homes. One query we have relates to why the figure of 100,000 has been selected. It is not evident from the draft strategy why a figure of 100,000 as opposed to 90,000 or 110,000 has been adopted. It would be beneficial if some details of the evidence base behind this figure could be provided. This is not because we believe the figure is necessarily the wrong one. We would merely like to see the evidence base behind this figure.

39. We would also submit that the language utilised around this ambition should be consistent throughout the final strategy document. The Minister in her foreword indicates that she wants “at least a third of these homes to be social homes.”<sup>34</sup> This is echoed on p11 where it is stated that “at least a third” of these 100,000 homes will be “social homes.” However, on p33, the reference to social homes has been removed from the definition of success outlined. In our view, the requirement that one third of the homes be social homes should be part of the criteria for assessing the success of the strategy. Consequently, the language utilised on p33 should incorporate specific mention of the need for one third of the homes to be social homes.

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### Question 5

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

40. We believe that the proposed indicators currently included in the draft strategy are all suitable.

### Question 6

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

41. We have no comment to make in response to this question.

### Question 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?

42. This is a crucially important question. As the representative body for the Homelessness Sector here, we know that many of our members face acute staff pressures at the current time and may find it difficult to meaningfully participate in any new structures which may be proposed for the purposes of delivering this strategy or providing oversight for it. It may be that the best approach to seeking meaningful engagement from representatives of the homelessness sector may be through the structures which already exist (for example the Central Homelessness Forum). It may be appropriate to seek to form a subgroup under the auspices of the forum specifically to consider the delivery and oversight of the Housing Supply Strategy.

43. However, if the Department determines that a new delivery or oversight structure needs to be formed we would stress that it is crucial the homelessness sector is represented on this body. Careful consideration may be needed to determine how best to achieve engagement on this body. The perspective of the sector needs to be heard as the strategy rolls out over the 15 year period.

44. We believe that an important question remains over how best to ensure that the voices of those with lived experience of homelessness are incorporated in to the development of the strategy. This is a wider question than merely this strategy. At the current time, no formal institution or body exists to provide a forum for those with lived experience of homelessness to feed in to policy processes or service development. While some service user representation does take place, it is often ad hoc and reactive. Different models as to how this can be done are available (for example, the Regional Service User Network and Renter's Voice are two good examples of how representation can be achieved.)<sup>35</sup> However, for this to take place meaningful funding for the development of a formal group would need to be provided either through statutory funding or from charitable sources. We submit that the Department should explore the formation of such a structure in conjunction with the Housing Executive.

### Question 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?

45. We would recommend that the Department consider the approaches adopted in other jurisdictions on these islands in considering this question. We do not have expertise in this area, but our understanding is that other jurisdictions have adopted useful and helpful approaches in the development and delivery of action plans.

### Question 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?

46. We have nothing further to add beyond what we outlined in our response to the Call for Evidence on this issue. For reference we stated the following: “We firmly believe in the value of co-design and consultation in the development process. If this society is to create and sustain vibrant communities, individuals and families living in a particular area need to feel they have an opportunity to be heard and to engage in the process. Admittedly, this can be a real challenge in practice. The Department, working with the housing sector and local government, should consider how to engage with local communities in place making. This may require greater use of technology such as applications or social media networks to reach out. It may need engagement with civil society organisations working on the ground in particular areas. Particular consideration needs to be given to how to ensure marginalised communities and groups such as racial minorities, persons with disabilities and LGBT+ communities can be included and considered in consultation exercises. This process should not be a passive one where those involved in the process merely wait for reaction; instead, those tasked with providing leadership in this area should reach out and actively seek views and opinions.”

### Question 10

Do you agree with the findings of the EQIA?

47. We welcome the publication of the EQIA for the Housing Supply Strategy. We agree that it is a fair analysis of the equality issues around housing and homelessness in this society on the basis of currently available evidence. We share some of the concerns around gaps in the data available in certain areas as well as some concerns around the age of some of the data being relied upon. While it may be a cliché, unfortunately it is true to say that ‘what is counted is what counts’. In some areas the lack of data hampers the ability of the Department to see whether equality issues in fact exist let alone seek to address them.

48. We note the fact that “the NIHE data waiting list and allocation data for social housing does not capture whether the lead applicant has a disability/does not have a disability. Or if there is an individual within the household of the applicant living with a disability.”<sup>36</sup> Similarly, the EQIA notes that “the main homelessness statistics provided by the Northern Ireland Housing Executive do not currently record a person’s sexual orientation.”<sup>37</sup> While there may be some sensitivity around disclosure of equality characteristics, it is noted

that the Co-Ownership scheme collates data related to both disability and sexual orientation. It is unclear to us why such data cannot be collated by the Housing Executive.

### Question 11

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

49. We would submit that the EQIA should consider the evidence around the housing needs of those who have No Recourse to Public Funds (NRPF) status. Individuals with this status are unable to claim a number of publicly funded benefits including crucially support with housing. Many of these individuals will be ethnic minorities so it would be appropriate for this to be considered in the section on race. One of the success stories of the Executive response to the Covid-19 pandemic has been the co-operation between a number of Executive departments to facilitate the 'Everyone In' scheme which allowed the Housing Executive to provide housing to those with NRPF status. However, as the scheme is linked to the pandemic, it will eventually come to an end. Before the pandemic, some with NRPF status were left destitute as they could not access the support of the state in many areas. We are concerned about the possibility of this happening again. In our view, the EQIA should consider the needs of this group.

### Question 12

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

50. Yes, we do broadly agree with the next steps outlined in section 5 of the EQIA. However, we would highlight that while it is indeed welcome that the draft Housing Supply Strategy states that it wants to be informed "by the lived experiences of those 'in the system' to help shape solutions" we do not see within the strategy itself a clear indication of how this will be achieved. This is not to suggest that the Department does not have plans to ensure such voices are heard; it is merely that these details have not been provided in the draft strategy. We believe the final strategy document needs to flesh out in practice how the Department will engage with those with lived experience of homelessness (as well of course as other relevant groups).

51. We welcome the comment that "sections 3 and 4 above have already highlighted significant data gaps in housing supply statistics, gaps that any monitoring framework must first acknowledge and then endeavour to remedy."<sup>38</sup> We believe it is important the Department takes steps to obtain up-to-date statistics on the potential impact of the strategy on all section 75 groups.

### Question 13

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

52. We note the following comment in the Rural Needs Impact Assessment: "Homelessness is sometimes a less visible issue in rural areas. Not enough robust information is available in relation to rural homelessness and therefore there is not a clear enough picture to show the extent of the problem. There is also a lack of awareness among some rural dwellers about their eligibility to access social housing.

This often leads to younger people relying on insecure, untenable arrangements such as ‘sofa surfing’.<sup>39</sup> We firstly note the statement that there is a lack of “robust information” in relation to rural homelessness. The recently published Rural Strategy from the Housing Executive includes some statistics in this regard. As the strategy notes:

“Between 2016 and 2021, the number of FDAs on the waiting list for a home in a rural area increased from 1,709 to 2,693 and the proportion of FDAs of all rural waiting list applicants increased from 33% in 2016 to 38% in 2021... At March 2021, the top homelessness presentation reason for all FDAs on the waiting list for rural areas was ‘Accommodation not reasonable’ which includes cases where the current home is unsuitable to meet the specific or general needs of the household. This was followed closely by ‘Breakdown of sharing arrangement/family dispute’ and then ‘Loss of Private Rental Accommodation’, ‘Relationship breakdown’ and ‘Domestic Violence’. The average time on the waiting list for rural FDAs is 44.5 months and the median age of lead tenant at application is 39.”<sup>40</sup>

At a recent consultation event, a helpful explanation was provided by a Housing Executive Official which provided the more nuanced perspective that robust data on rural applicants on the social housing waiting list is available but that such data is lacking regarding homelessness presentations. We would submit the Rural Needs Impact Assessment be amended to reflect this more nuanced perspective. We would also urge the Department and the Housing Executive to consider how to obtain robust statistics on rural homelessness presentations.

53. We secondly believe the Rural Needs Impact Assessment should give due cognisance to the evidence outlined in research conducted by Campbell Tickell on temporary accommodation in this society. The report specifically considers the lack of temporary accommodation in rural areas. It describes current provision in rural areas as “sparse” and outlines the detrimental impact this lack of provision can have.<sup>41</sup> As noted above, the Housing Executive’s recently published Rural Strategy for 2021-2025 outlines the following with regard to temporary accommodation provision in rural areas: “It is evident that the existing offer of temporary accommodation must be increased to reduce the requirement for non-standard options and we should look strategically at where accommodation should be located in order to address the needs of those who present from both urban and rural locations.”<sup>42</sup> We believe the final supply strategy needs to address provision of temporary accommodation. One aspect of this should be supply in rural areas.

#### Question 14

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

54. No.

#### Question 15

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

55. We have no further comments to make.

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## References

<sup>1</sup> 'Homeless Connect' is the working name of 'Council for the Homeless (Northern Ireland)', registered charity in Northern Ireland (charity number 103325)

<sup>2</sup> See Department of Communities, "Housing Supply Strategy 2022-2037", December 2021, 4. "I am on record as stating that a Housing Outcome is essential and I will continue to press for this commitment to be fulfilled."

<sup>3</sup> Homeless Connect, "Submission to the Housing Supply Call for Evidence", July 2021, <https://homelessconnect.org/wp-content/uploads/2021/10/HOUSING-SUPPLY-STRATEGY-SUBMISSION-copy.pdf> para 10.

<sup>4</sup> Homeless Connect, "Housing Supply Call for Evidence", para 11.

<sup>5</sup> Homeless Connect, "Housing Supply Call for Evidence", para 7.

<sup>6</sup> Department for Communities, "Housing Supply Strategy", 21.

<sup>7</sup> Department for Communities, "Housing Supply Strategy", 21.

<sup>8</sup> Northern Ireland Assembly, "Official Report (Hansard) Monday 13 December 2021" Volume 146, No 3, 20.

<sup>9</sup> Department for Communities, "Housing Supply Strategy", 21.

<sup>10</sup> Department for Communities, "Housing Supply Strategy", 21.

<sup>11</sup> Department for Communities, "Housing Supply Strategy", 22

<sup>12</sup> Department for Communities, "Housing Supply Strategy", 22.

<sup>13</sup> We are aware that this issue has been considered in a number of reports including Gillian Young, Allison Orr, Kenneth Gibb, Steve Wilcox and Declan Redmond, "Review of Social Rent Setting in NI", *Housing Executive*, 21 February, 2013 and Gillian Young, Steve Wilcox, Chris Leishman and Sarah McCloy, "A Review of the Affordability of social rents in Northern Ireland", *Housing Executive*, May 2017.

<sup>14</sup> Communities Committee, "Report on the Private Tenancies Bill", 12 January, 2022, <http://www.niassembly.gov.uk/globalassets/documents/committees/2017-2022/communities/reports/private-tenancies-bill/committee-for-communities---report-on-the-private-tenancies-bill.pdf> 57.

<sup>15</sup> Prevention Review Group, "Preventing Homelessness in Scotland", February, 2021 <https://www.crisis.org.uk/media/244558/preventing-homelessness-in-scotland.pdf> 20.

<sup>16</sup> Department for Communities, "Housing Supply Strategy", 24.

<sup>17</sup> The Housing (Northern Ireland) Order 1988 Article 6A, <https://www.legislation.gov.uk/nisi/1988/1990/article/6A>.

<sup>18</sup> Department for Communities "Housing Supply Strategy", 24.

<sup>19</sup> Department for Communities, "Housing Supply Strategy" 25.

<sup>20</sup> Department for Communities, Housing Supply Strategy, 23.

<sup>21</sup> Department for Communities, "NI Homelessness Bulletin January to June 2021", 16 September 2021, <https://www.communities-ni.gov.uk/system/files/publications/communities/ni-homelessness-bulletin-jan-jun-2021-tables.ods> table 3.5

<sup>22</sup> Nicola McCrudden, Mark Goldup, Tim Gray, John Palmer, Annie Field, Mia Rafalowicz-Campbell and Divya Krishnaswamy, "Strategic Review of Temporary Accommodation", October, 2020, <https://www.nihe.gov.uk/Documents/Research/Homelessness/Strategic-Review-of-Temporary-Accommodation-2020.aspx?ext=> para 4.37.

<sup>23</sup> Housing Executive, "Reaching Rural" Rural Strategy 2021-2025, 25 November, 2021, <https://www.nihe.gov.uk/Documents/Community/Rural-Strategy-2021-2025.aspx> 22.

<sup>24</sup> Department for Communities, "Poverty Policy", <https://www.communities-ni.gov.uk/articles/poverty-policy>

<sup>25</sup> "The international expansion of Housing First has been driven in no small part by a rigorous body of evidence, including experimental studies conducted in multiple countries, of the effectiveness of Housing First in reducing homelessness." Thomas Byrne, Minda Huang, Richard Nelson and Jack Tsai, "Rapid rehousing for persons experiencing homelessness: a systematic review of the evidence", *Housing Studies*, 29 March 2021, 2.

<sup>26</sup> Alastair Roberts, "Housing rites: young people's experience of conditional pathways out of homelessness", *Housing Studies*, 2019, Volume 34, No 7, 1120.

<sup>27</sup> Official Report, Deirdre Hargey MLA 13 September 2021, <http://data.niassembly.gov.uk/HansardXml/plenary-13-09-2021.pdf>, 67.

<sup>28</sup> Department for Communities, "Housing Supply Strategy", 18.

<sup>29</sup> Emma Baker, Laurence H. Lester, Rebecca Bentley & Andrew Beer, "Poor Quality Housing: Prevalence and Health Effects" *Journal of Prevention and Intervention in the Community*, 44.4 (August 2016) 229.

<sup>30</sup> Department for Communities, "Housing Supply Strategy", 26.

<sup>31</sup> Homeless Connect, "Housing Supply Call for Evidence", para 26.

<sup>32</sup> Department for Communities, "Housing Supply Strategy", 30.

<sup>33</sup> Department for Communities, "Housing Supply Strategy", 31.

<sup>34</sup> Department for Communities, "Housing Supply Strategy", 3.

<sup>35</sup> See Regional Service User Network (RSUN), <https://rsun-ni.org.uk/> accessed January 4, 2022 and Housing Rights, "Renters Voice for Private Tenants", <https://www.housingrights.org.uk/renters-voice-private-tenants> accessed January 4, 2022.

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<sup>39</sup> Department for Communities, "Rural Needs Impact Assessment", 2 November 2021, <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-rural-needs-impact-assessment.pdf> 6.

<sup>40</sup> Housing Executive, "Reaching Rural" 22.

<sup>41</sup> McCrudden et al, "Strategic Review of Temporary Accommodation", para 4.37.

<sup>42</sup> Housing Executive, "Reaching Rural", 22.



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