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**By email:** business.performance@nihe.gov.uk

03/02/25

#### Re: Draft Corporate Strategy 2025/26 - 2027/28 Consultation

Dear Sir/Madam

Thank you for the opportunity to engage with you on the development of your new Corporate Strategy. I offer a response on behalf of the Commissioner for Older People for Northern Ireland (COPNI).

The consultation document states that the Northern Ireland Housing Executive's (NIHE) mission is to "ensure that housing helps resolve some of our greatest challenges".<sup>1</sup> Northern Ireland's population is ageing. In Northern Ireland, mid-year 2022, there were 335,449 older people aged 65 and above. By 2042, the number of people aged 65 and above in Northern Ireland is projected to rise to 480,482, over a 43% increase.<sup>2</sup> Although this is something to celebrate, inadequate planning to address the challenges posed by Northern Ireland's changing demographic risks overwhelming our public institutions and having "devastating social consequences, in particular for older people".<sup>3</sup> COPNI maintains that our ageing population is one of Northern Ireland's greatest challenges if it is not addressed properly.

Housing-related matters are consistently raised with COPNI by older people and the organisations that support them. The majority of older people rely on fixed incomes,4 5 impacting their ability to keep pace with housing prices and rising living costs. Often, homes

<sup>&</sup>lt;sup>1</sup> Northern Ireland Housing Executive (2024) <u>'Our Promise to Our Communities</u>, Draft Housing Executive Corporate Strategy2025/26-2027/28', page 2.

<sup>&</sup>lt;sup>2</sup> NISRA (2025) <u>'2022-based Population Projections for Northern Ireland, Tabular 5 Year Age Bands'</u>.

<sup>&</sup>lt;sup>3</sup> Commissioner for Older People for Northern Ireland (2024) 'At the Centre of Government Planning, The Programme for Government and Preparing for an Ageing Population', page 10.

<sup>&</sup>lt;sup>4</sup> In 2022, the All-Party Group on Ageing and Older People found that key issue for older people is living on a fixed income, with little to no scope to source additional or new income. Age NI (2022) 'All Party Group on Ageing and Older People, 7th September 2022 Briefing'.

<sup>&</sup>lt;sup>5</sup> Research by Age UK found that, nationally, 25% of pensioners do not have any savings. One participant said she had "no disposable income". Age UK (2019) 'Struggling On', page 19.

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are not designed to accommodate the diverse needs of older people.<sup>6</sup> Within our communities, many older people experience loneliness, social isolation, poor access to transport, and fear of crime. Addressing these issues requires age-friendly initiatives including accessible and safe housing, as well as community measures that create environments to support older people in leading active, independent and socially engaged lives.

There is potential in each of your proposed high level strategic objectives to address the challenges of an ageing demographic. In relation to the objectives, COPNI offers the following comments:

#### High Level Objective 1: Ensuring the right homes are built in the right places.

The Northern Ireland Executive's draft Programme for Government (PfG) includes housing as one of nine Strategic Outcomes, citing that they want "everybody to have access to affordable, sustainable and quality housing that meets their needs".<sup>7</sup> NIHE recent statistics reveal that in the period July to September 2024, there were 48,366 applicants on the social housing waiting list in Northern Ireland. In the same period, however, only 8,555 allocations were made.<sup>8</sup> Demand is far outweighing supply.

In response to the draft PfG consultation, COPNI highlighted that the impact of an ageing population was not addressed in the housing section of the Programme, despite being "a key factor in the housing crisis in Northern Ireland".<sup>9</sup> In each of Northern Ireland's local government districts, older people make up a significant proportion of applicants on the social housing waiting list. NIHE data shows that over 23% of applicants on the social housing waiting list in Ards and North Down are older people, 20% in Mid and East Antrim, as well as 17% in Causeway Coast and Glens.<sup>10</sup> Given we live in an ageing population, we can assume these

<sup>&</sup>lt;sup>6</sup> Research by the Centre for Ageing Better highlights that work is needed to "increase the supply and visibility of accessible homes" and discussed the need for "options that reflect the needs and desires of older people". Centre for Ageing Better (2023) <u>'Locked Out: A New Perspective on Older People's Housing Choices'</u>, pages 11 and 12.

<sup>&</sup>lt;sup>7</sup> Northern Ireland Executive (2024) <u>'Our Plan: Doing What Matters Most, Draft Programme for Government 2024-</u> 2027', page 38.

<sup>&</sup>lt;sup>8</sup> Northern Ireland Housing Executive (2024) <u>'Northern Ireland Housing Bulletin, July – September 2024, Section</u> <u>2.1'</u>.

<sup>&</sup>lt;sup>9</sup> Commissioner for Older People for Northern Ireland (2024) <u>'Draft Programme for Government 2024-2027, Doing</u> What Matters Most, Consultation Response', page 4.

<sup>&</sup>lt;sup>10</sup> Northern Ireland Housing Executive (2024) <u>'Commissioning Prospectus, Social & Intermediate Housing</u> Requirements for the period 2024/25 – 2026/27'.

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proportions will grow over time. Practical and realistic actions are needed to close this gap, which includes acknowledging and planning for housing an ageing population.

COPNI's report *At the Centre of Government Planning* highlights that in addition to this already challenging situation, "the housing requirements of an ageing population are different to those of a younger population".<sup>11</sup> Trends suggest that as the population continues to age, average household sizes in Northern Ireland decrease.<sup>12</sup> Thus, the demand for smaller housing options will increase. Additionally, an ageing population also changes the reasons to move into social housing. COPNI's consultation response to the draft PfG details that while younger people tend to move to social housing for financial reasons, older people do so because their current home is not accessible and not fit for their needs.<sup>13</sup> Social housing needs to be flexible and tailorable to the diverse needs of older people.

Although not explicitly mentioned in your draft Corporate Strategy, COPNI appreciates NIHE's recognition of the challenges of housing an ageing population, given your *Older People's Housing Strategy*.<sup>14</sup> COPNI was pleased to see a commitment to working with partners to commission and build new social housing, as well as your work programme to "scale up a programme for new build social housing".<sup>15</sup> We are hopeful by reiterating the need for planning for the challenges posed by the ageing population that these concerns will be reflected in your programmes.

#### High Level Objective 2: Aligning our economic and environmental impact.

COPNI is encouraged by your work programmes under this objective to meet the draft PfG's commitment on a just transition and deliver investment to ensure the sustainability of your housing stock. In January 2025, COPNI responded to the Department of Agriculture, Environment and Rural Affairs' (DAERA) consultation on the establishment of a Just Transition Commission. In our response, we highlighted that "rapid societal change due to population

<sup>&</sup>lt;sup>11</sup> Commissioner for Older People for Northern Ireland (2024) <u>'At the Centre of Government Planning, The</u> <u>Programme for Government and Preparing for an Ageing Population'</u>, page 31.

<sup>&</sup>lt;sup>12</sup> Census 2021 results showed that the average household size fell from 2.54 in 2011 to 2.44 in 2021. NISRA (2022) <u>'Census 2021 Population and Household Estimates for Northern Ireland, Statistical Bulletin'</u>.

<sup>&</sup>lt;sup>13</sup> Commissioner for Older People for Northern Ireland (2024) <u>'Draft Programme for Government 2024 – 2027,</u> <u>Doing What Matters Most, Consultation Response'</u>, page 5.

<sup>&</sup>lt;sup>14</sup> Northern Ireland Housing Executive (2021) <u>'Older People's Housing Strategy 2021/22 - 2025/26'</u>.

<sup>&</sup>lt;sup>15</sup> Northern Ireland Housing Executive (2024) <u>'Our Promise to Our Communities</u>, Draft Housing Executive <u>Corporate Strategy 2025/26 – 2027/28</u>', page 10.

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ageing will coincide with that of significant disruptive climate change".<sup>16</sup> A paper by Help Age International emphasised the potential impacts of climate change on the "health, wellbeing and livelihoods of the ageing population". They point out that older people are at greatest risk of the impacts of climate change due to several factors: vulnerability to climate-related natural disasters; sensitivity to extreme hot and cold temperatures; prolonged exposure to pollution; and pre-existing health conditions.<sup>17</sup> Indeed, in the wake of the recent Storm Éowyn that hit on 24 January 2025, many communities were left without electricity for prolonged periods of time, which had significant, disproportionate impacts on many older people.<sup>18 19</sup> In this context, COPNI recommends that the realities of demographic ageing be acknowledged in discussions around just transition and climate change.

#### High Level Objective 3: Regenerating and investing in communities.

The World Health Organisation's (WHO) *National Programmes for Age-Friendly Cities and Communities: A Guide* encourages an approach in which "age-friendly cities and communities are designed to meet the needs of the wide diversity of older people" and "anticipate and respond flexibly to ageing-related needs and preferences".<sup>20</sup> COPNI is hopeful your plans to "collaborate and engage with communities" will support older people in experiencing community safety, cohesion and belonging, as well as encourage the removal of barriers that inhibit older people from ageing well in place. Sense of community safety, for example, can be vital to encouraging older people to age well. In response to your recent consultation on your Community Safety Strategy, COPNI highlighted that for many older people, community safety "goes beyond experiences of crime and victimhood".<sup>21</sup> In Northern Ireland, older people are much less likely to be victims of crime than younger age groups.<sup>22</sup> Despite this, older people

<sup>&</sup>lt;sup>16</sup> Commissioner for Older People for Northern Ireland (2025) <u>'Consultation Response on the Establishment of a</u> Just Transition Commission', page 2.

<sup>&</sup>lt;sup>17</sup> Help Age International (2023) <u>'Climate Justice in an Ageing World'</u>, pages 4 and 7.

<sup>&</sup>lt;sup>18</sup> Independent (2025) <u>'Community rallies round to support elderly and vulnerable cut off by Storm Éowyn'</u>.

<sup>&</sup>lt;sup>19</sup> Northern Ireland World (2025) 'McGlone: more support needed from NI Executive for rural areas impacted by Storm Éowyn'.

<sup>&</sup>lt;sup>20</sup> World Health Organisation (2023) <u>'National Programmes for Age-Friendly Cities and Communities: A Guide'</u>, page 9.

<sup>&</sup>lt;sup>21</sup> Commissioner for Older People for Northern Ireland (2024) <u>'Consultation on Draft Community Safety Strategy</u> <u>2025-2030'</u>, page 1.

<sup>&</sup>lt;sup>22</sup> For instance, police recorded crime statistics showed there were 4,193 recorded victims of crime in Northern Ireland aged 65 plus in 2023/24. In the same year, there were 5,007 recorded victims aged between 45 and 49,

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experience higher levels of fear of crime than younger age groups.<sup>23</sup> Even if they have not been a direct victim of crime, media reporting, past experiences or hearing about crime in their local area can heighten their anxiety. This fear can lead to behavioural changes, such as limiting social interactions, withdrawing from community activities and avoiding leaving their homes. As a result, older people may experience social isolation, loneliness, and weakened social bonds. We hope that the NIHE's investment in the regeneration of community Safety Strategy, will support and encourage older people to live independently, stay socially connected and feel valued in their local areas.

#### High Level Objective 4: Reducing housing-led health inequalities.

Age NI's Lived Experience Survey found that older people want to live at home, independently for as long as possible.<sup>24</sup> However, housing-led health inequalities often pose significant barriers to achieving this and can disproportionately impact older people.

Older people are more likely to experience fuel poverty. The Northern Ireland House Condition Survey found that almost four out of ten households in which the Household Reference Person is aged 75 and over were in fuel poverty in Northern Ireland. The same survey also highlighted that fuel poverty increases with age.<sup>25</sup> COPNI publicly expressed disappointment at the Executive's recent decision to limit the Winter Fuel Payment.<sup>26</sup> Since then, COPNI has engaged with the Department for Communities, other organisations and the media, drawing attention to the link between the cut to the Payment, fuel poverty and the health of older people in Northern Ireland. Many older people this winter have struggled and will continue to struggle to heat their homes. We know this can lead to poor housing conditions, including damp, cold, and mould. Given that older people are more likely to live with a disability or long-term health

<sup>7,733</sup> aged between 35 and 39, and 7,656 aged between 25 and 29. Police Service of Northern Ireland (2024) 'Annual Trends in Police Recorded Crime 1998/99 to 2023/24, Pivot Table 4'.

<sup>&</sup>lt;sup>23</sup> The 2020/21 Northern Ireland Safe Community Telephone Survey found that 11% of respondents aged 75 plus had high levels of worry about crime overall, compared to 3% of respondents aged between 16 and 34. Similarly, 17% of respondents aged 75 plus indicated they had high levels of worry when walking alone after dark, compared to 2% of respondents aged between 16 and 34. Department of Justice (2022) 'Findings from the 2020/21 Northern Ireland Safe Community Telephone Survey, Table 7c: Worry about Crime and Personal Safety, by personal characteristics (%) Northern Ireland, 2020/21'.

<sup>&</sup>lt;sup>24</sup> Age NI (2023) <u>'Lived Experience, What Matters to Older People'</u>, page 13.

<sup>&</sup>lt;sup>25</sup> NISRA & Northern Ireland Housing Executive (2016) <u>'House Condition Survey 2016, Appendix Tables, Table 6.6'</u>.

<sup>&</sup>lt;sup>26</sup> Department for Communities (2024) <u>'Written Ministerial Statement'</u>.

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problem<sup>27</sup>, such living conditions can work to exacerbate these existing health issues. Fuel poverty also impacts the extent to which older people can afford necessary home maintenance or energy-efficient upgrades, such as better insulation or heating systems. Prolonged exposure to cold, damp homes risk further health complications for older people.

Accessible housing is also a critical component to supporting older people to live independently and safely as they age. Many homes are inaccessible to older people, lacking features such as a step-free entry, wide doorways, railings, or level-access showers. Such barriers, among others, can increase the risk of falls, injuries and limit older people's ability to perform daily tasks. Many older people who experience mobility challenges, vision impairments or other issues may therefore require adaptations to their homes to address their needs. Age NI, for example, detail several adaptations older people may need to ensure they can continue to live at home. These include a ramp or handrails outside the home, a stairlift or wheelchair lift, a shower seat, repositioning or widening of doors, a wheelchair accessible sink.<sup>28</sup> In our *At the Centre of Government Planning* report, COPNI highlighted the value of coordinated planning and action: "Recent research ... found that older people with reduced mobility are often forced into residential care due to excessive delays in home adaptations ... The report highlights the interconnectedness between different areas of government, and how

successful policies in a certain area can have subsequent positive effects in other areas".<sup>2930</sup> In this case, policies and strategies to address housing-led health inequalities will reduce the burden on our health system. Strategies to address fuel poverty, for example, will reduce the number of people living in cold homes and subsequently reduce the number of older people in need of hospital care for respiratory conditions. Similarly, initiatives to tackle the inaccessibility of homes will reduce the number of older people in need of a move to a care home.

Given these issues, COPNI was pleased by the NIHE's commitment to improving health and housing outcomes for older people through your Supporting People Programme. We are in no doubt that the Supporting People Programme provides essential services to many older people across Northern Ireland to ensure they can live independently and safely. In COPNI's

<sup>&</sup>lt;sup>27</sup> Census 2021 results found that 56.8% of those aged 65 plus in Northern Ireland live with a long-term health problem or disability. NISRA (2022) <u>'Census 2021, Main Statistics for Northern Ireland, Statistical Bulletin, Health,</u> <u>Disability and Unpaid Care'</u>, page 18.

<sup>&</sup>lt;sup>28</sup> Age NI (2024) <u>'Adaptations and Equipment to make home life easier'</u>.

<sup>&</sup>lt;sup>29</sup> Commissioner for Older People for Northern Ireland (2024) <u>'At the Centre of Government Planning. The</u> <u>Programme for Government and Preparing for an Ageing Population'</u>, page 31.

<sup>&</sup>lt;sup>30</sup> Age UK (2024) 'The Disabled Facilities Grant'.

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response to the Department for Communities' consultation on the Equality Impact Assessment (EQIA) for the 2024-2025 budget, we highlighted that the 6.4% rise in funding for the Programme was welcome but insufficient to address the demand from older people.<sup>31</sup>

COPNI welcomes your commitment to scale up your Financial Inclusion Service. Benefit uptake among older people in Northern Ireland remains a critical issue, with many eligible individuals failing to claim the financial support they are entitled to. As an example, 72% of those entitled to Pension Credit in Northern Ireland receive it, with an estimated 28% potentially entitled to Pension Credit but not receiving it.<sup>32</sup> Older people may lack awareness of the benefits available to them. Others may hesitate to apply due to complex application processes or societal misconceptions about receiving benefits.<sup>33</sup> We are hopeful that efforts to address this issue, such as your Financial Inclusion Service, will serve to support older people in tackling poverty, fuel poverty, living costs, maintaining their homes, as well as raise awareness of the support available.

COPNI is also encouraged by the work programme to develop a Housing and Health Strategy and welcomes the inclusion of older people's housing as a key priority area. We look forward to engaging with you on the development of this new Strategy to ensure older people's voices are listened to, reflected in the Strategy and their diverse needs met.

#### High Level Objective 5: Drawing on the talent of our skilled housing professionals.

Older people are a diverse group. Numerous factors such as demographic characteristics like gender, sexuality, race and ethnicity- influence the identities of older people, as well as their experiences of ageing. Understanding the intersectionality of these characteristics is crucial to providing support and services to older people that can address their unique needs. It is important that NIHE acknowledges the diversity of older people, ensuring that its workforce is representative of the communities it serves.

Finally, your *Older People's Housing Strategy*<sup>34</sup> tells us you recognise the challenges of planning for and housing an ageing population. COPNI is supportive of the NIHE's strategic direction for the year ahead and is hopeful that their outcomes will support older people to age

<sup>&</sup>lt;sup>31</sup> Commissioner for Older People for Northern Ireland (2024) <u>'Consultation on Department for Communities'</u> <u>Budget 2024-25 Allowances'</u>, page 6.

<sup>&</sup>lt;sup>32</sup> NISRA & Department for Communities (2022) 'Pension Credit: Estimates of Benefit Take-Up'.

<sup>&</sup>lt;sup>33</sup> Age UK (2024) <u>'Briefing, Benefit Take-Up and Older People'</u>.

<sup>&</sup>lt;sup>34</sup> Northern Ireland Housing Executive (2021) <u>'Older People's Housing Strategy 2021/22 – 2025/26'</u>.

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well in their homes. COPNI trusts these plans will be resourced properly and implemented fully. We would welcome the opportunity to discuss this response, or the Corporate Strategy, further should it be necessary or helpful.

Best wishes

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