



Commissioner for **Older People**
for Northern Ireland

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RE: Draft Rural Strategy 2026-31 Consultation

To whom it may concern

The Rural Strategy of the Housing Executive is an essential document for the vulnerable population of Northern Ireland. In a report that will soon be published, the Commissioner for Older People for Northern Ireland (COPNI) has analysed the difficult circumstances experienced by older people in the private rental housing market, and how this is being amplified by the challenges and pressures faced by the social rented sector.

A stronger social housing system in rural communities, particularly where housing is well connected to transport corridors, could improve access to healthcare appointments, enable people to remain active in their communities, and help reduce loneliness. For these reasons, COPNI welcomes the publication of the present strategy.

The strategy acknowledges that circumstances in rural areas are often more challenging than in urban ones, as the rate of social housing provision in rural areas is below the proportion of the population living in those areas, indicating a gap between supply and need.¹

Across the document, a number of aspects of the Housing Executive's current work are described, including its communication with local partners to identify needs; the monitoring of land and rural housing stock; the establishment of community-based support programmes promoting cohesion; the increasing provision of digital services for social renters; and commitments to support older people in rural communities, among other things. These activities are all welcome and valuable. The strategy also

¹ Northern Ireland Housing Executive (2026) [Draft rural strategy 2026–2031](#); page 5.

recognises the importance of a wider whole-government approach, an aim that this office fully shares.

However, while the strategy establishes ambitious goals, it is doubtful that the present document offers a clear roadmap to achieve them. The document often describes existing or unrelated work rather than outlining clearly how the ambitions of the strategy will be achieved. This complicates the ability of stakeholders to evaluate the strategy and—if needed—make recommendations.

1. Growing Housing Need and the Situation of Older People

The Housing Executive is aware that the social housing needs of older people are growing as a result of an ageing population. The most recent data shows that homelessness presentations among older people have reached the highest number since records began.² In addition, older people often have distinctive housing needs and are more likely to be considered in priority need due to their accommodation being unsuitable for their circumstances.³

This means that the housing stock required for an ageing population must address older people's specific needs. For this reason, as the strategy acknowledges, the Housing Executive and Registered Housing Associations will increasingly need to consider how the social housing system can transition toward more age-appropriate provision.

The requirement for a viable and effective social housing system is compounded by the present trajectory of social housing availability, but also by private housing market trends. Private rent prices have increased by approximately 60% over the past ten years,⁴ which can be particularly challenging for older people, who generally have more limited access to financial resources.⁵

Regarding social housing needs in rural areas, the consultation document identifies a clear gap between need and availability. Approximately 36% of the population live in rural areas, while rural homes represent around 17.6% of the Housing Executive's

² In the year 2023-24, 14.2% of households presenting as homeless to the NIHE were pensioner households. Source: Department for Communities (2024) [Northern Ireland Housing Statistics 2023-24 Section 3 Tables – Social Renting Sector](#); table 3.9.

³ The proportion of households accepted as Full Duty Applicants for “accommodation not reasonable” reasons, constitutes now the largest share of applicants at 31.2% in 2024, up from 21.7% in 2005. Source: Department for Communities (2024) [Northern Ireland Housing Statistics 2023-24 Section 3 Tables – Social Renting Sector](#); table 3.11.

⁴ Between 2015 and 2024, the average monthly rent of Northern Ireland has increased by 60%, from £560 to £896 per month. Source: Ulster University (2024) [At a Glance. Private rental market performance 2024](#).

⁵ The income of adults older than 75 years of age is on average 59.4% lower than those aged 35 to 44; 48.5% lower than those aged 45 to 54; and 27.4% lower than those aged 55 to 59. Source: Family Resources Survey (Individual Dataset, Department for Work and Pensions). Retrieved through Stat-Xplore. Weighted mean total income by individual in Northern Ireland, in latest prices (weekly, CPI adjusted in real terms) by age bands and financial year (2023-24).

total housing stock.⁶ This highlights the disproportionate concentration of social housing in urban areas.

Certain locations are particularly impacted by this shortfall in provision. The consultation document notes that the rate of increase of rural applicants in housing stress is highest in Ards and North Down,⁷ which is also the Local Government District with the most aged population. In this district, 23.2% of residents are aged over 65, compared with 18.1% across Northern Ireland overall.⁸

Similarly, population ageing is occurring more rapidly in rural areas. While Belfast recorded 9.6% growth in its older population in the past decade, the rate of increase is significantly higher in some of the most rural districts like Mid Ulster (26.9%), Fermanagh and Omagh (30.6%), and Newry, Mourne and Down (30.2%).⁹

The area of Newry, Mourne and Down is of particular interest, as it has a high rural population (64.0%),¹⁰ a rapidly increasing older population (18.0% in 2024, up from 14.4% in 2014),¹¹ significant demand for social housing, and the longest waiting times for social housing allocations across all Local Government Districts (41.4 weeks).¹²

In addition, housing demand continues to grow across the system. Social housing applicants, Full Duty Applicants, and applicants in Housing Stress are all at historically high levels.¹³ Demand continues to outpace supply,¹⁴ and the average waiting time for allocation increased by 10 months between June 2021 and June 2025.¹⁵ All these factors combined suggest that a very thorough and exhaustive plan is required to address the housing needs of rural areas.

2. Strategy objectives

Naturally, in this context COPNI is particularly interested in understanding how the Housing Executive intends to address this demand. The strategy contains a number of ambitious and powerful statements of purpose. In the foreword, the strategy states

⁶ Northern Ireland Housing Executive (2026) [Draft rural strategy 2026–2031](#); page 5.

⁷ Northern Ireland Housing Executive (2026) [Draft rural strategy 2026–2031](#); page 21.

⁸ NISRA [2024 Mid-Year Population Estimates](#).

⁹ NISRA [2024 Mid-Year Population Estimates](#).

¹⁰ NISRA [Census 2021. Commissioned table CT0116 - Usual resident population by Local Government District and Urban Status](#).

¹¹ NISRA [2024 Mid-Year Population Estimates](#).

¹² Information obtained through a Housing Executive response to a COPNI FOI.

¹³ Source: Department for Communities (2024) [Northern Ireland Housing Statistics 2023-24 Section 3 Tables – Social Renting Sector](#); table 3.5; and NISRA (2025) [Northern Ireland Housing Bulletin](#); Section Two: Social Renting Demand; and freedom of information request response by the NIHE.

¹⁴ Northern Ireland Housing Executive (2026) [Draft rural strategy 2026–2031](#); page 21.

¹⁵ Information obtained through a Housing Executive response to a COPNI FOI.

that it ‘seeks to deliver more homes, and more quickly, recognising the positive social, economic, and environmental impact of housing for rural areas.’¹⁶ Similarly, the strategy states that its ‘core focus is to meet the current and emerging housing needs of rural residents, ensuring access to housing and support services required to lead secure, fulfilling lives.’¹⁷

Regrettably, it is difficult to identify a clear plan within the strategy that outlines how the Housing Executive intends to respond to this growing pressure and ensure access to housing, and deliver more homes, more quickly, in rural areas. In reviewing the priorities set out in the strategy, it is difficult to distinguish between descriptions of existing work and future action plans. A clear roadmap outlining how its objectives will be delivered is largely absent.

3. Priorities and themes

This office is supportive of the majority of themes and priorities proposed in the strategy. Issues like addressing the specific needs of rural tenants (Priority 1), enhance support for an ageing population (Priority 2), homelessness prevention (Priority 4), improvements in energy efficiency (Priorities 9 and 10), supporting community-based programmes (Priority 5), collaborating with Councils to support local growth (Priority 7), and promote climate resilient planning (Priority 11) are all welcome despite the fact these priorities often describe existing or past projects and not future plans. Nevertheless, if delivered adequately, these Priorities would increase protection and wellbeing of rural tenants.

However, the strategy fails to outline a clear plan to address the key issue facing social housing in Northern Ireland: demand outpacing supply. The commitment to invest in accessible housing options to meet growing demand and to protect and enhance rural housing supply (Priority 3) is welcome, but this priority provides limited detail on how these substantial goals will be achieved. There are no figures regarding investment levels, building targets, needs assessment, and timelines indicating how the number of accessible homes will increase.

Theme 2 addresses the most important aspect of the strategy: Enabling the Provision of Affordable Rural Homes. However, the theme introduces ambiguity by stating that its aim is to “facilitate the availability” of increased affordable housing by creating the right conditions for provision. Its wording is open to interpretation and lacks a clear, quantifiable commitment. As part of this theme, Priority 6 (Enabling New Affordable Homes) is arguably the most significant element of the strategy. It provides data on pressing issues that are at the core of the strategy’s concerns—number of rural applicants in housing stress, decline in rural allocations, share and increase of older applicants, etc. However, while the priority states that delivering affordable housing in rural

¹⁶ Northern Ireland Housing Executive (2026) [Draft rural strategy 2026–2031](#); page 2.

¹⁷ Northern Ireland Housing Executive (2026) [Draft rural strategy 2026–2031](#); page 37-38.

Northern Ireland remains a strategic priority,¹⁸ the document provides limited information regarding how demand will be met. The strategy sets a target of 908 rural homes to be built over the next three years, compared with 801 homes built over the past five years. It acknowledges the limitations experienced in previous years and the ongoing challenges related to coordination, funding, and land availability.¹⁹

Given that this represents a three-year plan addressing a significant housing shortage, it would be helpful to include additional information such as financial planning, projected shortfalls, estimated levels of need and analysis by area. All of these are largely absent. Without this level of detail, it is hard to fully assess the Priority and the Theme.

Priority 7 presents research commissioned by the University of Liverpool examining barriers to rural housing delivery. While the analysis highlights serious structural challenges, the solutions proposed in response are vague and generic, not providing any detail on how these systemic barriers will be overcome.²⁰

4. Conclusion

In conclusion, despite its many positive aspects, the strategy provides insufficient information to evaluate its capacity to achieve its aims. In addition, the presentation and formatting of the document itself create difficulties for the reader, convey a poor impression, and suggest that the document has not received a proper review prior to publication. Given the significance and potential impact of the strategy, this is a worrying matter.

Several issues affect the readability of the document. These include duplicated images, the inclusion of editorial remnants, incorrect numbering of figures (like the inclusion of “Figure 50” in page 6), in-text references with empty corresponding footnotes, the absence of page numbers, inconsistent footnoting without a standardised citation system, the absence of a table of contents and a generally disorganised structure. Some sections also appear to be included without a clear connection to the rural focus of the strategy—such as photographs and descriptions of housing developments in urban areas like North Belfast.

Overall, the document gives the impression of an early draft that would benefit from further editing, clarification, and structural organisation prior to publication. More substantively, the strategy provides limited information regarding targets, projections, or specific actions that the Housing Executive intends to undertake in rural areas. A

¹⁸ Northern Ireland Housing Executive (2026) [Draft rural strategy 2026–2031](#); page 24.

¹⁹ Northern Ireland Housing Executive (2026) [Draft rural strategy 2026–2031](#); page 24.

²⁰ ‘A strategic focus will be maintained on aligning delivery of the Social Housing Development Programme (SHDP) with the capacity of rural infrastructure. This includes accelerating planning approvals and enhancing land availability through proactive engagement with local councils and landowners. These measures are essential to ensuring that rural housing delivery is both responsive and feasible within existing infrastructure constraints.’



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detailed analysis of the situation would be valuable. Even if resources may not match identified needs, a clear analysis would still provide an important basis for discussion and future planning.

These observations should not be interpreted as criticism of the work undertaken by the Housing Executive, as this office knows well that it currently operates under challenging financial circumstances. However, the information presented and transparency demonstrated in the consultation document seems insufficient to enable a proper assessment of the strategy.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Ángel Leira Pernas', written over a light blue circular stamp.

Ángel Leira Pernas
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