

Department for Communities

Housing Supply Strategy: Call for Evidence

Response from the Commissioner for Older People for
Northern Ireland

July 2021

CONSULTATION QUESTIONS AND COPNI RESPONSES:

1. Please confirm whether you are replying as an individual or submitting an official response on behalf of an organisation.

This Consultation Response is submitted on behalf of the Commissioner for Older People for Northern Ireland.

2. Do you agree that a ‘Whole System’ approach given the challenges is the right one?

COPNI recognises that there are a range of factors hindering the creation of sufficient, high quality housing for all citizens. Therefore, COPNI contends that only an approach that addresses all elements of housing supply – the whole system – has a chance of delivering on such an ambition.

3. Do you agree with the 15 year timeframe proposed for the Housing Supply Strategy?

Addressing the factors which hinder the development of better, citizen-centred housing will take time to plan, to implement and for its impact to be felt.

The Commissioner welcomes the commitment to such a medium-term strategy as it reflects the magnitude of the challenge in reimagining housing for a changing, ageing society. Nevertheless, the Commissioner contends that having a strategy which will likely be implemented across the tenure of several ministers, requires that it remain as urgent, as demanding, and as effectively monitored as the Consultation Document suggests is currently necessary.

4. Do you agree with the proposed vision for the Strategy?

The proposed vision for the Housing Supply Strategy is that 'Every household has access to a good quality, affordable and sustainable home that is appropriate for its needs'.

COPNI holds that the quality of accommodation in which a person lives is fundamental to a person's quality of life. In light of the breath-taking demographic changes occurring in our society COPNI contends that policymakers must take radical steps to address the oncoming challenge. That challenge is considerable and multi-faceted: ageing housing stock; poor quality construction; smaller household sizes; and people living longer but with some form of physical impairment. The scale of this issue, especially in the context of unprecedented financial pressures and a global pandemic, is immense.

Therefore, we welcome this broad, bold vision statement which in its outworking must lead to a plan and action which places the housing needs of older people at the centre of decision-making.

5. Do you agree with the following proposed objectives for the Strategy:
(a) Increase housing supply and affordable options across all tenures to meet current and future demand.

Yes.

By 2041, a quarter of the Northern Ireland population is projected to be aged 65 and over.¹ There is a rapid increase in households of one or two adults without children—by 2041, the figure will be 60.3% of all households.² The Commissioner recognises this demographic reality and its implications, as outlined in the NIHE's *Older People's Housing Strategy*:

¹ Nisra Statistical Bulletin, October 2017, p.1

² Nisra Statistical Bulletin, December 2018, p.8

With an ageing society and smaller household sizes (2.54 based on mid-year 2016 NISRA data and projected to reduce to 2.42 in 2041), it is important to note the long term investment in housing (properties can last for 70 plus years) and to ensure that there are flexible sustainable housing choices that meet the needs of this changing demography. (p.18)

COPNI contends that housing options providing smaller, accessible and adaptable quality housing are urgently required. These priorities in the development of housing are mainstream across much of Western Europe, with the provision of supported, independent living (such as Extra Care Housing) and with legal duties on stakeholders to build homes to the highest standards (such as those incorporated in the Lifetime Home Standards).³ The Commissioner strongly supports the introduction of such measures (and the adoption of other aspects of international best practice) in Northern Ireland to create quality, appropriate housing for our ageing population.

Implementing the highest standards in terms of Building Regulations for private and social housing would ensure that every home is properly insulated, accessible and primed for Assistive Technologies. This approach would ensure that even as a person's mobility reduces, they would have greater independence for longer, thereby placing less strain on Health and Social Care services.

Effective spatial planning would ensure the provision of suitable supported housing in every community within existing social networks and amenities. Similarly, greater transport connectivity would increase access to social, wellbeing and personal opportunities, thereby reducing reliance on HSC services.

COPNI notes in the Housing Executive's *Supporting People Plan 2019-2020 and Strategic Intent 2020* that rather than expand options of small well-

³ See for example the broad range of research on housing an ageing population available at: <https://www.housinglin.org.uk/>

designed units, there are indications of plans to reduce options which have proven successful:

Within the Older People theme, over three hundred sheltered accommodation schemes have the potential to remodel to Floating Support...
(p.8)

Such consideration of a reduction in sheltered housing capacity by the Housing Executive seems inconsistent with efforts to promote a range of options and is especially worrying given the high levels of resident satisfaction in such accommodation settings.

(b) Reduce housing stress and homelessness and improve housing solutions for the most vulnerable.

Yes.

The rationale for improving housing solutions for the most vulnerable rests on the principle of providing the most support to those who most need it. The Commissioner commends the embedding of this principle in the Strategy's objectives as a foundation of a progressive, caring, and egalitarian society.

Specifically, it must be noted that age is a critical factor in an individual's level of vulnerability. The older a person is, the more likely they are to be engaged with HSC services for more serious illnesses, requiring more acute services. Approximately 50% of people in Northern Ireland aged 65 and over have a limiting longstanding illness.⁴ Consequently, the accommodation needs of this

⁴ *Health Survey Northern Ireland: first results 2019/20*, Department of Health, 2020 available at: <https://www.health-ni.gov.uk/publications/health-survey-northern-ireland-first-results-201920>

demographic must be fully accounted for as the Department develops its housing supply plans.

(c) Improve housing quality

Yes.

We believe that high standards of design and construction should be introduced for all new buildings and for renovations. While COPNI recognise that some may be reticent about increased regulation of the construction market, the Department for Communities as a public body with a duty to seek value for money should address the fact that public funds are being used to upgrade or adapt poorly planned, privately constructed houses.⁵ Introducing an obligation on all developers to build to the highest standards would benefit both the taxpayer and residents. COPNI recommend that the Strategy incorporate the intention of ensuring all new homes, public and private, are built to established best practice such as Lifetime Home Standards.

(d) Ensure the provision of housing options that contribute to the building and maintaining of thriving, inclusive communities and places.

Yes.

'Home' incorporates not only buildings, rooms and furnishings, it incorporates abstract concepts such as community, relationships and support. Without these abstract but vital elements, any housing option will fail to fulfil the strategic vision of being 'a good quality, affordable and sustainable home that is appropriate'.

⁵ See for example: 'For those vulnerable people (including older people) who prefer to remain in their homes, we administer a variety of grants and adaptations to support them both in the private sector and for our own tenants' (*Older People's Housing Strategy 2021/22-2026/27*, p.32).

As isolation and loneliness can represent distinctive social ills for older people who may be hindered from maintaining relationships by reduced mobility, limited income, and fear of crime, fostering accessible communities and places is essential. 'Housing options' must mean building homes, which people in our society want to live in, and being located in communities where people want to live.

(e) Support the transition to carbon neutrality by reducing whole-life carbon emissions from both new homes and existing homes.

Yes.

The Commissioner holds that only a sustainable approach to housing supply can address our current housing crisis. COPNI recognise that previous approaches to housing ignored the long-term impact of inefficient, unsustainable building leading to poor insulation, high energy costs, poor quality accommodation, frequent renovation, poor infrastructure, social delinquency and negative environmental impacts.

6. The terms good quality, sustainable and affordable mean different things to different people - how would you define these terms?

As the question indicates 'good quality', 'sustainable', and 'affordable' are relative terms. However, the Commissioner contends that if our society is to develop an effective and properly age-friendly housing strategy these terms must relate to established international best practice.^{6 7 8}

⁶ For discussions on quality housing see:

<https://www.housinglin.org.uk/Topics/browse/Design-building/>

⁷ For best practice on sustainable design see:

<https://www.housinglin.org.uk/Topics/browse/Design-building/EcoDesign/>

⁸ For best practice on affordable housing see:

<https://www.housinglin.org.uk/search/?keywords=affordable>

The Commissioner has expressed his concern on several occasions, (including in consultation responses to the Northern Ireland Housing Executive), that housing policy in the state seems to be dictated by short-term factors rather than a long-term vision of sustainable housing based on the best available evidence and best practice. As an example, he has queried the rationale for continuing to allow anything other than the highest standards of insulation and heating in a region with the highest level of fuel poverty in the UK, which affects 42% of households.⁹

7. What do you believe are the three main barriers to delivering the objectives for the strategy?

1) *The agreement and support of stakeholders such as the construction industry, landlords and the wider public.* Large-scale regulatory intervention and large-scale investment of public funds, as required to achieve the objectives of the developing Strategy, may elicit resistance, based a) on the short-term increase in construction costs; and b) the belief that the state should not interfere substantially in a free market economy.

2) *Cross departmental and inter-agency collaboration engaging government departments, local government, and bodies such as the Housing Executive.* As the Consultation Document indicates the current housing crises are a consequence of several factors and as such the solutions would require whole system engagement, from local government planning departments to DAERA's delivery of amenities and much more.

3) *Investment in a large-scale, medium-term building programme.* The delivery of a large-scale housing and communities programme would require significant levels of funding from an already strained government purse in the early stages of post-pandemic recovery in the context of emerging economic impacts of Brexit.

⁹ *42% Households in NI are affected by fuel poverty* available at:
<https://www.brysonenergy.org/news/42-households-in-ni-are-affected-by-fuel-poverty>

8. To what extent do you agree that there is a need to establish a more robust understanding of NI Housing Stock, e.g. by tenure, location, condition, etc.?

The investment required to overhaul the housing situation in Northern Ireland would be very significant. Given the size of the expenditure required, any plans must be based on the best evidence to ensure value for money.

The Commissioner has drawn attention in recent consultation responses to methodological concerns with research used to develop NIHE's Older People's Housing Strategy and Traveller Strategy. In these strategies there has been a tendency to derive conclusions based on respondents' limited awareness of alternative housing options.¹⁰ Plainly, a consequence of looking only at local feedback/research, is that resulting housing strategies tend to maintain the status quo.

9. Are you aware of any specific data sources or methodological approaches to estimating existing housing stock, e.g. by tenure, location, condition, etc.?

COPNI would recommend drawing on the expertise available from the Housing Learning and Improvement Network at: <https://www.housinglin.org.uk/> .

Specifically, regarding methodological approaches, COPNI cautions against unqualified dependence on local feedback/research to address the housing crises in Northern Ireland. Consideration should be given to alternative approaches to research on housing stock across the UK and internationally.

¹⁰ See consultation responses by the Commissioner for Older People for Northern Ireland available at: <https://www.copni.org/publications>

The Housing Executive's *Older People's Housing Strategy* references its research entitled 'Older People: Housing Issues, Aspirations and Needs', which was intended:

*To support and inform decision making in relation to appropriate housing for older people in Northern Ireland, through qualitative insights on the views of internal Housing Executive Stakeholders (16 respondents), external stakeholders (21 respondents) and older people themselves (57 respondents)'.
(p.8)*

While COPNI recognises that civic and client engagement should be at the centre of all public service (including our own), we also recognise the importance of contextualising that feedback with expertise from a range of sources. For example, a finding cited in the Housing Executive's *Older People's Housing Strategy* is that: 'the majority of older people wished to remain in their current accommodation without having to move at all later in life' (p.31). Such a finding intuitively rings true but without proper contextualisation it could be construed as a reason to forego radical interventions in homebuilding. Conversely, such a finding supports rather than undermines the need for a radical construction programme of small lifetime homes and Extra Care units.

People, generally speaking, desire 'the familiar' but, until small lifetime homes and Extra Care units become familiar or at least a visible option in Northern Ireland the status quo, or worse, will continue. To achieve a diversity of housing options, COPNI suggests that the Housing Supply Strategy incorporate not only research on the views of people with little or no experience of housing alternatives such as Extra Care Housing, Lifetime Home Standards or HAPPI principles but also research derived from those who have experience of such accommodation.¹¹

¹¹ See for example the range of research (and engagement with residents) on housing an ageing population at: <https://www.housinglin.org.uk/>

17. What challenges do you see in delivering a wider range of housing types, e.g. housing that is better suited to the needs of older people or those with disabilities and how can these be overcome?

There are several barriers to delivering a wider range of housing types. As noted in Question 7, there are three macro level challenges to re-imagining housing supply in the state: 1) Gaining the agreement and support of stakeholders such as the construction industry, landlords and the wider public; 2) Achieving effective collaboration across government departments, local government, and bodies such as the Housing Executive; and 3) Procuring the investment for a large-scale, medium-term building programme.

There are several second-level factors which need to be addressed to deliver housing appropriate for the needs of older people. These include:

- 1) Effectively promoting a cultural shift away from remaining in cold, ill-adapted and poorly maintained homes.

Many people live in poorly insulated, under-occupied houses in Northern Ireland because the housing stock has become outdated and was designed to cater for larger families. Publicising the benefits for health and wellbeing of smaller, well-insulated homes will lead to an increase in demand for such options.

- 2) Shifting the perception of houses as an asset to be left to family members.

The Local Government Association report that older people live in a third of all homes.¹² Many older people express reluctance to move to more appropriate accommodation as they consider that passing a house on to their family on their death is a duty. As a consequence of this housing stagnancy, large numbers of under-occupied houses offer poor accommodation to their

¹² *Housing Our Ageing Population*, LGA, 2017, p.10.

residents while inhibiting access to appropriately sized homes to others. State-sponsored programmes which assist older people to move easily and still retain equity in a property, should be considered to allow for greater access to housing options.

3) Ensuring all housing stock is age-friendly from design to construction. All housing should be age-friendly and easily adapted for reduced mobility, especially in our rapidly ageing society.¹³ There remains a misapprehension that only older people need age-friendly accommodation. As we all age, almost all of us will at some point require accessible housing and adaptations. Duties to recognise this need should be introduced for all new buildings and within reason for all renovations.

¹³ By 2041, the number of people aged 65 and over living in households is projected to rise by 186,800, an increase of 65.5 per cent (*NISRA Statistical Bulletin*, December 2018, p.5).