



Commissioner for **Older People**
for Northern Ireland

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Consultation Response: Housing Executive's Draft Older People's Housing Strategy 2020/21 – 2025/26

Dear Sir

I am writing to you in response to your call for engagement on the Housing Executive's *Draft Older People's Housing Strategy 2020/21 –2025/26*.

The matter of effectively housing an ageing population has been a constant and central area of concern for my office throughout my first term of office. I and my team have regularly participated in forums to address the fundamental issue of how best to house a rapidly ageing population, including attendance at the Housing Executive's thematic group on Older People, assistance with the Housing Executive's research and leading a discussion at a British Irish Council meeting in November 2019.

COPNI recognises 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 on the Housing Executive, is immense. Therefore, we welcome the fact that the Housing Executive has begun the process of drafting a housing strategy for Older People. COPNI offers a number of points below for your consideration, which may assist in the development of the finalised strategy.

Areas for Consideration

COPNI welcomes the statement that ‘this draft Older People’s Housing Strategy has been developed to ensure that our services evolve in response to the projected growth in the number of older people in Northern Ireland’ (p.4). We concur with the definition of the issue in the draft:

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.26)

However, it would be useful were the document to state explicitly how the Housing Executive will meet the enormous challenge presented by changing demographics, by offering specific targets against which progress can be measured, for example in terms of construction of Lifetime Home units, pilot Extra Care programmes and financial/percentage commitments.

Likewise, the language used for the four key themes: ‘1. Planning for the Future; 2. Promoting and Maintaining Dignity; 3. Providing Housing Advice for Older People; and 4. Promoting Participation’ (p.4) could be more specific at a point in time when identifiable action is required. An explanation of Theme 1 ‘Planning for the Future’ offers that:

Under this theme there are two distinct strands: Exploring Housing Options for Older People, which looks at different housing models; and Supporting Independent Living, which looks at ways to assist those who can and wish to remain in their own home. (p.4)

The phrases ‘exploring housing options’ and ‘looks at ways to assist...’ do not indicate as clearly as they might a commitment to action beyond mere consideration. As an alternative, it may be useful to place both the key themes and their descriptions in terms that are readily identifiable as measurable outcomes. The new strategy will be in operation until 2026, in which case the standard to which the Housing Executive would evaluate its performance, (as the current wording would have it), would require only that the Executive continue ‘to explore’ options. Given the need for urgent action as regards housing an ageing population, the intent of this area of work should be more precisely stated.

The strategy references the Housing Executive’s 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.12)

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 key finding cited in the draft is that: 'Feedback from focus group participants indicated that their preference was to remain living in their current accommodation rather than moving' (p.12). Such a finding intuitively rings true but without proper contextualisation it could easily be construed as a reason to forego radical interventions in homebuilding. Yet, 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. In order to achieve a diversity of options for consideration, COPNI suggests that the Strategy incorporate not simply 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 those who have experience of such accommodation.¹

The draft recognises 'that one third of respondents listed downsizing as one of their planned future options... This, however, is only a potential option in the owner occupied sector and currently these schemes are not widely available in Northern Ireland' (p.27). Might such a point offer an opportunity for the Housing Executive to build more of such options, even on a pilot basis?² COPNI recognises the large financial commitment involved in creating innovative housing solutions but as the draft highlights, adaptations of houses to support independent living are costly and that:

Demand is likely to increase as evidenced by demographic projections. Increasing demand may impact on the services and resources we direct to them and any funding associated with this going forward. (p.29)

The draft asserts that various forms of support for adaptations will be 'subject to funding' (p.29) acknowledging that demographic pressures make comprehensive retrofitting and ameliorative support unsustainable. Perhaps a more effective long-term approach would be to redirect a portion of such funding to build lifetime homes and Extra Care units; and then advance a business case (to the public and Government) for such sustainable options based on their effectiveness.³

¹ See for example the broad range of research (and engagement with residents) on housing an ageing population at:

<https://www.housinglin.org.uk/>

² 'If more choice of smaller suitable properties were available both in urban and rural areas this would provide an opportunity to free up larger properties in all tenures for families' (Draft Older People's Housing Strategy, p.34).

³ 'To date, there has been minimal development of specialised older people's housing for either owner occupation or private rental in Northern Ireland, but housing of this type, such as gated schemes for over 55s, is increasingly being developed by private

As the Housing Executive has a unique position as the Regional Housing Authority for Northern Ireland, COPNI would welcome its support for mandatory Lifetime Home Standards for private developers. The draft states that:

The Housing Executive encourages council planners to incorporate, within the emerging Local Development Plans, a requirement that all new build housing should meet Lifetime Home standards, with a proportion built to wheelchair standards. Lifetime Home standards were developed to ensure that homes are accessible and inclusive, to support the changing needs of individuals and families at different stages of life. (p.34)

While we recognise that the Housing Executive may be reticent about arguing for regulation of the construction market, as a public body with a duty to seek value for money it should highlight the fact that public funds are being used to upgrade or adapt poorly planned privately constructed houses.⁴ If there was an obligation on all developers to build to the highest standards both the taxpayer and residents would benefit. COPNI would recommend that the Strategy incorporate a more robust ambition of ensuring all new homes, public and private, are built to Lifetime Home Standards.

COPNI welcomes the draft's discussion of various housing solutions, noting for example that:

In other jurisdictions 'Extra Care Housing' has been utilised to meet the health and social care needs of elderly and other vulnerable people and has demonstrated that the number of hospital bed days utilised by older patients could be cut both through admission/readmission and through earlier discharges. Potentially this may free up hospital beds for other patients which can result in savings to the public purse. (p.36).

COPNI would recommend that in addition to noting that 'this model however is relatively new to Northern Ireland' (p.36), that the draft identify pathways to increase the construction (and evaluation) of such models.

Overview

The draft commendably makes reference to offering choice:

We, along with partner agencies, should raise awareness of the range of options available to older people, including newer models of provision, for example, retirement villages, and existing models of provision such as sheltered housing. This would allow older people to be more informed of their choices and options. (p.40)

developers for purchase or private rental elsewhere. These have been shown to be very popular' (Draft Older People's Housing Strategy, p.34).

⁴ 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' (Draft Older People's Housing Strategy, p.45).

COPNI welcomes this commitment to 'raise awareness of the range of options'. However, we believe that the inclusion in the strategy of an ambition to build examples of innovative, appropriate housing options in the villages and towns of Northern Ireland may more effectively prepare our society for the demographic turbulence that we are starting to experience as a society.

Moreover, COPNI notes in the Housing Executive's Supporting People Plan 2019-2020 and Strategic Intent 2020 that rather than expand options of small well-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 considerations of a reduction in sheltered housing capacity by the Housing Executive seem inconsistent with efforts to promote a 'range of options' and are especially worrying given the high levels of resident satisfaction in such accommodation settings.

COPNI appreciates that the Housing Executive is now facing into an unprecedented demographic shift while managing a pressured financial burden and as a consequence may be reluctant to make detailed commitments such as this, at this stage. Nevertheless, COPNI maintains that there is an urgent need to build innovative housing solutions, even if only in pilot form, based on regional, national and international evidence of what is most likely to work. To this end, we would encourage the Housing Executive to include identifiable and measurable outcomes to be achieved through the implementation of the finalised Strategy.

I would be delighted to engage with you further on the development of this strategy.

Yours Faithfully