

Housing Rights

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Consultation Response

Response to a Consultation on the Housing Executive's 'Sustainable Rural Communities' Draft Rural Housing Policy Proposals

March 2016

when everyone has a home

Housing Rights has over 50 years' experience of delivering free, independent housing advice across Northern Ireland. We welcome the opportunity to respond to the Housing Executive's draft Rural Housing Policy Proposals.

Housing Rights supports the overarching vision of the Proposals: 'Housing Services working in partnership to enable and support vibrant, shared and sustainable rural communities and provide economic, social and environmental benefits in rural areas.'¹ We welcome the Housing Executive's continued recognition of the need for a specific policy approach for rural housing. Several comments are offered below on specific elements of the Policy Proposals.

SUMMARY

Housing Rights supports the overarching vision of these Policy Proposals. We offer the following comments on particular elements of the Proposals:

- 1. Engaging with the Community Housing Advice Partnership.** CHAP, a partnership between Housing Rights and front-line advice centres across Northern Ireland, is a valuable tool for offering advice and support to vulnerable households, and has developed a useful knowledge base of housing issues and demand in rural areas. The Housing Executive should consider engaging with CHAP in the monitoring of these Policy Proposals.
- 2. Statistical monitoring & Welfare Reform.** Housing Rights welcomes the Housing Executive's commitment to monitoring the impact of welfare changes. Housing Rights, and CHAP, will be using our statistical recording systems to monitor the impact of these changes on people accessing our services. Housing Rights would encourage the Executive to pro-actively build upon relevant learning from Welfare Reform in Great Britain, as well as monitoring NI impacts, with a view to preventing any unnecessary negative impacts of the welfare reforms.

¹ Northern Ireland Housing Executive (2016) 'Sustainable Rural Communities: Draft Rural Housing Policy Proposals, Executive Summary, January 2016', p3

3. **Housing Options for rural customers.** Housing Rights supports the 'Housing Options' model, of sustaining tenancies and informed tenants as the most appropriate mechanism for preventing homelessness. We welcome the Executive's commitment to increase the capacity of their operational staff in this regard by sourcing relevant training and support in this area

4. **Supply of affordable housing.** Housing Rights welcome the Executive's commitment to develop delivery models for mixed-tenure housing. However, it is vital that any such developments are legitimately "affordable" to those in need of housing; "affordability" should therefore be defined in relation to an agreed definition of local household income.

Housing Rights would welcome further discussion with the Housing Executive about how we can assist in the delivery of these aspects of the Rural Housing Policy Proposals through the Community Housing Advice Partnership, monitoring and the provision of training.

1. Community Housing Advice Partnership

The Community Housing Advice Partnership (CHAP) is a joint initiative between Housing Rights, Advice NI and Citizens Advice, which is funded by the NI Housing Executive. Front-line advice centres across Northern Ireland can speak to 2 dedicated Housing Rights advisers who can offer expert help on housing cases to advisers, or take the cases on referral. CHAP agencies can also access free Housing Rights' training and information resources such as 'Housing Law in Practice NI', an exhaustive resource of housing law, policy and practice in Northern Ireland.

Since 2003, CHAP has offered an invaluable partnership between central specialist housing advice and front-line advice centres, many of which are based in rural areas across Northern Ireland.² Housing Rights feels that this partnership can add value to the monitoring of the NIHE Rural Housing Policy Proposals, in the following areas:

² CHAP has a range of generalist and specialist member advice centres, in each of the 11 new Council districts.

(a) Policy Objective 1, policy action 1: *‘Set out specific rural housing requirements at council level in the Housing Executive Commissioning Prospectus.’*³

Housing Rights notes the Housing Executive’s acknowledgement of the challenge of latent demand for social housing in rural areas. We would encourage the Housing Executive to engage with CHAP in order to consider the potential of using CHAP’s established knowledge base of housing enquiries in specific rural areas, in order to help inform the specification of rural housing requirements.

(b) Policy Objective 3, policy actions 1 & 2: *‘Focus on the prevention of homelessness in rural areas by examining all available options which will help people stay in their existing homes where possible, close to existing family/support networks’ and ‘Work in partnership with other agencies to provide vulnerable rural applicants with tailored advice and wrap-around support which could help them to sustain existing tenancies.’*⁴

Housing Rights believes prevention is the best cure and our work is focussed on enabling clients to sustain their homes and tenancies. Housing Rights’ involvement in CHAP allows specialist housing advice, which intends to sustain homes and prevent homelessness, to be cascaded to rural areas across Northern Ireland. We therefore welcome and encourage the Executive’s distinctive policy approach to rural areas, and are keen to use the infrastructure of CHAP to monitor the operation and effectiveness of the Executive’s policy proposals.

³ NIHE (2016) p3

⁴ NIHE (2016) p10

2. Statistical monitoring & Welfare Reform

Policy Objective 3, policy action 4: *'Monitor the impact of pending Welfare changes and mitigations on Housing Executive activities to determine if any changes are required as a consequence.'*

Housing Rights welcomes this commitment by the Housing Executive to closely monitor the impact of Welfare Reform, and remain open to changing policy if the impacts of Welfare Reform warrant this. Housing Rights, and CHAP, will be using our statistical recording systems to monitor the impact of these changes on people accessing our services.

Housing Rights would recommend that the Housing Executive takes note of the impact of Welfare Reform to date in Great Britain, and the particular potential impact of Welfare Reform in rural parts of Northern Ireland. A recent survey by the National Federation of ALMOs and the Association of Retained Council Housing found that, of 2,000 social-sector households in receipt of Universal Credit who were surveyed, 89% were in rent arrears (almost 3 times higher than the sector average of 31%): this is primarily caused by the Universal Credit application process, which can take 7 weeks before payment is made.⁵

The Joseph Rowntree Foundation has also highlighted the disproportionate impact which Welfare Reform may have on rural populations in Northern Ireland, who already suffer from poorer infrastructure and job opportunities.⁶ A further concern is the emphasis in Welfare Reform of a digital-by-default system, given that rural areas of Northern Ireland have some of the lowest rates of internet access in the United Kingdom.⁷

⁵ National Federation of ALMOs & Association of Retained Council Housing (2015) 'NFA and ARCH survey reveals 89% of Universal Credit Claimants in rent arrears', p1

⁶ 'Austerity in the UK – Communities worried that worst is still to come in Northern Ireland', available here - <https://www.jrf.org.uk/austerity-uk-communities-worried-worst-still-come-northern-ireland>

⁷ For example, the Northern Ireland Neighbourhood Information Service's 2014 dataset on Internet Access reports up to 31% of the population in parts of NI have no home internet access

(<https://www.nisra.gov.uk/public/PivotGrid.aspx?ds=6975&lh=63&yn=2005,2007-2014&sk=10&sn=People%20and%20Places&yearfilter=>); this compares to just 15% across Great Britain (<https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/internetaccesshouseholdsandindividuals/2014-08-07#main-points>).

It is evident that Welfare Reform will have significant and cross-cutting implications for rural housing, and the population in rural areas more generally. Housing Rights therefore welcomes the Housing Executive closely monitoring the impact of Welfare Reform in rural Northern Ireland, and would also encourage the Housing Executive to proactively monitor the situation in Great Britain – where Welfare Reform is further developed – with a view to preventing unnecessary negative impacts.

3. Housing Options for rural customers

Housing Rights welcomes the Housing Executive's commitment, in Policy Objective 1, policy action 4, to *'Increase the capacity of Housing Executive operational staff to examine all available housing options with rural customers.'*⁸

In rural areas, where there is reduced provision of social housing to begin with, a "housing options" approach is of paramount importance in preventing homelessness and ensuring the provision of sustainable housing solutions. It is clear in this regard that the private-rented sector will continue to be a vital source of housing in rural areas: if the NIHE is to deliver a Housing Options service, the role currently played by the private-rented sector must be acknowledged. In our recent response to the Executive's draft Financial Inclusion Strategy⁹, we welcomed the emphasis placed by the Executive on training front-line staff to empower tenants; we would encourage the Executive to take a similar approach in the training of frontline staff in the delivery of a Housing Options service.

4. Supply of affordable housing

Housing Rights welcomes, under Policy Objective 1 which is focussed on the provision of affordable homes, policy action 5: *'Develop a model for the delivery of rural intermediate/mixed-tenure housing schemes based on the outcomes of the affordable housing pilots and other examples of best practice.'*¹⁰

⁸ NIHE (2016) p6

⁹ Housing Rights (2016) 'Response to a Consultation on the Housing Executive's Financial Inclusion Strategy, 2015-18'

¹⁰ NIHE (2016) p6

In this regard, Housing Rights notes the recent report of the Department for Social Development's Housing Supply Forum. The Forum offered several recommendations, which included 'increased encouragement and support from Government for joint ventures between housing associations and private developers', with a desired outcome of 'many more ambitious mixed-tenure, mixed-use developments being progressed, often with significant regeneration benefits.'¹¹

Housing Rights wishes to emphasise, however, that any such developments must be focussed on truly *affordable* housing. Affordability in this context must be defined in direct proportion to household incomes: under such a definition, housing costs are generally defined as "affordable" if they are at or below a set proportion of a set household income – typically 30%.¹² Such definitions have been abandoned in recent definitions in Westminster, whereby "affordable" means a set proportion of the market rate (typically 80%), which remains unaffordable for those households in greatest housing need.¹³

Housing Rights would welcome further discussion with the Housing Executive about how we can assist in the delivery of these aspects of the Rural Housing Policy Proposals through the Community Housing Advice Partnership, monitoring and the provision of training.

For further information on this response please contact
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¹¹ Housing Supply Forum (2016) 'Report and Recommendations', p15

¹² See Hulchanski J (1995) 'The Concept Of Housing Affordability: Six Contemporary Uses of the Housing Expenditure-to-Income Ratio' *Housing Studies* 10(4), pp471-492

¹³ For example: an "affordable" home in London, under this definition, can cost as much as £450,000 and be practically viable only for households earning at least £77,000 per year.