

# New Housing Supply Strategy

Response from the Commissioner for Older People for Northern  
Ireland

February  
2022

Housing Supply Strategy Consultation  
Department for Communities  
Causeway Exchange  
1-7 Bedford Street  
Belfast  
County Antrim  
BT2 7EG

08/02/2022

**CONSULTATION RESPONSE: Department for Communities, *Consultation on the New Housing Supply Strategy***

Dear Sir / Madam

I am writing in response to your request for feedback on the Housing Supply Strategy produced by the Department for Communities.

My staff and I have been engaged on issues of housing from the commencement of my tenure in office as Commissioner. Over the past year, my staff have participated in meetings with the Consultation Team and in July 2021, I offered a detailed submission as to what housing supply for an age-friendly society would involve. Accommodation is a fundamental aspect of a good and contented life and an aspect which can often become more significant in our later years. Consequently, housing policy is a priority area for my office.

I congratulate the Department on its Housing Supply Strategy. It offers an ambitious vision of housing supply – with due consideration of the homes, the communities and above all the lives of those it could shape for the better. Specifically, I commend the Strategy's focus upon the evidence of our ageing society and what such demographic changes mean: 'how we meet the needs and

aspirations of an ageing population...which has important economic, and therefore funding, ramifications' (p.12).

The Strategy recognises that a housing supply strategy will only ever be successful insofar as it is a housing supply strategy for our distinctive context, which is, that of an ageing society. Such a starting point should encourage all stakeholders to regard housing for an ageing society not as a niche sectoral issue but rather a core issue which has whole system implications. Having made a detailed consultation response at the preliminary stage of this process, I will focus on several key aspects of the Housing Supply Strategy in its current form.

## OLDER PEOPLE'S HOUSING STRATEGY

The Housing Supply Strategy states:

*Building on the activities outlined under Objective 1 [Creating Affordable Options], we will:... Assist the Housing Executive in the delivery of its Older People's Housing Strategy 2021/22- 2026/27...(p.24).*

I have engaged regularly with the Northern Ireland Housing Executive on housing issues pertaining to older people. During 2020, I offered both a detailed written response to the Consultation on the Older People's Housing Strategy and my assistance for the Strategy's effective development. While recognising the challenging financial environment in which the Housing Executive is operating, the Executive's finalised Older People's Housing Strategy is disappointing.

The Older People's Strategy employs ambiguous terms to suggest action rather than commit to action, such as 'exploring housing options' and 'influence the planning aspect'; it fails to commit to a specific, substantial, or measurable programme (see for example the 'High Level Action Plan', NIHE, 2020, p.29); and it caveats a number of the Executive's relevant workstreams with the phrase 'subject to funding'. In sum, the Housing Executive's Older People's Strategy is a

document replete with aspirations, but it fails to lay the policy foundations for housing our ageing population. Consequently, I would suggest that the Department reconsider the implied reliance on this NIHE Strategy, which with its lack of a significant work programme, could prove damaging to the success of the overall Housing Supply Strategy.

## **INTERVENE RATHER THAN INFLUENCE**

The Housing Supply Strategy states that it will assist in the delivery of the Older People's Strategy which includes 'encouraging council planners to incorporate the requirement that all new build housing should meet lifetime home standards and exploring the use assistive technology' (p.24). Given the seriousness of the current housing situation and growing health and social care pressures, it would seem more logical for the Strategy to propose the introduction of Lifetime Home Standards and the adoption of international best practice across all new builds and renovations. As I have consistently highlighted to policymakers, retro-fitting accommodation to provide for an older impaired resident places a greater (and impossible) burden on the tax-payer than introducing Lifetime Home Standards for all new builds and renovations.

The Housing Supply Strategy accepts that '[o]ur Housing Fitness Standard now lags behind that in place in other jurisdictions' (p.26). Therefore, I urge the inclusion in the Strategy of an obligation to build to an agreed highest standard across all tenures, comparable to that operating in similar jurisdictions. Such a practical intervention would move some of the pressure for creating accessible, appropriate accommodation from the state to the construction industry and move us to a much more age-friendly society.

## **IMPLEMENTATION**

I am wholly supportive of the vision of the Housing Supply Strategy that:

*Everybody has access to a good quality, affordable and sustainable home that is appropriate for their needs and is located within a thriving and inclusive community. (p.11)*

Moreover, I welcome the definition of the Strategy's success: 'to create a housing system that can deliver upwards of 100,000 homes over its lifetime...homes of the right quality, right type, right cost and in the right locations to meet our current and future housing needs and demands' (p.11). The ambition to create such a substantial number of 'the right' homes, is precisely what is required in a rapidly changing society where one in four people will be aged 65+, and households with one or two adults without children, will account for three fifths of all households by 2041.<sup>1 2</sup> As the Commissioner for Older People for Northern Ireland with a responsibility to encourage age-friendly public policy I welcome such an ambition but stress that the realisation of this ambition into good, appropriate, homes and communities, must now be an absolute priority.

I would be delighted to engage further with the Department on the ongoing development and implementation of the Housing Supply Strategy.

Yours Sincerely



**Eddie Lynch**  
Commissioner for Older People for Northern Ireland

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<sup>1</sup> <https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/2016-based%20Population%20Projections%20-%20statistical%20bulletin.pdf>

<sup>2</sup> <https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/HP16-bulletin.pdf>