



Response to Housing Supply Strategy Call for Evidence

July 2021

Rentersvoice@housingrights.org.uk

Renters' Voice Response

Renters' Voice is a project for people renting from a private landlord or letting agent who want to improve things for private tenants in Northern Ireland. We are supported by Housing Rights and funded by the Nationwide Foundation but our voice is our own.

This response reflects the **views so far** of our core Renters' Voice Participants who are all private tenants in Northern Ireland. We have met as a group to discuss the Housing Supply Strategy (15th June), attended a joint event with social tenants from the Housing Policy Panel, where we heard from the Department about the strategy and took part in a discussion about key issues, (21st June) and further discussed issues relevant to this response (ongoing).

We have also drawn from responses to our October 2020 Renters' Voice survey, where we asked fellow private renters about the ongoing impact of Covid-19 and also about peoples' wider experiences of renting and what long-term changes are needed to make private renting work better. (We received 87 responses).

Further Engagement with Private Tenants and Commitment to Co-design

We very much welcome the references in the Call for Evidence document to the importance of 'user experience' as a form of evidence, to further engagement with stakeholders, including private tenants, and to a commitment to the concept of "Co-design".

Meaningful change can only be achieved by recognising and seeking the 'expertise by experience' of people affected by the issues that any strategy seeks to tackle. In the case of the Housing Supply Strategy, people living in the private rented sector in Northern Ireland are some of the relevant experts.

As is recognised in the Call for Evidence document, nearly one fifth of households in Northern Ireland now rent privately but there is a gap when it comes engagement of private tenants in policy formation. Renters' Voice was established in November 2019 to work towards closing this gap and has, to date, supported private tenants (both our core group through regular meetings and involved activities and a wider group through engagement with our mailing list, surveys etc.) to engage at a policy level with the emergency response to Covid-19, the PRS reform agenda, the Private Tenancies Bill and now the Housing

Strategy Call for Evidence and the Department's concurrent investigations into a potential Private Sector Leasing Scheme for Northern Ireland.

We continue to build Renters' Voice as a project through which private tenants can engage meaningfully at a strategic level and to widen our reach to more private tenants. As such, we will look forward to further involvement in the development of this strategy.

Title of the Strategy

During our discussions about this strategy so far, we have struggled with the relatability of the "Housing Supply Strategy" title and this, at first, made us unsure of its scope and relevance to private tenants. Whilst we are now much more aware of how wide and relevant this strategy is, we continue to see its title as a potential barrier to further individuals, including private tenants, viewing it as relevant to them. In the words of one of our participants, "unless you're actively involved with it, the Housing Supply Strategy title doesn't mean much to Joe public nor does it draw folk in."

We are aware of Housing Rights' suggestion to adopt the title from the Easy Read version, "A plan for housing for people in NI" and would be very supportive of a change to this or something similar e.g. "A housing plan for *everyone* in NI".

Our Views so far

Our considerations so far relate largely to the Introduction section of the Call for Evidence Questionnaire (we have indicated some of the relevant question numbers below).

Questions 2-4: Regarding the proposed 'Whole System' approach, 15-year timeframe and vision for the Strategy

We are widely supportive of the proposed approach and vision of the strategy with the caveat that there must be a shared understanding of the vision that is meaningful to ordinary people (see our response to Question 6 below).

We agree that housing for people in Northern Ireland must be viewed as an interrelated system where issues in one aspect will impact across the board. This includes the need for effective working across agencies and government Departments. It also includes the need to look at interrelations between housing tenures. At the Housing Policy Panel/ Renters' Voice event on 21st June, related issues for social and private tenants dominated discussion. Examples include:

- Availability of suitable options for older people, people with disabilities and people with other specific needs in both the social and private sector.
- Difficulties with getting necessary adaptations made to properties (e.g. to meet people's needs due to growing older, disabilities or long-term health conditions) in both sectors.
- The obvious impact of limited social housing supply forcing people to live in the Private Rented Sector who would ideally benefit from the extra support available to social tenants.

Regarding the proposed 15-year timeframe, we raised in the meeting on 21st June that, for some aspects of the strategy this is actually quite a short timescale. Part of the response to this from the Department's representative was that there is potential for some aspects of the strategy to be given shorter timeframes within the 15 years and for others to be recognised as needing longer timeframes that will go beyond the aims possible within the 15 years - we have discussed that this is a potentially sensible approach and a good topic for future consultation.

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

We felt that this was an important question to be asked and a good question for us to think about further (both now and as discussions about the strategy continue). We think that the best test for this vision and its related definitions is that they need to be meaningful to individuals in Northern Ireland when they think of what a good home means. Some of our participants shared their personal views of what these terms mean to them:

Good quality:

No need for major repairs, free from damp and energy efficient with adequate floor and wall coverings.

Warm, dry and safe both in the sense of being inaccessible by intruders and all apparatus being safe to use.

To me a good quality home means I can budget more effectively for utilities such as gas and electric, knowing the house is energy efficient and warm even in winter. It means better mental and physical health, bringing a sense of contentment and pride in my home. A home that is warm and safe for the whole family.

When it's refurbished, painted, clean with PVC windows or wooden floors. When all appliances are in good condition or new. Also with a garden or backyard that's well looked after.

Higher standard properties are very limited, and not accessible for all. Without reach of a sight. More often a good quality house means good neighbourhood also, which is in a high demand.

People's needs change so 'good quality' changes as needs change.

Sustainable:

I have the option to stay long term and the quality is strong enough to last or fixed when broken.

This goes along with 'good quality' - a good quality house is likely to ensure a longer tenancy which benefits both the renter and landlord.

For the long term, energy efficient, economically developed.

Affordable:

Rent at a level where those in receipt of Housing Benefit can meet the majority, if not all of the rent asked. For those waged, a rent in proportion to their earnings meaning rent can be paid without sacrificing a good quality of life. In both scenarios rent should be at a level to ensure no one has to suffer food or fuel poverty in order to keep a roof over their head.

Rent capped with an affordable deposit and knowledge that should I lose my income I will be able to get housing support to cover my rent. I would like to see rent caps that reflect the minimum wage.

We need to think about affordable to whom and on what ongoing basis, given the 2008 financial crash and now Brexit and Covid-19 have changed what many people regard as affordable and viable.

When I know I can pay deposit, then rent without going on debt. In case of losing my job, I can get support with rent.

Where my wages could provide a decent level of life without giving up every spending on a property. Everyone wants to live a life, not tied up completely in a monthly rent bill.

We also looked at the current definition of “Affordable Housing” used by the Department and felt strongly that it was not meaningful to us as private renters and will not be meaningful to other individuals and their financial/living situations – it sees affordability as relative to the housing market and not to what people can actually afford and what will leave us with a good (or even just acceptable) quality of life.

Question 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.

We feel that this is an essential objective, especially its focus across all tenures.

A key issue that many of our discussions within Renters’ Voice come back to is the general lack of good quality, affordable homes (both social and private rented) in Northern Ireland and how this pushes many private renters into unsuitable accommodation and/or problematic relationships with landlords or letting agents, without a way out or better options available.

9 out of 10 respondents to our October Renters’ Voice Survey said they had experienced one or more issue in their time as a private tenant and the top issue people said they had experienced was “Difficulties finding suitable properties to rent”– 58% saying they had trouble finding properties that they could afford, 50% saying it was difficult to find properties in an area where they wanted to live and 47% saying it was difficult to find properties that meet their needs or the needs of the people they live with.

Another topic that we come back to often in our Renters’ Voice discussions is costs (deposits/rent in advance/letting agent fees) at the outset of a new tenancy. Again, this

issue was reflected strongly in our October Survey, with over one third of respondents saying they had experienced difficulties with these costs.

We are further concerned about the barrier of needing to provide a guarantor for almost all private rented properties and how this impacts disproportionately on a number of groups who are already more likely to face difficulties in the private rented market - including people not originally from NI, older renters and people from lower income backgrounds.

The lack of secure/longer-term private tenancies available is also a barrier to finding private tenancies that are truly suitable to peoples' needs and allow us to settle and flourish, somewhere that we can see as a home. We are interested in anything that this strategy can do to remove barriers and also to shift the culture of landlords and letting agents only being willing to consider 6 monthly, yearly or periodic contracts, which seems so entrenched in NI.

Our main Renters' Voice campaign so far has been for longer 'notice to quit' periods, or ideally a move towards longer-term tenancies like those available in Scotland, as a means to us and other renters gaining the security we so badly need. The importance of this was also reflected in our October survey – with both 'Increased notice to quit periods' and 'Longer term tenancies (and limiting the circumstances where landlords can end a tenancy)' featuring in the Top 10 changes people said they would like to see to make private renting work better.

The pandemic has further exacerbated barriers to accessing good quality private rented homes – for example, with more people finding themselves in financial difficulty and/or reliant on benefits and lack of security becoming an even bigger source of anxiety for renters.

We would like to see more support available for private renters, including financial support to access and sustain tenancies and overcome challenges. The pandemic has opened discussion about what financial supports can and should be made available for people e.g. the unprecedented 'furlough' scheme in the UK and some countries have embraced approaches like a 'universal basic income'. We hope that more understanding will come out of peoples' experience during the pandemic – with more people having faced financial difficulties or having to rely on Government schemes or benefits, maybe for the first time.

We have recently had some contact with the Department for Communities about the investigations into a potential Private Sector Leasing Scheme for Northern Ireland and we are interested to hear more and also engage with what is meant by 'intermediate housing' in the Housing Supply Strategy Call for Evidence document – *is this the same concept or are they two related concepts that are being explored?* In line with this seeking to be an ambitious strategy, we would like to see plans for this type of housing that are truly transformative for a good number of people. At the same time, we must not lose sight of the need for improvements that will also bring change for people who will fall outside of any new schemes available and who will remain subject to the wider private rented market. New housing models might be a part of the solution but they will not be the full answer.

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

We feel that this is also an essential objective.

We would like to see more discussion opening up about what 'suitable housing' means for more people, for example:

- If someone has been homeless and needs more in place to support them to maintain a tenancy.
- People who cannot access social housing but still would benefit from more support to access and maintain a tenancy – as above regarding 'intermediate housing'/Private Sector Leasing schemes, but not losing sight of the fact that many people who are at risk in different ways will remain subject to the wider market.
- People more likely to find themselves at risk within the Private Rented Sector – the Covid-19 pandemic has shown us how easily anyone can find themselves at risk due to a change in their circumstances and that this is particularly hard-felt by people living with the insecurity of private renting. However, we are also mindful of groups of people who may find it particularly difficult to avoid the potential problems of living in the private rented sector (in England some of these groups have been identified as people on low incomes or in receipt of benefits, people who have immigrated from another country, people raising children in rented homes, people with disabilities and older renters. (Vulnerability amongst Low-Income Households in the Private Rented Sector in England, David Rhodes and Julie Rugg (2018))

The voices of people with lived experience must be sought and part of this should be through engagement with Renters' Voice. Our core participants can speak from our own varied experiences (including of risk and/or vulnerability for different reasons) within the housing market. We also have wider contact with a large number of tenants with further perspectives and experiences and will continue to develop our reach.

(c) Improve housing quality

This is another essential objective.

Over one third of respondents to our October Survey said they had experienced problems with a private rented property being in a poor condition and, whilst we will welcome a more aspirational approach from this strategy to improving housing quality including in the Private Rented Sector, there is a basic need to tackle the lack of housing standards in Northern Ireland starting with the housing Fitness Standard. Those of us who had been previously unaware of required property standards in Northern Ireland were shocked to hear in our recent Renters' Voice Training just how low this Fitness Standard is and we are aware that, whilst it is seen as an important issue by the Department and Minister for Communities, it will not be tackled within the recently announced Private Tenancies Bill.

Further significant issues related to housing quality include repairs and adaptations, both of which are a particularly problematic in the Private Rented Sector due to lack of regulation.

A huge 45% of respondents to our October Survey said they had experienced problems with getting a landlord or letting agent to carry out necessary repairs. We were not shocked by this figure however, as issues with repairs come up frequently in our discussions at Renters' Voice due to our own experiences and those of friends and family. This is exacerbated by our tenuous security as private tenants meaning we do not feel that we can 'rock the boat' with our landlord or letting agent for fear of being labelled as 'problem tenants'.

As noted above, difficulties with getting necessary adaptations made to properties were noted in the recent event with the Housing Policy Panel as an issue for both in both social and private tenants. However, we must note that there are particular barriers to this in the Private Rented Sector that, in our experience, can often prove insurmountable. There are no requirements/incentives/supports for private landlords to make necessary adaptations for their tenants and, even in limited situations where grants are available (e.g. for bathrooms to meet disability needs), landlords are reluctant to make changes to a property which might not suit future tenants. Landlords' lack of adaptability to disability needs is reflected by the experience of one of our Renters' Voice members having difficulty finding landlords who will accept her assistance dog. The tension between a private and almost unregulated Private Rented Sector and the basic needs and human rights of people who have no choice but to live in private rented accommodation is very stark when it comes to this issue.

Another issue that we have discussed is how commonly we have come across people with experience of having moved into private tenancies and then discovered a range of issues – often serious - with the property (for example issues with sewage systems, unexplained smells, pest infestations). This is another issue that needs to be better provided and legislated for and it is difficult to overstate the impact on people's physical and mental health when there are unresolved issues of this nature.

On a more aspirational note, we have also discussed how the Covid-19 pandemic has brought more awareness from more people that could help lead to new thinking, e.g. more awareness about:

- The importance of home environment - from lockdowns, people working from home or needing to shield or isolate during the pandemic.
- The links between housing and health – in terms of suitable housing conditions and both physical and mental health.
- The importance of green space that people can access from their homes.
- Links to wellbeing and ways to alleviate isolation e.g. People being allowed pets in rented accommodation.
- That, with more people working at home, the running costs and suitability of their housing have become a concern not only of private individuals but of public and private employers.
- Overall, the importance for everyone of having a safe and secure home – in this case when we have all been facing a pandemic, but this is equally true when any of us is facing a personal crisis or, more positively, when we are in need of a foundation to build other aspects of our lives on.

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

We also feel that this is an important objective and, as above, would like to see renewed conversations about what home and community can mean, hopefully with new awareness and understanding following on from the Covid-19 pandemic.

We are lucky in Renters' Voice to be a diverse group, including in terms of nationality, and we are interested in lessons that can be learned from other countries – both in terms of resources being put into researching this by the Department and us having the opportunity to contribute to discussions.

For example:

- We agree with the importance placed in the Call for Evidence document on providing housing that reflects demographic change, including our ageing population, and feel that it will be important to hear learning from existing schemes of this nature, whether in Northern Ireland or elsewhere. For example, we are aware of intergeneration living in Holland and German Co-Operative Housing models which allow people to move into properties within a community that are suitable for them at different stages of their lives e.g. flats of different sizes and ground floor flats for peoples' needs as they get older.
- We are also interested in the importance placed on 'mixed tenure' development and would like to hear more about learning from elsewhere.

As highlighted above regarding the culture around granting private tenancies, we see a lot of issues in housing in Northern Ireland as cultural and hope that this strategy can help to build better understanding of this and shift some of the cultural norms that work against its aims.

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

We also feel that this is an important objective which is important to the quality and sustainability of peoples' homes as well as to the environment.

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

We have discussed a range of barriers above to people accessing good quality, sustainable and affordable homes - with a particular emphasis on experiences in the private rented sector by our core group and people who have responded to our surveys.

We are unable to identify a "Top 3" but our October Survey found that:

9 out of 10 respondents said they had experienced one or more issues we asked about in their time as a private tenant.

The top three issues people had experienced were:

Difficulties finding suitable properties to rent – 58% saying they had trouble finding properties that they could afford, 50% saying it was difficult to find properties in an area where they wanted to live and 47% saying it was difficult to find properties that meet their needs or the needs of the people they live with.

Problems with repairs – 45% of people who responded.

Not always knowing what rights and responsibilities you have as a tenant – 44%.

Other issues that over one third of respondents said they had experienced included:

Difficulties with the costs associated with a new tenancy (e.g. deposits/rent in advance/letting agent fees),

Being worried about needing to leave a rental property sooner than they would like to,

Bad experience(s) with landlords,

Bad experience(s) with letting agents, and

Problems with a rental property being in a poor condition.

The Top 10 changes people said they would like to see to private renting were:

1. Increased checks on landlords when they register
2. Increased legal fitness standards for rental properties
3. Increased notice to quit periods
4. A scheme to help people with tenancy deposits
5. Written tenancy agreements
6. Tenant Information Packs
7. Longer term tenancies (and limiting the circumstances where landlords can end a tenancy)
8. Support for private tenants to have more of a say
9. More ways to resolve disputes between tenants and landlords
10. Limits to how often private rents can be increased.

Question 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.?

We feel that there is currently a lack of understanding of the true nature of the Private Rented Sector beyond the statistics that are commonly quoted – for example that approximately 1 in 5 households are now in this sector and that almost half receive help with housing through Universal Credit or other benefits.

We would welcome more information being gathered centrally and importantly shared in a way that is accessible to us and others to whom this information will be of interest.

An extra note on Engagement and Co-Production

Following on from Q.8 above, it is important that the effective engagement with non-professional stakeholders (including private tenants) to which this strategy aspires includes provision of information that will allow us and others to engage meaningfully with the issues that it covers. In the spirit of meaningful engagement or Co-production, thought must be given to the support and information that different stakeholders will need in order to have an equal footing in discussions. Renters' Voice are keen to discuss this and any other issues to do with engagement further with the Department.

Further Questions in the Call for Evidence

We have an interest in other questions in the Questionnaire (for example Q. 11 "How do we engage communities more effectively in place making?" and Q. 27 about the definition of housing stress) but have not been able to have these further discussions within the time available.

More about Renters' Voice, our October Survey and how to contact us

Renters' Voice is a project for people renting from a private landlord or letting agent who want to improve things for private tenants in Northern Ireland. We are supported by Housing Rights and funded by the Nationwide Foundation but our voice is our own.

We are one of 7 'Tenants' Voice' projects across the UK funded under the Nationwide Foundation's Transforming the Private Rented Sector program. These projects all take different approaches to strengthening the voices of private tenants from which we will be able to learn as our project progresses.

Our October Survey, quoted above, was conceived and designed by core Renters' Voice participants and conducted throughout October 2020, receiving 87 responses from private tenants. Please contact us for a copy of our full report.

To get in touch, please contact Rentersvoice@housingrights.org.uk, or our Co-ordinator, Claire Maddison (clairemaddison@housingrights.org.uk or 07936 929752).

You can also find us on Twitter (@RentersVoice) and Facebook (@RentersVoiceNI).