

Northern Ireland Housing Executive's (NIHE) draft Older Person's Housing Strategy 2020/21 – 2025/26

Belfast City Council response – September 2020

Belfast City Council (“the Council”), welcomes the opportunity to respond to this draft strategy. For ease of reference the Council has followed the suggested structure of the four thematic themes and associated actions plans in preparing this submission. In addition the Council has also included some broader introductory and concluding comments within its submission. In drafting our response we have also sought, and included input, from the Healthy Ageing Strategic Partnership (HASP) and members of the All Party Older People's Group.

Vision

The Strategy states that the NIHE vision is to:-

‘enable older people to live as independently as possible with dignity; with opportunities and options to meet their housing needs; and to be supported to engage and participate in community life to create vibrant sustainable communities.’

The Council having engaged with older people's representatives do not disagree with this vision. However, having engaged with older people's representatives and also through our previous consultations with older people, as part of our Age-friendly Belfast Plan we believe that reference to the importance of supporting older people to **‘plan for the future’** is an issue and commitment that requires greater prominence.

Therefore, the Council would suggest that the vision would be strengthened by including a reference to planning for the future. The following additional text below would provide for this important issue within your strategic vision:-

*Our vision is **‘to enable older people to plan for their future housing needs’**, live as independently as possible with dignity; with opportunities and options to meet their housing needs; and to be supported to engage and participate in community life to create vibrant sustainable communities.’*

Measuring Success

The Council agree with the approach being suggested by NIHE in terms of measuring the success of this strategy. However, it is unclear from the document how NIHE and other stakeholders will measure how people are better off as a result of the strategy and its associated action plans. In line with the wider public sector there would be merit in using an outcomes based accountability approach.

The majority of the measures outlined in the consultation document are outputs or procedural measures and not ‘better off’ measures; consequently they will be limited in evidencing the benefits the strategy may have on the quality of life of older people. The Council believes that these measures of success could be significantly strengthened by being outcome focused, emphasising the impact of the strategy and in particular how it will result in measurable change to the issues facing older people.

FOUR KEY STRATEGIC THEMES

The Council agree with the four themes outlined in the strategy document and particularly welcome the detail provided and focus in relation to Theme 1 - Planning for the Future, in light of our comments above.

THEME 1 - PLANNING FOR THE FUTURE

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.

Council response:

The Council agrees with the actions suggested within this theme, but would make the following comments/suggestions:

- The 2017 Age-friendly Belfast survey reported that almost half of older people in Belfast (46%) were not aware of housing options as they got older. In addition, work undertaken by the Council in relation to consultations on the Belfast Agenda and the emerging Local Development Plan highlighted the need for a particular focus on increasing access to suitable housing across the city.
- The numbers of older people in housing stress or who are homeless across Belfast indicates that more radical action is necessary. We would be concerned that these issues contribute to poor physical and mental health. It is not clear from the draft strategy that there will be the funding or capacity to adapt the housing stock quickly enough or develop alternative options to meet the changing needs of older people.
- The Council would also like to see more consideration of actions being undertaken by NIHE with the private rented sector. Research has shown that some of the poorest older people live in this sector and these numbers are likely to increase. Collaboration and partnership in this area would help to combat emerging issues.
- There is also a clear need for NIHE and other housing providers to do more with older people and their families to plan ahead. The NIHE could work in partnership with key stakeholders such as COPNI or Age NI on campaigns to raise awareness of this issue and help people to start planning for their future housing. Adopting a proactive approach would reduce undue stress and worry for older people and their families.
- It seems likely from the NIHE research quoted in the consultation report that a significant percentage of older persons are under-occupying their homes. Alongside the results of the 2017 tenant survey that found 92% of 65-84 year olds were happy that their accommodation was the right size for them, this raises questions regarding the assertion that properties under-occupied by older people are likely to be released. Furthermore, the report also notes that when older people do consider moving, they would prefer to remain within a narrow radius (less than 5 miles) of their existing accommodation. These details together highlight the importance of planning and delivering a range of well-designed and well-located housing for older people and services that are developed in consultation with and garner the support of older people.
- It is vital that good quality smaller homes are provided in the right locations. The Council recognise the need for a greater provision of mixed housing and as such we have proposed new planning policies

within our draft Plan Strategy that are designed to; encourage a broader mix of housing generally (Policy HOU6), particularly smaller homes across all tenures; to require more accessible and adaptable accommodation (Policy HOU7); and to manage the delivery of specialist residential accommodation (Policy HOU8), including sheltered housing, extra care housing and care homes. We welcome NIHE's support in the delivery and implementation of such policies to ensure that housing of the future meets the need of all residents.

- To date, there has been minimal development of specialised older persons housing for owner occupation or private rental in NI, but this is increasingly being developed by private developers elsewhere and has proven to be very popular. We may therefore see an increasing trend here too and it is vital that NIHE plan for this to ensure that the highest standards are delivered and to support older people in making the best choice.
- The Council's future planning framework proposes to increase the proportion of residential accommodation in Belfast City Centre and, whilst not all locations will be well suited to housing for older people, the City Centre could offer a range of suitable accommodation types in close proximity to a range of services. We would welcome the opportunity to work with NIHE to explore the potential for a range of accommodation options in such locations.
- Alongside this, the research findings within the Strategy also underline the importance of future housing for older people being brought forward in locations in close proximity to existing residential areas and existing local services. This is the approach that the Council's draft Plan Strategy Policy HOU8 seeks to encourage.
- However, reference is made in the consultation to a 'Hub and Spoke' model, whereby sheltered accommodation services (hubs) can offer additional support services and facilities (spokes) to residents of the scheme and to the wider community. Whilst the aim of ensuring that new services provided in any specialist development are open and accessible to the wider community, this particular model has the potential to jar with criterion b) of our draft Policy HOU8, which would assess the location of specialist accommodation with regard to the proximity of existing local services and facilities (as opposed to such services being provided on site). Whilst utilisation of existing services may not always be possible, it may be beneficial to consider the potential to deliver supporting services at existing service centres, such as local neighbourhood centres or health centres, which are easily accessible from new developments.
- The consultation notes that NIHE are currently working in partnership with the Department for Communities on a pilot scheme incorporating the Housing and Ageing Population Panel for Innovation, (HAPPI) principles into reconfigured housing stock. This, in conjunction with the development of an accessible housing register for social homes, indicates the level of importance attributed to meeting the needs of an ageing population, with the view expressed that 'if it meets the needs of older people, it meets the needs of everyone'. One of the action points states that NIHE will work to influence the Lifetime Homes Standards in the private sector and this aligns well with the Council's approach to accessible and adaptable housing outlined in Policy HOU7. This policy also recognises the need to close the accessibility gap between social rented and other tenures of housing, which will increase choice of accommodation and tenure for older people.
- Similarly, the Council also welcome the action point to increase provision of wheelchair standard homes in the Social Housing Development Programme (SHDP) from 7% to 10% by the end of 2020/21 (in line with draft PfG). This action also aligns closely with the Council's draft Policy HOU7.
- From an equality perspective the Council also welcome the use of the HAPPI principles for home designs as many older people not only have older children living at home, they also have caring responsibilities

for older parents and grandchildren. In some instances, they are primary carers for grandchildren who would otherwise have been taken into care.

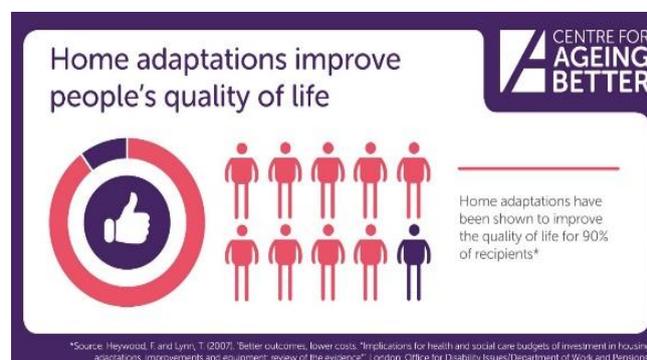
THEME 2 – PROMOTING AND MAINTAINING PEOPLES’S DIGNITY

This theme sets out the services that NIHE currently provide and looks at ways to develop new and existing services to promote and maintain the dignity of our tenants and customers.

Council response:

The Council agrees with the actions suggested, but would make the following comments/suggestions:

- We support the idea of a comprehensive handyperson service allowing older people to maintain their homes and thus maintain their independence for longer. The Belfast Safer Homes Scheme, run by Bryson supported by Belfast City Council and the Public Health Agency, is now well established. However, it does not cover a range of frequently requested services such as gardening and decorating, which would make a significant difference for older people being able to live independently.
- There is a need for greater investment in Home Improvement Agencies and this has been included in recommendations outlined in the All Party Parliamentary Group on Ageing and Older people Inquiry into Decent and Accessible Homes for older people, summer 2019.
- The Council welcome the changes and improvements planned for the Disabled Facilities Grants. In our experience older people tell us that these grants need to be promoted more, easier to use, and both waiting and delivery times need to be reduced. A quote received at one of our older people’s forums stated that, *“Promotion of grants, simpler processes and short times all vital, older people are not aware of grants available and/or feel it is too long and too much hassle to apply for one”*. Therefore, it is important that this progress is monitored to ensure that the planned changes results in measurable improvements.
- The Centre for Ageing Better infographic below states that home adaptations improve the quality of life for 90% of recipients. This highlights the importance and value of home adaptations which can very often can be undertaken without significant costs. There also needs to be a flexibility around smaller scale adaptations which allows these to be carried out quickly without causing major upheaval to the recipients.



- Through our previous engagement with our Health & Social Care partners, we are aware of their concerns that the discharge of older people from hospital can be delayed in some cases pending home adaptations. In these situations there must be greater flexibility based on the needs of the specific individual that could resolve these issues quickly and not lead to undue delayed discharge from hospitals or other care settings. This is particularly of concern if there is another Covid19 surge, as delayed discharges can lead to a greater risk of infection, physical ‘deconditioning’ and mental health problems with long term consequences for the older person.
- The Council would also recommend that the NIHE links in with partners in health, universities and councils to understand the significant emerging research and innovation being undertaken within the city in relation to assistive technology. This technology can be used to develop innovative adaptations to a property which can support older people to continue to live independently in their own homes
- Belfast Warm and Well Scheme is a partnership approach reporting to the Community Planning Living Here Board and aimed at addressing Fuel Poverty. The scheme provides a coordinated single point of assessment combining NEA, Make the Call and the City Council Affordable Warmth Team.

Affordable Warmth Scheme

- The Strategy references the Affordable Warmth Scheme which is a scheme that the Council play a critical role in across the city. This scheme covers a whole house approach in ensuring energy efficiency which includes replacement boiler, insulation (cavity wall, roof space and solid wall) and replacement windows. The scheme is also fully funded.
- There is set criteria for the Affordable Warmth scheme but it is not restrictive for older people as being over 65 is part of the eligibility criteria. However, the Council do believe it is restrictive for older couples as the overall household income is taken into account and consideration should be given to raising the income threshold for couples or families.
- It is not clear what evidence there is to suggest that the scheme isn’t reaching those most at risk. The scheme may not keep pace with the increase in the number of older people but the main issue is consistency and funding for councils to help deliver the scheme and the set ratio of 80:20 as it is targeted scheme. If the council had more resources available to support this scheme then we could deliver more referrals. However, given the funding uncertainty around this scheme this is very difficult.
- NIHE schemes to improve their own stock will ‘skip’ those homes purchased by former tenants. A more long term systematic approach is needed to fuel poverty which recognises it as a public health and community planning issue. This would involve comprehensive large scale retro-fitting public and private sector homes to improve insulation, windows and heating systems and making the gradual transition to alternative heating as easy as possible for those on low incomes. This would have the added benefits of being one of the most effective ways to reduce carbon emissions and job creation. Many NIHE homes that were purchased by tenants are often left with old gas boilers behind the fireplace and single glazed windows and were never included in NIHE schemes due to the householder purchasing the house. These older people can very rarely afford to improve the house themselves and should be considered in any local schemes.
- The Council agree with a long term systematic approach is needed to support appropriate home adaptations and improvement, this should include windows as this is a costly measure. The

Affordable Warmth scheme is the only scheme available for home owners to get help with this, but as a single measure we are unable to help due to prioritisation.

- The Council also supports the concept of dementia friendly homes embedded in dementia friendly communities referenced in the strategy. The Council would welcome further information on the planned programmes in this area and would be keen to work with the NIHE in promoting awareness around this approach.
- The work around energy efficiency and carbon reduction – energy efficiency is discussed but there might be other actions that could be considered, for example the use of renewable energy, moving people away from oil/gas, use of district heating schemes etc that might address fuel poverty (which is reported to be highest among the older generations) and enhanced heating/environment. There are many innovative alternative methods of home heating and cooling available now – more than the traditional movement from oil to gas heating. The Council feel it would be of value to the NIHE to explore the cost benefit analysis of these alternative schemes in greater details to assess their suitability.

THEME 3 – PROVIDING HOUSING ADVICE FOR OLDER PEOPLES

The Council would make the following comments/suggestions in relation to this theme:

- The Council would welcome consideration being given to the introduction of a dedicated older people's contact in NIHE. We believe this approach could improve communications and partnership approaches to providing housing advice. This concept of centralised advice for older people would be very useful to signpost people to the most suitable schemes and offer advice on housing issues.
- The Council believe there is a need to do more with older people and their families in relation to the provision of appropriate and tailored housing advice. NIHE could work in partnership with key stakeholders such as the Commissioner for Older People for Northern Ireland or Age NI on campaigns to help people to start planning for their future housing. We know from engagement with other local authorities that Nottingham City Council for example is working with Age UK on an equity release scheme targeted at older people living in areas of disadvantage. This is quite a compelling example of how partners are working together to help older house owners in areas of disadvantage to make affordable adjustments to their homes –as featured in a presentation at **Home is Where the Heart Is UK Age-friendly Network Conference, 3 June 2020** [https://www.youtube.com/watch?v=AE29zZ-
ea7M&feature=youtu.be](https://www.youtube.com/watch?v=AE29zZ-
ea7M&feature=youtu.be)
- The early response and community based interventions in light of the COVID-19 emergency has highlighted the existence and value of many local community based advice services. The Council believe that NIHE should link to these important and accessible local sources of advice when implementing its strategy.
- While the Council understands the difficulty in defining an older person, as people age at different rates physically and mentally, regardless of this the Council believes that it would be useful to encourage people to think about their current accommodation when they are fit and healthy – and prepare themselves for the future.
- Access to advice and support services is vital. While we appreciate that this strategy focuses primarily on how NIHE will provide the appropriate housing to meet the requirements of older people, it is however crucial that the NIHE cascade this strategic approach in a manner that is person-centred meeting the needs of the individual person and families. NIHE will need to carefully consider the

preventions and interventions that will be put in place as an agency or via its partnerships to ensure that all their tenants have access to support, are aware of that support available and understand how to use it. Older people face many complex challenges and will require access to a broad range of services and support it is vital that these issues are given equal consideration within the strategy and throughout its implementation.

THEME 4 - PROMOTING PARTICIPATION

We agree with the actions suggested and would make the following comments/suggestions:

- Technology and digital inclusion is important for all members of society including older persons and the last few months have shown this. Therefore, it is essential that the NIHE, in considering the provision of appropriate housing for older people, ensure that there is broadband/Wi-Fi in all its housing properties.
- Age Friendly Neighbourhoods are important and the Council support the actions suggested within this strategy document to support the use of outdoor space. We would emphasise that green spaces and well maintained common areas around housing is vital. Benches and well-spaced seating is important for older people and other age groups and whilst we understand some of the community safety concerns which exist, these issues need to be overcome with the support of local communities and innovative solutions.
- Ensuring access to outside space is vital for older people whether this be direct access or balconies. Access to green space/nature/biodiversity for a range of benefits could be expanded within the strategy document to make clear the multiple benefits, not least that it would help reduce flooding and overheating.
- The Council would welcome through this strategic approach the design of inter-generational neighbourhoods which are age- and dementia-friendly. These need to be walkable and will reduce the risk of social isolation and support 'Ageing in Place' from childhood to old age.
- The Council also recognise that shared spaces (if not shared accommodation) can be critical in combatting loneliness. Communal gardens, allotments have often been areas for older people to continue being active and increasing opportunities for local food production and learning. It is widely acknowledged through various sources of research that these types of activities also have a positive impact on mental health.
- The movement of older people through and around the city is crucial in fostering a sense of independence for older people. It is therefore vital that housing is situated in locations that doesn't isolate them from others, services and access to public transport.
- The Council also believe that it is very positive to see within the strategy document, an acknowledgment of the importance of community safety for older and vulnerable adults. These commitments reflect the Belfast Policing and Community Safety Partnership's (PCSP) ethos. It has been our experience through the Belfast PCSP that the NIHE has a flexible approach to the needs of their tenants and are willing to liaise with teams across their whole organisation which has shown them to be strong partners in addressing policing and community safety issues across Belfast.

Concluding comments

While the Council welcome the actions outlined within the document. There is concern that in and of itself

this strategy will be limited in meeting the scale of change facing our population. The Council believe that for the NIHE to achieve the strategic vision set out in this document there is a need for a true partnership approach in terms of planning for and delivery of appropriate housing for older people across the city.

There is a need for common ownership of the issues from the NIHE's and its strategic partners to ensure that the objectives of the strategy are met. The Council is aware that previously there was a joint housing and social care group which existed as forum to discuss the interface between health and NIHE but this group no longer meets. It is the view of the Council that such a forum along with other partnerships that include housing associations, private sector landlords and councils as the local planning authorities can all contribute and all have an important role to play in delivering a joined-up strategic approach to housing for older people, that our older people deserve.

The Council would also like to take this opportunity to highlight to the NIHE that whilst we acknowledge the need to focus on housing for older people, we need fairer housing provisions for all generations across the city. There is a need for an overall increase in the supply of affordable new homes and enhanced measures are required to ensure that those on low or modest incomes have access to them.

The Council prioritises its role in addressing inequalities across the city and within its communities and therefore warmly welcomes the production of this strategy. The Council will seek where possible through Community Planning Partnership and other channels to work with the NIHE in delivering this strategy to address any inequalities faced by our older people in securing and living in appropriate accommodation. Giving all our citizens, including our older generation, more control over the decisions that affect their lives and their communities is a key priority for the Council.

Much work has taken place in the last number of years, under the auspices of community planning, to ensure that the Council and its partners builds up the information and data knowledge of those who live, work and invest in the City. It is fundamental that this strategy document is used as a basis for the council to work with NIHE and other statutory agencies, to understand the nature and scope of the inequalities facing our older people in relation to housing and where they exist work together to develop programmes to target and reduce these inequalities for the greater good.