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| Report on | Response to Housing Executive Chronic Homelessness Action Plan |
| Date of Meeting | 25 th July 2019 |
| Reporting Officer | Adrian McCreesh Director of Business & Communities |
| Contact Officer | Claire Linney Head of Community Development Helen Gormley, Mid Ulster Community Planning |

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| Is this report restricted for confidential business? | Yes | |
| If 'Yes', confirm below the exempt information category relied upon | No | X |

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| 1.0 | Purpose of Report |
| 1.1 | <p>On 27th February 2019, the Northern Ireland Housing Executive commenced its consultation on the 'Chronic Homelessness Action Plan'. The consultation will run until 2ndth August 2019. The purpose of this Paper is to consider a draft Response to the Action Plan.</p> <p>Council meeting on 25th June 2019, it was agreed that Council would prepare a response to this consultation.</p> |
| 2.0 | Background |
| 2.1 | <p>Housing Executive has developed an action plan that addresses the needs of the Northern Ireland population experiencing chronic homelessness, and the proposal has been developed within the following context:</p> <p>Chronic Homelessness has been defined in The Homelessness Strategy 2017-22 as a 'group of individuals with very pronounced and complex support needs who find it difficult to exit from homelessness' e.g. mental and physical health issues, addictions, legal and justice issues and suffer discrimination. People experiencing chronic homelessness tend to struggle with sustaining a permanent housing tenancy or a temporary accommodation placement.</p> <p>The Plan covers a 3-year period from 2019 to 2022. It has 10 objectives that focuses on addressing the wider issues of chronic homelessness rather than focussing only on the specific issues of rough sleeping and street activity.</p> <p>In delivering the action plan, input and support is required from a range of stakeholders across the statutory, voluntary and community sectors. The Housing</p> |

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| | <p>Executive will employ new ways of working internally on a range of actions from the plan, while others cross departmental and interagency initiatives will require joint working by stakeholders.</p> <p>The Chronic Homelessness Action Plan will incorporate the actions of the Homelessness Strategy. The plan aims to:</p> <ul style="list-style-type: none"> ○ Improve the measurement and understanding of the scale of the problem of chronic homelessness and establish a baseline ○ Promote early intervention and prevention of chronic homelessness ○ Provide a rapid response to chronic homelessness to ensure interventions are effective and well targeted ○ Promote a cross departmental and interagency approach to addressing the problem of chronic homelessness. <p>7 Criteria has been identified to determine if an individual is experiencing chronic homelessness. Criteria include:</p> <ul style="list-style-type: none"> ○ An individual with more than one episode of homelessness in the last 12 months (constant breakdown of tenancies). ○ An individual with multiple placements/exclusions from temporary accommodation. ○ An individual with mental health problems. ○ An individual with addictions e.g. drug user or alcohol addictions. ○ An individual that has engaged in street activity, including rough sleeping, street drinking, begging. ○ An individual prone to violence - risk to self, to others or from others. ○ An individual who has encountered the criminal justice system. |
| 3.0 | Main Report |
| 3.1 | <p>Mid Ulster District Council agrees that, in the context of reducing chronic homelessness, it is imperative that there is improved understanding of the causes and complexities surrounding chronic homelessness, and the scale to which it exists. Ensuring early, effective and efficient interventions by all relevant agencies is essential to make certain that anyone who falls into chronic homelessness is quickly provided with sustainable housing and appropriate support to permanently end their homelessness.</p> <p>Council would state that a plan and strategy needs to address chronic homelessness in its widest sense. It is not just areas that have evidence of high levels of rough sleeping on the street, as in many rural areas this is not the position but exists in a more disguised manner as many homeless people are relying on</p> |

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| | <p>friends and families to provide accommodation in houses that are already at full capacity, causing further stress to other family units.</p> <p>Whilst there is a body of information that indicates chronic homelessness is associated with people who suffer with a range of complex support needs, there are further associated issues, and for Mid Ulster in particular it is the inability of tenants to pay rents (these are beyond reasonable levels). Homelessness caused by affordability of rental properties is becoming a major issue, and leading to chronic homeless particularly in the Dungannon town area with extortionate rent prices and expediential increases being imposed on tenants renting within the sector, resulting in immense suffering by residents who are enduring such rises on restricted or decreasing income levels.</p> <p>A number of proposals have been attached that require consideration – Any plan or strategy to address homelessness must be with an adequate budget and finances to make a difference. Homelessness through affordability needs to be addressed as often this leads to chronic homelessness – review of rental markets and potential rent control interventions where required. - review of the LHA to ensure it is adequate to meet rental need. -Housing allocation to provide for support needs and wider community engagement. - Flexible solutions for housing supply through an integrated approach. - Welfare reform impact review on the need for continued support</p> <p>The draft Response from Council is attached as Appendix A.</p> |
| 4.0 | Other Considerations |
| 4.1 | Financial, Human Resources & Risk Implications |
| | Financial: not applicable |
| | Human: not applicable |
| | Risk Management: not applicable |
| 4.2 | Screening & Impact Assessments |
| | Equality & Good Relations Implications: not applicable |
| | Rural Needs Implications: not applicable |
| 5.0 | Recommendation(s) |
| 5.1 | Council to consider and approve the attached consultation response. |

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| 6.0 | Documents Attached & References |
| 6.1 | Appendix A – Draft response from Council to Housing Executive |

Appendix 1



Comhairle Ceantair
Lár Uladh
Mid Ulster
District Council

16rd July 2019

Helen Hicks (Homelessness Policy & Strategy)
Housing Executive
1st Floor South
9 Laynon Place
Belfast
BT1 3LZ

Dear Ms Hicks

Ref: Consultation on Housing Executive Chronic Homelessness Action Plan

Mid Ulster District Council would like to take this opportunity to put forward views, opinions and concerns in relation to the proposed Housing Executive Chronic Homelessness Action Plan.

Specific views and concerns that Council has identified are set out in detail in the attached 'Response' document attached.

Yours sincerely

Adrian McCreesh
Director of Business and Communities

Mid Ulster District Council response to

Public Consultation – Chronic Homelessness Action Plan

Proposals for the first Chronic Homelessness Action Plan that will align with

the Homelessness Strategy from April 2019 to March 2022

Mid Ulster District Council welcomes the commitment from the Northern Ireland Housing Executive and Department for Communities in seeking to address the chronic homelessness issue in Northern Ireland, and areas most in need.

It is the understanding of Council that the Housing Executive has developed an action plan that addresses the needs of the Northern Ireland population experiencing chronic homelessness, and the proposal has been developed within the following context:

- Chronic Homelessness has been defined in The Homelessness Strategy 2017-22 as a 'group of individuals with very pronounced and complex support needs who find it difficult to exit from homelessness' e.g. mental and physical health issues, addictions, legal and justice issues and suffer discrimination. People experiencing chronic homelessness tend to struggle with sustaining a permanent housing tenancy or a temporary accommodation placement.

Data

Below are some statistics that must be taken into consideration in the process of planning for future service provision and in ensuring that any future strategy and plan is targeted at the areas most in need.

- Mid Ulster District Council area represents a population of 146,427 (June 2017) people across 1,714km² i.e. 14% of the regional landmass. Mid Ulster's population *grew* by 18.7% between 2001 and 2013 against the regional average of 8.3%, making Mid Ulster the **fastest growing** of the new 11 council areas, this trend is projected to continue with population climbing to **165,000** by 2030). This has resulted in additional pressure on housing provision and resultant homelessness in general.
- In 2017/18, **770** individuals **presented** as homeless in Mid Ulster. **468** awarded Full Duty Applicant Status and **103** households placed in temporary accommodation.

- The **running total** of Mid Ulster Full Duty Homeless Applicants on NIHE waiting list at 31 March 2018 was **644**.
- Mid Ulster area is considered as having the **third highest** number of chronic homeless people across all districts. Housing Executive Area Office for Mid Ulster estimated (on a specific date) that **39** of their homeless applicants were experiencing chronic homelessness based on 1-6 of the new proposed assessing criteria.
- Northern Ireland Housing Applicants 2017/18 included **1,723** applicants, **1,044** living in housing stress and **319** allocations. Only **18.5%** of Mid Ulster applicants received a housing allocation.
- **306** rural applicants were living in housing stress in 2017/18.
- Mid Ulster has **5,463** NIHE and Social Housing properties. This is the **second lowest** across all districts.
- Currently there are 23 registered housing associations in Northern Ireland. **10** of the associations currently own stock in the Mid Ulster District Council area.
- NIHE Projected Housing Demand for 2018-2023 is **700** units.
- Largest number of Mid Ulster Housing Benefit Claimants live in the **private sector**. At March 2018, there were **4,244** private Housing Benefit Claimants.
- Ulster University research showed weekly rental values for a semi- detached house in Mid Ulster to be **£121.38**. Research of the current rental market would show a previously Executive property is in the region of £600 - £650 per month (Estate agents as of July 2019).
- Mid Ulster District Council is spread across **four** Broad Rental Market Areas including: Lough Neagh Upper, Lough Neagh Lower, South and South West. The current rate for Mid Ulster and Dungannon in particular is very different from the areas that it is incorporated with and results in skewing the rental values.

Rationale for Chronic Homelessness Action Plan

Mid Ulster District Council agrees that, in the context of reducing chronic homelessness, it is imperative that there is improved understanding of the causes and complexities surrounding chronic homelessness, and the scale to which it exists. Ensuring early, effective and efficient interventions by all relevant agencies is essential to make certain that anyone who falls into chronic homelessness is quickly

provided with sustainable housing and appropriate support to permanently end their homelessness.

Mid Ulster District Council welcomes the cross-departmental 'Chronic Homelessness Action Plan', however significant amendments must be made to take on board the following points raised.

Responses to Chronic Homelessness Action Plan

Whilst much has been brought to pass through the delivery of various housing strategies in targeting homelessness, an integrated approach is required in responding to chronic homelessness across the region. Northern Ireland social housing sector is currently facing a major housing challenge with housing stress and homelessness figures at their highest level. In March 2019, 19,629 housing applicants were considered homeless in Northern Ireland, of which 3,943 were on the waiting list for more than 5 years. Council believes that the Housing Executive and Department for Communities in the development of the Action Plan, needs full resourcing to ensure that it can effectively tackle homelessness.

Even though Mid Ulster may look to have a low level of rough sleeping, it does have the third highest number of chronic homeless people across all districts (this is evidenced by figures provided by NIHE District Offices). Whilst many homeless people are not presenting on the streets they are relying on friends and families to provide accommodation which is in houses that are already at full capacity, causing further stress to other family units.

On 31 March 2018, Mid Ulster had a running total of 644 Full Duty Homeless Applicants on NIHE waiting list. NIHE research estimates that 5-10% of the homeless population suffer chronic homelessness. These levels of homelessness/ chronic homelessness are unacceptable, and as the Housing Executive and Department for Communities has referenced, there is a need for robust action. The plan needs to be appropriately resourced to achieve outcomes and key policy changes made to support delivery.

Whilst there is a body of information that indicates chronic homelessness is associated with people who suffer with a range of complex support needs, there are further associated issues, and for Mid Ulster in particular the inability of tenants to pay rents (these are beyond reasonable levels). Homelessness caused by affordability of rental properties is becoming a major issue, particularly in the Dungannon town area. Extortionate rent prices and exponential increases are being imposed on tenants renting within the sector, resulting in immense suffering by

residents who are enduring such rises on restricted or decreasing income levels. In some areas rents are in excess of £650 per month for five person three bedroom houses. Many tenants are being faced with shortfalls of up to £60 per week between rental charge and housing benefit payable. Other people on varying income levels are competing for a small number of properties and paying in the region of £150 per week. Consequently, to the affordability issues many tenants are experiencing recurring homelessness.

Council along with its community planning partners identified housing as a key priority for Mid Ulster. One of the proposed actions due to the above situation was to review the potential for rental cap or rent pressure zones, where tenants are experiencing homeless due to affordability. The voluntary landlord scheme has not worked. There is regular feedback on landlords hiking rents without notice, evicting people, not providing any rental security and not looking after their properties. At each supporting community estates walk, issues are raised about properties not being kept in decent condition and people paying unrealistic rents to live in these conditions without other options.

Local Housing Allowance (LHA) must be reviewed to take account of variations in rent charges within Broad Rental Market Areas. Council recommend that rental market areas be re-defined to reflect actual rental charges across all areas. Recognition is also given on the impact of LHA on the number of new social homes being built.

Housing Associations need to ensure they are charging rents based on the Local Housing Allowance levels. Situations arise where there is need for investment to build homes, and this is being funded by charging higher rents causing people to become homeless and increasing the issue of social pressure on need.

For people experiencing prolonged and serial homelessness, housing affordability barriers are often compounded by issues of poor mental health, addictions, social exclusion and financial stability. Against this background many individuals/families are leading unstable and chaotic lifestyles by living in unsuitable B&B, hostel, emergency and temporary accommodation in areas of which are unfamiliar and away from family support, to which they are dependent. There are instances where families and children are being placed in unsuitable temporary accommodation. Furthermore, social housing providers are making housing allocations without consideration of support needs for the individual/families which often worsens their situation and exacerbates their dependencies resulting in recurring temporary placements and serial housing failure. Council are of the opinion that changes must be made to the Housing Selection Scheme to enable mixed housing allocations that take account of family togetherness, community cohesion, and access to transport

services, education and employment with the view of providing an integrated holistic approach to long term housing sustainability.

It is fundamental that the Chronic Homeless Action Plan is delivered through a multifaceted approach involving statutory, voluntary and community sectors to ensure that people experiencing chronic homelessness are provided with appropriate permanent housing in their areas of choice along with tailored support to meet their individual needs. It is imperative that the NIHE, Housing Associations and partner agencies be committed to eradicating the homeless problem by investing the necessary resources so that the causes of the repeat homelessness becomes known, and appropriate action taken to ensure individuals/households have access to settled, affordable and suitable housing in their areas of choice. Models include buying up single properties in areas where there is stock coming to the market rather than relying on large developments Council recommend legislative changes be made to place Statutory Duty on relevant agencies to cooperate in an interdepartmental approach in providing the required resources, housing and support mix for people who are threatened or already experiencing homelessness.

Northern Ireland is experiencing a significant shortage in the provision of Social and Affordable Housing. NIHE estimate that 700 new housing units are required in Mid Ulster between 2018-2023. It is clear from the Social Housing Programme, that housebuilding is not keeping up with housing demand resulting in rising housing stress, homelessness and chronic homelessness figures. New ways for increasing the supply of social housing and alleviating homelessness must be prioritised.

Council recommend the following action:

- purchase of land and development of mixed housing types by the Housing Executive;
- widening the offering of 'Affordable Housing' by Housing Associations, enabling citizens the opportunity to avoid rental market pressures and accessing low cost home ownership;
- upscaling purchases of new and existing housing from the open market by social housing providers.
- enforcement of policy on new build private developments to ensure delivery of social and affordable housing at appropriate rate based on housing need;
- clearance schemes to see demolition and rebuild of older social housing schemes to prevent high levels of housing unfitness.

Further consideration must be given to future sales of social housing stock. Council are of the view that in the interest of equality for all, the current 'Right to Buy Scheme' be amended to 'Buy Back Scheme' where purchasers are obliged to sell the property back to social housing landlords in the event of disposing. This change will ensure that tenants can avail of low cost ownership, and housing stock ending up in social housing provision through NIHE or Housing Associations.

Criteria identified for assessing chronic homelessness should be amended in line with the following comments:

- An individual with more than one episode of homelessness in the last 12 months – this should be mandatory
- An individual with multiple placements/exclusions from temporary accommodation – this should be mandatory

Recommend additional criteria:

- Individuals who have recurring homelessness due to affordability of rent– rent rises are causing problems for tenants
- Individuals who have been released from hospital or institutions
- Individuals/Families who are victims of crime

Welfare reforms will have a major effect on the level of chronic homelessness across the region. With the changing benefits system, through the roll out of universal credit and bedroom tax, adverse effects will be experienced by low income individuals/families living in social and private rented housing. The four year benefits freeze for people living in private rented accommodation will undoubtedly result in tenants falling behind in rent payments, increased evictions and homelessness. Mid Ulster Housing Benefit figures 2018, show the largest number (4,244) of claimants are people living in properties belonging to the private sector. Affordability issues will also be experienced by people living in the social housing sector as a consequence of benefits cuts. Benefit reductions are further complicated by the end of bedroom tax mitigations in 2020 and the size criteria for tenants living in social housing. Council are of the opinion that the new size criteria will have a negative impact on family dynamics, communities and wider regeneration. Furthermore, they are alarmed for the worsening homelessness crisis in Mid Ulster giving the current levels of housing stress and homelessness. Council recommended the following: Current Bedroom tax mitigations be retained beyond 2020; further consideration giving to family needs when determining housing need using size criteria for bedroom tax; and NIHE, DfC and Social Housing Providers be prepared with appropriate solutions to respond to the escalation in the homelessness crisis.

Evidence is showing that there is a correlation between poverty and being able to afford the basic provisions in life such as housing and security, particularly for people with families and depression and in situations suicide. This is evidenced from charities on the ground and some of the statutory agencies working with people in crisis.

Conclusion and Recommendations

If Chronic Homelessness is to be properly addressed, there are a number of areas that require serious consideration, as summarised -

- Criteria identified for assessing chronic homelessness be amended to remove criteria 1 and 2, as these are viewed as mandatory. Additional criteria should be included taking account of affordability, individuals leaving hospital or institutions, and victims of crime.
- Action Plan to include identified outcomes over the plan period 2019-22.
- Increased provision of 'Affordable' homes with a decent standard of income for all. This is a priority for the Mid Ulster area.
- Housing Associations to upscale their offering to include provision of 'Affordable Housing' in areas of identified need.
- Appropriate resourcing of the Chronic Homelessness Action Plan by the Housing Executive, Department for Communities and Partner Organisations to achieve outcomes and key policy changes made to support delivery.
- Statutory Duty to be placed on relevant agencies to cooperate in an interdepartmental approach in providing the required resources, housing and support mix for people who are threatened or already experiencing homelessness.
- Review the potential for rental cap and pressure zone areas for rental markets causing homelessness.
- Local Housing Allowance be reviewed to take account of variations in rent charges within Broad Rental Market Areas. New Rental Markets Areas to be re-defined.
- Housing Selection Scheme be amended to enable mixed housing allocations that take account of family togetherness, community cohesion, access to transport services, education and employment.
- Identify new ways for increasing the supply of social and affordable housing. Suggested ways include: purchase of land and development by Housing Executive, expand offering of 'Affordable Housing' by Housing Associations, increased purchases of new and existing housing from the open market, enforcement of policy on new build private developments to ensure delivery of social and affordable housing, and clearance schemes to see demolition and rebuild of older social housing schemes.
- 'Right to Buy Scheme' to be amended to 'Buy Back Scheme'
- Flexible models to include buying individual properties in areas where there is stock coming to market rather than relying on large developments.
- Retain current Bedroom Tax mitigations beyond 2020. Housing Executive, Department for Communities and Social Housing Providers be prepared with appropriate solutions to respond to the escalation in homelessness crisis resulting from Welfare Reforms.