

Date: 15 December 10
Consultation: Draft Text for Housing Association Guide Re Improvement Schemes

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents registered and non-registered housing associations in Northern Ireland. Collectively, our members provide 34,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org

General Comments

NIFHA welcomes the opportunity to respond to this document which we appreciate is intended to clarify the position regarding the payment of Housing Association Grant for Re-improvement schemes. We have discussed this with a number of our members and there is a consensus of opinion that while the document does provide some measure of clarification, there still remain a number of areas where clarity is still needed.

The details of the areas requiring further clarification are as follows:

Specific Comments

1.9 Definition

Our members consider that more clarity is required here and have asked that examples are provided within the Guide to clearly illustrate the type of work that is covered by the definition. For example communal spaces include interview rooms or offices in some schemes.

Could the carrying out of works to upgrade properties to current legislative standards be included within the definition for example the inclusion of the provision of fire doors, legionella or energy conservation systems where none previously existed? These would not be repairs or maintenance and they would be “providing something that was not there before”. A more definitive list of types of works to be included would ensure the guide is not open to misinterpretation.

1.10 Eligibility Criteria

The part of the guide is unclear regarding the eligibility or otherwise of “off the shelf “ purchases as it only mentions those properties which have been previously grant aided for construction, rehabilitation or conversion.

1.11 Eligible Repair Works

Our Federation considers again, that a more definitive list of works would reduce the potential for misinterpretation of this section of the Guide.

1.13 Standards

The Guide says that the Association should attempt wherever possible to re-improve the entire buildings rather than individual units within them does this mean that associated works such as repainting areas where damage has been caused will also be grand aided and if so at what rate? Associations are also unclear regarding under which circumstances they can claim back decanting costs if this is needed when a whole building is subject to improvement works. Payment of decanting costs would therefore require further clarification.

I hope you find our comments useful please contact me if you require any further clarification.

Submitted on behalf of NIFHA by:

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