

THE NORTHERN IRELAND FEDERATION OF HOUSING ASSOCIATIONS

**38 Hill Street, Belfast, Northern Ireland BT1 2LB ☎ (028) 9023 0446 Fax No: (028) 9023 8057
E-Mail Address: info@nifha.org - Web: www.nifha.org**

22nd August 2006

**Belfast HMO Subject Plan Team
Belfast Metropolitan Area Plan 2015
2nd Floor Bedford House
16 – 22 Bedford Street
BELFAST
BT2 7FD**

To Whom It May Concern:

Re: HMO Subject Plan for Belfast City Council Area 2015

The Northern Ireland Federation of Housing Associations (NIFHA) represents 44 independent voluntary organisations, which benefit the community by providing affordable accommodation and related housing services to those in greatest housing need. Taken together, our members manage almost 30,000 units of accommodation dwellings and build over 1,300 each year, with one-third of all housing association stock is in Belfast. In the last twenty-five years these associations have undertaken a range of projects to respond to the needs of a diverse society, including HMO developments. This pro-active approach to service provision is continuing, as is our commitment to working for the benefit of the whole community.

We would like to thank you for affording us the opportunity to make comments on the above. NIFHA, on behalf of its members would like to highlight the following key comments in relation to this document:

1. An increasing number of smaller households and growing migrant community, along with other factors has meant increasing house prices and this in turn places immense pressure on the housing market to deliver in providing suitable accommodation. Rented accommodation is considered as a popular alternative for many households who cannot afford to buy in a highly competitive market. NIFHA welcomes the fact that in spite of this, the subject plan proposes to protect the natural environment and not displace indigenous communities.
2. It is important that regulation of HMOs is effectively enforced, particularly in problematic areas so that any issues with bad landlords and tenants can be properly addressed. Under the present system private landlords do not appear to be accountable for problems created by multiple tenures and a framework of legislation is required, placing a clear onus on the landlords and owners of HMOs to take responsibility for the impact their property is having on the social environment. The Planning Service should consider the merit of introducing measures to combat problems. For example, if a “three strike rule” was imposed to any incidences of Anti-Social Behaviour arising from any HMO address and the landlords licence was withdrawn, this would send a clear message that the concerns of the local residents were being taken seriously.

Representing and promoting housing associations in Northern Ireland

Chairperson: Mr Arthur Canning Dip (Est Man) MBEng Chief Executive: Mr Chris Williamson MCIH

VAT Registration No: 311 2120 40

3. The concept of student villages and off-campus accommodation must be considered as a means of helping to rejuvenate dilapidated areas within the city. This would be in line with the previous consultation's recommendation for a "spatial policy" with specific zones and property types. This should be fundamental in the dispersal of HMOs by encouraging and promoting the other types of accommodation, such as Lettings Over the Shop (LOTS) and areas along other arterial routes.
4. It is important to ensure that the objectives set out within the subject plan are achievable and that the registration process is easy to monitor, particularly in light of the Review of Public Administration. From a management point of view, it might be prudent to set the maximum size as five occupants for HMO standards.
5. Our members recognise the need to retain and sustain communities, including residential character. In recent years there has been phenomenal sporadic growth in the number of HMOs coinciding with significant increase in sales of social housing. The concentration of young people in rented housing has given rise to other social problems, resulting in the displacement of many households who were more familiar with the popularity of "digs" and this has exasperated the erosion of closely knit communities. Students who were lodging as part of a family home would have been much more aware of the concerns of older people and families, and hence more integrated into the community. This is an alternative provision of accommodation which should be positively encouraged, particularly with a large floating population.
6. The document seems to refer to problems that are common in HMO areas and suggest resolution through simple means e.g. gating of alleyways to prevent illegal dumping. It is important that the underlying cause of the problem is addressed in such instances as deterrents do not always necessarily produce the desired effect. To this end there is a need for a more robust and stringent approach from Belfast City Council.
7. At a recent seminar in relation to the South Belfast Sectoral Study, some participants recommended that the relevant agencies should consider putting pressure on landlords of empty properties rather than trying to meet demand single handed. In addition, residents seem to be in favour of a limitation to around 5% for the number of HMOs and would accept voluntary HMOs if the demand for such accommodation was matched by more robust governance. The subject plan should perhaps consider more community involvement in future planning for HMOs.
8. In addition, this document refers to the private renting of former NIHE stock but does not acknowledge that previously owned Housing Association stock might also contribute to the private rented sector. It is true that house sales may not be completely replenished by the number of new build in some cases. Therefore, to ensure a well balanced housing market it is important to consider the enforcement of "Article 40" so that a percentage of any new build housing developments should be made available to the social housing sector. Not all public land should be sold at market value and should be sold to the public sector only. Providers of social housing cannot continue to rely on windfall sites indefinitely.
9. Some of our members have highlighted concerns that areas with significant level of HMO properties are not included as HMO nodes. Perhaps this needs to be reviewed along with Category F, which addresses property conversion to flats. This could be detrimental in instances where it may be inappropriate to demolish dwellings that could otherwise be retained. . Where this is possible, the development of "room-by-room" letting could be encouraged alongside the traditional group letting, unless an adequate supply of low cost furnished self-contained accommodation can be developed. The role of specialist Housing Associations should be considered in the delivery of such strategies.

10. This subject plan does not recognise the equality impact for specific groups who generally find themselves in HMO type dwellings. The restrictions on availability of such accommodation will have a significant impact on young, singles and migrant workers.

11. NIFHA recognises that the success of a strategy can sometimes be dependant on a multi-agency approach in order to address the issue. We are more than happy to contribute and become involved in any joint working group that might be established in light of this document.

I trust that you will find these comments useful and should you have any queries regarding any of the points raised above, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink that reads "D. Henderson". The signature is written in a cursive style with a large, stylized initial "D".

DONALL HENDERSON
HOUSING POLICY AND RESEARCH MANAGER