

Response to Consultation

Date: 24 April 2008
Consultation: Housing Association Guide: Comments on Proposed Amendments to Parts 2, 3, 4, 5, 6 and 7.

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents 42 housing associations. This includes the 35 associations registered and regulated by the Department for Social Development (DSD). Collectively, these associations provide 30,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org

Background

Earlier this month the Federation commented on proposed changes to the Total Cost Indicators and Grant Rates. Those proposed changes will render it more difficult for associations to meet the government's output targets for social rented housing, even if the quality standards remained the same.

General Comments

- A. The proposed changes to Parts 2, 3, 4, 5, 6 and 7 of the Guide will set higher quality standards. NIFHA continues to support higher standards but reiterates that reasonable levels of subsidy are required to enable housing associations to set rents that can be afforded by tenants in low-paid employment. It is essential that the proposed changes to Part 1 of the Guide are considered alongside the changes to Parts 2, 3, 4, 5, 6 and 7.
- B. The DSD sent us the proposed changes on 27 March and imposed a deadline of 24 April 2008 for our comments. This period is unreasonably short and the problem is compounded by the large number and complexity of the proposed changes.

Specific Comments

NIFHA has major concerns about the following matters:

Part 2, Appendix 3, Annex P, last paragraph

In Existing Satisfactory Purchases it is difficult to accurately predict the cost of repairs and it is unreasonable to demand "firm" prices for submission with the application for project approval. In normal market conditions the time involved could mean that the property is sold to another purchaser.

Part 3, Appendix 1, paragraph 9.00 and related Annexes

NIFHA supports higher standards for sustainability but believes that the DSD should allow a more practical "lead in" time for making the Code for Sustainable Homes mandatory. Otherwise associations will have to re-do work that has already been carried out or is under way.

Our members and their consultants need more time to understand the content of the Code, make the necessary adjustments and appoint local accredited assessors.

We also need to understand in exactly what circumstances the alternative criterion of Ecohomes Very Good is acceptable.

We are concerned that it may not be cost-effective to achieve the Ecohomes Good standard in major rehabilitation and re-improvement schemes.

The DSD should now insert the implementation dates for the three stages of Energy Performance Certificates.

In Annex B, we believe the floor area 4p/3b dwellings needs to be 80-85 square metres.

The Federation is deeply concerned that the proposed rewording of section 4 on wheelchair housing still falls far short of what we believe is required and what the Chairman of the Housing Executive said in a letter to Habinteg Housing Association well over a year ago. We advocate a system where associations are enabled, without special approval on the part of the NIHE or Occupational Therapists, to provide a small proportion of new dwellings to the wheelchair design standard in the reasonable expectation that sufficient people needing wheelchair accommodation will apply.

Part 6

NIFHA continues to believe that Part 6 needs to be radically overhauled to:

- take account of the distinctive aspects of work to existing buildings (as opposed to merely referring to the arrangements for new construction in Part 4)
- make the procurement requirements more realistic and reasonable by substantially increasing the threshold costs at which competitive quotations and tenders are required
- in Appendix 3 (Adaptations), substantially increase the threshold costs for getting OT assessments, undertaking option appraisals and defining minor structural features.
- in form AW1, change the end of Part B to read “Estimated net cost of adaptation required”
- in form AW1, insert a box against certification 17 (to help insure this certification is not inadvertently missed)

Submitted on behalf of NIFHA by:



Christopher Williamson
Chief Executive