

**Date:** 16 June 2009

**Consultation:** Draft Housing Association Development Guide

## Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents 40 housing associations. This includes all 33 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](http://www.nifha.org)

## Background

NIFHA's members are responsible for about twenty five percent of all social housing stock in Northern Ireland. The present Housing Association Guide and any revisions to it are extremely important to our members' work. NIFHA is glad to have this opportunity to submit comments on the draft Housing Association Development Guide, which is intended to replace a substantial part of the present Housing Association Guide.

## General Comments

- A. The Federation welcomes the more user-friendly format of the Development Guide and the partnership approach used in its production.
- B. NIFHA notes that no significant change has been made to the content of the Guide (e.g. its rules, criteria, design standards).
- C. Given the considerable number of person-hours so far invested in the project by personnel from the DSD, NIHE, NIFHA and individual housing associations, it is sobering to consider the resource implications of the work that still needs to be done to:
  - incorporate important changes resulting from the Procurement Strategy and Housing Quality Indicators
  - add sections for maintenance, adaptations and miscellaneous building work
  - add sections on supported housing, finance, governance and possibly regulation and inspection.
- D. NIFHA acknowledges the advantages of a "living", web-based guide but insists that the DSD includes mechanisms by which housing associations and other users can easily, reliably and consistently:
  - see where changes have been made
  - obtain access to, and take copies of, archived versions of the Guide (This is very important for audit purposes)
  - see a "Notice Board" where immediate and/or temporary changes can easily be viewed.
- E. The transition from the old to the new Guide should be completed as quickly as possible to avoid inconvenience and possible confusion to users.

- F. The DSD needs to adhere to good practice in consulting NIFHA about changes to the Development Guide and the remaining parts of the old Guide. In particular, adequate time should be allowed to respond.
- G. In setting "go live" dates for various rules or sections of the Guide, the Department should take care to avoid nugatory work for associations and delay in delivering badly-needed homes.
- H. The Federation has always called for the Development Guide to clearly distinguish between mandatory and discretionary items so that problems do not occur during audit. We understand the position adopted by the draft Development Guide is as follows:
  - "Minimum Standards" are mandatory and an association that does not meet them must record its reasons. The DPG and/or DSD will then decide whether the justification for non-compliance is acceptable
  - "Additional Good Practice" is discretionary and associations will not be criticised by DPG or DSD if they decide not to follow it. (NIFHA notes that associations not adopting the additional good practice may miss some points when Housing Quality Indicators are made compulsory.)
- I. The Federation welcomes the Department's acceptance that certain types of scheme are less risky than others and the approval system should take this into account. We believe the embryonic "scheme banding" system in the Development Guide should be developed as quickly as possible to place more reliance on self-certification by associations, backed by retrospective checking.
- J. The needs of people needing supported housing or wheelchair housing are becoming increasingly diverse but the design criteria in the Development Guide are still rather rigid (though we acknowledge the useful enhancement recently allowed for one type of wheelchair housing). We look for more flexibility when the supported housing section is revised.
- K. Although the draft wording for approval of wheelchair standard housing is an improvement on the previous version, the Federation still feels it is unduly restrictive by requiring an OT's recommendation for specific individuals apart from "exceptional" circumstances. The words "exceptionally" and "may" should be removed or changed.
- L. Although the guidance on site registration has been improved, more clarity would be welcome on how the DPG will judge whether to renew a site registration and at exactly what point. A web-based spreadsheet of all sites registered would also be useful.
- M. The introduction of "smart" forms (e.g. which automatically do TCI calculations) and facilities for electronic submission of forms would be welcome.
- N. If this is not already available, a printer-friendly version of the Development Guide should be produced.

## **Specific Comments**

- 1. The requirement that an association must send DPG the brief it gave its property valuer represents a change in procedure which was not clearly identified and agreed by all the inter-agency working groups. NIFHA

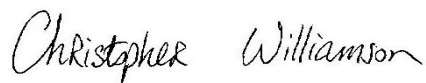
believes it should be regarded as an item to be audited rather than one to be included with scheme submissions. If our view is over-ruled then the relevant certifications should be removed from applications for scheme approval.

2. "Support in principle" must be confirmed by the area planners within NIHE, through issuing formal support as quickly as possible, so that associations can progress potential schemes. This is particularly important in light of the cost associated with site feasibility studies.
3. There should be an agreed structure between the DSD and NIHE for the bid process and formal release of the Social Housing Development Programme being tied to a specific date. This would provide more certainty for associations in relation to the submission of bids and identification of potential schemes.
4. Consideration should be given to including the Code for Sustainable Homes as part of the site appraisal. This could be presented as an additional item in the table *"Identify Cost Implications of Particular Physical Site Features"*
5. NIFHA recommends the following amendments in relation to wheelchair user housing:
  - Revise the section on bedroom design to enable wheelchair users to access all rooms.
  - There is reference (criterion 10) to wheelchair accessible entrance level WCs in 3 bedroom houses and compliance with at least Part M for 2 bedroom houses. A DSD note makes these standards applicable to 2 bedroom dwellings. This has major implications and we would recommend that it should be in the "Additional DSD Requirements" section of the main text.
  - Clear opening for doorways to be increased to 900mm minimum with 925 mm required for access
  - Entrance halls should be 1500 mm wide
6. Under the Design Section, "Off the Shelf Purchases" makes reference to two area bands above the DSD standard (not two area bands above or below). As private housing space standards are generally below those of the DSD, associations need clarification on this issue as it could effectively rule out this form of procurement.
7. The Guide reads "Fitting out of en-suite bathrooms and utility room provision will be treated as non-qualifying costs." The Working Group had discussed whether construction costs for non-qualifying rooms would be taken into account and if so how they would be calculated. This quote is unclear with regard the cost of constructing a utility room and/or the cost of providing fittings in it.
8. Through the review process, minimum furniture requirements and dimensions were set out for each room. These were prepared using the NHF space standards as guidelines but the draft Guide states they are minimum standards. NIFHA considers that the table at least needs to specify required and desirable for the final draft. Furthermore, the requirement to show radiators is included in the living and dining room tables but not in the bedrooms. This should be added for uniformity in all living spaces.

9. NIFHA accepts the principle that the Guide should include links to external websites maintained by other parties but we believe that tables produced and maintained by the DSD should not be excluded from the overall document. These are extremely relevant to design e.g. Lifetime Homes, furniture layout. Indeed, the link between Lifetime Homes and DSD requirements was discussed at length within the Working Group and it would therefore be useful to specify additional DSD requirements in the main text.
10. The table of additional DSD requirements to Lifetime Homes should match the equivalent table. The main text says DSD requires wheelchair turning in kitchens but this is not included in the table.
11. DSD staff had been referred, by one of our members, to a database which replaces the HAPM Component Life Manual called "The Building LifePlans Construction Durability Database" (see [www.componentlife.com](http://www.componentlife.com)). HAPM, as referred to in the document, does not exist any longer. However this new database may be worth considering within the context of the new Housing Association Development Guide.
12. There is a typographical error near the end of paragraph 2.24 – Landscaping. "Environmental impact should be addressed in the use of both soft and hard landscaping within the *curtilage* of dwellings to foster responsibility for landscaping by the residents."
13. The Abbeyfield model of accommodation and the Abbeyfield Standard should be included in 2.7.

The Federation trusts you will find these comments useful and looks forward to continuing dialogue on revision of the rest of the Housing Association Guide.

**Submitted on behalf of NIFHA by:**



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