

Date: 3rd July 2012
Consultation: Departmental Policy on Building Bungalows

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents registered and non-registered housing associations in Northern Ireland. Collectively, our members provide around 36,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org

NIFHA appreciates the opportunity to comment on the Department for Social Development's review of policy for building bungalows and wishes to make a number of comments.

The provision of bungalow accommodation has long been recognised as a successful and popular housing solution for older people, people with mobility conditions and those with significant disabilities. There are, however, only a small number of wheelchair user bungalows, within the total bungalow stock. These bungalows have in the main been provided to larger space standards and meet a different specification than the vast majority general needs bungalows.

In the past much of the older types of this accommodation were not wheelchair accessible but standards have improved and the more recent development of older peoples' dwellings and mobility accommodation has been shown to be more flexible in meeting tenants' needs. However, it is important that accommodation is built to be as flexible and adaptable as possible to ensure the widest possible range of tenants' needs can be met.

Bungalow accommodation should be constructed to meet the higher wheelchair user standards, but in reality, only a small number of this type of accommodation actually meets those standards. Adequate future provision of this type of accommodation needs to be made, which is integrated throughout accessible developments within Northern Ireland. This would enable the housing needs and hence human rights of disabled people to be met. NIFHA suggests that an analysis of the unmet housing need for this type of accommodation is undertaken, the results of which should be applied to the development programme. This would ensure that new housing is provided which responds to the needs of people on the housing waiting list and helps to reduce the current deficit for properties of this kind.

The important recent research which has analysed the number of existing and new wheelchair dwellings in Northern Ireland emphasises the scale of this challenge. The research indicates that there are estimated to be 25,627 wheelchair users [Source: Musgrave Park Regional Disablement Service] in

Northern Ireland. This excludes several thousand occasional and temporary wheelchair users and an unquantifiable number of people who purchase their wheelchairs privately. During the period 2009 to 2010 a further 2,282 people became wheelchair users.

The provision of wheelchair user bungalows has not been a high priority for DSD and in recent years there has been limited provision of this type of accommodation. This is usually on an individual needs basis, through a number of Housing Associations. NIFHA agrees with the suggestion in the consultation document that a lack of suitable elderly accommodation such as bungalows could mean that many elderly tenants may be unable to move from their larger family homes into smaller accommodation which may be more suited to their long term needs.

The consultation document indicates that significant numbers of wheelchair bungalows are occupied by tenants who do not require wheelchairs and it assumes therefore that the need for this type of accommodation could be met from our existing housing stock. NIFHA suggests that the tenants in each of the wheelchair bungalows would have to have their individual housing needs assessed before using these statistics as the basis for recommendations for the future. The database shows that a significant number of the tenants in these dwelling types in the Housing Association stock are elderly and therefore there is the potential for greater accessibility and mobility needs, for these tenants, either at present or at some time in the future.

NIFHA has concerns regarding the two proposals indicated in the section named "Re lets of adapted or special needs housing". The proposal to introduce a shorter or needs based tenancy would, we believe, be discriminatory; it seems to be inequitable to ask people with disabilities to agree to different types of tenancies especially with a reduced security of tenure than those given to tenants in general needs accommodation.

NIFHA fundamentally disagrees with the second proposal to review the award criteria for disabled adaptation grants with a view to reducing the 100% funding. We consider these types of grants to be a vital mechanism that enables people with disabilities to live in their homes no matter what the tenure is. The funding of these adaptations across all tenures ensures equitable and consistent provision of these type of works for people with disabilities.

Response to the Recommendations within the Report

With respect to the seven recommendations within the report our response is as below:

- 1. The current policy of providing bungalows on a needs basis remains sound. However, with in excess of 20,000 wheelchair bungalows of undetermined occupation, it is crucial that social landlords identify those tenants who no longer need them. These bungalows are a particularly important resource that requires expert management to meet current and future demand.**

As indicated above the total wheelchair user housing provision is limited and is at a level far less than the 20,000 noted in this recommendation. It is accepted that housing providers should identify accommodation that meets this standard and when re-allocating properties ensure that this is done in a way that maximises the use of those homes by those who could benefit from them most.

- 2. Consideration should be given to removing all bungalows from the House Sales Scheme. This would safeguard these much sought after dwellings for social housing tenants.**

This is a sensitive issue and would need to be viewed in the light of equality and disability discrimination implications. In the past the failure of a Housing Association to sell a 3 bedroom bungalow to a tenant with disabilities was deemed to be discrimination when tested in court.

- 3. An urgent review of how housing stock are managed should be carried out by both the Housing Executive and the Housing Association movement.**

We agree that both the Housing Executive and the Housing Association movement must make best use of their housing stock and maintain as far as possible clear records of its composition and use. NIFHA and our members would be happy to contribute to any review of how housing stock is used, which we suggest would be best co-ordinated by NIHE as our strategic partners.

- 4. The Housing Executive must accelerate their plans for the “Accessible Housing Register” as a matter of urgency.**

We agree that it would be beneficial to develop an Accessible Housing Register and continue to recommend that the Common Selection Scheme should be improved to help clearly identify those applicants for

social housing who require wheelchair user housing and other types of adapted housing.

5. Thought needs to be given to “shorter term” of possibly even “needs based” tenancies for wheelchair designed tenancies.

We feel it would be discriminatory to ask people with disabilities to agree to different types of tenancies than those used by others being allocated tenancies. Realistically this means that because of their disability they would have less security of tenure than people allocated to general needs dwellings.

6. The Social Housing Movement should be encouraged or required to use their rights under legislation to move tenants from wheelchair dwellings they no longer need.

We suggest that landlords continue to apply, with care, appropriate clauses in tenancy agreements, to encourage remaining occupiers of wheelchair user housing to voluntarily relocate to other suitable properties if disabled people cease to occupy wheelchair dwellings. There are many examples of sound housing management reasons, such as disability or age, which may justify remaining members of the household not relocating.

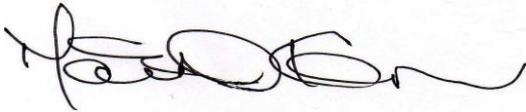
7. Consideration needs to be given to the issue of disabled adaptations. While I am not questioning that some disabled adaptations are very necessary, the fact that the Housing Executive state that they don't keep any kind of records in relation to the accessibility of their properties means that they could potentially be adapting a property when a suitable property already exists in the vicinity. The Housing Executive and Housing Associations need to, as a matter of urgency, create a register of properties that have been adapted. This would allow the identification of adapted dwellings for transfer to suitable tenants on the waiting list.

Whilst we accept it is good asset management for landlords to be aware of adapted property, unless adaptations are significant it is not considered necessary to seek to move people to benefit from them. In practice, it would prove very difficult to match within a reasonable timeframe, people with particular disabilities and appropriately adapted properties. It is important to continue to develop new housing to high accessibility standards, providing where appropriate, lifetime home standards as well as ensuring that there is an adequate and continuing supply of wheelchair user bungalows.

NIHE and NIFHA have been working for some time on a comprehensive property database. NIFHA have provided NIHE with significant property details including those that are wheelchair accessible, built to mobility standards with a ground floor shower and toilet facilities. The majority of the properties have now been geo referenced and may be viewed on the Geographic Information System.

I Hope you find our comments useful. If you require further information on any of the points raised in this response please do not hesitate to contact me.

Submitted on behalf of NIFHA by:

A handwritten signature in black ink, appearing to read 'Maire Kerr', written in a cursive style.

Maire Kerr – Housing Policy & Research Manager