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**Northern Ireland
Rural Women's Network**

**Northern Ireland
Rural Women's Network (NIRWN's)
Response To**

**The Draft Regeneration
and Housing Bill**

DSD

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1.0 Introduction

1.1 Northern Ireland Rural Women's Network (NIRWN) is a regional network established to articulate the voices of women in rural areas. It is jointly funded by the Department of Agriculture and Rural Development (DARD) and the Department for Social Development (DSD).

1.2 NIRWN has six key objectives:

- Increasing the voice of rural women through giving them a voice at Policy level
- Playing an advocacy and lobbying role on behalf of rural women
- Capacity Building and Group Development for rural women
- Encouraging women in decision-making and providing representation for rural women
- Information and networking opportunities for rural women
- Working within the Women's Centres Regional Partnership to give a voice to rural women's centres

1.3 NIRWN welcomes the opportunity to comment on DSD 'The Draft Regeneration and Housing Bill' consultation document. Our comments in relation to specific issues are set out below.

Response to Consultation

2.0 Part 1 Regeneration

2.1 Review of Public Administration

The consultation proposes the transfer of powers to the councils in 2011, but it is not yet clear that the changes under the Review of Public Administration ('RPA') will take place within the May 2011 deadline. NIRWN recommends that the consultation and Bill provide for implementation concurrent to or after the general RPA changes are in place, rather than specifying a concrete, and possibly unrealisable, timeframe.

The Department must ensure initial decisions made are based on rigorous systems in place from the start of the transfer. The Department should be cognisant of the potential lack of expertise in the councils in relation to many regeneration and housing issues. It is essential that the transfer or recruitment of experienced staff to councils be considered in full to ensure the proper implementation and optimal delivery of the powers and responsibilities transferred to the councils by the Bill.

NIRWN advocates that capacity building for all those to be involved should begin as soon as practical to ensure that the skills and understanding of all relevant issues are in place for both council officers and councillors.

2.2 Rural Social Need

In the background section of Part 1 the consultation document states:

Historically, the Department also used its powers to take forward regeneration in rural settlements as well as urban areas. However, with devolution responsibility for funding such work in rural settlements was vested in the Department for Agriculture and Rural Development. Under RPA the Department is transferring responsibility to local councils for area based regeneration and the budgets associated with this area of work.

The Department will also be conferring social need powers to allow them to discharge this role and Councils will be able to use these powers to work in both urban and rural areas. However, funding for rural areas will still be the responsibility of the Department of Agriculture and Rural Development.¹

NIRWN would dispute the notion that social need, poverty, deprivation, housing issues and regeneration are simply urban phenomenon. DSD must acknowledge that new council structures such as those proposed will be representing and delivering programmes for their council area, inclusive of rural areas. If DSD are the Department for **Social Development** for all of Northern Ireland's citizens, NIRWN asks:

'Is it the Department's message that rural people do not matter and have no social development needs?'

If this really is the case and the issue is finance, DSD must develop a clear understanding with DARD and the new council structures to ensure provision for rural people so that the social need and social development of rural citizens in Northern Ireland is not ignored.

NIRWN are stating very clearly that; equitable delivery of social development remains DSD's ultimate responsibility regardless of which Departments they feel can supplement the financing of this. DSD need to coordinate this at Department and Executive level and not leave this for new council structures to try to negotiate at the expense and further marginalisation of rural dwellers.

2.3 Equity of Service Provision & Delivery

DSD and new council structures need to have mechanisms in place before powers are conferred to ensure full integration of policy across Northern Ireland. It is imperative that we do not create a postcode lottery; people should not be disadvantaged through living in one council area rather than another on some of the major aspects of this Bill. This is particularly

¹ <http://www.dsdni.gov.uk/draft-regeneration-housing-bill-consultation.pdf>

important with regard to dealing with the energy efficiency of homes as well as the unfitness of homes. Schemes should be developed based on best practice and copied throughout Northern Ireland to ensure that we do not develop a spatially unfair system.

NIRWN argues that the transfer of powers and responsibilities creates the need for enhanced accountability for the future actions of the councils and the Draft Bill does not in this version, legislate for this.

2.4 Planning

Planning Policy is a powerful tool. Planning shapes the places where people live and work and the country we live in. It plays a key role in supporting the Government's wider economic, social and environmental objectives and for sustainable communities.

NIRWN recognises that gender is not a common consideration in planning activities; however we believe that given the many gendered patterns in the use of space, that the current planning reform process should consider the fact that men and women use space differently. It is argued that the gender blind approach to planning policy has resulted in built environments that often disadvantage women and do not meet their needs². The integration of gender into spatial policy-making would result in a more sustainable, equal and accessible built environment for all members of society³.

In order for gender considerations to be incorporated into planning practices; it is necessary for it to be explicitly considered as part of the current review of planning policy. Far more needs to be done to promote the need to think about gender issues in planning related policy and practice and it needs to be

² Greed, C. (2005) An investigation of the effectiveness of gender mainstreaming as a means of integrating the needs of women and men into spatial planning in the United Kingdom. *Progress in Planning*, 64, 243–321

³ Greed, C. (2005) An investigation of the effectiveness of gender mainstreaming as a means of integrating the needs of women and men into spatial planning in the United Kingdom. *Progress in Planning*, 64, 243–321

recognised as a legal requirement for all public bodies⁴, including new council structures.

NIRWN welcomes the transfer of many elements of the planning service to new councils. However it is pertinent to ensure that there are appropriate safeguards in place to ensure that a consistent and equitable approach to future planning decisions is implemented across the councils.

2.5 The Rural White Paper

The Rural White Paper for Northern Ireland as proposed by DARD had engaged rural stakeholders to develop reports for the Minister on 5 key sub areas as agreed by the Executive: Vision, People, Places, Services and Governance. The draft sub group reports were presented to Minister Gildernew on January 27th.

NIRWN recommends that DSD and the new council structures utilise the proposed 'Rural Forum' (see below) detailed in the 'Governance' sub group draft report as a potential way to engage meaningfully with rural dwellers on their experiences of regeneration and housing and developing and maintaining a relevant Bill into the future.

'Rural Forum: For the purpose of this paper the term 'Rural Forum' is used to describe some form of body to facilitate the bridging of 'bottom up' and 'top down' approaches. To be effective this Forum would require a statutory remit to be consulted with and on policies that may impact on rural. It is important that the Forum reflects the broad rural affairs agenda making connections between rural people, the environment and land. It is also important that the Forum brings together the community, voluntary, private and public sector interests of rural development. The Forum should be gender balanced (taking account of CEDAW⁵ and UN Security Resolution 1325⁶), and reflect the

⁴ Burgees G (2009) Planning and the gender equality duty – why does gender matter?, University of Cambridge

⁵ UN Committee on the Elimination of Discrimination Against Women, <http://www.un.org/womenwatch/daw/cedaw/recommendations>

multiplicity of rural society in NI. It should act as a sounding board and be recognised as a conduit for rural views and contribute to the direction, leadership and co-ordination of the rural affairs agenda. It should have the statutory ability to be represented on community planning partnerships'.⁷

⁶ <http://www.peacewomen.org/un/sc/1325.html> UNSC 1325 emphasises the distinct position of women in conflict and post conflict situations. It calls on member states to act in several areas, including the promotion of women in decision making institutions

⁷ Final Governance sub Group Stakeholder Report for the Rural White Paper (Jan 2010) p20

3.0 Part 2 Housing

3.1 Rural Housing

Housing is a rural issue despite DSD's assertion in this paper that *funding for rural areas will still be the responsibility of the Department of Agriculture and Rural Development*.⁸

35% of NI population live in rural areas. Rural living has several specific issues. These include:

- Isolation
- "Hidden" need - where individuals with the same needs don't get together to make themselves heard
- A strong attachment to the area people were brought up in
- Difficulty in providing a good standard of service on a small scale
- Lower "institutional capacity" - for example, smaller schools and hospitals

The main rural housing problems include:

- Affordability
- The impact of PPS14 - legislation which makes it difficult to get planning permission for new homes in rural areas
- Increasing waiting lists for housing
- Not enough new social housing
- Higher than average levels of unfit housing⁹

There were 5553 households on NIHE waiting lists for rural areas. Of these 2616 were deemed in 'housing stress'. This represents 12.8% of all those in housing stress (i.e. rural and urban) and includes 1073 homeless households seeking homes in rural areas. A key aim is to ensure that new build social housing meets the required needs and targets. A 2006 House Condition Survey¹⁰ showed that 5.4% (11,300) rural dwellings (usually privately owned) were unfit for habitation compared to 2.6% in urban areas.

NIRWN argues that housing has an impact far beyond that of 'just' providing accommodation – it brings social, economic and environmental benefits and

⁸ <http://www.dsdni.gov.uk/draft-regeneration-housing-bill-consultation.pdf>

⁹ http://www.nihe.gov.uk/index/sp_home/strategies/rural-2.htm

¹⁰ http://www.nihe.gov.uk/2009_house_condition_survey_preliminary_findings_feb_2010.pdf

has a spin off effect on matters such as health, education, transport, employment and land use¹¹. Housing helps strengthen local communities and contributes to 'rural development'. Village activities and services need customers, users and participants. As the number of full time residents using local services and taking part in social activities declines; the viability of the village shop, post office, church, bus service, school, pub, sports clubs are all undermined. The break up of family and social networks when young people are forced to move away leaves older people increasingly dependent on services provided by the public sector¹². Current efforts to diversify being made by the farming industry will be pointless if employers cannot attract local staff, especially in the recreation and leisure industries where low and seasonal incomes prevail.¹³

Rural need is often hidden; where need is apparent it is dispersed and small in scale, making it more difficult to allocate expenditure when compared to urban need. Due to the smaller scale of rural housing, rural social/affordable new build does not benefit from economies of scale and can, therefore, be higher cost than its urban equivalent. Similarly, it is more difficult to provide homeless temporary accommodation in rural areas.

NIRWN is disappointed that the Draft Bill does not stipulate how DSD intend to legislate for and address rural housing issues and this must be rectified, i.e. rural citizens are not to be disadvantaged and further marginalised as a result of this Bill.

3.2 Role of NIHE

NIHE currently owns around 15,000 social rented homes in rural areas. They also have a role in identifying where new social and affordable housing is needed. NIHE provides advice and information for anyone wishing to privately rent or own a home in rural areas. NIRWN believes these are vital service provisions for rural people that must be retained.

¹¹ Final Places sub Group Stakeholder Report for the Rural White Paper (Jan 2010)

¹² <http://www.ruralhousing.org.uk/webpages/TheProblem.html>

¹³ <http://www.ruralhousing.org.uk/webpages/TheProblem.html>

NIHE recognises that there are particular problems in rural areas.¹⁴ For example, they acknowledge that those interested in rural housing do not always register with them, as they may feel rural housing opportunities are limited. To help address this potential hidden need, or "latent demand", NIHE carry out housing needs surveys in selected rural areas each year.

NIHE has identified areas where there is felt to be a latent demand for rural housing (Stranocum, Lisnagunogue, Lislea, Loughgall, Burnfoot, Swatragh, Dungiven, Ballyeaston, Knockloughrim, Gulladuff and Tobermore) and Rural Priority Areas. Rural Priority Areas are designated as part of NIHE strategy to tackle rural unfit and disrepair in the private sector by targeting grant aid to those areas in greatest need¹⁵. Rural Priority Areas are areas which suffer from poor housing, isolation and economic disadvantage.

There are 10 wards currently identified by NIHE as Rural Priority Areas where enhanced grant aid may be available in certain circumstances:

- Belcoo and Garrison (Fermanagh)
- Belleek and Boa (Fermanagh)
- Derrygonnelly (Fermanagh)
- Derrylin (Fermanagh)
- Newtownbutler (Fermanagh)
- Rosslea (Fermanagh)
- Bonamargy & Rathlin (Ballymena)
- Glendun (Ballymena)
- Newtown Stewart (Strabane)
- Pomeroy (Cookstown)

NIRWN is pleased that NIHE has a clear understanding of rural housing needs and difficulties and are actively researching and discussing with key stakeholders the most effective methods of addressing these. NIRWN is concerned that DSD in this Bill have not made it clear whether this role will remain with NIHE or, be transferred to councils. If this role is to be transferred; is the developed learning; key areas identified etc. to be passed on to councils or do these communities continue to suffer from poor housing, isolation and economic disadvantage. NIRWN would like clarity on this issue.

¹⁴ http://www.nihe.gov.uk/index/yn_home/rural_issues/new_homes.htm

¹⁵ http://www.nihe.gov.uk/index/yn_home/rural_issues/improving_properties/priority_areas.htm

3.3 Fuel Poverty

People in rural areas are subject to many of the same causes of fuel poverty as their urban counterparts; they also face some additional rural challenges:

- Rates of housing unfitness are higher in rural areas than in urban areas¹⁶
- In rural areas of Northern Ireland, 33% of pensioners live in households experiencing income poverty¹⁷
- Older homeowners are finding it difficult to cope with the rising cost of living, particularly energy costs
- The fear of fuel poverty is causing older homeowners to behave in ways which are placing them at risk
- In Northern Ireland, the highest prevalence of fuel poverty is found among older people living alone¹⁸
- Very high rates of fuel poverty are experienced by both households with low income and single pensioners¹⁹
- A culture of self-sufficiency dominates in rural areas.

Fuel poverty in Northern Ireland is more than twice as common as anywhere in England²⁰. This situation has been exacerbated by cumulative energy increases:

Natural Gas increased by 28%²¹

- Electricity supplied by NIE has increased by 33%²²
- Oil has increased by 96%²³

¹⁶ NIHE - Rural Homes and People 2006

¹⁷ Central Anti-Poverty Unit. Lifetime Opportunities – Government’s Anti-Poverty and Social Exclusion Strategy for Northern Ireland. Belfast: Office of the First Minister and the Deputy First Minister; 2007.

¹⁸ All-Ireland policy paper on fuel poverty and health, Institute of Public Health in Ireland, December 2007

¹⁹ <http://www.poverty.org.uk/i80/index.shtml>, 2008

²⁰ Northern Ireland House Condition Survey, NIHE 2004

²¹ Based on Phoenix Natural Gas tariff, 2008

²² NIE, 2008

²³ Tackling Fuel Poverty: Facing Uncertainty, Northern Ireland Fuel Advisory Group, 2008

With global indicators suggesting that energy will increase in price over future years the case becomes stronger for not maintaining but increasing spend on programmes that affect the most vulnerable in our community. The estimated one third of fuel poor households living in rural areas will require innovative solutions, as many homes categorised as hard to heat are found in rural areas, either because of the reliance on oil, solid wall construction, and/or general age of houses in rural areas.

NIRWN wants assurances that this Bill will acknowledge the specific Fuel Poverty challenges rural people experience and that DSD does not propose to abdicate responsibility for energy efficiency in rural areas to other Departments. If the Bill is formalising the local Council 'powers to promote domestic energy efficiency in their districts; including powers to deliver advice and information, provide funding or other assistance and produce action plans to improve domestic energy efficiency'; NIRWN would like explicit mention of councils' responsibility to redress the equality balance in regard to fuel poverty for rural people.

4.0 Additional Cross-Cutting Considerations

4.1 Public Engagement

Regarding effective consultation it is essential that there are clear regulations on what this should entail. Consultation findings should detail objections and how they have been addressed. It should also demonstrate that the consultation process considers section 75 groups and good relations.

NIRWN would need assurances that this consultation process would actively seek to engage with all consumers and take account of the diversity of our population by ensuring that consumer panels represent the multiplicity of Northern Irish consumers; the different needs and requirements of rural and urban dwellers and the S75²⁴ demographics of the area to ensure the voice of those most marginalised in our communities are heard and their needs provided for. As suggested in the previous section on a Rural Forum NIRWN argues that any consultation group should be gender balanced (taking account of CEDAW²⁵ and UN Security Resolution 1325²⁶), and reflect the multiplicity of rural society in NI.

NIRWN believes it is imperative that for the Regeneration and Housing Bill to be effective; monitoring and evaluation of the Bill must include consumers. DSD, NIHE and new local council structures must establish a mechanism for actively engaging with the public.

4.2 Monitoring and Evaluation

NIRWN argues that this Bill will require constant updating and monitoring to maintain cohesive, improved delivery for all Northern Ireland's citizens but particularly to ensure that those most marginalised do not suffer further inequality due to the council area they live in. NIRWN would ask that the

²⁴ Section 75 of the Northern Ireland Act 1998

²⁵ UN Committee on the Elimination of Discrimination Against Women, <http://www.un.org/womenwatch/daw/cedaw/recommendations>

²⁶ <http://www.peacewomen.org/un/sc/1325.html> UNSC 1325 emphasises the distinct position of women in conflict and post conflict situations. It calls on member states to act in several areas, including the promotion of women in decision making institutions

Draft Bill states very clearly how DSD proposes to ensure equitable delivery across the region once powers have been conferred to councils.

NIRWN would argue this role must remain with DSD.

4.3 Role of the Community Voluntary Sector

New Council structures working with the voluntary and community sector will produce improved outcomes within a number of areas of the proposed conferred powers, including both the practical delivery of programmes (for example energy efficiency programmes) and working with such groups to develop consensus around proposals (e.g. for proposed schemes).

NIRWN believes that powers to fund NGOs to deliver work on behalf of the council is vital but so is promoting the understanding within councils on why, and how, working with NGOs is of significant benefit to the council; delivering stronger and more supported economic, social and environmental outcomes.

4.4 Age

The rural population is aging with 39% of pensioners living in rural Northern Ireland and 41% of farmers aged 55 and over²⁷. Our population is ageing and evidence indicates that older people in Northern Ireland face many barriers that inhibit their quality of life and equitable participation in Northern Irish society. Some of these barriers have been highlighted by OFMDFM and include; health care, poverty, *social exclusion*, fear of crime, *housing* and transport²⁸.

NIRWN would argue that often these barriers are further exacerbated by gender and geography and research indicates that a higher percentage of older people in Northern Ireland will be older women²⁹. Research shows that where a person lives has a bearing on exclusion as, for example, older

²⁷ Age Concern/Help the Aged

²⁸ OFMDFM (2009) A Commissioner for Older People in Northern Ireland: A Strong Independent Voice for Older People p 21

²⁹ OFMDFM (2005) Ageing in an Inclusive Society, p 34

women living in remoter rural areas experience some of the highest rates of exclusion as do older people living in disadvantaged urban housing estates³⁰.

4.5 Emergency Housing

Violence in the home can also have significant practical implications, including housing. During 2003-04, approximately 700 households which presented as homeless to the Northern Ireland Housing Executive (NIHE) stated domestic violence as the cause of the homelessness³¹.

Women with no recourse to public funds (NRPF) are being denied access to safe refuge accommodation because refuges are dependent on government funding. These women are not eligible for benefits, such as housing benefit whilst in refuge, and prohibited from employment. As such, non-UK national victims of domestic and sexual violence are essentially trapped, faced with an impossible and inhumane choice between destitution and a life of violence and abuse. In these cases women who have experienced domestic and sexual violence are left financially dependent for their survival on their abusers whether they be their partner, family member/s, employer or trafficker³².

More women with NRPF escaping domestic violence will face homelessness, sleeping rough, hardship and complete poverty. They are also at risk of losing their children as they have no means to support them³³. *Women's Experience of Violence: Mapping Experiences and Responses*³⁴ noted that the scale of violence against the non-national population of women living in Northern Ireland highlights their isolation and difficulties in accessing services and support; including emergency housing.

³⁰ Walker, A. (2003) *Social Exclusion and Growing Older*, Ageing in an Inclusive Society Conference, Europa Hotel, 28th March 2003.

³¹ Northern Ireland Housing Executive, Homelessness Statistics 2003-2004.

³² 'No Home from Home' - Homelessness for People with No or Limited Access to Public Funds
Roisin Devlin and Sorcha McKenna, NIHRC, September 2009

³³ 'Women with no or limited recourse to Public funds' Women's Aid Federation NI, October 2007

³⁴ 'Women's Experience of Violence: Mapping Experiences and Responses- A Pilot Study' Anne Mc Murray on behalf of WCRP, Dec 2009.

NIRWN seeks clarification on how DSD will ensure that women with no recourse to public funds, who have experienced domestic and sexual violence, have access to emergency accommodation and support in Northern Ireland, and that this is properly resourced?

4.6 Cross Departmental Issues

NIRWN welcomes DSD's consideration of transferring responsibility to local councils to enable councils to tackle disadvantage at a local level.

DSD is not however the only department with a remit for: addressing disadvantage; undertaking community development; environmental improvements; regeneration; housing responsibilities.

DSD needs to lead all our government departments to work together to deliver the Regeneration and Housing and information that will meet the current needs of NI citizens, particularly those in rural areas. It is not acceptable for DSD to abdicate responsibility for social issues³⁵ of rural people to other departments. DSD must take responsibility for coordinating the transfer of budgets from all relevant departments for regeneration and housing and ensure councils are equipped with the capacity and knowledge of how to manage these budgets effectively for all of Northern Ireland's citizens. DSD must retain the capacity to monitor budget spending across NI to ensure equity for all citizens.

4.7 Consumer Voice

NIRWN believes that the future RPA structures, in particular the local council clusters, will potentially have the greatest impact on those areas outside of Belfast and Derry. It is with this in mind that we believe that whilst the new responsibilities of local councils has great potential for positive impact in relation to delivery of effective solutions for rural people; it may create difficulties when people aren't satisfied or, experience difficulties with their provision.

³⁵ <http://www.dsdni.gov.uk/draft-regeneration-housing-bill-consultation.pdf> p 11

NIRWN would like DSD to have mechanisms in place to ensure that rural people know who ultimately has final responsibility for their provision and to whom they need to take their concerns if they require their provision reviewed. It would be entirely unacceptable if individuals had their issues passed from local council to DSD; back and forth with neither prepared to take responsibility. This becomes more complex with potential for difficulty when we consider the role of NIHE and their remit for provision too. Rural people need to know; who to approach regarding their regeneration and housing issues and who ultimately will take responsibility for addressing those issues.

5.0 Summary

NIRWN underlines the need for more clarity, in both the consultation and the Bill, when making changes to existing regeneration and housing policy. In many instances it is unclear who will have final responsibility for delivery in the future; who will monitor that delivery is: effective, efficient and equitable and who will be responsible for the delivery of Regeneration and Housing for rural citizens.