

April 22nd, 2022

## **Notice Of Meeting**

You are requested to attend the meeting to be held on **Wednesday, 27th April 2022 at 7:00 pm** in **via Zoom**.

# Agenda

## Virtual Meeting Guidance

[Guidance for virtual Council meetings.pdf](#)

*Not included*

## Agenda

[C 27.04.2022 Agenda.pdf](#)

*Page 1*

1. Prayer
2. Apologies
3. Declarations of Interest
4. Mayor's Business
5. Mayor and Deputy Mayor Engagements for the Month (Copy attached)

[5. April 2022.pdf](#)

*Page 5*

6. Minutes of Council Meeting held on 30 March 2022 (Copy attached)

[C 30.03.2022 Minutes.pdf](#)

*Not included*

[C 30.03.2022 Minutes PM.pdf](#)

*Not included*

7. Minutes of Committees

- 7.1 Planning Committee dated 5 April 2022 (Copy attached)

[Minutes PC.05.04.22.pdf](#)

*Not included*

[Minutes PC.05.04.22 PM.pdf](#)

*Not included*

- 7.2 Environment Committee dated 6 April 2022 (Copy attached)

[EC.06.04.22 Minutes.pdf](#)

*Not included*

[EC.06.04.22 MinutesPM.pdf](#)

*Not included*

- 7.3 Regeneration and Development Committee dated 7 April 2022 (Copy attached)**
- [RDC 07.04.22 Minutes.pdf](#) *Not included*
  - [RDC 07.04.2022 MinutesPM.pdf](#) *Not included*
- 7.4 Corporate Services Committee dated 12 April 2022 (Copy attached)**
- [CS12.04.2022 Minutes final.pdf](#) *Not included*
  - [CS12.04.2022 Minutes final PM.pdf](#) *Not included*
- 7.5 Community and Wellbeing Committee dated 13 April 2022**
- Copy attached
- [13.04.2022 CWB Minutes.pdf](#) *Not included*
  - [13.04.2022 CWB Minutes PM.pdf](#) *Not included*
- 7.5.1. Arising from Item 21 - Queens Platinum Jubilee Grants**
- Report attached
- [7.5.1 Queens Platinum Jubilee Grants - April.pdf](#) *Page 8*
- 8. Resolutions**
- 8.1. Newry Mourne & Down District Council – Increased Energy Costs**
- Correspondence attached
- [8.1. Resolution - nmd energy.pdf](#) *Page 14*
- 8.2. Newry Mourne & District Council – Opposed to Planned Changes to Red Diesel**
- Correspondence attached
- [8.2. Resolution - nmd red diesel.pdf](#) *Page 15*
- 8.3. Fermanagh & Omagh District Council - Continuing**

## **Healthcare Provision**

Correspondence attached

[8.3. Resolution - Fermanagh DoH.pdf](#)

Page 17

### **8.4. Fermanagh & Omagh District Council - Independent Review of all deaths with potential issues around domestic violence**

Correspondence attached

[8.4. Resolution - Fermanagh Dom Violence.pdf](#)

Page 18

### **8.5. Fermanagh & Omagh District Council - Recruiting staff within the hospitality and tourism sectors**

Correspondence attached

[8.5. Resolution - Fermanagh Staff in Hospitality.pdf](#)

Page 20

## **9. Request for Deputation from Padel Tennis**

Report attached

[9. Deputation Request Report - Padel Tennis C 27.4.22.pdf](#)

Page 21

### **9.1. Delegated Authority – Consultation on PRN and PERN**

Report attached

[9.1. Delegated Authority - Consultation on PRN and PERN.pdf](#)

Page 22

## **10. Grant of Entertainment Licence**

Report attached

[10. Grant of Entertainment Licence DL.pdf](#)

Page 24

## **11. Invitation from Irish Guards to Ceremony at Windsor Castle**

Report attached

[11. Invitation from Irish Guards to Ceremony in Windsor.pdf](#)

Page 25

## **12. Request to light up Council buildings for Foster Care Fortnight**

Report attached

[12. Request to light up Council buildings for Foster Care Fortnight.pdf](#)

Page 26

## **13. Community Festival Funding**

Report attached

[13. Council Community Festival Funding 2022-23.pdf](#)

Page 28

## **14. Sealing Documents**

## **15. Transfer of Rights of Burial**

## **16. Notice of Motion Status Report (Report attached)**

Report attached

[16. NOM Covering Report.pdf](#)

Page 35

[16. NOM Tracker April 2022.pdf](#)

Page 36

## **17. Notices of Motion**

### **17.1 Notice of Motion submitted by Councillors Adair and Edmund**

That Council Task Officers to work with the woodland trust to develop and enhance community trails at Carrowood, Carrowdore as a potential peace plus project.

### **17.2. Notice of Motion submitted by Councillors P Smith, Cooper and Cummings**

That Council facilitates the Comber TT Soapbox Race by helping to organize insurance for the event.

### **17.3. Notice of Motion submitted by Councillors McRandal and Douglas**

That this Council recognises the environmental damage caused by modern day packaging, much of which is disposed of in landfill or as litter. This Council agrees that producers, not ratepayers, should be responsible for the net costs of managing packaging waste and that litter payments must be included in any Extended Producer

Responsibility scheme.

This Council tasks Officers with bringing back a report detailing what initiatives Council have undertaken to encourage businesses within the Borough to review, change and/or reduce the packaging they use. The report should include analysis of achievements and challenges encountered to date and outline further initiatives that could be undertaken to encourage businesses to change or reduce the packaging they use.

#### **17.4. Notice of Motion submitted by Alderman Irvine and Alderman Keery**

That this Council notes with the concern the recent decision taken to no longer lock playgrounds in the Borough. That a report is brought back on the matter that will look at maintaining a locking up schedule that will include the Bloomfield and Rathgill playparks.


#### **17.5. Notice of Motion submitted by Councillors Dunlop and McKimm**

This Council commends and recognises the extraordinary efforts of the Samaritans during the Covid pandemic and beyond. The ability of the volunteers to react quickly and effectively during the pandemic and to continue to offer support to anyone who needs a listening ear day or night, 365 days a year, is to be commended and congratulated. This Council recognises the mental health challenges facing our society, and agrees to light up our council buildings in green (the colour of the Samaritans) on the evening of 22 December by way of demonstrating that the Samaritans are always there for all within society

### **Circulated for Information**

a) DfC Consultation Outcome Report – Intermediated Rent (Correspondence attached)

b) Department of Health – Health Inequalities Annual Report 2022 (Copies attached)

 a) *Intermediate Rent Consultation Outcome Report\_2.pdf*

*Page 50*

 b) *Health Inequalities NI Fact Sheet 2022.pdf*

*Page 138*

**\*\*\* IN CONFIDENCE \*\*\***

#### **18. Tender Award to Deliver HGV Training on behalf of Ards and North Down Labour Market Partnership**

**\*\*\*IN CONFIDENCE\*\*\***

Report attached

 **18. Tender award to deliver HGV Training on behalf of Labour Market Partnership.pdf**

*Not included*

## **19. Notification of Application for a Liquor Licence - Copeland Distillery**


**\*\*\*IN CONFIDENCE\*\*\***

Report to follow

## **20. Use of Council Land in Donaghadee and Millisle - BBC Drama Series Hope Street 2**

**\*\*\*IN CONFIDENCE\*\*\***

Report attached

 **20. Use of Council Land in Donaghadee Millisle - BBC Drama Series Hope Street 2 (002).pdf**

*Not included*

 **20. Appendix 1 - photo of filming locations in Donaghadee.png**

*Not included*

 **20. Appendix 2 - photo of filming location in Millisle.png**

*Not included*

 **20. Appendix 3 - car parking location in Donaghadee.png**

*Not included*

## **21. UNITE Industrial Action Further Update**

**\*\*\*IN CONFIDENCE\*\*\***

Report to follow

## **ARDS AND NORTH DOWN BOROUGH COUNCIL**

21 April 2022

Dear Sir/Madam

You are hereby invited to attend a meeting of Ards and North Down Borough Council which will be held remotely via Zoom on **Wednesday, 27 April 2022 at 7.00pm.**

Yours faithfully

Stephen Reid  
Chief Executive  
Ards and North Down Borough Council

### **A G E N D A**

1. Prayer
2. Apologies
3. Declarations of Interest
4. Mayor's Business
5. Mayor and Deputy Mayor Engagements for the Month of April 2022 (Copy attached)
6. Minutes of Council meeting dated 30 March 2022 (Copy attached)
7. Minutes of Committees (Copies attached)
  - 7.1. Minutes of Meeting of Planning Committee dated 5 April 2022
  - 7.2. Minutes of Environment Committee dated 6 April 2022
  - 7.3. Minutes of Regeneration and Development Committee dated 7 April 2022
  - 7.4. Minutes of Corporate Committee dated 12 April 2022
  - 7.5. Minutes of Community and Wellbeing Committee 13 April 2022
- 7.5.1 Arising from Item 21 - Queens Platinum Jubilee Grants (Report attached)
8. Resolutions
  - 8.1 Newry Mourne & Down District Council – Increased Energy Costs (Copy letter attached)



- 8.2. Newry Mourne & District Council – Opposed to Planned Changes to Red Diesel (Copy letter attached)
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- 13. Community Festival Funding (Report attached)
- 14. Sealing Documents
- 15. Transfer of Rights of Burial
- 16. Notice of Motion Status Report (Report attached)
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- 19. Notification of Application for a Liquor Licence - Copeland Distillery (Report to follow)
- 20. Use of Council Land in Donaghadee and Millisle - BBC Drama Series Hope Street 2 (Report attached)
- 21. UNITE Industrial Action Further Update (Report to follow)

**MEMBERSHIP OF ARDS AND NORTH DOWN BOROUGH COUNCIL**

Alderman Carson	Councillor S Dunlop
Alderman Gibson	Councillor Edmund
Alderman Girvan	Councillor Egan
Alderman Irvine	Councillor Gilmour
Alderman Keery	Councillor Greer
Alderman McDowell	Councillor Johnson
Alderman McIlveen	Councillor Kendall
Alderman Menagh	Councillor Kennedy
Alderman Smith	Councillor Mathison
Alderman Wilson	Councillor McAlpine
Councillor Adair (Deputy Mayor)	Councillor McArthur
Councillor Armstrong-Cotter	Councillor McClean
Councillor Blaney	Councillor McKee
Councillor Boyle	Councillor McKimm
Councillor Brooks (Mayor)	Councillor McRandal
Councillor Cathcart	Councillor Smart
Councillor Chambers	Councillor P Smith
Councillor Cooper	Councillor T Smith
Councillor Cummings	Councillor Thompson
Councillor Douglas	Councillor Walker

**LIST OF MAYOR'S/DEPUTY MAYOR'S ENGAGEMENTS  
FOR APRIL 2022**

**Friday 1 April**

15:00 hours UNICEF Ukraine Fundraiser – Harbour and Company,  
Donaghadee

**Saturday 2 April**

10:00 hours Starting Hospice Walk – Queen's Leisure Centre, Holywood  
10:30 hours Home Nation Power Chair Disability Football – Ards Blair Mayne  
19:00 hours Comber Rotary Club, Young Musician of the Year – Campbell  
College, Belfast

**Tuesday 5 April**

12:50 hours Unfurling of Flag for IWBA – Opening of Irish Bowls for the Year  
– Pickie Bowling Club, Broadway, Bangor

**Wednesday 6 April**

19:00 hours Rotary Club Charity Dinner – Donaghadee Golf Club

**Thursday 7 April**

15:30 hours Schoolchild's Visit/Tour of Town Hall – Bangor

**Friday 8 April**

14:00 hours 90th Anniversary Celebration for Movilla High School –  
Donaghadee Road, Newtownards

**Saturday 2 April**

11:30 hours Unfurling of Flag and Opening of Green – Donaghadee Bowling  
Club, The Commons, Donaghadee  
13:15 hours Bangor International Choral Festival – St Comgall's Parish  
Church – Brunswick Road, Bangor  
17:30 hours Prizegiving at Bangor International Choral Festival – St  
Comgall's Parish Church – Brunswick Road, Bangor

**Monday 5 April**

12:50 hours Unfurling of Flag for IWBA – Opening of Irish Bowls for the Year

– Pickie Bowling Club, Broadway, Bangor

### Wednesday 6 April

19:00 hours Rotary Club Charity Dinner – Donaghadee Golf Club

### Thursday 7 April

11:00 hours Photocall – Litter Pick with Children from Primary Schools – Conway Square, Newtownards

15:00 hours PR Photo – Promotion of Pipe Band Championships – Castle Park, Bangor

15:30 hours Schoolchild's Visit/Tour of Town Hall – Bangor

### Friday 8 April

10:00 hours Action Mental Health Event – Ards Blair Mayne Wellbeing and Leisure Complex – Newtownards

14:00 hours 90th Anniversary Celebration for Movilla High School – Donaghadee Road, Newtownards

### Saturday 9 April

11:30 hours Unfurling of Flag and Opening of Green – Donaghadee Bowling Club – The Commons, Donaghadee

13:15 hours Bangor International Choral Festival – St Comgall's Parish Church – Brunswick Road, Bangor

17:30 hours Prizegiving at Bangor International Choral Festival – St Comgall's Parish Church – Brunswick Road, Bangor

### Monday 11 April

10:30 hours **Deputy Mayor** – Launch of Intergenerational Week – Bryansburn Care Home, Bryansburn Road, Bangor

19:00 hours Donaghadee 'In Bloom' Meeting – Harbour & Co, Donaghadee

### Tuesday 12 April

11:00 hours Ministerial Visit – Town Centre, Bangor

### Wednesday 13 April

14:15 hours Unveiling of the Wall of Fame Plaque – Bangor Aurora Aquatic Wellbeing and Leisure Complex – Newtownards

15:30 hours Visit by Local Family – Mayor's Parlour, Town Hall, Bangor

### Friday 15 April

12:00 hours Photoshoot at NI100 Park – Beside Somme Centre, Conlig

**Thursday 21 April**

19:30 hours            Classical Concert with Eric Gentet – Rosemary Street Church, Belfast

**Friday 22 April**

11:30 hours            In Bloom Press Launch – Next to Portaferry Sports Centre, Cloughey Road, Portaferry

14:00 hours            Visit of Eric Gentet and Stephen Beet – Mayor's Parlour, Town Hall, Bangor

**Sunday 24 April**

15:30 hours            Prizegiving – Irish Sailing Youth National Championships – Ballyholme Yacht Club, Seacliff Road, Bangor

**Monday 25 April**

13:30 hours            **Deputy Mayor** – New Projects at Cairn Wood – Craigtantlet

**Tuesday 26 April**

11:00 hours            Shoreline Probus Donaghadee – Bow Bells, Donaghadee

11:30 hours            **Deputy Mayor** – PR Photo – In Bloom Tallest Sunflower Launch – Movilla High School, Newtownards

**Wednesday 27 April**

10:50 hours            Soft Launch of Donaghadee Moat – Moat Street, Donaghadee

14:00 hours            Photo Opportunity – Launch of the Heritage Trail – Outside Portaferry Castle

**Thursday 28 April**

12:00 hours            Special Opening of Additional Accommodation at Killard School – North Road, Newtownards

17:30 hours            Wardens 145 Years Celebratory Event – High Street, Newtownards

19:00 hours            Exhibition of Old Mill House and Walled Garden, Helens Bay – North Down Museum, Town Hall, Bangor

Unclassified

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## ITEM 7.5.1 Arising from Item 21

### Ards and North Down Borough Council

Report Classification	Unclassified
Council/Committee	Council
Date of Meeting	27 April 2022
Responsible Director	Director of Community and Wellbeing
Responsible Head of Service	Head of Community and Culture
Date of Report	01 April 2022
File Reference	CW-150
Legislation	Recreation and Youth Services Order (NI) 1989
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	Queens Platinum Jubilee Grants
Attachments	

Council agreed in February 2022 to put in place a grants scheme to mark the Queens Platinum Jubilee. The scheme enabled local constituted community organisations within the Borough to avail of grant assistance from the Council to commemorate / celebrate the Queens Platinum Jubilee and in March 2022 the following was agreed:

***The Councils Community Festival Fund (CFF) is presently open for applications, closing on 21 March 2022 with a total budget of £90,000, with individual small grants available up to £1,000 each for local festivals, £4000 for Neighbourhood Festivals and £15,000 for Large Festivals. The CFF grants cannot be used to run Street Parties to celebrate the Jubilee and community and voluntary groups are being advised that a separate grant scheme will be available for that purpose.***

***In order to ensure parity between the two grant schemes it is recommended that the Jubilee Grants are increased, from a budget £350 each, as per the previous Queens Birthday Grants in 2016, up to a maximum of £1,000 each. The Jubilee Grants will open for applications week commencing 7 March 2022. As per the Councils Grants Policy the grants will be assessed by a panel of officers and***

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***their recommendations will be brought to Council in April 2022 for approval. A small proportion of the budget will be used to purchase party packs containing bunting, table clothes napkins etc,***

A total of £40K was set aside for the grant scheme. £35K was allocated to the grant scheme with a further £5K allocated for official bunting, party wears etc. The latter will be made available to groups who were deemed ineligible to apply for more substantial funding for example, un-constituted groups, religious organisations etc. All funding must be expended over the Queens Platinum Jubilee official holiday from 2<sup>nd</sup> June to 6<sup>th</sup> June 2022.

Eligible grant applications were scored by an officer panel. and applications were measured against the following criteria: -

- Events / Activities to celebrate or commemorate the Queens Platinum Jubilee
- Events / Activities are suitably advertised and open and inclusive to the wider community
- Value for money is demonstrated
- Evaluation undertaken

The following was recommended to Members at the Community and Wellbeing Committee on 13 April 2022:

**Table 1. Successful Applicants**

#	Name Of Group	Score	Eligible Amount	Amount Awarded
1	1st Newtownards Somme & Historical Society	60%	£1,000.00	£1,000.00
2	Ballygowan & District CA	55%	£1,000.00	£1,000.00
3	Ballyhalbert Community Association	75%	£1,000.00	£1,000.00
4	Ballywalter Community Action Group	70%	£1,000.00	£1,000.00
5	Bangor Ex Services Club	65%	£1,000.00	£1,000.00
6	Bowtown Community Development Group	80%	£1,000.00	£1,000.00
7	Breezemount CA	80%	£1,000.00	£1,000.00
8	Carrowdore & District CA	70%	£1,000.00	£1,000.00
9	Clandeboyne Village CA	70%	£1,000.00	£1,000.00
10	Cloughey & District CA	55%	£1,000.00	£1,000.00
11	Comber Regeneration Community Partnership	60%	£1,000.00	£1,000.00
12	Conlig Community Regeneration Group	70%	£1,000.00	£1,000.00
13	Decorum NI	50%	£1,000.00	£1,000.00
14	Donaghadee Community Development association	80%	£1,000.00	£1,000.00
15	Donaghadee Heritage Preservation Company	60%	£700.00	£700.00
16	Eastend Residents association	70%	£1,000.00	£1,000.00



## Unclassified

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17	Glen Ward Community Development Association	60%	£1,000.00	£1,000.00
18	Harmoni	75%	£983.32	£983.32
19	Hollywood District Guides	65%	£985.00	£985.00
20	Kilcooley Community Forum	60%	£1,000.00	£1,000.00
21	Kilcooley Womens Centre	60%	£1,000.00	£1,000.00
22	Kirkistown Primary PTFA	55%	£1,000.00	£1,000.00
23	Ladybird Childcare Services	60%	£1,000.00	£1,000.00
24	Lisbarnett & Lisbane CA Ltd	65%	£1,000.00	£1,000.00
25	Loughries Men's Shed	70%	£995.00	£995.00
26	Millisle & District Community Association	65%	£1,000.00	£1,000.00
27	Millisle Health & Wellbeing Group	60%	£500.00	£500.00
28	Millisle Youth Forum	65%	£950.00	£950.00
29	Mothers Union Branch St Philip & St James	60%	£145.00	£145.00
30	Portavogie Historical Society	65%	£1,000.00	£1,000.00
31	Recharge CIC	60%	£1,000.00	£1,000.00
32	Redburn Loughview Community Forum	55%	£1,000.00	£1,000.00
33	Seahaven Park homes Residents Association	55%	£1,000.00	£1,000.00
34	St Mark's Drop In	60%	£660.00	£660.00
35	The Regimental Association of the Ulster Defence Regiment (Bangor Branch)	55%	£1,000.00	£1,000.00
36	West Winds Development Association	65%	£1,000.00	£1,000.00
37	Whitehill Community Association	65%	£1,000.00	£1,000.00
		<b>Totals:</b>	<b>£34,918.32</b>	<b>£34,918.32</b>

Table 2. Unsuccessful Applications

#	Name of Group	Score	Reason for unsuccessful application
1	Ards Rangers FC	Not Scored	Sports Club
2	Ballycrochan Presbyterian Church	Not Scored	Faith based organisation
3	Bangor District LOL No 18	Not Scored	Political / Faith Based organisation
4	Comber Methodist Church	Not Scored	Faith based organisation
5	Comber Recreational FC	Not Scored	Sports Club
6	Friends of Ravara Training Centre	Not Scored	No essential documents provided
7	Hollywood Shared Town	40%	Failed to reach pass mark

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8	<b>Newtownards Orange Hall Trustees Committee</b>	Not Scored	Political organisation / Building Trustees
9	<b>North Down Scout Centre</b>	Not Scored	No constitution / Large Charitable organisation
10	<b>Portavogie PTA</b>	35%	Failed to reach pass mark
11	<b>The Beacon</b>	Not Scored	No essential documents provided

Of the 48 organisations which applied for funding under the scheme. 39 were deemed eligible with 37 being deemed successful in their application, meeting eligibility requirements and the criteria set out above Table 1 refers. 2 applications were deemed eligible but could not be scored as they did not supply the required essential documentation see Table 2 above..

Applications were deemed ineligible if they were from faith based / sporting organisations. These exclusions were clearly documented in the Grant Guidance, made available to applicants and in line with the Councils current Grant Aid Policy.

Further to the above recommendations presented at the Community and Wellbeing Committee on 13 April 2022, Members agreed that the item be deferred until the full Council meeting in order that applications from all constituted community groups could be scored. The results of that process and the scoring panels recommendations are set out in tables 3 and 4 below.

**Table 3. Successful Applicants**

#	Name Of Group	Score	Eligible Amount	Amount Awarded
1	<b>1st Newtownards Somme &amp; Historical Society</b>	60%	£1,000.00	£1,000.00
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33	Seahaven Park homes Residents Association	55%	£1,000.00	£1,000.00
34	St Mark's Drop In	60%	£660.00	£660.00
35	The Regimental Association of the Ulster Defence Regiment (Bangor Branch)	55%	£1,000.00	£1,000.00
36	West Winds Development Association	65%	£1,000.00	£1,000.00
37	Whitehill Community Association	65%	£1,000.00	£1,000.00
		<b>Totals:</b>	<b>£34,918.32</b>	<b>£34,918.32</b>

Table 4. Unsuccessful Applications

#	Name of Group	Score	Reason for unsuccessful application
1	Ards Rangers FC	Not Scored	Not a community Group - Sports Club and no supporting documentation i.e. constitution
2	Ballycrochan Presbyterian Church	65%	Not a community group - Faith based organisation
3	Bangor District LOL No 18	60%	Not a community Group - Political / Faith Based organisation
4	Comber Methodist Church	40%	Failed to reach the pass mark
5	Comber Recreational FC	45%	Not a community group - Sports Club

## Unclassified

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6	Friends of Ravara Training Centre	Not Scored	No essential documents provided
7	Hollywood Shared Town	40%	Failed to reach pass mark
8	Newtownards Orange Hall Trustees Committee	45%	Political organisation / not a constituted community group
9	North Down Scout Centre	45%	No constitution / Large Charitable organisation
10	Portavogie PTA	35%	Failed to reach pass mark
11	The Beacon	Not Scored	No essential documents provided

Members should note that the Queen Platinum Jubilee Grants Scheme has been run in line with Council's approval in March and in line with the Councils approved Grants Policy.

Should Council decide to fund ineligible applications Council would:

- not be complying with its agreed Grants Policy
- be opened to claims of unfairness from groups hitherto deemed ineligible, who may well have wished to apply for this funding stream but did not, due to the specified criteria.

Members will note in Tables 3 and 4 above:

- a wide range of eligible local community organisations have been successful in receiving funding under the Queens Platinum Jubilee Grant scheme.
- £34,918.32 has been expended from the available fund.
- each eligible and successful application was recommended to received 100% of the funding they applied for under the scheme.

It is further recommended that those groups who were not recommended for funding in Table 4 above are prioritised to receive Party Packs.

To date £2,700 has been spent from the £5k set aside to provide non-constituted community, voluntary and resident groups with street party packs.

It is further recommended that officers review the Councils Grant Aid Policy that was approved in 2016.in light of Councils wish to make small grants available to constituted groups who may wish to run street parties, to celebrate/commemorate future national events.

### RECOMMENDATION

It is recommended that Council approve:

1. The recommendations set out in tables 3 and 4 detailed in this report.
2. That officers review the Councils Grant Aid Policy that was approved in 2016.in light of Councils wish to make small grants available to constituted groups who may wish to run street parties, to celebrate/commemorate future national events.

Marie Ward  
Chief Executive



Comhairle Ceantair  
an Iúir, Mhúrn  
agus an Dúin  
Newry, Mourne  
and Down  
District Council

Our ref: C/057/2022

15 March 2022

Mr Stephen Reid CEO  
North Down & Ards Borough Council  
Town Hall  
The Castle  
Bangor  
BT20 4BT

Dear Mr Reid

**Re: Emergency Notice of Motion – Increased Energy Costs**

At a Meeting of Newry, Mourne and Down District Council held on 7 March 2022, the following emergency Notice of Motion was agreed:

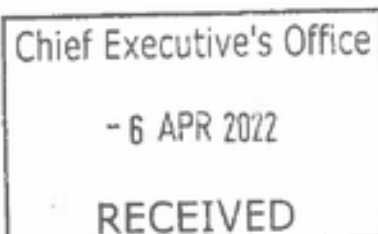
**“In light of the massive hikes of prices in relation to energy related costs such as oil, gas, electricity and fuel in recent days and times all of which will have a major detrimental impact on all our residents in our district and beyond, Newry Mourne and Down District Council call upon and demand that the Chancellor of the Exchequer release the much necessary funding and support to enable that all households who have been affected by these massive price increases receive much needed support and help where it is needed most especially in the times that we are now in and beyond. If this motion is adopted, we encourage the other ten councils to do the same for their residents”.**

This emergency motion was unanimously agreed and Newry Mourne and Down District Council ask that you join them and write to the Chancellor of the Exchequer.

I would ask that you give this matter serious consideration and I look forward to your response.

Yours faithfully

**Dorinnia Carville**  
**Deputy Chief Executive**



Marie Ward  
Chief Executive

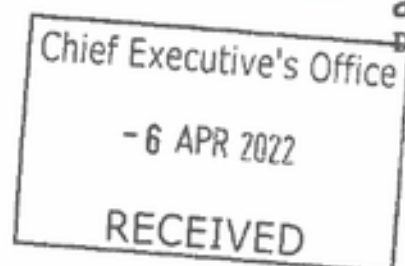


Comhairle Ceantair  
**an Iúir, Mhúrn  
agus an Dúin**  
**Newry, Mourne  
and Down**  
District Council

Our ref: C/054/2022

15 March 2022

Mr Stephen Reid CEO  
North Down & Ards Borough Council  
Town Hall  
The Castle  
Bangor  
BT20 4BT



Dear Mr Reid

**Re: Notice of Motion – Opposed to Planned Changes to Red Diesel**

At a Meeting of Newry, Mourne and Down District Council held on 7 March 2022, the following Notice of Motion was agreed:

**"That Newry Mourne and Down District Council oppose the planned changes to Red Diesel usage being brought in by HMRC in April.**

**The proposed changes to red diesel usage in any vehicle other than what are described as vehicles being used for agricultural purposes only.**

**Council notes with concern that these changes will have severe implications for many sectors of our economy locally throughout our district and not solely within agriculture. Council writes to the British Treasury opposing the planned changes and seeking to immediately pause these damaging proposals and to look at new ways as to how government can practically support businesses take the necessary actions to move away from fossil fuels and to put in place measures and policies that will have a meaningful impact on reducing emissions as these proposals will only serve to increasing input costs without themselves reducing emission.**

**Council writes to all Councils in the North asking them to write to the British Treasury asking them to raise concerns that this will have a detrimental economic impact across all Council Areas".**

Members spoke at length about how proposed changes would have damaging effects on all sectors who avail of red diesel and the detrimental effect on businesses in particular the agriculture, construction, quarrying and manufacturing sectors that were already struggling with increased costs of materials and soaring energy prices. Recent fuel price hikes as well as reductions and in some cases withdrawal of EU funding had farmers under pressure and charities would also lose out as fundraising tractor runs would no longer be feasible.

Newry Mourne and Down District Council are opposed to the planned changes and have asked the British Chancellor to immediately pause this move and instead look at how to practically support businesses to take the necessary action to move away from fossil fuels and put in place measures and policies that would have a meaningful impact in reducing emissions.

Newry Mourne and Down District Council ask that you join them and write to the British Treasury raising concerns on the detrimental economic impact these proposed changes will have.

Oifig an Iúir  
Newry Office  
O'Hagan House  
Monaghan Row  
Newry BT35 8DJ

Oifig Dhún Pádraig  
Downpatrick Office  
Downshire Civic Centre  
Downshire Estate, Ardglass Road  
Downpatrick BT30 6GQ

0330 137 4000 (Council)  
council@nmandd.org  
www.newrymournedown.org

Ag freastal ar an Dún  
agus Ard Mhacha Theas  
Serving Down  
and South Armagh



I would ask that you give this matter serious consideration and I look forward to your response.

Yours faithfully

A handwritten signature in cursive script that reads "Dorinnia Carville".

**Dorinnia Carville**  
**Deputy Chief Executive**

Alison McCullagh  
Chief Executive



Fermanagh & Omagh  
District Council  
Comhairle Ceantair  
Fhear Manach agus na hÓmaí

Our Ref: Democratic Services

Date: 12 April 2022

Email: [democratic.services@fermanaghomagham.com](mailto:democratic.services@fermanaghomagham.com)

Mr Stephen Reid  
Chief Executive  
Ards and North Down Borough Council  
Townhall  
The Castle  
Bangor  
BT20 4BT

Dear Mr Reid,

**Re: Continuing Healthcare Provision**

At the Council meeting held on 5 April, Members asked that I write to the Commissioner for Older People to commend him for progressing judicial review proceedings against the Department of Health regarding the Department's changes to continuing healthcare.

Members also requested that I write to all other Councils in Northern Ireland to encourage them to make similar representations to the Commissioner.

The Council trusts you will give this issue due consideration.

Yours sincerely

A handwritten signature in blue ink that reads "Alison McCullagh".

**Alison McCullagh**  
Chief Executive



Alison McCullagh  
Chief Executive



Fermanagh & Omagh  
District Council  
Comhairle Ceantair  
Fhear Manach agus na hÓmaí

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Our Ref: Democratic Services

Date: 12 April 2022

Email: [democratic.services@fermanaghomagh.com](mailto:democratic.services@fermanaghomagh.com)

Mr Stephen Reid  
Chief Executive  
Ards and North Down Borough Council  
Townhall  
The Castle  
Bangor  
BT20 4BT

Dear Mr Reid,

**Re: Motion – Independent Review of all deaths with potential issues around domestic violence**

At the recent Council meeting held on 5 April 2022, Fermanagh and Omagh District Council adopted the following Motion:

***“This Council calls on the Chief Constable of the Police Service of Northern Ireland to instigate an independent, strategic review of the handling of all deaths in which there were established or potential issues around domestic violence and in particular those which were not investigated or treated as murder, or death was deemed to be from suicide or accidental injury.***

***This review should determine all aspects of each case including decisions taken by senior officers and explanations for same, and if all procedures and protocols were fully adhered to and all avenues of investigation exhausted.***

***In addition this council calls on the Chief Constable to establish a mechanism whereby officers of any rank can raise concerns as to the circumstances and investigations of such deaths and indicate if they are being overruled and/or ordered by superiors not to pursue these cases.***

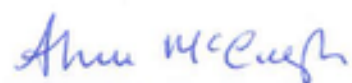
***Further, this council calls on all Health and Social Care Trusts to either expand “Whistleblower” Policies or create a separate, similar channel for all treating staff to voice concerns on the presentation of victims, with support for staff in alerting the Police Service of Northern Ireland and ensuring said concerns are fully taken on board and appropriately documented.***

***This motion should also be shared with the Minister for Justice, the Police Ombudsman, the Policing Board, the Commissioner for Human Rights and all***

***district councils with a view to adopting the requests/recommendations contained therein."***

The Council trusts that you will support this Motion.

Yours sincerely



**Alison McCullagh**  
**Chief Executive**

Alison McCullagh  
Chief Executive



Fermanagh & Omagh  
District Council  
Comhairle Ceantair  
Fhear Manach agus na hÓmaí

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Our Ref: Democratic Services

Date: 12 April 2022

Email: [democratic.services@fermanaghomagh.com](mailto:democratic.services@fermanaghomagh.com)

Mr Stephen Reid  
Chief Executive  
Ards and North Down Borough Council  
Townhall  
The Castle  
Bangor  
BT20 4BT

Dear Mr Reid,

**Re: Motion – Recruiting staff within the hospitality and tourism sectors**

At the recent Council meeting held on 5 April 2022, Fermanagh and Omagh District Council adopted the following Motion:

***“This Council calls on the UK Government and the NI Executive to urgently review the current deficit experienced by employers in recruiting staff within the hospitality & tourism sectors. This has become a major crisis not only locally but throughout the entirety of Northern Ireland.***

***Further, that this Council writes to Kevin Foster MP, Minister for Immigration in the UK Government, and associated Stormont Ministers, to ask that immediate measures are instigated to alleviate the recruitment difficulties in this vital sector to our economy.***

***It is recommended that this Motion is circulated to all other Councils in Northern Ireland seeking their support in lobbying on behalf of the Tourism and Hospitality providers.”***

The Council trusts that you will support this Motion.

Yours sincerely

A handwritten signature in blue ink that reads "Alison McCullagh".

**Alison McCullagh**  
Chief Executive

Unclassified

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**ITEM 9****Ards and North Down Borough Council**

Report Classification	Unclassified
Council/Committee	Council
Date of Meeting	27 April 2022
Responsible Director	Chief Executive
Responsible Head of Service	
Date of Report	21 April 2022
File Reference	
Legislation	
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable <input type="checkbox"/>
Subject	Request for Deputation - Padel Tennis
Attachments	

Mr Liam Botham has requested a date to make a presentation to Council outlining his plans for the creation of a Padel Tennis Facility in the Borough.

**RECOMMENDATION**

It is recommended that Council agrees to the deputation request from Mr Botham and this be referred to the Community and Wellbeing Committee.

Unclassified

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**ITEM 9.1.****Ards and North Down Borough Council**

Report Classification	Unclassified
Council/Committee	Council
Date of Meeting	27 April 2022
Responsible Director	Director of Environment
Responsible Head of Service	
Date of Report	01 April 2022
File Reference	
Legislation	
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable <input type="checkbox"/>
Subject	Request for Delegated Authority - Consultation on Reforms to the Packaging Waste Recycling Note (PRN) and Packaging Waste Export Recycling Note (PERN) systems and Operator Approval.
Attachments	

DAERA have recently written to stakeholders to advise that the Government response to the Extended Producer Responsibility (EPR) for Packaging consultation has now been published and is available to view through the following link:

[Packaging and packaging waste: introducing Extended Producer Responsibility - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/packaging-and-packaging-waste-introducing-extended-producer-responsibility)

DAERA have also advised that a consultation is being launched on Reforms to the Packaging Waste Recycling Note (PRN) and Packaging Waste Export Recycling Note (PERN) systems and Operator Approval. This consultation can be accessed through the following links:

<https://consult.defra.gov.uk/packaging-extended-producer-responsibility/reforms-to-the-prn-and-pern-systems/>

<https://www.daera-ni.gov.uk/consultations/reforms-packaging-waste-recycling-note-prn-and-packaging-waste-export-recycling-note-pern-systems>

Unclassified

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The PRN and PERN consultation closes on 21 May 2022. A draft Council response will be prepared by officers and provided to the Environment Committee on 4 May 2022. In order to ensure it may be issued before the consultation closes, it is recommended that Council agreed to grant delegated authority to the Committee to sign off and issue the response.

#### **RECOMMENDATION**

It is recommended that Council agrees that the Environment Committee shall have delegated authority to consider and agree for issue a Council response to the consultation.

Unclassified

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**ITEM 10****Ards and North Down Borough Council**

Report Classification	Unclassified
Council/Committee	Council
Date of Meeting	27 April 2022
Responsible Director	Director of Environment
Responsible Head of Service	Head of Regulatory Services
Date of Report	05 April 2022
File Reference	LR 100 / 90101
Legislation	The Local Government (Miscellaneous Provisions) (NI) Order 1985
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	Grant of Entertainment Licence
Attachments	None

An application has been received for the grant of entertainment licence as follows:

**Royal North of Ireland Yacht Club**

**Applicant:** Mr Roger Lees, 88 Princetown Road, Bangor

**Days and Hours:** Monday to Sunday during the permitted hours during which intoxicating liquor may be sold or consumed on these premises under the Registration of Clubs Order (NI) 1996.

**Type of entertainment:** Indoor dancing, singing and music or any other entertainment of a like kind.

**RECOMMENDATION**

That the Council grants the application.

Unclassified

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**ITEM 11****Ards and North Down Borough Council**

Report Classification	Unclassified
Council/Committee	Council
Date of Meeting	27 April 2022
Responsible Director	Director of Organisational Development and Administration
Responsible Head of Service	Head of Administration
Date of Report	11 April 2022
File Reference	'-
Legislation	'-
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable <input type="checkbox"/>
Subject	Invitation from Irish Guards to Ceremony at Windsor Castle
Attachments	

The Irish Guards are due to be presented with their new colours at a ceremony at Windsor Castle on Tuesday 17<sup>th</sup> May 2022. Given their impending Freedom of the Borough, Major Niall Hall, Regimental Adjutant, has invited members of the Council's Freedom of the Borough working group to attend this ceremony.

It was agreed at Council in March 2022 that two officers would be nominated to attend. The Mayor has also subsequently received an invitation and would like to attend. Flight and subsistence costs will be approximately £150 and can be met from the Mayor's allowance.

**RECOMMENDATION**

It is recommended that the Mayor is permitted to attend the Irish Guards ceremony in Windsor Castle, London on 17<sup>th</sup> May 2022.



Unclassified

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**ITEM 12****Ards and North Down Borough Council**

Report Classification	Unclassified
Council/Committee	Council
Date of Meeting	27 April 2022
Responsible Director	Director of Organisational Development and Administration
Responsible Head of Service	Head of Administration
Date of Report	07 April 2022
File Reference	LP37
Legislation	
Section 75 Compliant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable <input type="checkbox"/>
Subject	Request to light up Council buildings for Foster Care Fortnight
Attachments	

Requestor

HSC NI Foster Care

Reason for requestTo mark the start of Foster Care Fortnight (9<sup>th</sup> to 22<sup>nd</sup> May 2022)Dates and colours

Turquoise and yellow on 9<sup>th</sup> May 2022, and annually thereafter, at an available date during the fortnight. The fortnight normally falls during the middle 2 weeks of May.

Background information

Foster Care Fortnight is an annual UK wide celebration of Foster Care. HSC NI Foster Care urgently need more people to come forward to offer foster homes to children in care right across Northern Ireland. As the statutory authority for Looked After Children, it is their responsibility to ensure they have a wide pool of foster carers available to meet the needs of the children requiring foster homes. Since the beginning of the pandemic, they have advised that the number of children and young people coming into care has increased, at the same time, the number of people who have enquired to foster has dropped by approximately 23%. At the moment, there are over 2,800 children & young people living in foster care in NI. They use Foster

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Care Fortnight as an opportunity to publicly thank their existing foster carers for their commitment to children in their care and as an opportunity to raise awareness about the need for more short term and longer-term foster carers in all areas.

HSC Northern Ireland Foster Care is the statutory body with responsibility to all Looked After Children in Northern Ireland. They are made up of all 5 HSC Trusts' fostering teams across NI, including SEHSCT, and are the largest recruitment agency for foster carers in NI. They have advised they not only recruit carers; they also train and support them in their fostering role.

Does it meet policy requirements?

Yes - request has been received from a non-profit making organisation based in the Borough to mark a significant occasion.

### **RECOMMENDATION**

As this request meets the policy requirements, it is recommended that Council accedes to the request and lights up Council buildings in turquoise and yellow on the date requested and annually thereafter.

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**ITEM 13****Ards and North Down Borough Council**

Report Classification	Unclassified
Council/Committee	Council
Date of Meeting	27 April 2022
Responsible Director	Director of Community and Wellbeing
Responsible Head of Service	Head of Community and Culture
Date of Report	15 April 2022
File Reference	CD27
Legislation	Recreation and Youth Services Order (NI) 1989
Section 75 Compliant	Yes <input type="checkbox"/> No <input type="checkbox"/> Other <input type="checkbox"/> If other, please add comment below:
Subject	Community Festival Funding 2022-23
Attachments	Appendix 1 - Assessment Panel Recommendations

The Community Festivals Fund (CFF) is jointly provided by the Department for Communities (DfC) and the Council. The fund was established in recognition of the positive contribution that festivals can make to communities and to the local economy. The CFF has been divided into three categories:

- Local Festival: of up to £1,000 for a local community festival that attracts up to 1500 attendees
- Neighbourhood Festival; up to a maximum of £4,000 attracting between 1,501 - 5,000 attendees from neighbouring areas/towns/villages
- Large Scale Festival; up to £15,000, at least three days in duration and attracting a minimum of 5000 attendees.

Although a Letter of Offer (LoO) has not yet been received from DfC, and the Department has advised that in the incoming year quarterly LoO's will be issued to Councils. It is expected that the total budget available for the fund is circa £91k.

## Unclassified

The Council invited applications for the 2022/23 Community Festival Fund with a closing date of 21 March at 4.00pm.

In keeping with the success of the YouTube Guidance Video last year, replacing the traditional grant application workshops 52 hits were recorded.

By the closing date 34 applications were received requesting funding totalling £100,200. The applications were assessed and scored by the Community Development Manager, Community Development Officer, Events Officer, and Community Development Grants Officer, using the following criteria.

<b>Grant Criteria - Local</b>	<b>Max Points</b>
Community Involvement	5
Promotes Equality	5
Tackling Poverty & Social Exclusion	5
Volunteering, attendance & Community Participation	5
Opportunities to improve skills/training	5
Marketing & PR	5
Value for Money	5
Project Evaluation	5
<b>Total</b>	<b>40</b>

<b>Grant Criteria – Neighbourhood/Large</b>	<b>Max Points</b>
Aim and objectives of organisation & experience in organising festivals	5
Capacity of Participants	5
Benefit to local community & economy	5
Need and benefit for festival	5
Outcomes and Impacts	5
Promotes cultural tradition	5
Equality/community cohesion	5
Tackling poverty and social exclusion	5
Encourages participation/attendance	5
Training & skills provided	5
Value for money	5
<b>Total</b>	<b>55</b>

Festivals that included a commemorative element were also scored out of 5, with a total possible scoring of 40 (Local) 55 (Neighbourhood and Large). It should be noted that no group applied for a Commemorative event.

A 20% weighting was applied to: i) applications for festivals taking place in the top 10% of the most deprived wards in the Council area, (using the DfC Weighting Tool) and ii) from festivals that specifically target those who are socially excluded. The assessment panel agreed a pass mark for the Local Festivals of 45% (score 18) and a pass mark for the Neighbourhood and Large Festival of 45% (24.75). The marks were totalled and calculated as a percentage of 100.

## Unclassified

There was a broad spectrum of applications received, some of which were very detailed and strong in meeting the DfC criteria and others were less so. On the completion of the assessment process, the panel agreed that:

- Seven festival applications did not reach the pass mark of 45%. All applications lacked detailed responses to some of the questions and therefore scored under the required pass mark.

Successful applications were classified into the three categories. The total funding requested from the 13 Local Festival applicants was £12,980, applications for 6 Neighbourhood Festivals totalled £17,980 and 4 Large Festivals requesting £53,800. On the completion of the assessment process, the value of the funding programme of successful applications totalled £84,760 which was slightly than the available budget. CD Team recognises that several groups who are regular applicants to CFF fund have instead made application to the Queen's Platinum Jubilee Fund, which would explain this slight underspend.

	<b>Number of applicants</b>	<b>Total value of funding</b>	<b>% funding awarded</b>
Local Festival	13	£12,980	100%
Neighbourhood Festival	6	£17,980	100%
Large Festival	4	£84,760	100%
Unsuccessful applicants	7		N/A
Ineligible applicants	4		N/A

Subject to approval successful applicants will be awarded the following -

Local Festivals	100% of the amount requested
Neighbourhood Festivals	100% of the requested amount.
Large Festivals	100% of the amount requested.

Appendix I lists the groups which applied, the recommended scores, the funds requested and the amount to be allocated based on the budget available. Seven applications failed to meet the required pass mark and four applicants were ineligible.

All awards to groups for festivals must use the funds before the end of the grant period 31<sup>st</sup> March 2023.

Given the CFF LoO from the Department of Communities is not going to be available to Council until the end of June 2022, it is recommended that awards to successful applicants, whose Festivals commence or are to be held between March and June 2022 (Q1) are made at risk, from the Councils contribution of £60,000 which match funds the Departments estimated contribution of £31,000 to the total CFF budget of circa £91,000.

## Unclassified

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The Q1 Festivals are:

<b>Group/Organisation</b>	<b>Name of Festival</b>	<b>Amount Requested</b>
Friends of St Patricks PS Ballygalget	End of school festival	£1,000
Millisle Regeneration	The Big Lunch	£1,000
North Down YMCA	YMCA Fusion Festival	£980
Polish Association	International Childrens Festival	£4,000
Comber Regeneration Community Partnership	Comber Fringe Festival	£15,000
Donaghadee Community Development Association	Donaghadee Summer Festival	£15,000
<b>Total</b>		<b>£36,980</b>

**Recommendation.**

It is recommended that Council approves:

1. The recommendations detailed in the attached tables in Appendix 1
2. The award at risk LoO to successful applicants whose Festivals commence or are to be held between April and June 2022 (Q1)

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## Appendix I

Table 1 Local Festival

	Group / Organisation	Name of Festival	Amount requested	Score	% Score	100%
1	Ballygowan Presbyterian Church	Fun day	£1,000	20/40	50.00%	£1,000
2	Ballywalter & District Historical Society	Ballywalter Ulster Scots festival	£1,000	19/40	47.50%	£1,000
3	Bloomfield Community Association	Family Friendly Festival	£1,000	27/40	67.50%	£1,000
4	Breezemount Community Association	Youth Led festival	£1,000	27/40	67.50%	£1,000
5	Conlig Community Regeneration Group	Family Day	£1,000	26/40	65.00%	£1,000
6	Friends of Abbey PTA	Spring Festival	£1,000	19/40	47.50%	£1,000
7	Friends of St Patricks PS Ballygalget	End of school festival	£1,000	28/40	70.00%	£1,000
8	Greyabbey Orange Lodge 1592	Greyabbey Ulster Scots festival	£1,000	21/40	52.50%	£1,000
9	Millisle & District Community Association	Burns Night Celebration, A St Patricks Day Event and a Holocaust Memorial Day event	£1,000	19/40	47.50%	£1,000
10	Millisle Regeneration	The Big Lunch weekend	£1,000	18/40	45.00%	£1,000
11	Millisle Youth Forum	Halloween Festival of fun	£980	21/40	52.50%	£980
12	West Winds Development Association	50th Anniversary festival	£1,000	23/40	57.50%	£1,000
13	Whitehill Community Association	Community fun day	£1,000	25/40	62.50%	£1,000
						<b>£12,980</b>

Table 2 Neighbourhood Festival

	Group / Organisation	Name of Festival	Amount requested	Score	% Score	100%
14	Ards Peninsula Villages Partnership	Ards Peninsula Kite Festival	£4,000	31/55	56.36%	£4,000
15	Hollywood Shared Town	The Creative Hollywood festival	£4,000	26/55	47.27%	£4,000
16	Kilcooley Womens Centre	International Women's day	£1,000	34/55	61.81%	£1,000
17	North Down YMCA	YMCA Fusion festival	£980	27/55	49.09%	£980
18	Polish Association	International Children's Day, Polish Independence day,	£4,000	29/60	48.33%	£4,000

## Unclassified

		Cultural Christmas Celebration				
19	Saintfield District LOL No.5	Ballygowan Twelfth of July Festivities	£4,000	27/55	49.09%	£4,000
						<b>£17,980</b>

Table 3 Large Festivals

	Group / Organisation	Name of Festival	Amount requested	Score	%	100%
20	Comber Regeneration Community Partnership	Comber fringe festival	£15,000	31/55	56.36%	£15,000
21	Donaghadee Community Development Association	Donaghadee summer festival	£15,000	36/55	65.45%	£15,000
22	Portaferry Community Services	Portaferry sails & sounds festival	£8,800	34/55	61.81%	£8,800
23	Portaferry Gala Fest	Portaferry galafest and galaween fest	£15,000	35/55	63.64%	£15,000
						<b>£53,800</b>
<b>CFF Total</b>						<b>£84,760</b>

Table 4 Unsuccessful - failed to reach pass mark

	Group / Organisation	Name of Festival	Amount requested	Score	%	
24	Cloughey & District Community Association	20th Anniversary celebration	£1,000	10/40	25.00%	
25	Friends of Columbanus Bangor (FoCB)	Columbanus festival	£3,560	23/55	41.82%	
26	Holywood District Community Council	Holywood Mayday fair	£3,430	22/55	40.00%	
27	Holywood Family Trust	Family festival	£1,000	15/40	37.50%	
28	Kilcooley Community Forum Ltd	Community fun day	£1,000	14/40	35.00%	
29	Londonderry Primary School PTA	Summer Fete	£1,000	16/40	40.00%	
30	Love Ballyholme	Summer at Holme	£1,000	17/40	42.50%	

Table 5 Ineligible Applications



## Unclassified

34

	<b>Group / Organisation</b>	<b>Name of Festival</b>	<b>Amount requested</b>			
31	Abbey Villa Youth	Abbey villa community fun day	£750			
32	Dickson Park Residents	Dickson Park Platinum Jubilee party	£700			
33	Portaferry Costal Rowing	Row fest	£1,000			
34	Portico of Ards ltd	Annual Tenebrae service	£1,000			

## ITEM 16

**Ards and North Down Borough Council**

Report Classification	Unclassified
Council/Committee	Council
Date of Meeting	27 April 2022
Responsible Director	Chief Executive
Responsible Head of Service	
Date of Report	20 April 2022
File Reference	CG 12172
Legislation	Local Government Act (NI) 2014
Section 75 Compliant	Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/>
Subject	Notices of Motion
Attachments	Notices of Motion - Status Report

Please find attached a Status Report in respect of Notices of Motion.

This is a standing item on the Council agenda each month and its aim is to keep Members updated on the outcome of motions. Please note that as each motion is dealt with it will be removed from the report.

**RECOMMENDATION**

It is recommended that the Council notes the report.

**NOTICE OF MOTIONS UPDATE – APRIL 2022**

TO BE POPULATED BY DEMOCRATIC SERVICES							
DATE RECEIVED	NOTICE	SUBMITTED BY	COUNCIL MEETING DATE	COMMITTEE REFERRED TO	OUTCOME OF COMMITTEE WHERE NOM DEBATED	MONTH IT WILL BE REPORTED BACK TO COMMITTEE	OTHER ACTION TO BE TAKEN
31/05/15	Permanent recognition of Rory McIlroy in Holywood	Councillor Muir	24/06/15	Corporate Services Committee – October 2015	Agreed	TBC	Update sought at Jan 22 Council – to be reported to CSC
21/1/19	Shelter at slipway in Donaghadee	Councillor Brooks & Cllr Smith	Council – January 2019	Environment Committee	Agreed	TBC	
25/9/19	Report on feasibility of holding annual remembrance service for those lost to suicide	Councillor Martin	Council – October	Corporate Services – November 2019	Agreed	Reported to CSC January 2020. Further report to come back	
16/01/20	Closing of a public right of way at Andrew Shorefield, Groomsport	Alderman Keery	Council – January 2020	Corporate Committee – February 2020	Agreed	Reported to CSC in March and	

TO BE POPULATED BY DEMOCRATIC SERVICES							
DATE RECEIVED	NOTICE	SUBMITTED BY	COUNCIL MEETING DATE	COMMITTEE REFERRED TO	OUTCOME OF COMMITTEE WHERE NOM DEBATED	MONTH IT WILL BE REPORTED BACK TO COMMITTEE	OTHER ACTION TO BE TAKEN
						October 2020. Further report to follow.	
16/01/20	Installation of CCTV for Donaghadee with costings	Alderman Keery	Council – January 2020	Environment Committee – February 2020	Agreed	TBC	
27/2/20	Council opposes money spent on Irish Language Act	Councillor Cooper	Council- June 2020	Corporate Committee – August 2020	Agreed	SoS reply reported to and noted by Nov 2020 CSC	Letters sent to SoS and NICS Perm Sec. SoS reply reported to CSC. NICS Perm Sec reply awaited.
3/3/20	Management of Sand Dune Systems in Cloughey and Portavogie	Councillor Adair	Council – June 2020	Community and Wellbeing Committee – September 2020	Agreed	Report due by June 2022.	Coastal Erosion Forum meeting took place and information to be considered for scoping

TO BE POPULATED BY DEMOCRATIC SERVICES							
DATE RECEIVED	NOTICE	SUBMITTED BY	COUNCIL MEETING DATE	COMMITTEE REFERRED TO	OUTCOME OF COMMITTEE WHERE NOM DEBATED	MONTH IT WILL BE REPORTED BACK TO COMMITTEE	OTHER ACTION TO BE TAKEN
							out report to be brought back to Members. Site meeting attended 8 April 2022
20.10.20	"I would like to task officers to produce a report to consider what could be a more environmentally friendly and benefit the wellbeing of the community for the use of the disused putting green on the Commons and play park at Hunts park in Donaghadee . Following the success of the Dog park in Bangor and the demand for a Dementia garden, both should be considered as options in the report. The process should involve consultation with the local community."	Councillor Brooks	Council October 2020	Community & Wellbeing Committee – December 2020	Agreed	TBC	Officers to liaise with Regeneration and consideration of Masterplan and also take into account play strategy local consultation when it takes place in Donaghadee and bring back a report thereafter.

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22.10.20	Officers to work with the National Trust to develop and regenerate the Park Land adjacent to Greyabbey Village Hall as potential village renewal scheme.	Councillor Adair	Council November 2020	Regeneration and Development - December 2020	Agreed	Covered under the Small Settlements Scheme report to March RDC which was ratified by March Council	
8 April 2021	Council to source funding for Millisle Lagoon and Beach Park	Councillor Thompson and Councillor MacArthur	Council April 2021	Regeneration and Development Committee - September 2021	Agreed	Covered under the Small Settlements Scheme report to March RDC which was ratified by March Council	

TO BE POPULATED BY DEMOCRATIC SERVICES							
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19 April 2021	Flying of Union Flag on all Council buildings and war memorials all year round. Flags at half mast on death of any monarch or any other member of the Royal Family or Prime Minister of the UK for the period of mourning.	Councillor Cooper	Council April 2021	Corporate Committee – September 2021	NOM as amended agreed at March 2022 Council	TBC (awaiting EQIA)	EQIA to be carried out
10 May 2021	That officers are tasked to bring back a Report on how the Council might approach a Climate Change Action Plan and perhaps including - but not limited to - a review of all Council long-term investment, a Borough-wide engagement via an Innovation Lab, a Conference of Ideas, and values-based recommendations for next steps.	Councillors Walker & Egan	23 June 2021	Environment Committee – October 2021 (deferred from September Committee)	Agreed	TBC	

TO BE POPULATED BY DEMOCRATIC SERVICES							
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17 May 2021	Loughview Cemetery, Comber - It is requested that officers bring back a report outlining a proposal for the design, costs and positioning of a sign that is comparable to other graveyard signs throughout the Borough. Furthermore, that the report also includes the option of planting flowerbeds or similar at the entrance to the cemetery on the Ballygowan Road.	Alderman Girvan & Councillor Cummings	23 June 2021	Community & Wellbeing Committee -October 2021 (deferred from September Committee)	Agreed	Report to C&WC 13th April 2022  Further report TBC	
20.10.2021	That officers bring back a report to consider the option of transferring responsibility for bins which are currently the responsibility of the Parks Section into the Environment Directorate.	Alderman McIlveen & Councillor Cathcart	Council November 2021	Community & Wellbeing December 2021	Agreed	Report to C&WC 13th April 2022	



TO BE POPULATED BY DEMOCRATIC SERVICES							
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20.10.2021	<p>That this Council writes to the Minister for Communities to express concern at the high level of housing stress and shortage of social housing within our Borough. Further, that the minister is made aware of the limited temporary accommodation available to our residents.</p> <p>The Council further requests that the minister should bring forward proposals to identify sites in towns and villages within our Borough for additional social housing and, in the interim, requests that she works with the Northern Ireland Housing Executive to ensure that additional emergency accommodation is made available to those in extreme housing stress,</p>	Councillors MacArthur & Adair	Council November 2021	Corporate Services (deferred to January 2022)	Agreed	April CSC	Letter issued to DfC Minister. Response reported to April CSC and noted (to be ratified by April Council)

TO BE POPULATED BY DEMOCRATIC SERVICES							
DATE RECEIVED	NOTICE	SUBMITTED BY	COUNCIL MEETING DATE	COMMITTEE REFERRED TO	OUTCOME OF COMMITTEE WHERE NOM DEBATED	MONTH IT WILL BE REPORTED BACK TO COMMITTEE	OTHER ACTION TO BE TAKEN
	particularly in these challenging times.						
20.10.2021	That this Council notes with concern the significant increase in the cost of energy; recognises this will adversely affect many households across our Borough and calls on the Minister for Communities to establish a departmental led fuel poverty task force to assist the department in developing solutions to support those impacted and prevent many more people from falling into fuel poverty.	Councillors P Smith & Blaney	Council November 2021	Heard at Council November 2021	Agreed	C&WB March 2022	Letters sent 4.4.2022 to DfC and HM Treasury
3.11.2021	That this Council, in liaison with the Department for Infrastructure, will seek permission for and explore a source of funding in order to	Councillor Douglas & Alderman Wilson	Council November 2021	Regeneration & Development December 2021	Agreed	TBC	Consultation with Town Advisory Group currently

TO BE POPULATED BY DEMOCRATIC SERVICES							
DATE RECEIVED	NOTICE	SUBMITTED BY	COUNCIL MEETING DATE	COMMITTEE REFERRED TO	OUTCOME OF COMMITTEE WHERE NOM DEBATED	MONTH IT WILL BE REPORTED BACK TO COMMITTEE	OTHER ACTION TO BE TAKEN
	make an artistic feature of the steps which lead from Princetown Road to Queen's Parade at Bangor seafront as part of Bangor Town regeneration, and brings back a report to Council addressing how this can be achieved as a pilot for the Borough.						taking place and outcome will be reported to future meeting.
01.12.21	That this Council recognises the need for an additional park and ride to serve the Ards Peninsula and agrees to lobby Translink and the Department of Infrastructure to seriously consider this facility, which would further reduce vehicle movements within the Borough and assist our residents to continue to reduce the Borough's carbon footprint.	Councillor Thompson and Councillor Edmund	Council – December 2021	Corporate (deferred from January to February CSC)	Agreed	May 2022	Letters issued to DfI and Translink

TO BE POPULATED BY DEMOCRATIC SERVICES							
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31.12.21	Coastal and Storm Damage to Ballywalter Harbour, repair costs and reinstatement costs	Councillors Adair and Edmund	Council January 22	Environment February 2022	Agreed	TBC	Report to be brought back
17.12.21	Sea Swimming, promotion and water quality and consultation with users	Councillors Egan and Douglas	Council January 22	C&W February 22	Agreed	Report to C&WC 13th April 2022	Letter to DAERA Minister
10.1.22	Review of Old Minerals Permissions (ROMPs). For Department to implement, administer and deliver ROMPs	Councillors McKee and Kendal	Council January 22	Planning Committee February 22	Agreed		Letter issued to DfI Minister. Awaiting reply.
17.1.22	Roads and Footpaths Ballygowan upgrade and build on and work up further enhancements for village	Councillors P Smith & Blaney	Council January 22	Regeneration and Development February 22	Agreed	Covered under the Small Settlements Scheme report to March RDC as ratified by March Council	

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18.1.22	Refugees Sanctuary in the Borough	Councillors McKimm, Dunlop, Smart and Mathison	Council January 22	C&W February 22	Agreed	TBC	Refugee strategy and report to be brought back
19.1.22	Queen's Platinum Jubilee Funding	Councillor Cooper and Alderman Menagh	Council February 22	Corporate Committee – March 22	Agreed	TBC	Letters sent to Sec of State and Ministers
20.01.22	Stand4Trees and Tree Protection Orders	Councillors Kendall and McKee	Council February 22	Planning Committee – March 22	Agreed	Planning Committee June 2022	
1.02.22	Park and Ride at Bangor Sportsplex	Councillor Chambers and Alderman Smith	Council February 22	Corporate Committee – March 22	Agreed	TBC	Letter to Translink
1.02.22	Kircubbin Promenade Enhancements	Councillors Adair and Edmund	Council February 22	Regeneration & Development Committee – March 22	Agreed (to be ratified at March Council)	Covered under the Small Settlements Scheme report to	

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						March RDC as ratified by March Council	
3.02.22	Naming of Play Park in Ballygowan	Aldermen McIlveen and Gibson	Council February 22	Community & Wellbeing Committee – March 22	Agreed (to be ratified at March Council)	TBC	
16.02.22	Funding for sub-regional football stadiums	Councillors P Smith and Smart	Council - February 22	Heard at Council	Agreed (as amended)	Report to C&WC 13th April 2022	Letter issued to Minister 4/3/22.
02.03.22	400 <sup>th</sup> anniversary of Kirkistown Castle	Councillors Adair and Edmund	Council – March 22	Community and Wellbeing Committee – April 22	Agreed (as amended) (to be ratified at April Council)		
09.03.22	Resurfacing Bridge Road South, Helen's Bay	Councillor Greer, Johnson, Kendall & McRandal	Council – March 22	Corporate Services Committee – April 22	Agreed (to be ratified at April Council)		

TO BE POPULATED BY DEMOCRATIC SERVICES							
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09.03.22	Calls for Council responsibility for a devolved Regeneration Budget	Councillor Walker and Alderman McDowell	Council - March 22	Regeneration and Development Committee – April 22	Agreed (to be ratified at April Council)	TBC	Pending ratification at April Council, HOR to: 1. Draft letter to Minister; 2. Outline to RDC, a united engagement campaign with other Councils, SOLACE & NILGA, to secure Ministerial support.
22.03.22	Solidarity with Ukraine & Council support	Councillors MacArthur, Armstrong-Cotter, Dunlop, McClean and Egan	Council – March 22	Heard at Council – March 22	Agreed at March Council	14 April C&WB Committee	

TO BE POPULATED BY DEMOCRATIC SERVICES							
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23.03.22	Flood lighting and running track, Cloughey	Councillor Boyle and Alderman Carson	Council – March 22	Community and Wellbeing Committee – April 22	Agreed (as amended) (to be ratified at April Council)		





Department for  
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**Commonities**

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# Consultation Outcome Report

## Intermediate Rent: Development of Policy and Model

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March 2022

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## Acknowledgements:

We would like to thank those individuals and organisations contributing to developing the Intermediate Rent policy and model proposals, and those who have assisted in drafting this report, in particular:

DfC Professional Services Unit

DfC Communications & Engagement Unit

DoF Business Consultancy Service

DoF Housing Advisory Unit (CPD)

CBRE (Belfast); UK Collaborative Centre for Housing Research (CaCHE); Propertypal

Affordable Rent Project Board and Project Working Group members

Those who attended consultation events and who submitted a response to the consultation

## About this document

This document, a Consultation Outcome Report, presents the findings from the consultation on Proposals for the development of an Intermediate Rent policy and model.

## Background

The Department for Communities (DfC) has begun to develop new policy around the introduction of Intermediate Rent here to provide an additional affordable and more secure housing choice. Many families are struggling with increasing rents and insecurity in the private rented sector, and demand continues to exceed supply for social homes. The Department is taking forward a range of actions to help address housing inequalities, and has begun with the introduction of new Private Tenancies legislation. This will increase protections for tenants in areas such as rent increases and deposits, notice to quit periods, and safety checks. It also lays the foundation for more protections around energy efficiency.

Intermediate Rent is a housing model which does not currently exist within the local housing market and is neither social housing nor is it open market private rental. It is variously referred to as 'affordable rent', 'Mid-Market rent', and 'cost rental' in other neighbouring jurisdictions. Models of this kind have been operational across the UK and Ireland for some time, but have yet to

be provided in any formal way in the housing market here.

Intermediate Rent traditionally occupies the space between private rentals and social rentals, offering enhanced security of tenure and more affordable rents. It provides quality properties which are well maintained, and offers support to tenants which can help mitigate some of the issues which tenants can face in accessing and sustaining a tenancy.

Intermediate Rent homes can make a positive difference when it comes to rental affordability, and can reduce or remove some of the barriers which people, particularly those who are vulnerable, can face in getting and sustaining a tenancy in a home that meets their needs. It will not be a suitable solution for everyone, but for some it can offer a more secure, cost effective, and sustainable housing option.

This consultation aimed to share the Department's thinking on the scope of a new Intermediate Rent policy and model. The Department is developing an overarching policy for Intermediate Rent which will set out the principles underpinning it, such as a design standard, its provision at below market rents, and so on. In parallel, a subsidised model will come forward, setting the additional rules around any subsidy from Government towards the development of some Intermediate Rent homes. New planning obligations under development are expected to mandate more affordable housing in new

developments. Some of these new homes may be for Intermediate Rent, but may not be part of the subsidised model. All Intermediate Rent homes will be expected to meet the principles of Intermediate Rent as set out in the policy, whether subsidised or not.

The consultation explored and sought stakeholders views on the detail of issues such as how a model may be supported financially, what the rules around developing and letting Intermediate Rent homes may be, and who may be able to deliver and to live in Intermediate Rent homes.

The Department has established a number of forums, with cross sectoral representation including housing professionals, social and private housing providers, local government, and advocacy groups. The DfC project team has worked closely with these organisations to help inform the development of a suitable Intermediate Rent policy and model and to bring forward the consultation proposals.

A number of other pieces of work are also relevant to the development of the Intermediate Rent Policy proposals and will influence the context within which the policy will be delivered:

- [The Review of the Role and Regulation of the Private Rented Sector](#)
- [The Fundamental Review of Social Housing Allocations](#)
- [The draft Homelessness Strategy 2022-2027](#)

- [The draft Housing Supply Strategy](#)
- [The Definition of “Affordable Housing”](#)

## Consultation process

The Department’s consultation, “Intermediate Rent: Development of Policy and Model”, contained proposals on the development and implementation of a new affordable rental product: Intermediate Rent. It was published between 18 October 2021 and 14 January 2022.

The consultation proposals were accompanied by a research report commissioned from the UK Collaborative Centre for Housing Evidence (CaCHE) around the need for an Intermediate Rent product, the potential demand, and the mechanisms required to make a product viable to develop, deliver and rent within the NI housing market.

A number of other documents were published on the Department for Communities website, including the following:

- Development and delivery of a new Intermediate Rent policy and model (equality screening)
- Consultation on Intermediate Rent – Easy Read
- Intermediate Rent Development of policy and model MS Word questionnaire

A Rural Needs Impact Assessment and Data Protection screening were also produced, referenced in the published documents, and were available on request.

Results were collected using the NICS preferred consultation tool, Citizen Space, and by responses submitted via email and post. To raise public awareness and understanding of the Intermediate Rent consultation proposals the Department used social media and engagement events to ensure as many stakeholders and members of the public as possible were able to participate in the consultation.

## Press, Social media and online activity

- A Departmental Press Release: (<https://www.communities-ni.gov.uk/news/minister-hargey-proposals-increase-affordable-housing-options>)
- 1,063 unique views of the Intermediate Rent consultation webpage and 197 unique views of the DfC Intermediate Rent webpage
- Article on the CaCHE blog [An Intermediate Rent model for Northern Ireland](#)



- Departmental tweets (16,006 Impressions; 3,923 Impressions for a reminder tweet) and retweets from a range of interested parties
- Article on Supporting Communities website, and an Amp Survey '[The Amp Survey Says Yes to Intermediate Rent](#)'

Intermediate Rent proposals and a Q&A session to allow attendees to clarify any issues. While most events had a small audience, two were held as sessions within larger events i.e. the CaCHE NI Knowledge Exchange Hub and the Housing Rights Conference 2021.

## Stakeholder engagement



Ten separate consultation engagement events were held (virtually due to Covid-19 restrictions) with:

- housing professionals and academics
- NIFHA and Housing Associations
- tenants and tenant representatives
- Local Government: councillors and officials
- NIHE officials and the NIHE Board
- Construction and Developer sector representatives,
- Attendees at the Housing Rights Conference

These sessions included a presentation on

## Publication and Distribution

- The consultation document and an easy read version of the consultation document were published online via the DfC website.
- The consultation document was issued by email to key DfC stakeholders, housing professionals, third sector organisations (including those who represent tenants and those experiencing or at risk of experiencing homelessness).
- The consultation document was issued in hard copy to key stakeholders who requested this format.

## Consultation Responses





Responses to the consultation were submitted via a range of methods:

- Citizen Space online survey questionnaire
- By email directly to the DfC team
- By post

In addition, Supporting Communities hosted a short survey via its Amp site. Those who responded were asked questions broadly aligned with some of the questions posed within the Citizen Space questionnaire. 95 surveys were completed and the results can be viewed online [here](#).

A total of 33 responses were submitted (via email, post, and Citizen Space) from a wide range of stakeholders, including housing professional bodies, third sector advice and advocacy groups, housing providers, political representatives and members of the public. A total of eight responses were submitted by individual members of the public, with the remaining 25 submitted by organisations.

Sixteen responses were received via email or post<sup>1</sup>. Seventeen responses were received using the online questionnaire survey, thirteen using Citizen Space and a further four using the Word questionnaire (which were transposed into Citizen Space to assist in analysis). Seven of these were from members of the public, responding as individuals from a tenant's perspective. The remaining ten responses were from organisations.

## Analysis and Collation of Respondent Views

Responses were reviewed and analysed in relation to the proposals as set out in the consultation document. Some stakeholders provided feedback on all proposals, while others chose to respond only on certain issues or questions. In addition some stakeholders also provided feedback on other housing issues beyond the scope of the consultation.

To help analysis, responses received by post and email were aligned with the questions posed in Citizen Space questionnaire where possible, and issues which did not align to specific questions were considered separately.

Various themes were identified and captured in line with each proposal. These are presented alongside an analysis of the support for the proposal. We looked for any trends or specific variances between the views of individuals and those of organisations. For most of the proposals there were no significant differences. Where there were differences, this is discussed within the feedback although given the low numbers in each group, this information should be treated with some caution. To assist with analysis, respondents were categorised as follows:

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<sup>1</sup> Late responses have been considered within the commentary against the Proposals only. Unfortunately it was not possible to incorporate late responses into the data analysis.

Category	Description
Individual	includes all responses from individual members of the public
NI social landlord/representative	includes the Housing Executive, and Housing Associations and their representative body
Housing professional	organisations with a specific focus on housing such as the Chartered Institute of Housing
Voluntary/Community/Advocacy/Charity	includes a range of bodies such as Housing Rights
Statutory body	includes a range of bodies such as the Equality Commission
Political Representative	includes political parties
Council/local government	includes Councils and NI Local Government Association
Finance Professional	includes responses from those working in the finance industry
Trade Union	includes responses from Trade Union bodies
UK Housing Provider	includes those involved in housing provision in other UK jurisdictions
Construction and Developer sector	includes those working in the construction and developer sector and their representative bodies

In order to protect the privacy of respondents we have not included a full list of names of those who provided a response, nor have we

published the responses in full. A number of organisations also published their own responses online.

## Methodology

### Response Rates

There were 17 responses to the online survey, and 16 responses via email or post. Due to the relatively low number of responses, caution is advised in interpreting the data presented.

In some cases, where there are common themes, proposals are grouped for the purposes of analysis. It should be noted, however, that not all respondents answered every question, in some cases providing comments but not providing an answer to the question posed.

The analysis is therefore set out to show how many people commented or responded on the proposal/grouped proposals. These figures include all respondents who agree, disagree, neither agree nor disagree or who did not offer a clear view. These details have been captured for those who provided their response either using the online survey or by email/post.

### Preferences

This document sets out the proposals, the views received from respondents, including their preferences to each proposal, and indicates the levels of support or opposition to the proposals. Those respondents who used the Citizen Space questionnaire indicated (in most cases) their preference for

each proposal. Analysis has been undertaken on the responses received by email and post. Although these responses did not always align with the questions set out in the online survey, they provided (in most cases) an indication of the respondent's support for or disagreement with a proposal. The analysis of some of this feedback (in terms of support for or opposition to the proposals) required some interpretation and, as such, should be treated with some caution.

### Issues Raised Outside the Scope of this Consultation

Some respondents provided views and information regarding wider policy issues which fall outside the scope of Intermediate Rent. Issues raised included the broader issue of housing affordability, data gathering and regulation in the wider Private Rented Sector, dealing with issues such as land banking, Planning and infrastructure issues generally, vacant and derelict properties or sites, the provision of social housing and wider economic and societal issues including climate action and skills development.

All of these issues are undeniably important and, while they do not sit within the scope of the Intermediate Rent policy and model, the Department and the wider Executive is taking forward action around these issues via a range of Housing, Energy and Green strategies.

## Next Steps

The feedback received, through engagement events and in writing, was largely positive. In respect of some proposals, several respondents sought further detail on specific points.

The majority of responses were in favour of the development of Intermediate Rent, albeit subject to certain clarifications or adjustments. It is clear that there is support for the introduction of Intermediate Rent among tenants and those that represent their interests.

The Department will now move to apply the feedback received and to finalise the detail of the policy and model, including those aspects around which further detail is needed, and work will be completed to seek approval for the required funding.

Working with the Housing Executive's Research Unit, a team from Ulster University has recently been appointed to gather some further information specifically in relation to tenant and operator perspectives on the IR policy and model. This market research focused piece will engage with a range of tenants and with organisations which may have a role in delivering Intermediate Rent. The resulting report is expected to be

available to the DfC Project Team in spring 2022, and the outputs will also help inform the final decision making around the policy and model.

The Department acknowledges that the consultative process has left some issues unresolved. This document has been produced to provide an early indication to interested parties on how the proposals have been received and what the next steps will be. In providing this early readout it has not been possible in this document to be prescriptive about all of the final detail yet. These issues need further exploration, data gathering, scenario planning, and discussion with a range of interested parties. Some of these matters will also need to be finalised in consultation with the operator. These additional tasks are set out within the commentary on each proposal.

The project team in DfC intends to continue to engage with a range of interested parties as it finalises the policy and the operational model. Taking on board the comments received, and discussed in detail below, this engagement will include dialogue with prospective tenants, organisations representing tenants and landlords, planning officials, the Housing Executive, potential providers and the developer and construction sector as required.

The project's Working Group and Project Board, established in 2020, are comprised of key stakeholders across the housing sector:

Chartered Institute of Housing (CIH)  
 Councils (Belfast City Council; Derry City & Strabane Council)  
 Department for Communities  
 Housing Rights  
 Landlord Association of Northern Ireland (LANI)  
 Northern Ireland Federation of Housing Associations (NIFHA)  
 Northern Ireland Housing Executive (NIHE)

The Project Board and Working Group will continue to play a key role in shaping the final outputs from this process, ensuring a continued stakeholder influence in the development of the policy in its final stages and implementation.

## Proposals, Departmental Response and Next Steps

This report follows the format of the consultation paper and associated questionnaire. The main body of this report sets out the proposals, grouped under thematic areas, summarising the comments received on each proposal/grouped proposal. It then describes how the Department will move forward in consideration of the matters raised.

## Would an Intermediate Rent home be suitable for me?

The Department proposes that it will work with interested parties to develop a programme to supply Intermediate Rent homes offering secure, affordable, good quality, well managed homes to lower income households, at below market rents, in areas of choice. Prospective tenants will apply for an Intermediate Rent home in a similar way to other private rentals.

### Proposal 1, 2 and 3 Analysis



#### Proposal 1 What we asked

To what extent do you agree there is a need for the introduction of a new intermediate rental product as described?

**Out of a total of 33 responses 32 (97%) responded to this proposal**

27/32  
in support

97%  
Response rate

#### Analysis of Responses

Of those who responded using the Citizen Space questionnaire the majority of respondents (15

out of 17) agreed that there is a need for the introduction of a new Intermediate Rent model, whilst the remaining two respondents neither agreed nor disagreed.

Of those who responded by email/post the majority of respondents (12 out of 15) agreed that there is a need for the introduction of a new Intermediate Rent model. Of the remaining three respondents two disagreed and one did not clearly indicate whether they agreed or disagreed.



## Proposal 2 What we asked

To what extent do you agree with the proposed application process outlined?

**Out of a total of 33 responses 22 (67%) responded to this proposal**

13/22  
in support

67%  
Response rate

## Analysis of Responses

Of those who responded using the Citizen Space questionnaire almost two-thirds of respondents (11 out of 17) agreed with the proposed application process outlined. An equal number of respondents neither agreed nor disagreed, or disagreed (three respondents each).

Of those who responded by email/post, two out of five agreed with the proposed application process outlined, one respondent disagreed and two commented but did not indicate if they agreed or disagreed.

The only responses received which disagreed with the proposal were received from organisations with 4 of 15 organisations indicating they disagreed.



## Proposal 3 What we asked

To what extent do you agree with the listed household descriptions which are likely to benefit most from Intermediate Rent homes?

Out of a total of 33 responses 20 (61%) responded to this proposal



### Analysis of Responses

Of those who responded using the Citizen Space questionnaire just over three-quarters of respondents (13 out of 17) agreed with the listed household descriptions, which are likely to benefit most from Intermediate Rent homes. A further three respondents neither agreed nor disagreed and one respondent disagreed.

Of those who responded by email/post one respondent out of three agreed with the listed household descriptions, which are likely to benefit most from Intermediate Rent homes. A further two respondents commented but did not clearly indicate if they agreed or disagreed.

### Summary of respondents' views

#### Proposal 1

The Department was seeking the views of stakeholders on whether they thought there is a need to introduce a new Intermediate Rent (IR) product. There was strong support for the proposal with most respondents indicating that they agreed.

Respondents indicated that Intermediate Rent will help those who are struggling with affordability in the Private Rented Sector, and can help those who have relatively low social housing points. Feedback also indicated it would create a wider pool of rental products which would bring diversity to the rental market and this **“would be of benefit in addressing the changing needs of those seeking accommodation”**. It was recognised as **“one element in a wide range of measures need[ed] to address the housing crisis across Northern Ireland”**, and would help to break down barriers faced by those trying to access housing.

Some individual respondents referenced their desire to move into home ownership and see IR as a stepping stone to this goal. A period of more affordable rent would allow them the space to save for a deposit and allow them to move on from the scheme. In order to maintain Intermediate Rent homes for rental in the longer term there will be no ‘Right to Buy’ element. Others highlighted the potential for IR to help address difficulties

they currently face in accessing an affordable home which is close to family/ their children's schools, or in locations where social housing may be limited.

One response from a NI social landlord / representative commented that, **“The delivery of quality homes operated by a professional landlord with improved standards and options for tenants in the private rented sector, at a reduced rental level making them accessible to those who need them most, summarises the benefits. Intermediate Rent has potential to help in mixed tenure schemes, where intermediate tenures blur the lines between social and private and reduce the potential for any one tenure to “claim” new developments.”**

Those who were not in favour of the proposal stated that any available funding should be used to fund the provision of social housing to prioritise objective need. The need for a range of strategies to address housing needs was highlighted by one respondent from the Council/ local government sector: **“It is acknowledged that increasing social housing alone is not the only solution, and that growing the supply of other affordable products can help address housing need in its broadest sense.”** As an additional type of affordable housing it can contribute to meeting affordable housing planning obligations being brought forward through Local Development Plans.

One respondent challenged the **“necessity for such an additional housing model in**

**an area with a population as small as NI”**. The consultation proposals were developed following extensive desk research and engagement with stakeholders considering a range of aspects in relation to the policy of which ‘need’ was a key part. Independent research produced by CBRE led to the commission and publication of the CaCHE report, ‘Establishing an evidence base for the development of a viable intermediate rent model for the Northern Ireland housing market’ (2021), which is available on the [DfC website](#) and further market research is currently underway which will focus on tenant demand and provider appetite for such a product.

Feedback from the NI social landlord / representative sector queried whether an affordable Intermediate Rent policy and model could be developed and launched without more widely assessing and defining the concept of housing affordability: **“It is proposed that affordability will be a key driver for an applicant, however, without an agreed definition of affordability or housing costs, it will be difficult to assess how affordable the model is to households, regardless of its tenure.”**

The consultation received comments from a UK Housing provider who already delivers and operates a below market rent housing model. They indicated that although below market rents are attractive, an Intermediate Rent home offers so much more which is attractive to tenants including:



1. **“Stability of tenure (partly due to renting from a charity rather than from a private individual and partly due to tenants being encouraged to treat the property as their own)**
2. **Quality of home**
3. **Location of property (close to family, work, friends) with few equivalent alternatives;**
4. **Having a landlord they can trust; and**
5. **Professional repairs service which deals with issues quickly.”**

## Proposal 2

The proposal indicated that Intermediate Rent (IR) would not be accessed through an allocations process (as is the case for social housing). Rather, prospective IR tenants will make an application for a tenancy. Evidence elsewhere has shown an application process based on a ‘first come, first served’ basis (subject to meeting any relevant eligibility criteria) can be an effective method of matching tenants with properties. This can be supplemented by an ‘Expression of Interest’ phase, allowing applicant tenants to clarify eligibility, and the Operator to filter ineligible applications.

There was strong support for an application process with supporters commenting **“This appears to be a sensible approach, especially the focus on the affordability assessment.”** A UK housing provider responded to say they use a similar application process and

that **“We have generally found it to be a fair and reasonable way to offer homes to prospective tenants.”**

Another respondent working in the Voluntary/Community/Advocacy/Charity sector stated their organisation **“agrees it would be appropriate for the assessment process to be carried out by the operator”**, and that the proposed **“first come first served’ allocation process is appropriate for this product.”** They went on to say it may be useful to review the ‘first come first served’ process after an initial period **“to consider whether prioritisation on the basis of additional criteria would help to address any issues that may have arisen.”**, and noted that unsuccessful applicants should be signposted to advice services to help them meet their housing needs.

The principles of fairness and equality of access in the application process was a recurring theme for respondents. Processes should be implemented to make sure that applicants are fully informed of what the provision offers and how it differs from other types of housing provision. One respondent highlighted it is **“essential that information is accessible and meets the communication needs of the range of tenants using the proposed model. This information includes in relation to language and accessible formats.”** They also underlined that, **“To ensure equality of opportunity, the development of the programme and the provision of a ‘first come, first served’ basis**

**there needs to be a greater awareness of rights and the market in order to empower potential tenants to explore the full range of options open to them.”**

Some agreed that the application process needs to be robust but the process risks becoming overly cumbersome. One respondent indicated that they did not feel they had enough information to respond, another indicated that assessment criteria and an affordability assessment should be used as part of the application process.

Those respondents who disagreed suggested that alternative methods could ensure greater fairness. Some respondents asked if creating an Intermediate Rent waiting list has been considered and, although this has not been proposed, a number of responses made reference to an allocations process: **“I do not agree with ‘first come first served’. Allocation should always be process of fairness, there should be a range of things to consider before making a selection rather than selecting the first application that meets the initial requirements and that those most in need of the property are given priority.”**

One response stated, **“It is reasonable that prospective tenants will be chosen on a first come first serve basis initially and will be subject to an affordability assessment”**, but they disagreed with the proposed application process on the basis **“that the income bands suggested for eligibility for intermediate rent may be too high and may still exclude households that can’t access social housing.”**

Respondents generally indicated that a clear and well understood application process will help prospective tenants understand if they are eligible to apply. Clarity on the process where demand exceeds supply is also required.

### Proposal 3

The Department set out the households that it thinks would be most likely to benefit from or to be interested in renting an IR home, who may already be spending more than 30% of their income on housing costs, as those who are:

- Existing private renters struggling with affordability
- Social housing applicants in housing stress but with low points (who will wait a very long time for a social home in their area of choice)
- Those in ‘concealed’ housing stress, living in unsuitable accommodation but who have not applied for a social home

Additional interest may come from:

- Social housing tenants moving to an IR home (where the driver may be location, quality or change in personal circumstances)
- Older people who currently rent and want to downsize or change location

Comments were generally positive with 14 out of 20 comments in favour of the proposal. One theme which emerged is that if the lower income threshold was further reduced

more people could benefit from the scheme. One respondent who disagreed with the proposal, strongly disagreed on how income bands were defined: **“£18,000 -£30,000 is not low income. Most of the tenants we house are on much lower income than this and therefore would not benefit from this scheme That is true ‘low income’.”**

One respondent indicated that they felt that they needed more detail to respond on the proposal, and another stated: **“The descriptions cover a broad range of households - There are many other groups of individuals who need to be housed and may not be able to access via a social housing route - students, keyworkers, migrants and those with physical disabilities – how do these groups currently find housing solutions?”**

There was some misunderstanding that IR will only be available for those who are already on the social housing waiting list. This is not expected to be the case as the scheme will be open to all who wish to access it and who meet the eligibility criteria. Other respondents queried whether someone who was a Full Duty Applicant<sup>2</sup> (FDA) (and therefore has over 70 points) would lose their FDA status if they had an IR tenancy and

whether this may deter those in this position from applying for the scheme.

To be clear, those applying for an IR tenancy would not be asked to leave the social housing waiting list. It is important to point out however that it could be the case that accepting an IR tenancy may, on review, lead to a reduction in an applicant's points. For this reason the Department feels that IR may be better suited to those who have under 70 points.

#### Key themes/ issues raised by respondents

- Lack of suitable, affordable accommodation in the Private Rented Sector (PRS) in the places where tenants wish to live/remain
- IR will provide an alternative for those on the social housing waiting list with low points
- The minimum income cap should be reduced/removed to avoid excluding those who would benefit from IR

“This would be a lifeline to many low/ middle income families struggling to find a secure and affordable home.”

<sup>2</sup> A Full Duty Applicant is a person who has passed all four tests for homelessness and who has not yet been given a permanent social tenancy. The Housing Executive has certain responsibilities to people with this status, including providing temporary accommodation, storing their furniture in certain cases and making them 3 reasonable offers of a permanent tenancy.

"This scheme will help many families work their way out of poverty. It should also help to stabilise the private rental market as they will not have the same power over tenants to push up rent as they will have more options."

## Departmental Response and Next Steps

### Proposal 1 and 2 (Grouped)

There is clear support for the introduction of an additional affordable rental type in the housing market here and the Department will continue to work with a range of interested parties to finalise the detail of the policy and model. Proposal 1 will therefore be taken forward as outlined.

Regarding the application process, we will continue to engage with a range of interested parties to finalise the process and the associated guidance, and will agree this with the IR Operator once they have been appointed. This will also allow the opportunity to incorporate the feedback received and to determine how the application process can be streamlined for the applicant whilst still seeking to help those who will benefit most. It is not envisaged at this stage that a waiting list will be created but consideration

will be given to an expression of interest process which will allow a prospective tenant to confirm that they meet the eligibility criteria.

In undertaking this, the Department will examine the matters raised in relation to:

- ensuring that the application process is fair and that equality of opportunity is assessed and incorporated throughout the provision
- ensure that the application process is well-defined for potential applicants, and sets out what will happen if an IR tenancy is not offered
- ensure that sufficient detail is provided to ensure that potential tenants can make an informed decision on whether IR is right for them
- provide information which is accessible in a range of formats and languages, and
- review and refine the application process after an initial running period to ensure that those who will benefit from IR can access it

### Proposal 3

Respondents were largely in agreement with the Department in relation to those households who are likely to benefit most from IR homes. The concerns that it will not address affordability for those living on the lowest incomes within the Private Rented Sector are noted.

The Department has been mindful that Intermediate Rent, being higher than social rents, is not going to be suitable for all people and families as it will not be affordable for every household. It would improve affordability for some however, the housing needs of those on the very lowest incomes may be best met in the social housing sector. The Department remains of the view that the households listed above are those who are most likely to be attracted to and assisted by availing of an IR tenancy.

The Department will therefore proceed with Proposals 1 to 3 largely as set out in the consultation taking account of those matters outlined above.

## How will Intermediate Rent levels be set and reviewed?

The Department proposes that Intermediate Rents will initially be set at up to 80% of market rent for the same type and size of property within the same geographical area. Regular rent reviews will operate, and an agreed uprating formula will be used to determine rent increases.

## Proposal 4, 5 and 6 Analysis



### Proposal 4 What we asked

Based on evidence and research it is proposed that Intermediate Rents are initially set at up to 80% of local market rents for similar types and sizes of properties. Do you agree this proposal would be reasonable and attractive?

**Out of a total of 33 responses 26 (79%) responded to this proposal**



### Analysis of Responses

Of those who responded using the Citizen Space questionnaire, three-quarters of respondents who answered this question (12 out of 16) agreed that Intermediate rents set at up to 80% of local market rents was reasonable, whilst the remaining four respondents disagreed.

Four-fifths of respondents (12 out of 15) agreed that this proposal was attractive, whilst three respondents disagreed. One respondent both agreed and disagreed that this proposal was attractive; assumptions have not been made around what their true response should have been.

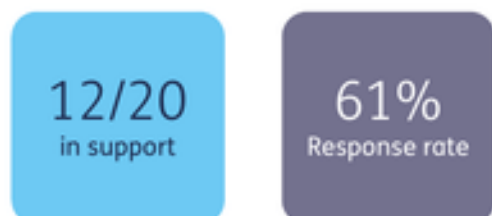
Respondents who responded by email/post did not indicate reasonableness or attractiveness in their responses and are not captured above. Of those who responded using email/post 2 of 10 were in favour of the proposal, one respondent disagreed the remaining seven respondents did not clearly indicate whether they agreed or disagreed.



### Proposal 5 What we asked

Do you agree with the proposed uprating arrangements?

Out of a total of 33 responses 20 (61%) responded to this proposal



#### Analysis of Responses

Of those who responded using the Citizen Space questionnaire, over three-fifths of respondents who provided an answer (10 out of 16) agree with the proposed uprating arrangements whilst the remaining six respondents did not.

Of those who responded by email/post, two respondents who provided an answer (2 out of 4) agreed with the proposed uprating

arrangements whilst the remaining two respondents did not clearly indicate if they agreed or disagreed.



### Proposal 6 What we asked

Do you consider an alternative uprating approach would work better to ensure IR offers affordability to tenants and viability to the programme operator?

Out of a total of 33 responses 17 (52%) responded to this proposal



#### Analysis of Response

Of those who responded using the Citizen Space questionnaire three-fifths of respondents (9 out of 15) consider that an alternative uprating approach would work better to ensure Intermediate Rent offers affordability to tenants and viability to the programme operator, whilst six respondents did not.

Of those who responded by email/post only two commented regarding this proposal both appeared to be in favour of an alternative uprating approach.

## Summary of respondents' views

### Proposal 4

Setting affordable and sustainable levels of rent is key to IR providing an affordable rental level for lower income households. Rental income forms an important part of the financial model underpinning IR, so rents must be set at a point which ensures viability for the Operator. In considering optimising rents for both purposes the Department commissioned extensive analysis of the costs of private rents here, compared to Housing Association rents, and analysis of housing cost expenditure of those in receipt of Housing Benefit. This research indicated that a significant proportion of households currently struggling to meet unaffordable rents could benefit immediately from a rent set at 80% of market rents. The research also considered rent setting aligned to Local Housing Allowance (LHA) rates<sup>3</sup> and identified that there would be significant challenges in setting rents at LHA rates for a viable scheme in the local housing market.

Those who responded to the survey were asked to consider both how attractive and reasonable rents set in this way would be. Many who indicated a view agreed they thought rents discounted by around 20% of open market rents would be both reasonable and attractive. One respondent reflecting the position of other individuals requested

**“Please make housing affordable for young parents who want to work part time while caring for young children.”**

The responses from email/postal respondents did not indicate their view on the reasonableness or attractiveness of the rent setting proposition. Only one respondent appeared to disagree with the proposal based on feedback that, **“All affordable housing models, including intermediate rent, should be grounded in people’s incomes and circumstances rather than pegged solely to market rates.”** Others agreed subject to caveats around how rent setting is implemented so that it avoided distorting the existing PRS market, while another raised concerns that the market rents in their area are higher than they should be and that setting rent in relation to an inflated market rent would not be affordable for those on lower incomes.

A number of respondents noted that their preference would be to set the IR rents with reference to local LHA rates to allow those who rely on housing benefit capped at LHA rate to access an IR tenancy in an affordable way.

Some voiced opposition to a rent setting formula for Intermediate Rent that would track the market rent year on year. It has been the Department’s position that the initial IR rent will be determined at the first tenancy in

<sup>3</sup> Local Housing Allowance (LHA) is a rent assessment scheme for those who rent in the private sector. It determines how much Housing Benefit someone renting in the private sector can receive, based on rent levels in their area and number of people in their household.

relation to the prevailing local market rents, and thereafter any rent increase would be based on the uprating formula discussed under Proposal 5. Each subsequent tenancy would be based on the most recent rental price for that property and subject to any uprating formula. It would not be re-set annually against the local market rents.

The issue of viability of setting rent at up to 80% of the local market rent came up repeatedly, often interlinked with discussion of location and how that would interplay with rental demand and costs. This uncertainty may have resulted in some stakeholders not indicating a defined position on the proposal. One response indicated that IR should not be set below social rent, suggesting that that could call into question the viability of IR for the operator.

Caution was urged in relation to setting rents, noting that up to 80% of market rents is a reasonable starting point which should be regularly monitored and reviewed. There was some support for trialling the rent setting model and completing further demand analysis to undertake scenario planning, which could cement viability and determine the appropriate level of public subsidy for the model.

One respondent, a UK provider of a below market rent housing model, commented on how the rents were set within their scheme, noting that they had erred away from setting rents in reference to the local market. This was applied for a number of

reasons including that 80% of market rent can be unaffordable in certain locations, that it can thwart development in rural areas (in particular) where market rents can be 'very low'. The volatility of market rent prices was also cited as a reason not to tie their rents to market rents, while LHA rates are more likely to remain stable and offer a safety net where tenants who, for example, lose employment do not lose their home.

The response acknowledged the complexities around rent setting, noting **"As a generality, we would suggest that so long as the general principles are set out clearly with flexibility to cope with local conditions inherent in the drafting and subject to clear limits, control over actual rent setting and increases should lie with those responsible for operating and taking liability for the provision of the housing."**

## Proposals 5 and 6 (Grouped)

These proposals set out how rents would be reviewed and revised periodically, and offered readers the opportunity to suggest alternative uprating options. The uprating model proposed a formula of CPI plus up to 1% is used, giving some certainty to tenants to understand how their rent may increase. It also offers a degree of certainty in terms of model viability, with some confidence around anticipated levels of rental income into the model. Rent costs are expected to be set to cover ancillary costs such as any service



charges and domestic property rates where applicable, to avoid any unanticipated costs for tenants.

The majority of respondents who commented on the proposed uprating arrangements were supportive. Some wanted rent to remain fixed over the five year tenancy, and others were supportive of a CPI based uprating approach, **“A CPI approach may also work for Landlords and Tenants in budget planning. Funding model scenario testing required: to test viability generally, how the funding model would operate generally, as well as with CPI linked uplifts over the proposed 20-year term.”** Although some who responded requested more information, some felt able to support the proposal, subject to certain limitations to minimise how much IR rents could be permitted to increase.

More than half of those who commented (11/17) indicated they would favour an alternative uprating approach (ie not CPI plus up to 1%) however no significantly different alternative approach was suggested. The reasons put forward for seeking an alternative uprating approach largely relate to ensuring continued affordability for tenants in the long term and stability of rental costs.

Some responses supported setting limits on the amount which rent could be increased. Some respondents highlighted that a large number of those who live in the Private Rented Sector rely on housing benefits paid at LHA rate to help towards their housing costs. They requested that any decision to increase the rent should take into consideration changes or freezes in the LHA rate and other cost of living increases which could impact on the affordability of any rent increase.

A response from a below market rent UK Housing Provider commented, **“Reference to CPI brings a strong element of certainty to tenants which is incredibly important. It should also be workable from an ongoing viability perspective, if the initial cost assumptions are correct.”**

#### Key themes/ issues raised by respondents

- Reducing IR rent to up to 80% of market rent (or a bigger reduction) would be welcome
- Potential for IR to influence the market rent in local areas
- Viability of an up to 80% rental model in all locations
- Rent increases should consider other cost of living increases and changes in the LHA rate

"While I agree that this is both reasonable and attractive, there needs to be stability built in to this: that rent should remain the same or lower for a period of 12/18/24 months"

"It is reasonable if it is set at the same price for the 5 years to ensure that the private market do not push prices up which would in turn push these prices up. ...private rent prices have increased dramatically due to the pandemic so we need to average that prices over previous years so it is not set unrealistically high. I would suggest taking a 2019 average"

## Departmental Response and Next Steps

### Proposal 4

The proposal aims to provide an overarching rent setting policy for any Intermediate Rent homes developed, and also a subsidised model, where government funding will contribute towards development. It is important when considering the rules around

Intermediate Rent that some aspects, for example how rents are set, will be common to all Intermediate Rent development, whether it is subsidised or not.

Setting an Intermediate Rent level of up to 80% of average local market rents had a great deal of support amongst respondents and will be implemented as outlined subject to review and agreement with the appointed Operator. The Department does not dispute that it would be ideal to be able to offer lower rents but the research commissioned indicated significant viability challenges for setting the rent at LHA rate in the local context.

The volatility of open market housing, including accessing rented accommodation, the cost of rents, and the cost of operating a home have been brought into sharp focus through the period of the Covid-19 pandemic and the current world events which are placing an increasing strain on households budgets. The introduction of an Intermediate Rent product, offering reduced rents, would provide assistance to households whose cost of living is increasing while income remains relatively stagnant. The research evidence demonstrated that reducing rents by 20%, particularly for medium to lower income households, can immediately improve their affordability situation.

The proposal indicated that rents will be set at 'up to' 80% of market rent (for a

similar property type and size in the same location). Where it is appropriate and viable to deliver IR homes for rents of less than this, it will be pursued. In order to make sure properties are as affordable as possible it will be necessary to ensure that the property types and locations provided will meet the needs of the target tenants, including their housing affordability needs. We will also look at opportunities to set rents with reference to applicants' incomes, where possible. Where IR is developed without subsidy, it would be expected that that rents would be set with reference to the final policy decision.

Alongside support for the proposal there was also a significant degree of uncertainty expressed by those working in the housing sector that it would be viable to set the rent at this level and in which locations this would work. The Department remains committed to provide a policy and model which improves affordability, and will revisit the research and the data available before finalising the rent setting methodology. This will assist in preparing the business case for the model to ensure that it is satisfied that a robust case can be made.

It is envisaged that Intermediate Rent will be most effective in areas of high demand but the locations for intervention have yet to be determined and further discussion will be required with the IR Operator as to how and where implementation will commence and the locations for expansion.

The issue of defining housing affordability sits outside the scope of the proposed policy and model, however the Department is already separately committed to explore the issues around rents across social and private rented housing to explore issues around housing affordability.

### Proposals 5 and 6

Proposal 5 and 6 received a mixed reaction in terms of how and when rents should and could be uprated, although no specific alternative models were proposed. Further consideration will be given to setting a fair and transparent uprating formula, which gives a degree of certainty both to tenants and to the operator in terms of affordability and viability respectively. The Department accepts that wider economic factors, such as the setting of LHA rates and cost of living fluctuations, should form a part of the decision making process for the IR programme operator in consultation with the Department on whether it is necessary to implement a rent rise in any given year.

In the absence of any viable alternative to uprating the Department will implement Proposal 5 as outlined. In order to mitigate the concerns of respondents the Department will require the IR Operator to provide the tenant with more information on how the rent they pay could change, and an estimate of the maximum amount their rent could increase by each year over the 5 year tenancy before they enter into any agreement.

## What will the Eligibility Criteria be for an Intermediate Rent tenancy be?

The Department proposes that targeting Intermediate Rent homes to lower income households is central to the programme. There will therefore be an income eligibility criterion.

### Proposal 7, 8, 9 and 10 Analysis



#### Proposal 7 What we asked

To what extent do you agree with the proposed initial income bands for accessing an Intermediate Rent home?

**Out of a total of 33 responses 28 (85%) responded to this proposal**

14/28  
in support

85%  
Response rate

#### Analysis of Responses

Of those who responded using the Citizen Space questionnaire, the majority of respondents (12 out of 17) agreed with the proposed initial income bands for accessing an Intermediate Rent home. A further two respondents neither agreed nor disagreed while three respondents disagreed or strongly disagreed.

Of those who responded by email/post 2 of 11 agreed with the proposed initial income bands for accessing an Intermediate Rent home. One respondent disagreed and 8 respondents commented without clearly indicating if they agreed or disagreed.

When considering both survey results and narrative responses together people responding as individuals were more likely to agree with the proposal on income bands (5 out of 7) than those responding for organisations (9 out of 21). Only a small number of respondents (4 out of 28) disagreed with the proposal, all of these respondents were from organisations.



#### Proposal 8 What we asked

It is proposed that income can come from a variety of sources e.g. earned income, interest on savings, private pension income as well as housing related benefits. To what extent do you agree these and other types of income should be considered when accessing an IR home?

**Out of a total of 33 responses 19 (58%) responded to this proposal**

13/19  
in support

58%  
Response rate

### Analysis of Responses

Of those who responded using the Citizen Space questionnaire, three-quarters of respondents (12 out of 16) agreed that a variety of income sources should be considered when accessing an Intermediate Rent home. However, three respondents neither agreed nor disagreed and one respondent disagreed.

Of those who responded by email/post one of three respondents agreed that a variety of income sources should be considered when accessing an Intermediate Rent home, the remaining two respondents commented without clearly indicating if they agreed or disagreed.



### Proposal 9 What we asked

Do you think the level of savings held by prospective tenants should be considered as part of eligibility and / or an affordability assessment when applying for an IR home?

**Out of a total of 33 responses 17 (52%) responded to this proposal**

11/17  
in support

52%  
Response rate

### Analysis of Responses

Of those who responded using the Citizen Space questionnaire, the majority of respondents (11 out of 16) think the level of savings should be considered as part of the eligibility/affordability assessment when applying for an Intermediate Rent home. The remaining five respondents did not.

Of those who responded by email/post only one respondent commented regarding whether the level of savings should be considered as part of the eligibility/affordability assessment when applying for an Intermediate Rent home, they disagreed with the proposal.

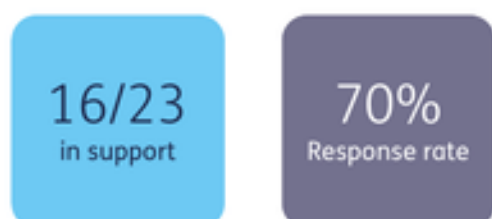
Organisations were more likely to agree that savings should be taken into consideration with 8 of 10 agreeing with the proposal and 2 who disagreed. Individuals were almost evenly split with 3/7 agreeing with the proposal and 4 disagreeing.



## Proposal 10 What we asked

Do you agree consideration should be given to additional eligibility criteria in such circumstances?

Out of a total of 33 responses 23 (70%) responded to this proposal



### Analysis of Responses

Of those who responded using the Citizen Space questionnaire, over four-fifths of respondents (14 out of 17) agreed that consideration should be given to additional eligibility criteria in certain circumstances. The remaining three respondents disagreed.

Of those who responded by email/post 2 of 6 respondents agreed that consideration should be given to additional eligibility criteria in certain circumstances, the remaining four respondents commented but did not indicate if they agreed or disagreed.

### Summary of respondents' views

#### Proposal 7

The Department asked stakeholders if they agreed with the proposed initial minimum and maximum income bands for accessing an Intermediate Rent home.

The higher end of the income eligibility bands were set to ensure those who do not need help and don't need to access an affordable rent product cannot apply. This focuses the assistance on those who face financial barriers in accessing a home that meets their needs. The income floor was suggested with the aim of ensuring that an IR tenancy did not put a household into a position where they are struggling to pay their rent or other basic living costs. The overarching aim of the IR policy and model is that where possible an IR tenant should not pay more than 30% of their income on rent.

Support for the proposal among the respondents was mixed. The clearest message respondents were keen to convey was that the lower income threshold would potentially exclude people who would benefit from access to IR and are currently paying higher rents than would be offered under IR. Although this would mean that their rent in IR could be more than 30% of their income, it would be lower than their current rent and

so would improve affordability for them. One respondent who commented disagreed with the policy proposal in general as it was not focused solely on objective need.

Another respondent indicated, from their perspective there, **“was no definitive support ... for criteria set purely on income”**. They feel outgoings are as important as income, urging consideration of additional factors **“such as number of dependents, childcare costs, dependents with disabilities, and other cost of living factors which would impact a tenant’s ability to meet IR criteria. A means test that includes real cost of living expenses may be more appropriate as opposed to simple income related criteria.”**

Others pointed out that the upper income threshold should reflect the regional variability in income and that **“consideration to inconsistent levels of income should be given to those on zero hours contracts”**.

A UK Housing Provider of a below market rent model commented that, **“A degree of flexibility to help households who do not meet the minimum criteria but who are currently in unsuitable accommodation would assist. Also, flexibility to help households who do not meet the minimum threshold but who currently pay more than the affordable rent and have not fallen into arrears would ensure that while they earn less than the recommended minimum income levels, they too could get the**

**benefit from a more affordable rent and their payment history would also provide a level of comfort to the provider that the tenant could sustain their tenancy.”**

## Proposal 8

The Department suggested that income assessed as part of eligibility for IR could come from a variety of sources including earned income, interest on savings and for example private pension income as well as housing related benefits.

One response observed that **“all sources of income should be considered in order to get a thorough idea of affordability, including any assets. This should then be held against any out-goings. ie, loan repayments, credit cards, child care costs, Social Costs etc”** while another commented that **“Decisions on income should be related to long term affordability. If a person is having to dip in to savings then long term affordability is questionable.”**

For some there was clear agreement with the proposal; another respondent adopted a more cautious position indicating that it is, **“important that no blanket exclusions are made based on a households’ income source, e.g. those in receipt of benefits, and we welcome the fact that the proposed model is open to this group”**. Someone highlighted the importance of affordability

irrespective of the income source saying, **“Regardless of the source of income, the process for accessing an IR home must fairly balance household income against household expenditure so that the tenant’s rental costs do not prevent them from feeding their families, paying their bills and heating their homes.”**

### Proposal 9

There was some resistance to considering any savings held by applicant tenants. One response refuted it commenting, **“Including income from savings and benefits does nothing to ease the strain on housing poverty, and makes it more difficult to access or sustain eligibility for this support.”** It was also suggested that those who are saving for a deposit towards home ownership might be unfairly disadvantaged if savings are taken into consideration.

There were a range of reasons given for considering savings given by those who agreed with the proposal, generally respondents felt that savings should be permitted up to a point. One respondent from the NI Social landlord/representative sector pointed out **“households should be encouraged to save for any unforeseen future costs and applicants should, therefore, be able to retain some savings. We believe that the interest on savings over a certain level should be taken into consideration as income to contribute to housing costs.”**

Others felt that prioritising those without significant savings would help ensure access for those who would benefit most **“savings play a part on housing benefit entitlements and so it should also pay a part in applying for a property. Those most greater in need should come first.”** Few respondents mentioned a specific allowable amount of savings. Those that did referenced £30k, or an amount which is no more than 15% of the value of the property they are renting.

### Proposal 10

Views were sought on whether we should include additional eligibility or prioritisation criteria which could help focus offers of tenancies. These could include circumstances such proximity to family, proximity to schools, or whether the applicant was on the social housing waiting list.

The majority of respondents (16 of 23) agreed that consideration should be given to additional eligibility criteria. Those who disagreed indicated that additional criteria would **“swamp the scheme”**. A respondent from the NI Social Landlord/representative sector stated, **“all applicants should generally be given equal access to an intermediate rent based on income. Eligibility criteria which prioritises potential applicants on the basis of family connections or living in a neighbourhood may have equality implications, including disadvantaging applicants from a minority background with no existing links to an**



area, and could limit the potential to create balanced and shared communities and could also be difficult for the programme operator to assess.”

They went on to say that, “if social housing applicants were to be prioritised in an Intermediate Rent model, it may simply encourage all potential Intermediate Rent applicants to first apply for social housing as a means of gaining advantage to access intermediate housing and increasing waiting lists as a consequence.”

Another response emphasised that “the most important factor will be ensuring that the allocation process operates to the principles of fairness, equity and non-discrimination”.

Those who agreed with the proposal commented to indicate that they agreed an applicant should have a link to the area through family connections or work/ study and suggested the addition of a new criteria in relation to having children in the local school. One suggested that having the criteria linked to the Social Housing waiting list “would help remove those on housing stress, currently with 30 points plus and reduce the waiting list significantly.”

A UK housing provider suggested considering an additional criteria “We would suggest that unsuitable current accommodation is added as a circumstance e.g., due to disability or inappropriate current

conditions (e.g. due to age, family circumstances e.g. having a baby and buggy in a top floor flat without a lift, poor quality/damp current accommodation etc).”

#### Key themes/ issues raised by respondents

- The lower income threshold should be reduced/removed
- IR applicant tenants should be permitted to have savings but a threshold should be applied
- Additional prioritisation criteria could introduce discriminatory impacts on some section 75 group

“I agree overall but would like to see the lower end dropped to ensure we do not miss out some of the most vulnerable.”

“I agree that earned income, pension & benefits should be considered. I would think that interest on savings would not be very much for someone on a lower income so would not see why this needs to be included.”

“if they [the applicant] have enough saved for a 15% deposit on a suitable home then they should be supported to buy a house not take up a space on the scheme.”

## Departmental Response and Next Steps

### Proposal 7

As there will be a limited supply of Intermediate Rent homes, it is important that these are directed towards those who can best benefit. For this reason income eligibility bands were suggested, based on the principle that the homes should be directed towards lower to moderate income households and that an IR tenant should generally not pay more than 30% of their income on rent.

The Department accepts the views that those at the highest end of the proposed income bands would not be considered by many to be on a “low income”. Data examined indicates that households within this income bracket are often expending more than 30% of income on housing costs. It is recognised that IR may not offer an affordable solution for some low income people and families. However, IR may improve the affordability position for many, by offering a lower rental cost. The IR product is intended to complement social housing delivery without impacting on its funding by using a financial model funded largely through low cost Government loan and private finance. It will simply not be possible to deliver an IR model using this financial model in a way which is financially viable and yet affordable for all incomes, however it will be possible to deliver a model which will be of real benefit to some.

In response to the concerns raised by stakeholders during the consultation the Department is minded to adopt a more flexible approach, removing an explicit minimum income floor. An indicative income floor of £18k for single applicants and £20k for joint applicants will help inform the final affordability assessment, however, an applicant whose income is lower than this (including those on zero hours contracts) can demonstrate an IR tenancy can be affordable for them if they have paid rent at higher level than the rent for the property they are applying for over several months based on a similar income and without leading to arrears. The maximum income threshold of £30k for a single applicant and £40k for joint applicants was widely supported and will apply to the initial phase and be kept under review.

### Proposal 8

Proposal 8 will be implemented as set out in the consultation document. A good level of support for this proposal was demonstrated among respondents. Income from a variety of sources e.g. earned income, interest on savings, private pension income as well as housing related benefits will be considered as part of the affordability and eligibility process.

The Department is keen to ensure that the application process and eligibility criteria are clear and that a potential applicant can easily determine for themselves if they would be eligible to apply for an Intermediate Rent

home and if it would be suitable for their needs. This will be key to making the scheme as accessible as possible to as wide a range of potential applicants who would benefit from the scheme. Whilst the Department has noted the comments from respondents that there should be flexibility in relation to income thresholds across locations and there should be a more complex assessment of affordability, it does not anticipate that these changes would be compatible with reducing the complexity of the scheme for applicants. It could prolong the application process, become intrusive and create unnecessary hurdles for those applying for the scheme.

### Proposal 9

There was some misunderstanding of what the Department meant by this proposal. It had been framed to probe whether respondents felt that savings (and what level of savings) should be considered at application stage. The responses received indicate that some stakeholders were responding on the basis that an ongoing assessment of savings during the tenancy would happen, which could be used to exclude someone from the scheme. This will not be the case.

Support was mixed in relation to whether applicant tenants should be permitted to have significant savings, for example to be saving towards a deposit for a house. The Department has considered the feedback, and on balance, considered that it would be

reasonable to permit savings, such as the beginnings of a deposit for a home. However, there is still some work to be done to establish what the threshold for these savings should be and how the level of savings should be revised on an ongoing basis.

### Proposal 10

Although the majority of respondents were in favour of including additional or secondary eligibility criteria which could be used to prioritise applicants from a wider pool, prioritisation criteria can bring challenges and may unintentionally disadvantage some.

There is a need for fairness and equity, as well as simplicity, in the application process and a need to ensure that any additional criteria which were applied did not disadvantage minority groups. The Department considers the risk that these criteria could create disadvantage for anyone applying for the scheme, but perhaps more so for those who come from a minority/ethnic group. It is very difficult to envisage how the IR operator could implement multiple additional eligibility criteria without disadvantaging a household unintentionally. It would also be difficult and potentially discriminatory for an IR operator to have to make a judgement on whose circumstances should take priority over another's.

For the reasons outlined above it has been decided that Proposal 10 will not proceed as outlined. The Department will work with

the IR Operator to determine the fairest approach to offering a tenancy, this may be similar to that used in a comparable scheme which is based on a lottery system.

## Would tenants need to provide references, a deposit or a guarantor?

The Department proposes that in line with other private tenancies, Intermediate Rent tenants will provide references and can build up a deposit.

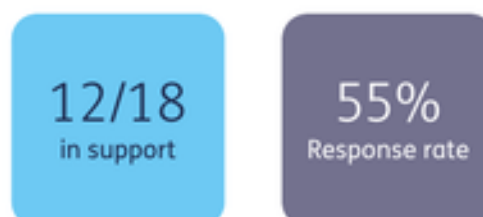
### Proposal 11 and 12 Analysis



#### Proposal 11 What we asked

For other private rentals it is common for landlords to ask for references and deposits. To what extent do you agree with the approach to references as outlined for IR tenancies?

**Out of a total of 33 responses 18 (55%) responded to this proposal**



#### Analysis of Responses

Of those who responded using the Citizen Space questionnaire, almost two-thirds of respondents (11 out of 17) agreed with the approach to references as outlined for Intermediate Rent tenancies. However, two respondents neither agreed nor disagreed and four respondents disagreed.

Of those who responded by email/post, only one respondent commented on the approach to references as outlined for Intermediate Rent tenancies. They agreed with the proposal.

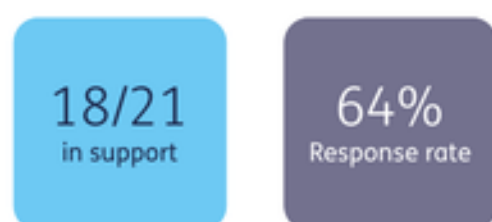
Respondents from organisations were more supportive of the proposal than those responding as individuals. 2 of 7 individuals agreed with the proposal, 3 of 7 disagreed, 2 strongly disagreeing and 2 of 7 neither agreed nor disagreed. 10 of 11 organisations were in favour of the proposal with 4 strongly agreeing and one organisation disagreed.



## Proposal 12 What we asked

To what extent do you agree with the proposal that a tenancy deposit should be applicable to IR homes (instead of the need for a guarantor), which can be gathered over the initial period of the tenancy where the tenant requests that?

**Out of a total of 33 responses 21 (64%) responded to this proposal**



### Analysis of Responses

Of those who responded using the Citizen Space questionnaire, the majority of respondents (15 out of 17) agreed that a tenancy deposit should be applicable to Intermediate Rent tenancies (instead of the need of a guarantor), which can be gathered over the initial period of the tenancy where a tenant requests this. The remaining two respondents neither agreed nor disagreed with this proposal.

Of those who responded by email/post, 3 out of 4 who commented on whether a tenancy deposit should be applicable to Intermediate Rent tenancies (instead of the need of a

guarantor), agreed with the proposal, one further respondent commented but did not clearly indicate whether they agreed or disagreed.

### Summary of respondents' views

#### Proposal 11

The Department sought views whether a landlord reference would be necessary for an IR tenancy similar to arrangements that operate in the private rented sector. It was acknowledged that not everyone could provide a landlord reference, and that there may be a need for certain exceptions (e.g. where the tenant is a first-time renter) where an employer or personal reference could be acceptable.

Responses to this proposal were mixed and there were clear differences in the palatability of the requirement for references between those responding as individuals and those responding on behalf of an organisation. Reasons given for disagreeing with the proposal by individuals were in relation to possible exclusion of vulnerable people: **“Not everyone knows someone who fits the usual referee criteria”**, and another respondent commented, **“People who are or have been homeless, find providing references a barrier to accessing accommodation.”**

One respondent who did not offer a position on the proposal commented that **“I do believe deposit and 1 month’s rent should be included.”** Another individual agreed with

the proposal indicating that two references should be required: **“Work based reference and personal reference.”**

There was some confusion around what might be required by way of references, although most respondents broadly welcomed the flexibility to include employer or personal references, especially where an applicant has no history of renting: **“The need for a reference from a previous landlord may discriminate against young people and other first-time renters and should not be considered as a pre-requisite for access to the intermediate rent scheme.”** Another respondent highlighted a potential equality impact for minority ethnic groups who may find it more difficult to provide a reference or guarantor should one be a requirement.

A respondent from the NI social Landlord/representative sector commented, **“It is reasonable to expect Tenants to provide some comfort around their ability to honour the commitment that they are signing up to. The Private Rental Sector would be largely inoperable without credit checks / reference processes. References and deposits are sensible.”**

A below market rent UK Housing Provider commented: **“we currently ask for two references ... basic reassurances are still required.”**

## Proposal 12

Views on the collection of a tenancy deposit at the outset of a tenancy as proposed would allow the tenant to request to build up a deposit gradually over the first 6-12 months of their tenancy. Furthermore, it was proposed that the collection of that deposit may be sufficient to negate the requirement for a guarantor.

Support for this proposal was clear, with one respondent from the Voluntary/Community/Advocacy/Charity sector indicating that their organisation **“strongly supports the proposal in the document to enable a tenant to build up a deposit gradually over the first 6 – 12 months of their tenancy rather than paying it all at the outset.”** The response also **“welcomes the proposal to deem either the upfront or gradual payment of a deposit sufficient to negate the need for a guarantor (and we recommend that where a guarantor is deemed necessary such requirements are not prescriptive).”**

Another respondent from the same sector stated **“This proposal is how we ... currently operate and I would therefore strongly agree to it.”**

A political representative indicated their **“support for proposals around negating the need for a guarantor on the basis of upfront/gradual payments of deposits which will no doubt improve accessibility”**. They also commented on the forthcoming Private Tenancies legislation which will, when operational, provide safeguards linked to

limiting deposits to one month's rent; these comments were also echoed by a respondent from Council/local government. Some stakeholders sought reassurance that these changes will apply to IR, which will of course be the case, as these homes will be subject to any regulatory arrangements for the private rented sector.

Feedback received pointed out that respondents, **“believe these proposals will help provide a degree of flexibility for those who are unable to secure a guarantor for many different reasons for example, those leaving situations of domestic violence, those with strained family relationships, those who have no parent/legal guardian still living, or those other situations.”**

An NI social landlord / representative sector response stated **“established norms within the private rented sector (deposits / references etc) should apply rather than the norms of the social rented sector in which the funding / operating model reflects the acuity of housing need / stress.”**

Another representative from the same sector supported the proposal to allow the incremental collection of a deposit which **“can act as a significant barrier to accessing housing”** and highlighted, **“Guarantor frameworks pose a barrier to many for a whole range of reasons. Guarantor frameworks can be open to abuse and can place most vulnerable persons at risk e.g through turning to loan sharks/money lenders as a guarantor.”** Other respondents raised the issue of very high levels of deposit

being required by tenants in the PRS who were not able to provide a guarantor thereby acting as a further barrier to accessing a tenancy.

An additional issue raised by stakeholders during the consultation engagement sessions related to letting fees, viewing fees, and charges for credit checks which are still being passed on to some tenants in the Private Rented Sector. These fees are unlawful and effectively exclude those on low incomes from accessing a home. No such charges will apply for the Intermediate rent model, and where there are costs associated with any credit check required these will be absorbed by the Operator. The same rule would be expected to apply to any un-subsidised IR tenancies.

#### Key themes / issues raised by respondents

- Requirement for references at the outset of a tenancy presents a problem for some prospective tenants.
- The ability to build up a deposit over 6-12 months would be welcome.
- The provision of references/guarantors and a deposit at the outset of a tenancy is a necessary safeguard.

**“Agree that a deposit that can be accumulated over the initial period of the tenancy would be a better option than a guarantor that many people may not be able to secure.”**

“Ability to pay a deposit up front is an important indicator of likelihood to sustain the tenancy. We would not allow a deposit to be built up over time, as rent arrears can very quickly exceed deposit amounts and instead we work with rent deposit guarantee scheme operators (often run by local authorities) where an up-front deposit is an issue.”

## Departmental Response and Next Steps

### Proposal 11 and 12

Proposal 11 and 12 will both proceed as set out above and in the consultation document. Overall respondents were in favour of both proposals which are a pragmatic approach to ensuring the scheme is accessible to those it aims to help whilst managing the risk inherent in any property letting arrangement.

The Department welcomes the feedback from respondents in relation to references both in identifying the prospective tenants who may need additional flexibility in this regard and in relation to the need for reference/s as a safeguard. Evidence gathered in advance of engagement also highlighted potential difficulties in the provision of a reference from some groups and shaped the Department's proposal which incorporated the flexibility to allow an applicant in such circumstances to provide personal references, we now think this should be expanded to include a reference from an employer.

A deposit capped at one month's rent is another safeguard which the Department feels is a sensible approach to minimise the risk associated with not requiring a guarantor under most circumstances and to cover any costs associated with damage to the property or abandonment. Providing the facility to build up the deposit over a number of months will give tenants some space to cover the other upfront costs associated with a move such as rent in advance and moving costs. There was a great deal of support for this approach among stakeholders.

Some respondents pointed out that one or more references and a full deposit should be required. The funding mechanism for social housing is different than the proposed funding mechanism for IR and this will mean that the approach to references/guarantors and deposits will present more risk for the IR Operator. Whilst the Department agrees references and deposits have an important role in providing surety, it feels some intervention is required so that these barriers for entry to the scheme can be minimised by incorporating an element of forbearance within the model to allow the risk to be effectively managed by the IR Operator. There may be some circumstances which may require an applicant to provide a guarantor, this could for example be a history of significant outstanding rent arrears. Further discussion will be required with the appointed IR Operator to agree under what circumstances a guarantor will need to be provided.



## How long would an Intermediate Rent Tenancy Last for?

The Department proposes that Intermediate Rent tenancies would be offered for a duration of (up to) 5 years. Tenancies will be reviewed and may be renewed. Where a tenant moves on, the Operator will work with them as they transition to a new home.

### Proposal 13, 14 and 15 Analysis



#### Proposal 13 What we asked

What advantages and challenges can you identify for Intermediate Rent tenancies of (eg up to) five years in duration with an opportunity to renew?

**Out of a total of 33 responses 20 (61%) responded to this proposal**



#### Analysis of Responses

Of those who responded using the Citizen Space questionnaire 14 provided a comment when prompted for advantages and 11 provided a comment when prompted for disadvantages

Of those who responded using by email/post 6 commented on the tenancy period but

responses were not clearly broken down by advantages and disadvantages.



#### Proposal 14 What we asked

To what extent do agree with the Department's proposal that Intermediate Rent tenancies should be subject to review with an opportunity to renew after the initial tenancy term?

**Out of a total of 33 responses 20 (61%) responded to this proposal**



#### Analysis of Responses

Of those who responded using the Citizen Space questionnaire, the majority of respondents (15 out of 17) agreed that Intermediate Rent tenancies should be subject to review with an opportunity to renew after the initial tenancy term. The remaining respondents were equally split between neither agreeing nor disagreeing and disagreeing or strongly disagreeing (one respondent each).

Of those who responded by email/post, all three of those who commented on this issue agreed that Intermediate Rent (IR) tenancies should be subject to review with an opportunity to renew after the initial tenancy term.



## Proposal 15 What We Asked

As an initial Intermediate Rent tenancy comes to an end, please rate your preferred option:

- Reapplication and eligibility checks if the tenant wishes to remain in property
- Tenancy renewed without need for eligibility checks on agreement of tenant and landlord
- Option to have a rolling tenancy
- No option to extend tenancy, tenant to leave property at end of initial tenancy
- Other (please specify)

Out of a total of 33 responses 18 (55%) responded to this proposal.



### Analysis of Responses

This proposal asked respondents to rank potential options which could take place as an Intermediate Rent tenancy comes to an end from a given list. As such it is not appropriate to quantify levels of support for this proposal.

Of those who responded using the Citizen Space questionnaire, the most popular option chosen from the list was 'Tenancy renewed without need for eligibility checks on

agreement of tenant and landlord'. This was closely followed by 'Option to have a rolling tenancy', and 'Reapplication and eligibility checks if the tenant wishes to remain in the property'. The 'Other' category (please see below for more details) and 'No option to extend tenancy, tenant to leave property at end of initial tenancy' ranked much lower.

Of those who responded by email/post only one respondent specifically commented on this proposal. Although their ranking of options differed slightly from those captured using Citizen Space factoring these in did not alter the overall option ranking.

### Summary of respondents' views

#### Proposal 13

The Department proposed that Intermediate Rent will offer tenancies up to five years, which is longer than the 12 months commonly offered in market rentals. This can provide greater security of tenure for tenants and in turn help ensure that people and families in an IR dwelling feel like it is their home, can plan for their future and develop a sense of belonging and community. Although tenants will be offered multi-year tenancies, as with any tenancy, they would not be compelled to stay for the full tenancy duration and, if their circumstances change, the statutory notice to quit period would apply.

The Department asked for views on the relative advantages and challenges of offering a five year tenancy term. Respondents were largely supportive of the proposal and identified a number of advantages especially when comparing this to the standard 12 months. A political representative commented: **“Security of tenure is vital for protecting individuals, worker’s and families from eviction, but also for providing them the stability and peace-of-mind in their housing situation, which will in turn support them to become ingrained within a local community.”**

Indeed, research has concluded that that a lack of secure tenure can have a detrimental effect on people’s wellbeing. The advantages of a longer tenancy identified included:

- providing stability which is important for all but will particularly be valued by those with children in local schools
- additional security of tenure/peace of mind
- protects tenants from risk of eviction with very limited notice e.g. due to a property being sold
- avoidance of disruption, allows people to plan
- can allow for changes in circumstances – family size, employment situation etc,
- provides greater incentive for the tenant to feel invested in their home and the local community

- allow households to feel settled and secure, develop a sense of belonging and attachment to an area
- enhances health and wellbeing by virtue of avoidance of the detrimental impact lack of security of tenure can have
- allowing time to get into a position to access home ownership, social housing or private rental accommodation
- provides certainty of income for the landlord

The IR product has not been designed for those tenants who are seeking a transitional rental product for short term use as the market already caters for shorter tenancies. The Department considers that offering a longer tenancy term is a key aspect of the IR proposal which can help tenants reduce the costs associated with moving home frequently. It can also be financially advantageous for an Operator by reducing costs associated with tenant turnover. This feature of IR has the support of other respondents one of whom commented that 5 years should be the minimum term tenancy term offered.

Other jurisdictions offer tenancies without an end date as a default. One below market rent UK Housing Provider based outside Northern Ireland noted: **“it is difficult to see advantages for a fixed end point from the tenants’ viewpoint”**.

Some concern was raised by one respondent, who felt that the specified five year tenancy represented a cap once the end point has been reached and challenged DfC's assertion that 5 years represents medium to long-term security. The assertion that five year tenancies are more secure was also challenged by others who suggested, **"Five years is a short time in housing and we have found ... that knowing a tenancy could end in 5 years does not bring the stability and security that people need, to feel that the property is their home."** The Department would agree that it would be optimal to extend a tenancy where appropriate and is examining what arrangements should be considered for renewal at the end of the initial tenancy.

A misconception that arose in the feedback in relation to this proposal was that the Department would look to existing private rented landlords to offer Intermediate Rent. The Department intends to appoint an Operator for IR, who will part finance the model, develop the homes, and act as the landlord.

Challenges associated with longer tenancies identified by stakeholders include:

- what happens after 5 years in relation to eviction, tenancy renewal and rent charges?
- dealing with 'problem' tenants e.g. anti-social behaviour which can cause disruption and blight a scheme causing letting issues in future

- Managing expectations, in that an IR tenancy can be ended
- If tenant turnover is high re-let costs and resources will be high which could threaten viability if offering properties at less than market rates
- Ensuring tenant is aware of roles and responsibilities before committing to tenancy
- If a tenant gets into arrears or if a property is being kept in a state of disrepair, may be difficult for landlord to regain vacant possession

Although stakeholders were able to identify challenges associated with a 5 year tenancy, many of these are inherent in any letting arrangement and are not specific only to 5 year tenancy arrangements. Some of the challenges were in relation to uncertainties regarding renewal and rent uprating which are dealt with under separate proposals (14, 15 and 8 respectively), some of these uncertainties envisage scenarios which are not expected to arise under the IR scheme. The Department considers that these challenges will all be manageable and would agree with the position of one respondent who commented, **"We do not believe there are significant challenges that would outweigh any of the advantages in providing a more secure home to tenants."**

## Proposal 14

The Department will work with the operator, once appointed, to finalise the detail of

tenancy review and renewal. Where an IR tenant wants to renew their tenancy after the initial 5 years, this will be considered. An assessment of the household's income will help determine whether the home remains an affordable option. The Department is not proposing to re-apply the initial income eligibility criteria at renewal. To do so would undermine the tenant's ability to improve their financial situation and could unintentionally lead to homelessness.

This was echoed by one respondent: **"we recommend that the default after the initial 5-year term should be that the tenancy is renewed, irrespective of the income level of the tenant."** However, a contrary view was also made by an organisation who feel strongly, **"that intermediate rent tenancies should be subject to review to ensure that tenants of intermediate rent homes are those who need them the most. Providing tenants with the opportunity to renew after the initial tenancy term provides an elements of housing choice, should they choose to renew or move on."**

If it is determined that the property is no longer affordable due to a change in circumstances, the Operator will work with tenants to aid transition to another home from the early part of the final year of their tenancy. One respondent flagged that a review may be required during a tenancy if their circumstances change: **"the review will have to come earlier if the accommodation /size/type/location etc becomes inappropriate."**

Only one respondent disagreed with the proposal to carry out a review, however, their comments demonstrate positivity towards permitting a 5 year tenancy to be extended.

When it came to the arrangements around reviewing a tenancy at the end of the first five year term, views were very much in favour of the need to review a tenancy at the end of the initial period so that it could be extended. **"Option to renew is vital, while some tenants will use this opportunity to plan for the future and save a deposit to buy, others will not have had enough disposable income to do this or may have seen a change in circumstances or hit a crisis. The option to renew is key to ensure we do not leave tenants with insecure housing and additional stress."**

A respondent from the NI social landlord / representative sector in agreeing with the point above also pointed out that there are other considerations which need to be considered at the review point, **"There are reasons why a tenancy should not be renewed (e.g. breaches of lease)."**

## Proposal 15

Under Proposal 15 respondents were asked to rank in order of preference, the process that should take place when it comes to renewing or ending an IR tenancy. The ranked responses provided by respondents to the questionnaire was as follows:

1. 'Tenancy renewed without need for eligibility checks on agreement of tenant and landlord'
2. 'Option to have a rolling tenancy'
3. 'Reapplication and eligibility checks if the tenant wishes to remain in the property'
4. 'Other'.

Only one stakeholder commented in their narrative response that reapplication and eligibility checks are needed to **“to ensure intermediate rent products are adequately meeting the needs of the tenant, and the product is meeting its intended policy objectives.”** The Department would agree with point in that it recognises the need to ensure that where a person can no longer afford an IR home that they are helped in so far as possible by the IR Operator in advance of their tenancy coming to an end. There were very limited comments made by respondents but the 'other' option was selected by 2 who made the following remarks:

- I think there is more to talk about on this rather than providing 1,2,3 at this time. So please do not consider this answer as final
- We feel there needs to be checks and balances on eligibility to ensure those who require the IR product most can access it

#### Key themes/issues raised by respondents

- Offering tenancy lengths of up to 5 years was welcomed
- Reviewing tenancies with the possibility of renewal was well received in the majority
- There were mixed views on whether income should be checked at the review point

“Up to 5 years provides stability and can allow for changes in circumstances – family size, employment situation etc. By guaranteeing up to 5 years, you provide greater incentive for the tenant to invest in their home and local community.”

“It will incentivise applicants to consider this as an attractive option, because of the level of stability on offer. However clear terms and conditions must be offered from the outset.”

## Departmental Response and Next Steps

### Proposal 13

The Department agrees with respondents that there are many advantages for tenant health and wellbeing in offering longer tenancies. There are also some challenges

associated with this such as managing anti-social behaviour which is below the threshold of breaching a tenancy but is detrimental to neighbours. Proactive management and tenancy support will be an important element of IR provision, helping identify and address issues which can lead to such behaviours, and to protect security of tenure before it leads to loss of accommodation.

A small number of respondents would like longer tenancy lengths. This will be kept in mind for review once the provision becomes established. A five year term is an enhancement on what is currently available and a clear explanation of the review and renewal process will provide assurance that if tenants abide by the terms of their tenancy they can extend it. A period of more than 5 years may put off some potential applicants who would benefit from the scheme but would be wary of making a long term commitment. Proposal 13 will therefore proceed as planned.

### Proposal 14 and Proposal 15 (Grouped)

There was high overall support for a review process as a tenancy ends, positively disposed toward renewal. There were mixed views on whether income should be considered again at this point. The highest ranked option under proposal 15 was that the tenancy be renewed without need for eligibility checks on agreement of tenant and landlord closely followed by the option to have a rolling tenancy.

These options closely align with the Department's views of how renewal should take place. There is a caveat in the renewal option that both the tenant and the operator must agree to the renewal and this agreement would be difficult to reach where a tenant or the IR Operator has identified that they are struggling with the affordability of an IR tenancy due to excessive rent arrears. The Department considers it would be appropriate for the IR Operator to assist a tenant in such circumstances by providing support to find more suitable and affordable accommodation rather than simply renewing an unaffordable tenancy at the end of the initial tenancy term.

There are of course explicit reasons why a tenancy would not be renewed at the end of the initial tenancy term. These would include for example continuing antisocial behaviour, sub-letting, rent arrears above a certain level, abuse of IR Operator staff etc.

Some respondents feel that a tenancy should only be renewed if a person's income is below the threshold for entry to the scheme. The Department would argue that this would impact on the security of tenure offered by the scheme and could have unintended consequences. Fear of losing their home could cause a person to miss out on opportunities to improve their situation through, for example, taking a promotion at work or forming a new relationship. It is considered to be a reasonable assumption that someone who has a significant improvement in their financial situation

would be likely to leave IR accommodation of their own accord and seek out other housing options such as home ownership.

For the reasons outlined above, the Department will proceed with the arrangement that a review will be carried out as a tenancy is coming to an end and, if mutually agreeable, the tenancy be renewed without need for eligibility checks. There will be a review of the affordability assessment to ensure the option remains affordable for the tenant.

## What Tenancy Support Services will be available?

The Department proposes that Intermediate Rent tenants will have available a network of support services, provided either directly through the programme operator or through other organisations, to help support them to maintain their tenancy.

## Proposal 16 and 17 Analysis



### Proposal 16 What we asked

To what extent do you agree with the suggested approach of Intermediate Rent programme operators offering support services to tenants?

**Out of a total of 33 responses 23 (70%) responded to this proposal**

20/23  
in support

70%  
Response rate

### Analysis of Responses

Of those who responded using the Citizen Space questionnaire, over four-fifths of respondents (14 out of 17) agreed with the suggested approach of Intermediate Rent programme operators offering support services to tenants. A further two respondents neither agreed nor disagreed, whilst the remaining respondent disagreed.

Of those who responded by email/post, all agreed (6 out of 6) with the suggested approach of Intermediate Rent programme operators offering support services to tenants.





## Proposal 17 What we asked

What type of tenancy support services, if any, would you suggest are appropriate to be delivered to Intermediate Rent tenants?

Out of a total of 33 responses 18 (55%) responded to this proposal



### Analysis of Responses

This proposal asked what type of tenancy support services, if any, respondents suggest are appropriate to be delivered to Intermediate Rent tenants. As such it is not appropriate to quantify levels of support for this proposal.

Some of the services suggested by respondents included:

Housing services  
e.g repairs,  
maintenance

Access to  
health care

Money Advice/  
Budgeting  
and Debt

Education  
Services

Benefits  
Advice

Housing/Tenancy  
rights

## Summary of respondents' views

### Proposal 16 and 17 (Grouped)

Evidence demonstrates that many tenants, including those moving into the rented sector for the first time, could benefit from having a more effective relationship with their landlord and from receiving advice on how to manage their tenancy and their home. Effective tenancy engagement can enrich the relationship between the tenant and their landlord, assist in better understanding each other's needs, and can provide advice directly or signpost tenants to advisory services. This can help build trust which can in turn allow a more open discussion around difficult issues, such as antisocial behaviour and rent arrears, allowing prompt, early and effective action.

The provision of tenancy support services was well received by respondents with most being very much in favour. One respondent commented, **"We agree with the Department's proposal that intermediate rent tenants will be able to avail of a network of support services, provided either directly through the programme operator or through other organisations, to help support them to maintain their tenancy."**

Only one respondent disagreed with the proposal, commenting that **"Landlords are not equipped to offer social support to tenants. The power dynamic makes this an entirely inappropriate approach. A third sector organisation in a local area should offer support instead."**

When asked what type of support should be provided, the majority of responses suggested that these should be geared towards benefits and financial management/ budgeting advice which would assist tenants with sustaining their tenancies: **"social security and financial advice services [should] be made available for intermediate rent tenants given that the product is designed to support the needs of low-income households."** Directing tenants towards further services as required was also supported: **"Signposting to other support services should also take place including for those households in greater need of additional assistance to sustain their tenancy."**

It was suggested that financial inclusion support could be incorporated into the assessment stage to ensure that an applicant's income and potential for tenancy sustainment is maximised at the outset. Another respondent made reference to an assessment at the outset of a tenancy to highlight any shortfalls between Housing Benefit and rent payments. Some respondents highlighted the need for information to be provided for those wishing to access home ownership including information on co-ownership. One respondent commented, **"Support and information on money management, mortgages and loans, saving for a deposit, avoiding arrears, etc would be very beneficial for those who wish to access home ownership after the five year period ends."**

It was recommended that access to a handbook containing, for example, useful contacts and basic advice for tenants could be very useful in both printed and online formats. The provision of information in relation to maintenance and repairs, accessing local services such as mental and physical health services, substance abuse support, education and social programmes and community advice were mentioned by a number of respondents.

Support services can be good for clarifying rights and responsibilities of all parties from an early stage. A number of the services provided by Housing Rights such as the Landlord advice line, tenant information pack and mediation service were suggested by other organisations as exemplars of advice and services which could usefully be provided to IR tenants.

#### Key themes raised by respondents

- Responses overwhelmingly in favour of offering tenant support services, particular Benefits and financial management advice
- Agreement that offering support services plays a key role in enabling tenants to sustain their tenancies

“services could support tenants to consider home ownership, other tenancy options or application for social housing to ensure that the small stock of intermediate rent homes is being targeted appropriately at people who can benefit most from them.”

“...support services are important to help sustain tenancies and can clarify rights and responsibilities. Support services can also signpost additional help for a household beyond housing, such as debt management or health services, which some tenants may find difficult to navigate”

## Departmental Response and Next Steps

### Proposals 16 and 17

Proposal 16 and 17 will proceed as outlined with some refinement following discussion with the appointed Operator and through engagement with IR tenants once the scheme is operational.

Overall, the feedback and suggestions regarding the provision of support services gathered during the consultation period are very closely aligned with those which had been previously envisioned by DfC, informed by the CaCHE research and pre-consultation engagement sessions with various groups and organisations.

The Department would agree with respondents in relation to the useful role that tenancy support could play in enabling a tenant to maximise their income and sustain their tenancy. This kind of support will also be very useful in enabling tenants to understand their rights and responsibilities. It will be important that IR tenants are provided with the information that they require at the outset of their application to determine what they are agreeing to and what their responsibilities will be. A handbook for tenants may be usefully incorporated into the scheme information, the optimal format for this will however require further discussion.

Further work will also be required to agree with the future IR Operator exactly how advice and support services will be delivered, this may be influenced by the experience the Operator has in this regard and the services currently provided by the organisation. It is anticipated some services may be drawn from existing specialist service providers with some more generalist advice being supplied directly by the Operator. The Operator can also help direct tenants to other useful services, such as benefits advice, money advice, health and social care services etc.

## Intermediate Rent Programme Operator

The Department proposes that the Intermediate Rent programme should be delivered by a single programme operator, either a standalone charity established for this purpose or a Housing Association subsidiary, with housing experience, and dedicated to Intermediate Rent delivery.



### Proposal 18 Analysis What we asked

Do you agree with the proposal that a single entity should be appointed with responsibility to act as Intermediate Rent programme operator in delivering Intermediate Rent homes?

**Out of a total of 33 responses 28 (85%) responded to this proposal**

13/28  
in support

85%  
Response rate

### Analysis of Responses

Of the 17 respondents who used the Citizen Space questionnaire to comment, over two-thirds of respondents who answered this question (11 out of 16) agreed that a single

entity should be appointed with responsibility to act as Intermediate Rent programme Operator in delivering Intermediate Rent homes. The remaining five respondents disagreed. One respondent left comments on the proposal but did not indicate a position.

For those who provided a response by email/post (11 respondents) the majority (5) were undecided, while around a third (4 responses) disagreed, and just under one fifth (2) agreed that a single entity should be appointed to operate a subsidised model.

Most individuals who responded were in favour of a single Operator model. Organisations indicated a greater variance in views, with an almost even split between agreement, disagreement, and neither.

### Summary of respondents' views

#### Proposal 18

When it came to who should deliver Intermediate Rent a range of views were received. It was proposed that a single entity should be appointed for Intermediate Rent delivery, **“the evidence supports a single dedicated programme operator, and the scaling up of delivering supply from a low base can help introduce the model with a test and learn approach via a single operator.”**

The operator (also referred to as the “programme operator”) will be responsible for the development of a new supply of homes, and for ongoing operation e.g. letting, tenancy management, property

management etc throughout the period of any associated Government subsidy. Where any Intermediate Rent homes are developed outside the subsidised model, the final policy around rent setting, tenant eligibility, lease length and so on, will apply in the same way that it applies to any subsidised development.

Several respondents acknowledged that a single entity delivery model could offer a consistent approach and, where IR may (in future) broaden out to multiple delivery organisations, there will need to be a consistent set of guidance and rules applicable. One respondent specifically indicated that, **“the appointment of a single entity to act as an intermediate rent operator is preferable, at least in the first instance”**, a view echoed by others.

Some were keen to have more detail of the funding mechanism to underpin Intermediate Rent before being definitive around the delivery mechanism. Around one third of responses thought that restricting delivery to one Operator may miss an opportunity: **“a critical mass could still be achieved whilst allowing a broader range of delivery partners”**, while others suggested that social enterprises should be able to bid for funding to acquire properties to be let as Intermediate Rentals.

Those who were in favour of multiple delivery bodies indicated that housing providers already operating in the housing market here are well placed to deliver, particularly in the

context of mixed-tenure developments. Some felt that there was a risk that the Operator(s) could have, **“little or no knowledge or understanding of rural communities where this scheme will be very beneficial.”** There is strong backing for a model which supports certain specific development, such as the inclusion of homes to be made available for certain target tenant groups (such as younger/first time renters or older people).

Most of those who responded favoured the concept, over time, of IR being delivered by multiple providers, driven by the social contribution towards improving housing options for vulnerable households.

A central role for the Housing Executive will be needed, according to a number of respondents, with some in favour of the Housing Executive being the Operator and others who felt that the Housing Executive must, at a minimum, engage with the Intermediate Rent Operator(s) around development location and specification.

The Housing Association (HA) sector were particularly robust in their preference that HAs and their subsidiaries would be best placed to deliver Intermediate Rent, and that single entity operation could have the potential to distort competition. The feasibility of a separate IR Operator developing units on the same mixed tenure site as a HA raised concerns: **“We consider IR product will be most successful as part of mixed tenure schemes (rather**

**than as standalone) to help blur the lines. This in our view is incompatible with the intermediate rent scheme being built and managed by a single entity.”**

#### Key themes raised by respondents

- The rules must be clear, straightforward, and outcomes-focused
- A ‘test and learn’ approach should be applied, allowing adjustments to be made to ensure success
- Importance of maximising local housing market experience, with particular reference to the role of the Housing Executive
- Expanding the delivery model beyond a proposed single entity

“An initial single body could test the development of a coherent policy regime which is simpler, reduces uncertainty, increases transparency and accountability, and improves awareness”

“more than one operator may add some healthy competition to the process and an incentive to deliver the best quality homes for tenants”

## Departmental Response and Next Steps

### Proposal 18

The consultation reflected the wider ambition to deliver a new housing tenure, set apart from the existing social and private rented tenures, which can have a distinct and positive impact on the housing market, making available a supply of affordable homes for rent to supplement and complement existing provision.

Although some do not favour the introduction of Intermediate Rent (IR), preferring that the focus must be on providing social homes, the evidence points to a market failure for some households where the current rental arrangements (both social and private) do not meet people's needs.

It is proposed that the initial IR model provider would be procured via an open competition. This can help to take a 'test and learn' approach, both to the overarching policy and to test the arrangements for providing Government funding towards a subsidised model.

In reference to the pressing need for new homes, the Department has sought to develop a policy and model founded within the existing statutory framework. This approach is not without its challenges. A phased rollout will help identify any policy and any legislative changes which are needed for effective implementation and outcomes realisation.

Although this proposal has garnered a range of differing responses, it is important that the Department develops a model which can be financially viable while still delivering the desired outcomes for tenants. It remains the case that in the prevailing market conditions, it will be necessary to deliver a model at scale in order to realise viability when using a loan-based funding mechanism.

This has been confirmed through a range of independent research which the Department commissioned from CBRE, DoF Business Consultancy Service, and CaCHE. The practical solution to this, in the first phase, is to focus on a single provider model to achieve that necessary scale to ensure viability.

Taking account of the range of responses received, and the body of evidence on which the proposal was based, the Department is minded to proceed to develop and publish a core Intermediate Rent policy, and will work towards delivery of homes on the ground through a single entity Operator in the first phase. This can help test the principles, providing an appropriate and sustainable option both for tenants and delivery, and allow the opportunity to explore the potential to expand any future funding programme(s) to a wider range of delivery bodies.

Following further dialogue, evidence gathering, and deliberation, the final policy and model will be available, including details of the funding arrangements. This will allow the appointment of an initial IR Operator to develop and let a supply of new homes.

The Housing Executive, as statutory authority for assessing housing need, will have a central role in the practical provision of Intermediate Rent. Any IR delivery body will need to work closely with both the Department and the Housing Executive in relation to the siting, specification, and tenancing of Intermediate Rent homes.

## Regulating an Intermediate Rent Programme Operator

The Department proposes that specific regulatory arrangements, complementing the Private Rented Sector regulatory regime, should be applicable to the Intermediate Rent programme operator to provide appropriate governance, and to provide confidence to attract private finance.

### Proposal 19 and 20 Analysis



#### Proposal 19 and Proposal 20 What we asked

To what extent do you agree with the Department's analysis of the regulatory arrangements for an Intermediate Rent programme operator?

Are there any additional regulatory matters which the Department should seek to apply to delivery arrangements?

**Out of 33 responses received 24 responses (73%) commented on Proposals 19 and 20**

14/24  
in support

73%  
Response rate

### Analysis of Responses

For those who responded using the Citizen Space questionnaire, almost two-thirds of respondents (10 out of 16) agreed with the Department's analysis of the regulatory arrangements for an Intermediate Rent programme Operator. Just under one-third of respondents (5 respondents) neither agreed nor disagreed, with the remaining respondent disagreeing. One respondent left comments, but did not offer a specific answer to the question posed.

For those who provided a response by email or post (seven in total) the majority (4 respondents) agreed with the proposal, while the remainder neither agreed nor disagreed.

### Summary of respondents' views Proposal 19 and 20 (Grouped)

The issue of regulatory arrangements which could be applicable to the IR Operator produced a range of issues, queries and concerns among those who commented. The consultation indicated the Department's position: **'A robust system of regulation has been an important aspect of the funding and development of social housing...**



**Some similar arrangements are expected to be necessary for the delivery of an Intermediate Rent programme.'**

Intermediate Rent (IR) is, by design, not a social rented product but rather an additional rental option which seeks to reduce some of the barriers faced by some in getting a rented home that suits their needs. As such, its place in the housing market occupies that space between private / open market and social rentals. It is one strand of a broader strategy to increase housing supply, reduce housing stress, and to put in place policy, legislation, and guidance towards ensuring that every household has access to a good quality, affordable and sustainable home that is appropriate to its needs. The provisions enacted in forthcoming Private Tenancies legislation will apply to Intermediate Rent.

It was clear that the majority of respondents favoured some additional regulation for the IR Operator. One respondent was in favour of an asset lock to retain IR homes beyond the lifetime of the loan: **"We need to ensure that that these homes are kept in public ownership and cannot revert to the operator after FTC loan finance is paid off."** The Department's preference is to retain Intermediate Rent (IR) homes as affordable rented dwellings for the long term. The opportunity to retain these homes as affordable rentals beyond the term of the loan will be explored further.

There was little support for the Operator to abide by only what is in place for the wider private rented sector; indeed one respondent noted that, **"regulation of the IR model must be undertaken by a competent, independent oversight body whose focus is on the housing needs and welfare of the tenant."**

Some concern was expressed that without bespoke regulatory arrangements underpinning the model, IR would be contrary to the Minister's stated intention to, **"protect residents in the private rented sector as much as we possibly can."**

While DfC continues to implement the outworking of its 'Review of the Role and Regulation of the Private Rented Sector', the Department will apply lessons learnt from that review around suitable arrangements to ensure that Intermediate Rent tenants can gain access to well-managed, good quality, affordable homes.

Some of those in favour of specific regulation sounded a cautious note, advising that proportionate or **"light touch"** arrangements would be prudent, while others indicated a preference for certain stringent provisions to ensure that Intermediate Rent homes are developed and delivered in a way that achieves the optimal outcomes.

**Key themes raised by respondents**

- Any IR regulatory model should be replicated across the PRS
- Intermediate Rent homes should remain as IR homes beyond the term of any loan funding
- Rules should be set for the design and development standard and be robustly monitored to ensure that properties retain a high quality standard for tenants
- Detailed guidance should be provided to ensure fair, transparent, and robust housing management procedures which can be used by all delivery agents

“There is a danger that too much regulation, or inappropriate or unnecessary regulation can limit flexibility to engage with tenants, limit growth and be time-consuming and distracting. We would suggest that having a regulatory regime which is ‘light touch’ would be most appropriate”

“specific regulatory arrangements, complementing the private rented sector regulatory regime, should be applicable to any intermediate rent programme operator to provide appropriate governance, and to provide confidence to attract private finance.”

**Departmental Response and Next Steps****Proposal 19 and 20 (Grouped)**

It is important that there is clarity on the rules underpinning the Intermediate Rent policy and model. Tenants and providers alike must be clear about what is expected of them, and what the consequences are if these are not adhered to. That is why the Department feels it is important to have regulatory rules, supported by clear guidance, to aid those providing Intermediate Rent homes in understanding how this will operate.

The Department acknowledges the importance, both to those who offer Intermediate Rent homes, and for those who live in them, of a robust regime which clearly supports the rights and obligations of both the tenant and the Intermediate Rent Operator. It is also important that where public money is used to subsidise the development of these homes, there are sufficiently robust mechanisms in place to ensure best use of public monies, to hold the recipient to account and, where needed, to initiate corrective action.

For this reason it is anticipated that any Intermediate Rent landlord, including any initial Operator, would firstly be subject to the statutory requirements of the private rented sector. This includes, for example, the need to be a registered landlord, the requirement to protect any tenancy deposits in a registered scheme, the requirement to follow the statutory Notice to Quit period, and the requirement for properties to be fit for

human habitation and so on. It would also require adherence to forthcoming provisions contained within the Private Tenancies legislation. It is expected that any entity providing homes for Intermediate Rent would, at a minimum, comply with these requirements.

Secondly, any organisation receiving subsidy towards a supply of Intermediate Rent homes, would be required to abide by additional regulatory requirements.

The Department intends to ensure any such requirements are both necessary and proportionate. Building on best practice, the IR regulatory arrangements will combine elements from social housing regulation arrangements here, and the methods used to regulate affordable/intermediate rental products elsewhere.

These requirements may include evidence of the constitution of the Board and wider organisational structure of the Operator, satisfactory demonstration of the financial soundness of the organisation via financial statements which may include audited accounts (provided at regular intervals through the lifetime of any subsidy scheme), and any agreement as required around the Public Service Obligation nature of any funded Intermediate Rent provision.

Further advice will be taken, including legal advice (as required), before arrangements are finalised and implemented. It is anticipated that any subsidised model will be supported with contractual arrangements setting out the

obligations of both the Department and the Operator, most likely in the form of a detailed Letter of Offer and an associated Loan Agreement. This will provide clarity on the respective roles and responsibilities and will include checks and balances to ensure that public money is being expended appropriately, and opportunities to correct any variations, up to and including early repayment. A final form of regulatory arrangements will be incorporated into the detail of the subsidised model, and published by the Department.

The policy and model will be supported by clear and detailed guidance material. The Department will use the evidence gathered, including feedback received in response to this consultation, to develop and publish such guidance.

## Delivering a Core Intermediate Rent Framework

The Department proposes that a core framework model, informed by input from key statutory bodies, will provide an effective model for the delivery of much needed Intermediate Rent homes of good design and quality in areas of identified need.

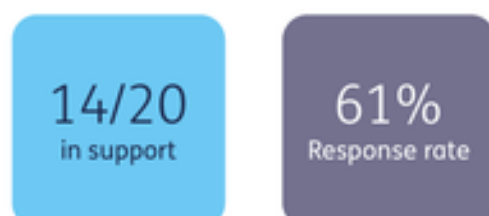


### Proposal 21 Analysis What we asked

To what extent do you agree that the programme operator should be involved

in developing the specification for Intermediate Rent Homes (this may include eg the location, rent setting, and the quality standard)?

Out of a total of 33 responses 20 (61%) responded to this proposal



### Analysis of Responses

20 responses were received expressing views on the scope that any delivery body should have to influence the specification and delivery of Intermediate Rent homes.

There were 17 respondents who used the Citizen Space questionnaire to comment on this proposal. Just over four-fifths of respondents (13 out of 16) agreed that the programme operator should be involved in developing the specification for Intermediate Rent homes. Of the remaining respondents, two neither agreed nor disagreed and one disagreed. One respondent left comments, but did not offer a specific answer to the question posed.

Of those 3 respondents who provided a response by email/post 2 neither agreed nor disagreed with the proposal, while the remaining one respondent agreed that the Department should work with delivery partners to agree some of the detail of the policy and model for Intermediate Rent.

4 individuals supported a role for the Operator in designing the model arrangements, while 10 organisations were also in favour.

### Summary of respondents' views

#### Proposal 21

Some respondents were clear that the Department must take the primary role in mandating certain conditions to ensure that the policy and model achieve their stated outcomes, offering limited flexibility to the operator when it comes to development and operation.

Several were keen that the needs of and outcomes for IR tenants would be prominent in determining a final policy and model, and advocated continuing engagement between the Department as sponsor of the initiative, potential tenants, and the Operator: **“the Department should continue to engage with tenants and representatives of tenants in the development of the model.”** A structured programme of tenant engagement is important as part of delivery, but also during the development and refinement of the product, in order to ensure the model is fit for purpose and meets the needs of its tenants on an ongoing basis.

There was some support for the Department, in designing the policy and model, to promote the development of Intermediate Rent homes in rural areas, where need and demand for such a product is identified: **“consideration should be given as to how delivery agents could be encouraged to deliver in rural areas where the need is for a small number of units.”**

One respondent who operates a similar model elsewhere commented that, **“the provider will be responsible for the viability of the organisation and liabilities which attach by virtue of carrying out the construction and housing/tenancy services. They also have the most vested interest to ensure that the homes are attractive and relevant, so that void times are low. As such they will need to be fully involved to ensure that a workable commercial solution that meets the needs of the tenants as well as policy objectives is achieved.”**

The risks and liabilities which an IR operator would be assuming in taking on that delivery role were recognised by many. Not only should they have a say in some of the detail, that they would have valuable experience and expertise to bring to bear on delivery: **“The programme operator should know locations, rents, standards and the market better than anyone. So long as they can provide evidence of the rental setting, the need of the locations and the proof of standards. The operator will know what will work well in practice rather than just theory.”**

This can help to deliver a sustainable and viable model, while protecting the interests of tenants, the Operator and funders alike.

A role for the Operator in shaping the scheme can, **“ensure it is reflective of local demand; that the objectives are deliverable and that the properties are provided in locations that will generate a positive response.”** It will be important to harness the experience that an operator will have around practical

housing delivery and management: **“The programme operator will likely have first-hand experience which will benefit shaping the scheme and will need to carry out practical administration so better if this is a collaborative exercise.”**

Many referenced the key role which the Housing Executive should play in terms of contributing to the process, **“it is crucial that NIHE sets the strategic principles and best practice examples for social and affordable housing provision for others to follow. It is also important that the Framework underlines this.”** Another noted, **“a framework that incorporates key statutory bodies, will provide an effective model for the delivery of much needed Intermediate Rent homes of good design and quality in areas of identified need, that includes NIHE and Councils.”**

#### Key themes raised by respondents

- Engagement with tenants, as well as any operator, will be important to ensure that identified outcomes are met
- It will be important to incorporate the housing experience and expertise of the operator into a deliverable model
- The Housing Executive (in particular) and other housing-related experts should be involved in developing and delivery of the model as required
- The Department should include rules within a funded model to facilitate units for specific uses

“The provider will be responsible for the viability of the organisation and liabilities which attach by virtue of carrying out the construction and housing/tenancy services. They also have the most vested interest to ensure that the homes are attractive and relevant, so that void times are low. As such they will need to be fully involved to ensure that a workable commercial solution that meets the needs of the tenants as well as policy objectives is achieved”

“there is a risk that the scheme becomes self-regulated and the specification is weighted in favour of providers and against service users”

## Departmental Response and Next Steps

### Proposal 21

It is important to be clear that the Department sees the development of subsidised Intermediate Rent homes as a partnership between Government and the Intermediate Rent operator(s). Any funding arrangement will see a contribution towards the cost of developing, delivering and operating a model, rather than fully funding it. In a similar way to the social housing funding model, the Operator will also make a contribution.

Both parties will therefore take on certain risks and liabilities in the delivery of Intermediate

Rent, and it is appropriate that the operator has some say in how the model will work in practical terms.

It is clear that it is the Department’s central role to set the parameters of the outline Intermediate Rent framework policy and model, although some flexibility should be available to ensure that a scheme delivered within the model can be viable and provide a sufficiently attractive offering to eligible tenants to justify the rental price point.

The Housing Executive has been one of a number of expert housing bodies represented on the Department’s Project Board and Project Working Group, which contributed to the development of the proposals. We will now work more intensively with relevant units within the Housing Executive to explore the practicalities which have yet to be determined around, e.g., optimal locations and planning-related issues, opportunities to interface with social development for mixed tenure sites, need and demand analysis, opportunities to signpost applicants towards an operational scheme, and so on. Intelligence from, for example, the Housing Executive’s new Strategic Market Housing Analysis and input from their Place Shaping team will help inform issues including location setting.

The Department and, in due course, the Operator (or any other IR delivery entity) will need to engage with other housing providers, housing professionals and advocacy organisations to optimise the opportunity to

create and implement an attractive, viable, sustainable policy and model which makes a positive contribution to driving up housing supply, driving down housing stress (whether recorded or concealed) and make a real difference for the cohort of households for which the current housing market does not meet their needs.

The evidence gathered by the Department, in combination with the responses received as part of the consultation (both views expressed at engagement events and in writing), confirm that there is a gap in market provision and that the right policy and model can make a real and tangible difference to people and families where they have the opportunity to access an Intermediate Rent home.

The final policy and model, once agreed with all relevant parties, will be available for review. It will form the basis for the decisions by Planners where Intermediate Rent forms part of any affordable housing planning obligations under new Local Development Plans. The availability of alternative products, such as Intermediate Rent, when set in the context of mixed tenure developments (in particular) may encourage developers to integrate affordable housing more readily into new developments, particularly where any affordable housing planning obligation is applicable.

Finalising the detail of the policy and model will also allow the Department to progress to appoint an Operator, via a competitive process, and enable practical delivery of a new supply of homes for rent.

## Designing, Delivering and Funding a Financially Viable Model

The Department proposes that a model based around the established practice (a blended approach between the social development and shared ownership delivery models) should broadly apply to a new Intermediate Rent model.

### Proposals 22 and 23 Analysis



#### Proposal 22 What we asked

Do you agree with the use of primarily Financial Transactions Capital loan funding to support the delivery of a supply of Intermediate Rent homes?

**Out of a total of 33 responses to the consultation, 23 (70%) responded**



#### Analysis of Responses

17 comments were received via the Citizen Space questionnaire, with one respondent leaving comments but not answering the question posed. The vast majority of respondents (14 out of 16) agreed with

the use of primarily Financial Transactions Capital loan funding to support the delivery of a supply of Intermediate Rent homes, the remaining two respondents disagreed.

Of those six respondents who provided their response by email/post, three agreed with the use of FTC towards the cost of providing homes for Intermediate Rent. The remaining three disagreed, citing alternative funding sources or alternative uses for available public monies.



### Proposal 23 What we asked

To what extent do you agree with the methodology outlined to calculate the costs to subsidise Intermediate Rent development?

Of the 33 total responses, 20 (61%) responded on Proposal 23



#### Analysis of Responses

Just over half of all respondents who used the Citizen Space questionnaire (8 out of 15) agreed with the methodology outlined to calculate the costs to subsidise Intermediate Rent development. The remaining seven respondents neither agreed nor disagreed.

For those who provided their response by email/ post (5 respondents who commented on this proposal) 3 responses were undecided, with most indicating they would need more detailed information in order to either support or reject. Two respondents disagreed with the proposal.

#### Summary of respondents' views Proposals 22 and 23 (Grouped)

The Department is proposing the use of Financial Transactions Capital (FTC) loan funding to support a core delivery model, which can be viable at scale. A number of factors are being considered around the financial model in terms of assessing viability and scenario planning. These include estimates of the initial cost to develop/ acquire the units, the potential rental income, the costs associated with managing the properties and tenancies, and the outturn asset value at the end of any loan term.

A small number were not in favour of the use of public monies for the development of Intermediate Rent homes, citing that any available monies should be focused on the development of social housing: **"If a 'funding model' with 'a long term [low] interest Government loan' can form the basis of a long term funding solution, why can a long term funding model, outside of the Block grant but with funding still provided by Treasury, not be applied to the funding of programmes run by the NIHE".**



Many comments were heavily caveated, citing a lack of detail having restricted stakeholders' ability to consider the breadth of implications of the proposal: **“there is no indication of the overall cost of the implementation of such a model, which makes it difficult to determine value for money.”** The financial arrangements described in the consultation paper are at a high level, partly as it is difficult to be prescriptive about funding until the full shape of the policy and model is defined.

The intention to create a funding package which seeks to protect the funding for social housing development was welcomed, and it is: **“vital that the funding of intermediate rent is not at the expense of funding for social housing and we welcome the recognition that a separate additional funding mechanism should be established.”**

Many were generally supportive, and: **“welcome the use of Financial Transactions Capital to develop an intermediate rent product which has the potential to increase the supply of housing and help people access accommodation in their area of choice, who might previously have been excluded from doing so as a result of unaffordable private rents.”** FTC was seen as a means to stimulate the market and increase the supply of available affordable housing to improve the situation for some vulnerable households.

Some respondents felt the proposal did not sufficiently outline what FTC is and how it can be used. The Department of Finance disburses FTC monies, supplied through the UK Treasury. This loan funding can only be used as support for private sector interventions and it has been used to date in the housing market to fund predominately Intermediate Shared Ownership products. For stakeholders who wish to learn more about FTC and how it can be used, the Department of Finance (DoF) has published a short [overview paper<sup>4</sup>](#) which can be viewed on the DoF website.

One respondent noted that, **“the use of Financial Transactions Capital (FTC) funding as a form of contributory low cost/subsidised loan from government, to support the delivery of the supply of Affordable Rent homes is welcome”**, citing the Northern Ireland Co-Ownership Housing Association shared ownership model as an established and successful model using a blend of FTC and private finance towards affordable home ownership.

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<sup>4</sup> <https://www.finance-ni.gov.uk/publications/financial-transactions-capital-guidance>

It was queried why low-cost FTC loan is the only option suggested, rather than a mixture of loans and grants, as is the case in some earlier schemes elsewhere: **“We would encourage the Department to explore all available alternative options for the delivery of an intermediate rent product and ensure that the product is deliverable in a variety of circumstances”**, that developing a viable model is critical and that, **“there needs to be more detailed financial modelling undertaken.”** Others queried why an operator would be inspired to pursue FTC loans when commercial lending is currently relatively accessible.

The issue of the viability of the Intermediate Rent policy was, as expected, a pressing matter for most respondents: **“Greater clarity on the funding model generally is required in order to test viability against financial metrics, repayment terms etc. This will determine on whether this product would be viable to deliver. Clarity [is] also on requirements to be met to qualify for the funding, both scheme specifics and as a borrower.”**

Although there was not consensus on applying a loan-based model, there was concern expressed around a package including the exceptional use of flexibilities such as public land ‘on favourable terms’. A number of respondents felt that public land should, under no circumstances, be used for housing other than social housing: **“any additional flexibilities required should not come from social housing budgets.”** Others queried what was meant by availability of land ‘on favourable terms’: **“We**

**would like more detail on what favourable terms could be but believe that public sector land should be prioritised for social housing in areas of social housing need and that this too should be provided on favourable terms.”**

Several respondents noted that certain efficiencies may be achieved through the renovation of empty properties into a new supply of Intermediate Rent homes which may be less costly than Off The Shelf (OTS) properties: **“Another potential delivery mechanism we believe might be worth exploring is the conversion of existing vacant space above commercial premises, which has often required incentives to deliver within the private sector, but which may be relatively quick in comparison to new-build developments but more commercially viable at a reduced rental rate than OTS purchases may be.”**

Several respondents suggested a completely different approach to the financing of Intermediate Rent. One respondent suggested that a scheme may be achievable using an institutional investment approach using asset management finance to build properties which can be on-let to Intermediate Rent tenants. Lease arrangements could allow for initial favourable conditions, such as lower rent periods, with the Asset Manager retaining ownership over a long-term lease period, and properties handed back by the Intermediate Rent landlord at the end of the lease term. There is, of course, no impediment preventing private entities from using private finance to

provide accommodation options. Another respondent felt that a model offering funding for the purchase of existing dwellings to on-let as Intermediate Rent could be an alternative model.

#### Key Themes/Issues raised by respondents

- The viability of a loan-funded subsidised model
- Availability of a range of development options including 'Living Over the Shops' and use of empty dwellings
- Use of Public Land on any terms should be excluded
- Alternative funding sources or alternative funding models

Housing finance is a long-term model and initially a longer-term loan would be helpful for a new housing provider. Thereafter, a blend of finance, such as using development finance and thereafter long-term loans or bonds, could be possible"

"more detailed information ... is needed to enable opportunity to examine the financial implications of the proposed funding model"

## Departmental Response and Next Steps

### Proposals 22 and 23 (Grouped)

The Department has been examining the development of an Intermediate Rent policy and model, having identified the need in the housing market for a rental option outside the established social and private markets, to help to meet that need where the market has failed to. It is important, therefore, that Government has a central role in developing and overseeing the delivery of the policy and model to make sure that it delivers and continues to deliver the security, affordability, and quality outcomes which are required.

As such, while the Department must be assiduous in how public monies are spent, the ability to part-finance the development of at least some Intermediate Rent homes gives Government a defined level of control to direct development and delivery in line with the requirements of the policy and model. It is also worth considering why, for example, institutional investment has not yet come forward for private affordable rental products here to date, despite affordable rental models being well established in other neighbouring jurisdictions.

The Department wishes to design a policy which can work across the housing market and, when it comes to producing a workable model which includes a funding element, the Department is taking steps to ensure that any such funding does not compete with

the established Social Housing grant model. This is why the Department has focused on alternative funding opportunities, such as FTC loan. Conceptually, the use of a loan-based subsidy model is neither untried nor untested in the local housing market, however it is acknowledged that the requirement to charge rent at below market rates puts additional pressure on the funding model. Scenario planning, based on further detailed analysis of the feedback received, will form the basis of a business case to support the model.

In the current market conditions commercial lending can be readily accessed on reasonable terms however, the nature of FTC loan means that it can be offered over a longer period than a commercial loan (and potentially at lower interest rates), allowing the operator to service a commercial loan (as the private finance element) over a shorter timescale and therefore incurring lower interest charges.

The proposed funding model has been successfully delivering new affordable homes for rent across the UK for some time, demonstrating that in the right circumstances and at the right scale, a model can work successfully without grant or other incentives.

While the Department welcomes the opportunity to discuss new funding and development opportunities to increase housing supply, evidence suggests that a subsidised model would (at least initially) offer a good guarantee of successful outcomes. It also provides for a close

element of management and monitoring, allowing for appropriate evaluation at key junctures. This can provide additional reassurance for any private financiers involved, and permits the Department an opportunity to initiate corrective action where any element of the policy and model are failing to meet the intended outcomes.

Some of those who responded to the consultation queried whether an alternative model, relying on an asset development/management investment model might offer an alternative approach. One advantage of such a model could be a reduced requirement for public monies. While such an approach has certain attractions, it is noted that the market has not, to date, brought forward a package of this kind within the local housing market. However, the Department will continue to work alongside stakeholders to explore and bring forward proposals to expand affordable housing supply here.

The CaCHE research included a suggestion that the ability to make available public land 'on favourable terms' would provide an additional flexibility for more difficult sites. There was very limited support within the responses for the application of any such flexibility. To be clear, it is not expected to be the case that 'favourable terms' would include any sale of public lands at below market value. Indeed it is the Department's intention that the core funding model comprising Government loan and private finance should be able to support a model without additional intervention.

DfC is open to the development of a supply of IR homes through a range of development options including OTS new build homes, bespoke design and build units, and also renovation or conversion of existing properties (such as restoration of empty homes or the use of the space above retail or commercial premises for housing). The latter may also have a wider regenerative impact, particularly as town and city centres continue to experience the impacts of the recent economic and social changes. Whatever the development mix, Intermediate Rent aims to create an additional supply of homes and does not intend to include currently occupied dwellings.

To create a model comprising dwellings which meet the IR design standard and require minimal maintenance and hold their value over the term of the loan, it is envisaged that new build properties will be more financially viable. However there may be opportunities to use other methods, where appropriate.

We will continue to work with partners to consider appropriate development options, and will seek to strike the right balance between facilitating a range of design and development options and ensuring that future expenditure issues (eg future decarbonisation/energy efficiency/fitness measures) are considered and factored into any development.

Proposals 22 and 23 will therefore proceed broadly as outlined using FTC loan. This will ensure that the development of Intermediate Rent does not directly compete for funding with the Social Housing Development Programme. Feedback received, both via engagement events and through written responses, will help to define the policy which will in turn inform the costs associated with the model, and will help finalise the detail of a viable and sustainable model.

## Delivering Intermediate Rent Homes – Construction, Development and Standards

The Department proposes that Intermediate Rent homes should meet as a minimum the statutory construction and quality standards, with opportunity for additional requirements as necessary.

### Proposal 24 Analysis



#### Proposal 24 What we asked

It is the Department's view that all Intermediate Rent Homes will be required to meet the statutory building standards and statutory housing fitness standard as a minimum. Do you think that additional design and construction standards should apply to Intermediate Rent homes?

**Out of a total of 33 responses to the consultation 25 (76%) responded to this proposal.**



### Analysis of Responses

Of those who responded using the Citizen Space questionnaire (7 out of 17) felt that additional design and construction standards should apply to Intermediate Rent Homes. The remaining 10 respondents did not feel these should apply.

Of those who responded by email/post (4 out of 8) were supportive whilst the remaining 4 commented but did not indicate whether they agreed or disagreed

### Summary of respondents' views

#### Proposal 24

A range of responses was received when it came to an appropriate designed developmental and construction standard for Intermediate Rent homes. Those who commented on this proposal were firmly in favour of the provision of a good quality home, kept to a good standard throughout the lifetime of each tenancy. There was a mix of views on how this might best be achieved, with some comments seeking further detail.

Some comments expressed concern around a higher standard for Intermediate Rent homes which could put further pressure on the private rented sector, with a fear that this might cause more landlords and their properties to leave the market, which is already under pressure to meet rental demand.

Several responses raised concerns with regards to imposing a standard which is higher than the statutory minimum construction standards, citing increased costs for development. There was concern that any such cost increase could subsequently be passed on through rent costs to tenants, who are already on relatively low incomes.

One respondent noted the opportunity offered by setting a design standard for Intermediate Rent which can **“help deliver a range of positive impacts for tenants and the wider community including better health outcomes, reduced fuel poverty, lower energy costs, increased thermal comfort and much else. This should inform plans for delivery of the affordable housing project in line with best practice.”**

Another noted that **“Building new intermediate rental products provides the department with an opportunity to build net zero homes that operate at low running costs for the tenants who live in them. Failing to build to this standard will only store up future retrofitting costs for the department and delivery provider.”**

In the context of the forthcoming 'affordable housing' requirements of Council's Local Development Plans a Local Government organisation indicated their desire to go further than simply meeting the statutory minimum and to, **"strongly recommend that the forthcoming Housing Supply Strategy set the agenda for the supply of new homes, including high quality sustainable construction standards."**

A number of respondents welcomed the prospect of standards being uplifted under an Intermediate Rent scheme, stating that a model which is affordable to rent should also further increase affordability by driving down running costs e.g.: **"a more ambitious minimum energy efficiency rating than is required elsewhere in the PRS could be considered. This would not only ensure the properties are sustainable, but could further address affordability issues by reducing the amount of money tenants have to spend to adequately heat their homes, which we know to be a significant issue for many of our low income PRS clients."** Others stated that additional safety measures should be included around, eg, fire safety.

Spiralling fuel poverty rates were highlighted by several respondents and it was suggested that this, coupled with the imminent introduction of Climate Change legislation, could be an opportunity for DfC to show leadership on these issues by insisting that homes provided meet additional design and construction standards to ensure they are as close to zero carbon as possible.

The issue of Climate Change is highlighted in many responses in terms of the potential future requirements for 'Net Zero' homes. In order to achieve the specified targets, existing building regulations shall need to be significantly amended. One respondent noted, **"It is encouraging to note that sustainability and zero carbon targets have been mentioned, given these are essential elements of consideration going forward. However, we do not believe that such critical requirements have been meaningfully reinforced."** Other respondents suggested that it would be worth bearing in mind the strong push towards electric vehicles and charging points being installed in homes and that renewable technologies should be considered in order to reduce tenants' fuel costs, as well as the property's contribution to carbon emissions.

The issues central to development, such as suitable land availability, access to infrastructure (water, sewerage, electricity and gas networks and broadband) were also points which were noted within the responses to this Proposal.

A number of respondents advocated for including Intermediate Rent homes in mixed tenure developments, and highlighted the associated benefits which can include creating vibrant and sustainable communities, being mindful of the need to ensure 'tenure blindness.'

Some of the respondents highlighted the needs of persons with disabilities and the

needs of older people. They recommend that all new builds in private tenures comply with suitable accessible standards, to help individuals to secure a home and remain in it over the long term. They make the point that, **“over time, the universal application of accessible standards would significantly reduce the need for formal care services and costly home adaptations in the future.”**

New ways of living and working since the Covid-19 pandemic were also raised, with some respondents insisting that adequate green space and leisure space needs to be accommodated within any Intermediate Rent plans with one respondent insisting on **“adequate green space provision in housing schemes; a central green space that is accessible to all. Evidence shows that well planned social housing with good green space provision has less social issues in the longer term.”**

Furthermore, many respondents promoted the need for sustainability and recommended that in developing Intermediate Rent homes, the Department should take the opportunity to ‘future proof’ homes against such aspects as changing needs of the tenants and ever increasing energy efficiency standards This can be achieved by including a sufficient ‘Space Standard’ alongside a suitable accessibility standard, (for example Lifetime Homes) to allow for properties to be easily adapted to meet the occupants’ needs. Also, the inclusion of appropriate energy efficiency and decarbonisation measures can also:

- a. help reduce running costs for the tenants, and
- b. help reduce expensive future costs where retrofitting would otherwise be required.

People could save money on some of their household bills if their homes are built to meet modern energy standards, and it may be prudent to incorporate some of these requirements now to ensure minimal retrofitting where standards are uplifted in future. This would provide Best Value for Money in terms of Whole Life Costing.

#### Key Themes/issues raise by respondents

- IR viewed as an opportunity to future proof by building towards net zero homes: implementing related measures now, avoiding expensive retro-fitting costs in the future
- Cost implications of any improvements to the existing standards for both tenants and developers

“The current regulatory regime for privately rented properties is not fit for purpose and would not give any guarantee of the design and quality of the properties.”



"In light of spiralling fuel poverty rates and the imminent introduction of climate change legislation it would show leadership if DfC insisted that homes provided meet additional design and construction standards to ensure they are as close to zero carbon as they can be."

"We see no reason, given the significant programme in building regulation uplifts over the coming years, to set additional design and construction standards for Intermediate Rent homes."

## Departmental Response and Next Steps

### Proposals 24

Historically, there has been a long held perception that the quality standards generally in the Private Rented Sector have been below what most people would expect from a good quality home. In developing a new Intermediate Rent product, we have the opportunity to address some of these issues by providing a good quality, comfortable home that can be easily kept in good order by the occupant and that will be maintained to a high standard by the Operator. This was directly highlighted by one respondent who said the current regulatory regime for privately rented properties is not fit for purpose and that this would not give any

guarantees regarding the design and quality of properties.

The Department has committed to begin a review of the statutory minimum fitness standard and any additional requirements which arise as part of that review will also be applicable to any Intermediate Rent homes.

The responses vary between discussing new build and existing homes. Therefore, the Department will need to give consideration to establish if different standards are required between new built stock and existing stock (i.e. 'Off the Shelf' purchases). Newly built homes can be designed/delivered to a specific standard while existing (off the shelf) homes may only meet the statutory requirements. Therefore additional standards can be more costly to achieve in such circumstances.

The Building Regulations are the statutory minimum requirement to which any dwelling that is being constructed/renovated must comply. They represent a robust, reliable and accepted construction sector standard, but on their own do not necessarily allow for future needs to be built in. It is important that, in developing new Intermediate Rent homes, we seek (where possible) to make provision for these likely measures. This can help avoid the need for costly retrofit works to meet a revised standard imposed within a relatively short timeframe, although at this stage there remains a degree of uncertainty over how best to achieve Zero Carbon homes.

Much of the associated specification and standards are still being developed and as such we cannot yet be prescriptive in determining the appropriate standard. This will be advised in due course.

It is clear from the responses that there are many factors to consider. However, it should be stressed that, with the imminent introduction of Climate Change legislation, uplifted Building Regulations home design and specification changes are unavoidable irrespective of the impact this has on developer or tenant costs. As mentioned above, currently, all new built homes shall be constructed to comply with the current Building Regulations however the Department for the Economy's draft 'Energy Strategy for Northern Ireland: Path to Net Zero' includes proposals to uplift these Building Regulations. This means ensuring that new buildings are net zero ready.

The Department of Finance is aiming to uplift its technical booklet Part F 'Conservation of fuel and power in dwellings' (NI Building Regulation) over a 5 year period with full implementation of 'net zero ready' anticipated no later than 2026/27:

- An imminent uplift is anticipated to apply to the construction of new homes in Spring 2022
- A phase 2 discussion exercise will gather evidence, including whether an early introduction of requirements based on low carbon heating could be feasible for the 2023 uplift

There is much evidence that living in an affordable good quality home can help ensure a broad range of benefits for those who live there, to their health, education and employability, as well as addressing some of the harmful impacts of poverty and social exclusion. If designed appropriately and developed accordingly the Intermediate Rent Standards will help promote energy efficiency and reduce carbon emissions, which are positives both for the tenant and wider society.

The Department remains minded to explore the inclusion of provisions in excess of the minimum statutory development requirements in consideration of the responses received:

- i. during the engagement events which took place over the last several months;
- ii. to the consultation.

No respondents referred to the size of the units and only one touched on 'high quality, secure, and accessible living', however space and security are two aspects that the Department may consider. Homes should be of sufficient size to be liveable and be adaptable to the tenants' changing needs, and strive to create safe and secure environment. This can offer peace of mind to those who live there as well as developing a sense of 'home'. Considerations like 'Secured by Design' aspects assist design development here. For the landlord this make homes more rentable/attractive to let as well as establishing a valuable asset.

We are however cognisant of the new ways that people are using their homes, including 'Working from Home' arrangements, and, when finalising the standard for Intermediate Rent, consideration will be given to space for those who need to work from home.

Going forward, DfC intends to make use of the wide array of evidence gathered during the course of this consultation and beyond in order to formulate a scheme, which can deliver on as many development objectives as possible. Best Value for Money is defined as the most advantageous combination of Cost, Quality and Sustainability to meet customer requirements. Sustainability is understood to refer to economic, social and environmental benefits. As such sustainability is and will be at the core of any design/development standard for Intermediate Rent to ensure that associated properties are of a high quality that is fit for purpose both now and in the future, while having the flexibility to be responsive to the changing needs of the current and future tenants.

Design and development to a high standard, while it will come at an initial cost, will assist in Intermediate Rent homes retaining a high quality standard and can reduce ongoing maintenance or retrofit costs. Taking this approach can also benefit the asset value of the properties. This will be an important aspect of the overall viability and sustainability of IR development.

## Outcomes which indicate success

The Department proposes that Intermediate Rent homes should meet as a minimum the statutory construction and quality standards, with opportunity for additional requirements as necessary.

### Proposal 25 Analysis



#### Proposal 25 What we asked

Do you agree with the proposed outcomes identified as a way to identify the success of the programme?

#### Follow up question

Do you wish to propose additional outcomes for consideration?

**Out of a total of 33 responses 18 (55%) responded on the outcomes proposed**



#### Analysis of Responses

Of those who indicated a position on this proposal the majority, 16 respondents, agreed with the proposal. Of those who

disagreed, comments were provided on alternative actions which the Department should consider.

The vast majority of respondents on Citizen Space (15 out of 17) agreed with the proposed outcomes identified as a way to identify the success of the programme. The remaining two respondents disagreed.

One respondent provided comments by email, indicating that they were in favour of the proposals, subject to certain suggested adjustments.

### Summary of respondents' views Proposal 25

It is important in bringing forward a new housing product that all interested parties are clear about the intended outcomes.

To accompany this a clear evaluation framework, which allows for monitoring against those agreed outcomes, can allow us to measure both the success of the products and to understand how it has helped people and families who have accessed Intermediate Rent. Regular monitoring and evaluation of outcomes can also help with early intervention if changes are required.

The Department proposed that outcomes would be evaluated by monitoring performance against three key questions:

1. How much have we done?
2. How well did we do it?
3. Is anyone better off?

The Department proposed the following specific indicators, and asked readers to confirm if these were sufficient, or to advise if they felt the Department should consider alternative or additional outcome indicators:

Among the key indicators of successful outcomes could be the extent to which Intermediate Rent:

- Addresses Housing Supply – How many Intermediate Rent homes are created; how many vacant properties/vacant sites are brought into use under the programme
- Addresses Tenant Choice – How many households apply for and are successful in being offered an Intermediate Rent home; how many Intermediate Rent tenancies are created

The responses around outcomes were largely positive, with the majority of respondents agreeing with the proposed outcomes indicators suggested.

One respondent had a strong view on the importance of clarity around core objectives suggesting that: **“a focused monitoring and evaluation framework is put in place in order to assess whether these objectives have been met.”** The respondent went on to indicate a number of core objectives which might be appropriate: **“these primary objectives could include:**

- **Improving affordability for low to moderate income private renters**
- **Reducing housing stress**
- **Addressing barriers to accessing and sustaining tenancies in the PRS**

Several respondents took the opportunity to comment on the suggested indicators with one response suggesting, longer term, **“a metric to consider may be the success of those who have made use of intermediate rent accommodation and who have moved on to home ownership, the private rented sector or been successful in securing a social home as a measure.”**

One response tied the proposed outcomes to the design / quality standard to which Intermediate Rent homes could be developed, suggesting that: **“if intermediate rent products are provided at accessible housing, incorporating standards such as Lifetime Homes and wheelchair standard dwellings, they could provide additional housing appropriate for older people and those with disabilities. These groups often on lower incomes and may find intermediate rent as an attractive option.”**

One response indicated that further research across the whole of the PRS could provide enhanced detail and context, **“a detailed profiling of the whole sector is needed before any section of it is developed as a new scheme.”** A number of respondents took the opportunity to restate their view that an alternative funding and delivery

methodology would achieve the outcomes the Department is seeking.

Finally, one respondent stated that, given the Housing Executive has identified the need for ‘intermediate’ housing supply in rural areas that, **“the Department must ensure that this need is addressed in rural communities by ensuring that any provider must make provision for intermediate housing in rural communities.”** They suggested that all intermediate housing provision should be mapped as an additional outcome.

#### **Key themes/ issues raised by respondents:**

- The proposed outcomes-focussed approach to evaluation is to be welcomed
- A robust monitoring and evaluation framework is required
- Inclusion of specific standards could increase the size of the potential customer base for Intermediate Rent homes

## **Departmental Response and Next Steps**

### **Proposal 25**

Respondents were unambiguous that the outcomes associated with Intermediate Rent need to be clear, transparent and well understood. They must be measurable, and monitored in a way that ensures that they are reviewed and evaluated at an appropriate frequency to ensure that outcomes are being met, and to take corrective action if not. It has been suggested that where a design

standard associated with Intermediate Rent includes specific provisions for e.g. adaptations, then these should be recorded, and the use of these dwellings should be monitored to ensure that any properties which have adaptations or can accommodate adaptations can be used by a tenant who has a specific need.

Taking account of the comments received, it is acknowledged that some adjustments should be made around the outcomes and indicators of success associated with the implementation of an Intermediate Rent policy and model.

The Department agrees that it is important that outcomes are clear and measurable, and reflect the outline objectives associated with introducing Intermediate Rent. The Department feels that the increase of housing supply is a core outcome. Another core outcome is to make the rental costs more affordable, particularly for lower to moderate income households. Therefore the core outcomes are expected to include:

1. **Increase Housing Supply.** This will be measured through the numbers of homes which are constructed, renovated, converted or acquired (as Off the Shelf new build properties) for Intermediate Rent.
2. **Improve Rental Affordability.** This will be measured by recording how much rent (as a percentage of household income) applicant tenants are paying at time of application, and how much rent they are paying as an Intermediate Rent tenant (as a percentage

of household income) in an equivalent property.

Adding to the supply of homes will increase overall housing delivery. It is important to acknowledge that not all those who will want or seek to avail of an IR tenancy will have applied for social housing and will therefore not be captured in recorded 'housing stress'. That means that some of these people will be in concealed housing stress. It is important to capture where possible any reduction in recorded housing stress, for those who accept a tenancy and who are on the Common Waiting List. We will keep this aspect under review.

We will examine the opportunity for other outcomes to be recorded, monitored and evaluated. It is important to note that the outcomes should be measurable, which requires the provision of some baseline data. This may restrict the extent to which certain matters can be outcomes. Data will be gathered from applicant tenants around their ability to provide landlord references (a common barrier to accessing a private rental) or their request to build up a deposit over time. This information will help in assessing whether those matters included in the scheme to address perennial barriers to attaining and sustaining a PRS tenancy are mitigated by the policy and model.

Similarly, data will be recorded around the tenancy duration, both the duration requested by applicant tenants, and the time tenants

remain resident in their Intermediate Rent home. The reason for moving on will also be captured. This can help better understand Intermediate Rent tenants' needs when it comes to the duration of their tenancy, and examine why they move on, if it is helping to address barriers to accessing a market rental or providing a more affordable rental solution while awaiting a social home, and if it is assisting people into home ownership.

## Additional data, evidence or information



### What we asked

**Do you have any other data, evidence or information to help shape the development and delivery of an Intermediate Rent model that have not been captured elsewhere in this document?**

The Department has outlined below some of the key criticisms and points which have been submitted in response to the consultation which have not been dealt in the proposal sections above. It has not been possible to detail all the issues raised in this document but respondents should be assured that all responses have been read, analysed and feedback taken on board where possible.

**Feedback that funding should be focussed on addressing objective need**

One respondent from the Voluntary/Community/Advocacy/Charity took issue with the Departments proposals, below is a summary of some of the key criticisms with the exception of potential Equality impacts which is addressed in the next section:

- The Department has had time to learn the lessons of other Intermediate Rent schemes in other jurisdictions but has not done so and has not critically analysed these
- The experience of the very many households across the jurisdictions reviewed by the DfC paper who cannot afford their so-called 'affordable' market-based rent does not figure. To be truly affordable, rents must be pegged to income rather than market rates
- Flexibilities in rent setting which will be determined in conjunction with the IR Operator when appointed - these are important programme elements that deserve scrutiny and full public oversight
- Intermediate Rent might displace social renting within affordable housing agreements on Local Development Plans or may compete for available land/ subsidised land

The Department has considered all aspects of Intermediate Rent schemes in other jurisdictions and tried to draw up proposals based on the best aspects of their practice.

Whilst the Department would agree that for some it will not be an affordable option, there are also a significant number of households who will benefit. It is worth bearing in mind

that affordability is not the only factor which Intermediate Rent seeks to address, as raised by a number of respondents.

In order to implement a model which will help a significant number of households the Department must put forward proposals which are financially viable and this will not be feasible to do based on a product which is loan funded and based on rents pegged to incomes at the lower end of the scale.

Intermediate Rent will be a fairly niche product which will not deliver homes on a scale which will out-compete social housing. The targets and funding for the Social Housing Delivery programme will not be impacted.

## Equality Considerations

Alongside the consultation proposals, the Department published an initial equality screening, which assessed the potential impacts of the proposals across the nine equality categories identified under Section 75 of the Northern Ireland Act (1998).

The consultation paper asked stakeholders to consider the proposed Intermediate Rent policy and model as outlined in that document, and asked for views on whether this would impact on people from the Section 75 categories differently:

There are nine equality categories defined under Section 75 of the Northern Ireland Act (1998). Do you think that introducing

an Intermediate Rent programme in Northern Ireland would impact on people from Section 75 groups differently?

Where stakeholders held any additional data or evidence which the Department should consider on the potential impacts in respect of rural needs and data protection impacts, they were asked to provide this for further consideration.

18 respondents made reference to the potential equality impacts in their response. Of those who responded using the Citizen Space questionnaire almost three-quarters of respondents (10 out of 14) do not think that introducing an Intermediate Rent programme in Northern Ireland would impact on people from the Section 75 groups differently, the remaining four respondents thought it would. Of those who responded by email/post and who commented on equality impacts, all 4 respondents who commented felt that IR would differently impact on people from different Section 75 categories.

### Summary of respondents' views

A number of respondents expressed concern around rent setting criteria, and the potential that this could have to have a differential impact on certain Section 75 categories, particularly in respect of religious belief, age, gender and marital status. One respondent specifically requested that the Department review the initial equality screening in consideration of additional information provided within their response. This review



was conducted during December/January, and a revised equality screening was published on the [Department's website](#)<sup>5</sup>.

One respondent robustly asserted that the Department must provide clarity around the intended outcomes, and how this would be measured and evaluated: **“in our view it is important that the primary objectives of the intermediate rent model are clearly articulated and that a focused monitoring and evaluation framework is put in place in order to assess whether these objectives have been met.”** The respondent went on to call for a monitoring and evaluation framework which would capture which persons or households had benefitted from the policy and model in order to determine what, if any, difference it has made.

A number of responses reflected on the potential equality impacts of situations which are not specifically covered within Section 75 of the Northern Ireland Act (1998). This included, for example, the particular needs of those living in rural areas. The issue of development in rural areas will be considered when it comes to identifying development needs across a variety of locations.

One response reminded the Department that, **“policy should be designed to effectively tackle the persistent inequalities experienced by people within Section 75**

**equality groups”**. The same respondent noted that when it comes to delivery consideration of the housing requirements for all people across all equality groups is required, and underlined the need to consider the equality impacts of any potential new policy. Mitigations should be developed to address negative impacts.

The potential impacts on ethnic minority groups, including migrants, were raised with a number of responses flagging issues which could have the potential to negatively impact these groups in particular. These relate, for example, to issues such as ability to provide landlord references or a guarantor, or to demonstrate family links to a particular location. There should be adequate publicity, across a range of media, and an opportunity to apply into the scheme through a variety of forms (i.e. not only using electronic application). Information should also be available in a range of languages to ensure equality of access. The Department is taking these issues into consideration and in considering the feedback received through consultation, will revise a number of the proposals which had the potential to disproportionately impact this Section 75 category.

Several respondents indicated that the policy and model should seek to improve equality for persons with a disability, who can experience difficulties in gaining a tenancy

<sup>5</sup> <https://www.communities-ni.gov.uk/publications/development-and-delivery-new-intermediate-rent-policy-and-model-screening-0>

within a suitable, secure and affordable home. As discussed within Proposal 24 (above) there was some support for all Intermediate Rent homes to be developed to the Lifetime Homes standard, and to be designed and developed to a space standard which allows for a range of adaptations. For people living with disabilities, whether physical or otherwise, the policy should permit the provision both of physical adaptations and should take account of the particular needs of persons with other disabilities, (learning disabilities, mental ill-health, neuro-diversity).

Furthermore, any adapted dwellings should be **“included on the NIHE’s accessible housing register for social housing, which includes a planned rolling programme to increase its coverage including to housing association stock and private accommodation.”** The mechanisms to be used to advertise or apply for an Intermediate Rent home could also, without proper planning, exclude those with sensory disabilities when compared to the general population.

Feedback was also received on the potential impacts of the policy and model on the Section 75 category of “Age”, with respondents highlighting that there could be the potential for an unintended negative impact on, for example, older persons if the scheme is largely electronically based, suggesting that, **“account should be taken of the lower rates of information technology awareness and/or internet**

**usage by older people or people with sensory disabilities compared to that of the general population.”**

“recommend that the evaluation framework is designed not only to assess whether the objectives have been met but to also capture who has benefited (both in terms of numbers and demographic profile), how they have benefited, and what overall difference has this made (both on an individual level and to the overall housing market.)”

“we recommend that all relevant indicators are tracked not only in aggregate but also for the impact on individuals from each of the Section 75 grounds”

## Departmental Response and Next Steps

The proposed new Intermediate Rent policy and model is a departure for the housing market here. It is one of a wide range of interventions which aim to improve relative affordability, to reduce housing stress, and to increase housing supply through the provision of a new supply of homes offered at below market rents with additional security and support measures embedded.

Intermediate Rent is intended to provide a more secure, supportive, and affordable housing solution for a section of the population for whom the housing market does not currently meet their housing needs. This group of people and families are not necessarily those who are in the most acute need however, without intervention, it is unlikely that the market will adjust to provide for their needs.

For many, the ability to access a social rented home is both the desired and the optimal outcome. At September 2021 some 13,721 of those on the waiting list were in receipt of the lowest number of points (<30 points). A further 6,566 households have 30-69 points meaning that that they are in housing stress but are below the level to be awarded Full Duty Applicant status. For households in receipt of 69 points or fewer, the intended policy may offer a desirable and more immediate alternative to a social housing allocation.

Intermediate Rent should not displace those seeking a social rental, and the policy is

being developed in a way that tries to ensure that they can continue on their journey to obtain a social tenancy. It cannot be ignored, however, that many have been awarded a lower number of points and will wait a long time in order to receive an offer of a social home. While they await such an offer, many will be living in unsuitable accommodation, whether that is because it is too expensive, it is not suitable (in terms of size, layout, location) for their needs, and so on.

We are now working to expand the affordable housing options available for people who either choose not to access a social home or who are in receipt of a low number of points under the Housing Selection Scheme and are struggling to make ends meet in expensive and often poor quality market rented accommodation while they await that offer. Intermediate Rent is therefore being developed, not necessarily to provide a housing solution that is attractive or available to everyone. Rather, it is intended to meet that identified need for a supply of rented homes which are more secure, more affordable, and are underpinned by support services to manage tenancies and properties.

As outlined above, the Department has undertaken a requested review of its initial equality screening decision, based on additional information and evidence presented within responses received. The revised equality screening identified that, based on the additional information presented, there is the potential for a minor positive impact

for several Section 75 categories. However, as the final detail of the policy and model are completed, the Department will continue to assess the equality impacts to maximise the positive impact and mitigate any negative impacts arising.

In further developing the detail, the Department will continue to gather data and evidence to support development, and will continue to identify, monitor and evaluate the impacts of the policy and model across all Section 75 categories. Opportunities will be identified and applied to ensure that, where possible, the operational policy and

model can make a positive impact across all Section 75 categories, but particularly for those groups who have been identified as having different experience and needs when it comes to housing.

The monitoring and evaluation of any equality impacts is also a critical element of the policy and model, and a future iteration of the Department's assessment of the equality impacts will provide more detail around the specific arrangements to monitor, evaluate and, where needed, take corrective action. This will be applied throughout the lifetime of the policy.

## Summary of Departmental Response and Next Steps

Proposal Number/ Proposal Summary	Support	Planned action	Comments
1. Is there a need for an Intermediate Rent product here?	27/32 in support	Taken forward	
2. There will be an application process with income eligibility criteria and an affordability assessment.	13/22 in support	Taken forward	Additional work with IR Operator required to develop final application processes
3. Intermediate Rent might provide most benefits for certain households (listed in the document)	14/20 in support	Taken forward	
4. Rents will be initially set with reference to 80% of open market private rents within a locality	12/16 reasonable, 12/15 attractive 2/10 in support	Taken forward	Subject to further viability and affordability testing
5. Rents will be uprated annually through a published formula, possibly linked to CPI	12/20 in support	Taken forward	Further consideration of LHA rate and economic conditions to form part of considerations.
6. Respondents asked if alternative uprating methods should be used and identify which methods	11/17 in support	No alternatives identified	
7. Eligibility for Intermediate Rent tenancies based on indicative minimum and maximum Income bands	14/28 in support	Proposal amended	Minimum income used as a guide only, additional flexibility incorporated to widen how affordability can be demonstrated.

Proposal Number/ Proposal Summary	Support	Planned action	Comments
8. Indication of which forms of income may be taken into consideration	13/19 in support	Taken forward	Income from a number of sources considered.
9. How an applicant's savings (or other assets) may be treated	11/17 in support	Taken forward	Further work required to determine savings threshold
10. Opportunity to suggest additional eligibility criteria, including prioritisation criteria	16/23 in support	Not taken forward	Potential adverse equality impacts identified in original proposal.
11. Examining the need for applicant tenants to provide references (landlord, employer, personal)	12/18 in support	Taken forward	Additional flexibility added where a landlord reference is unavailable.
12. Examining the need for an upfront deposit/ the need for a guarantor	18/21 in support	Taken forward	
13. Tenancy duration – advantages and challenges associated with a 5 year tenancy	n/a	Taken forward	
14. Tenancy review – do you think there should be a review when a tenancy comes to an end	18/20 in support	Taken forward	
15. Tenancy renewal – what circumstances will be considered in relation to renewal (ranked by preference)	n/a	Taken forward	
16. Whether the IR landlord should offer tenancy support services	20/23 in support	Taken forward	

Proposal Number/ Proposal Summary	Support	Planned action	Comments
17. What types of tenancy support should be offered/ available	n/a	Taken forward	Subject to agreement with IR Operator and tenants in due course on support service delivery
18. Whether IR should be delivered by a single programme operator	13 / 28 in support	Taken forward for initial phase	Commitment to evaluate and explore broadening to additional delivery bodies in future.
19. Whether additional/ bespoke regulation is required for model; and 20. What additional regulatory matters should apply	14 / 24 in support	Taken forward	Further detail on the additional regulatory requirements will be available in due course.
21. Whether the IR operator involved in final detail of specification	14 / 20 in support	Taken forward	Further dialogue with interested parties will shape the extent.
22. Funding an IR model using a mix of FTC loan and private finance	17 / 23 in support	Taken forward	More analysis of viability calculations to be provided in due course.
23. How any subsidy could be calculated	8/20 in support	Taken forward	More analysis of viability calculations to be provided in due course
24. What design standards should apply to IR homes	11/25 in support	Taken forward	Commitment to further considerations to additional design and quality standards for IR homes.
25. Identification of evaluation outcomes	16/ 18 in support	Taken forward	Proposed outcomes revised and commitment to further consideration.

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# Health Inequalities NI 2022

## Hospital Activity



In 2020/21, the inequality gap for all admissions stood at **36%**.

The rate of emergency attendances for the most deprived areas was more than **one and a half times** that of the least deprived.

## Alcohol, Drugs & Smoking



Alcohol specific mortality in the most deprived areas was **around four times** that in least deprived.

In 2018/19-20/21, the **drug related admission rate** inequality gap stood at **225%**.

In 2018/19-20/21, the **alcohol related admissions** inequality gap stood at **278%**.

## Life Expectancies & General Health

The **life expectancy at birth** inequality gap in 2018-20 was **6.9 years** for males and **5.0 years** for females.

The **healthy life expectancy** inequality gap in 2018-20 was **11.8 years** for males and **14.9 years** for females.

The **disability free life expectancy** inequality gap in 2018-20 was **11.9 years** for males and **12.3 years** for females.



## Diet & Dental Health



The **total dental extraction rate** in the most deprived areas was **nearly double** the rate in the least deprived.

## Mental Health & Wellbeing



In 2016/17-20/21, rates of **self-harm admissions** in the most deprived areas were **more than two and a half times** that in the least deprived.

## Pregnancy & Early Years



**Smoking during pregnancy** in the most deprived areas was **over four and a half times** the rate in the least deprived.

The **U20 teenage birth rate** in the most deprived areas was **over seven times** the rate in the least deprived.

## Premature Mortality



In 2016-20, **preventable mortality** in the most deprived areas was **almost three times** that in the least deprived.

The **under 75 respiratory disease** mortality rate in the most deprived areas was **over three and a half times** the rate in the least deprived.

The **under 75 circulatory disease** mortality inequality gap stood at **137%** in 2016-20.

The **under 75 cancer mortality** inequality gap stood at **71%** in 2016-20.

## Major Diseases & Conditions



The rate of **respiratory admissions** in the most deprived areas was **more than double** that of the least deprived areas, for all ages and for those aged under 75 years.

The inequality gap for **cancer incidence** in 2013-19 stood at **19%**.

In 2020, the inequality gap for **antihypertensive prescriptions** stood at **24%**.

## Health Inequalities NI 2022

### Further Information

This fact sheet is an accompaniment to the *Health Inequalities Annual Report 2022*. This annual publication is one of a series of reports produced as part of the NI Health & Social Care Inequalities Monitoring System (HSCIMS) and presents a comprehensive analysis of health inequality gaps between the most and least deprived areas of NI, and within Health & Social Care (HSC) Trust and Local Government District (LGD) areas across a range of indicators. This report is an update of the Health Inequalities Annual Report 2021. The report is accompanied by downloadable data tables which contain all figures, including urban and rural breakdowns.

**For further information and to link to the report and downloadable tables please follow the link below:**

<https://www.health-ni.gov.uk/articles/health-inequalities-statistics>

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