

## **Ending Homelessness Together – the Homelessness Strategy for Northern Ireland 2017-2022**

PPR Consultation Response Feb 2017

### **1. Vision Statement “Ending Homelessness Together”**

a. Do you agree with the vision of this Strategy?

YES

b. In your view what are the key priorities to end homelessness?

### **Introduction**

Established in 2006 by the renowned trade unionist and human rights leader Inez McCormack, the Participation and the Practice of Rights (PPR) organisation works to support marginalised people and groups to use a human rights based approach to make change on the socio-economic issues which impact their lives. We currently work with people affected by unemployment, changes to social security benefits, people living in poor social housing and those who are homeless as well as those impacted by suicide and self harm. Our methodology was recognised in 2012 by the UN Office of the High Commission for Human Rights as a good practice example of how communities can claim their rights. In 2013 Mary Robinson, former UN High Commissioner for Human Rights and former President of Ireland, described PPR’s work as “the way in which human rights work should be, but isn’t, done.”

Since 2006 we have worked to support campaigns on homelessness (Homeless Not Voiceless), housing inequality (Equality Can’t Wait), and other related issues, and thus have practical experience of the issues raised in this strategy. In this consultation response we will be making specific comment on eligibility, housing supply and vesting, private rental, welfare reform, advice, equality assessments, and strategy targets.

### **Human Rights Standards**

The role of government generally, and in the delivery of housing and homelessness services specifically, is to respect, protect and fulfil the right to housing as part of the right to an adequate standard of living. This duty is clearly identified in international law, notably article 11(1), of the International Covenant on Economic, Social and Cultural Rights (ICESCR), to which the governments of the United Kingdom and Ireland are signatories. Article 11(1) states;

“The States Parties to the present Covenant recognize the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions. The States Parties will take appropriate steps to ensure the realization of this right, recognizing to this effect the essential importance of international co-operation based on free consent.”

Article 2 of ICESCR also places an obligation on the Northern Ireland Executive to ensure that the government “take steps to the maximum of its available resources” to progressively realise the right to housing.

The United Nations Committee with responsibility for oversight of ICESCR has clarified that such steps must be “deliberate, concrete and targeted” towards the realisation of rights.

Article 2 also provides that State Parties guarantee that the right to housing be exercised without discrimination of any kind as to race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.

ICESCR also mandates that the Northern Ireland Executive give due priority to those social groups living in unfavourable conditions by giving them particular consideration. Policies and legislation should correspondingly not be designed to benefit already advantaged social groups at the expense of others. Significantly, the Committee also notes that the obligation to ensure the protection of the rights of vulnerable groups is relevant even in times of severe economic constraint or recession.

The United Nations (on three separate occasions over that last seven years), the Council of Europe Human Rights Commissioner and the Human Rights, and Equality and Children’s Commissions set up under the Belfast Agreement have all called for religious inequality in housing to be addressed in North Belfast.

The UN Committee on Economic, Social & Cultural Rights expressed its concern in June 2016 about the persistent inequality in the access to adequate housing in North Belfast, affecting in particular Catholic families and recommended that the state:

“Intensify its efforts to address the challenges to overcome persistent inequalities in housing for Catholic families in North Belfast, including through meaningful participation of all actors in decision-making processes related to housing.”

#### PPR’s comment on ‘Ending Homelessness Together’

In general, we note with concern the level of homelessness in NI, including ‘rough’ , ‘hidden’ and those in hostels. NIHE own figures show that “Between 18,000 and 20,000 households

presented to the Housing Executive on an annual basis throughout the last strategy". The Northern Ireland Housing Bulletin July – September 2016 notes that in this period 4,924 households presented as homeless to the NIHE, an increase of 269 (5.8%) from the previous quarter. The number of households accepted by the NIHE as full duty applicants for the same time period was 3,096, again an increase (15.7%) on the previous quarter.

### Welfare cuts

The consultation document cites a Crisis report that states that two thirds of Local Authorities in England which introduced welfare reform saw an increase in homelessness. As this strategy is for Northern Ireland, one of the areas with the most social deprivation in Britain and Ireland , we can expect the effects to be more severe here. The New Policy Institute (NPI)'s 'Monitoring Poverty and Social Exclusion in Northern Ireland 2014' report notes that "Overall, almost 400,000 people live in poverty in Northern Ireland." Much of the welfare 'reform' measures will be introduced to NI 'as is', and while the document cites mitigations such as the delay in the Bedroom Tax, it does not address that any such mitigations will last only until 2020 (and the scope of the strategy is till 2022). Nor does it address how homeless services will address the large loss of income many tenants will face with i.e. the benefit cap. Moreover, an increasing number housing associations in Britain have stated they will 'assess' the ability of tenants affected by the benefit cap to pay rents, and will not be offering tenancies to many (Inside Housing, 3 February 2017). This will lead to increased homelessness.

The strategy proposes to 'advise and support tenants' without explaining what this will look like, nor does the strategy grasp that no amount of advice has prevented homelessness among many tenants in Britain who lost large amounts of their benefits. Any government strategy, and especially a social one like homelessness prevention which explicitly mentions that homelessness is "a cross-cutting issue", that notes that homelessness has "long term implications for health and wellbeing", and that stresses the need for inter-departmental working, can operate in a vacuum. It makes little sense for the Executive to be increasing the chance of homelessness among the poorest (through the implementation of welfare 'reform', while simultaneously pursuing a (inadequate) prevention strategy.

The document states that Housing Advisors "will also seek to explain realistic options to prevent households from experiencing future housing related debt and to make sound financial decisions." The logic of 'sound financial decisions' does not apply in case of welfare caps, sanctions and bedroom taxes. People cannot save something from nothing.

Further, the consultation document itself cites research which would support the claim that welfare reform is a false economy, because the research shows how “failing to prevent homelessness costs the public purse thousands of pounds more per individual than would timely interventions”.

The effect of homelessness on mental health is noted, as well as the link between poor mental health and risk of homelessness. Therefore, it is with concern that the Department of Health (one of the Departments noted in this strategy as being an important partner) spends c. 8% of its budget on mental health while mental health cases count for c. 25% of all health cases.

**Recommendation 1: That NIHE lobby for appropriate measures to be set up to mitigate the effects of welfare reform, including debt relief, rent arrears relief.**

**Recommendation 2: Implement ‘Unfair Share’ campaign recommendations which call for an increase in the percentage of the health budget spent on mental health immediately, and increase total budget over time. More information can be found here: <http://www.pprproject.org/more-dough-needed-%E2%80%93-mental-health-rights-campaigners-call-on-the-minister-for-health-to-fund-mental>**

#### Failure to equality screen

The consultation document notes that: “Equality issues are central to this strategy and equality issues will be central to monitoring the delivery of the Strategy.”

However, we note with concern that an equality impact assessment (EqIA) will not be carried out for this strategy. We express particular concern that the equality screening document, which is a binding commitment on the Northern Ireland Housing Executive has not been made readily publically available alongside the consultation document and was only made available to PPR over two weeks after requesting it (two days before official consultation deadline). It should be noted that NIHE’s Equality Scheme states:

“4.4 The purpose of screening is to identify those policies that are likely to have an impact on equality of opportunity and/or good relations.

4.5 Screening is completed at the earliest opportunity in the policy development/review process.”

At time of writing, the screening document still not publically available. This is all the more worrying in light of the recent investigation into the Department for Communities in relation to the ‘Facing the Future Housing Strategy’ wherein the Department were found in November

2015 to have breached their equality obligations by failing to screen the strategy. It is deeply concerning that opportunities continue to be missed to ensure that housing policy and programmes in NI are effective in tackling inequalities.

The strategy itself highlights various groups – such as those with No Recourse to Public Funds (which will have BME/racial group/ethnic minority overlap), single adults being largest group presenting as homeless (‘marital status’) and elderly people. Others not mentioned include religious groups (Catholics over represented on waiting list in i.e. North Belfast). The screening exercise has not addressed how this inequality will be affected.

**Recommendation 3: That a full equality impact assessment be carried out for this strategy.**

Lack of targets/figures

As with previous homelessness strategies, this strategy sets no targets, neither annual nor over the lifetime of the strategy, for the reduction for the number of household experiencing homelessness. Nor is there budgets (annually or over lifetime of strategy) of what resources will be allocated to prevent homelessness and achieve the objectives of this strategy. They need to be linked to specific targets about how much homelessness will be reduced each year; otherwise there is no plan. It is of further concern that the total annual budgets between 2011/12 and 2015/16 have remained largely stagnant.

**Recommendation 4: Set targets for the reduction of number of homeless holds, both annual and over lifetime of strategy.**

**Recommendation 5: Set figures for spend for strategy, both annual and over lifetime of strategy, linking this to the proposed reduction in number of homeless households.**

**Recommendation 6: Increase the budget for the successful implementation of homelessness prevention as needed.**

## **2. Objective One: Preventing Homelessness**

a) Do you agree that preventing homelessness should be the primary objective of this strategy?

YES

Please provide supporting comments below:

We agree that preventing homelessness should be a key objective of this strategy. However, we believe this strategy fails to meet this objective in several key ways.

#### Assistance eligibility requirements

This homelessness strategy, as with previous strategies, fails at the first hurdle in its objective of preventing homelessness, by the fact that full homeless services are not available to all homeless households.

The Full Duty Applicant (FDA) test of 'Eligibility', 'Intentionality', 'Homeless', and 'Priority Need' excludes many homeless people from full support.

#### 'Eligibility' test excludes most vulnerable groups.

The Eligibility test excludes a large range of households from receiving homelessness assistance, including asylum seekers, women on spousal visas fleeing domestic violence, and increasing number of EU nationals who are without current 'right to reside'. That people in these situations cannot even access homeless hostels or women's shelters fails to respect the most basic human rights of these individuals, as well as Programme for Government outcomes such as having "a more equal society" and ensuring Northern Ireland is a "welcoming, outward looking society". Women's Aid NI has said of the situation "that non-UK national victims of domestic and sexual violence are essentially trapped, faced with an impossible and inhumane choice between destitution and a life of violence and abuse." Indeed other EU jurisdictions, such as France, have no immigration conditions on accessing homeless hostels. A homelessness strategy that does not provide access to assistance for all who live in this state, especially the most vulnerable, cannot be human rights compliant.

It is of additional concern as they groups excluded (which includes those listed above) are often already in a vulnerable situation, for example having restrictions on social security entitlements and in some cases the right to work. There may also be issues with English being spoken as a second language. In addition individuals affected by these restrictions are clearly likely to be ethnic minorities – thus there are s75 equality implications.

Northern Ireland goes beyond England, Scotland or Wales in its eligibility test, in that "the NIHE can deem someone to be ineligible as a result of 'unacceptable behaviour' in a previously held NIHE tenancy."

#### Social Services Assistance for individuals affected by immigration control

The consultation document claims that individuals affected by immigration control can be referred by the NIHE to social services for assistance. While an FOI – submitted by PPR –

showed that there were over 1100 cases of people being refused NIHE housing assistance due to immigration status in 2015/16, the NIHE confirmed that they have no central records of those who were referred to social services for help and thus were not able to provide a figure (Freedom of Information Request response from NIHE – 2nd Feb 2016. Date range 1st April 2015 – 31st March 2016).

In essence this means that while the potential exists for individuals affected by immigration control to be referred for assistance, there is no evidence that this is happening.

For example, the South Eastern Trust and the Southern Trust both separately confirmed in separate FOI responses that they had received no referrals for households with or without children from the NIHE; the Western Trust received no referrals for households without children; the Belfast Trust were able to confirm the number of families that were referred (10), however in regards to single adults they stated:

“Currently there are no formal processes established in the Trust for capturing this level of information, the Trust however is considering ways to identify and monitor these referrals to ensure this information will be readily available in the future”. (Freedom of Information Request response from South Eastern Trust – 1st Feb 2016; Freedom of Information Request response from Western Trust – 25th Jan 2016; Freedom of Information Request response from Southern Trust – 8th Feb 2016; Freedom of Information Request response from Belfast Trust – 13th Feb 2016. The Northern Trust has not provided a response at the time of writing).

PPR’s work with asylum seekers and refugees indicates that referrals do not happen regularly. The under-utilisation and/or lack of awareness of these duties among staff in NIHE can have devastating consequences. Part of this strategy must be to map out any and all times when someone may be eligible for support, and how to ensure that this support is accessibly in a timely manner. As per normal functions of NIHE, interpreters services must be available for this.

As such PPR recommends a central record system, alongside training for both NIHE and social services of when they have a duty to refer and accept a referral for housing assistance. Indeed it is notable that Objective 5 of the strategy is “Improved data gathering within frontline services”. This is additionally important for s75 duties on monitoring for racial/ethnic minority groups.

**Recommendation 7: NIHE should ensure that their staff and staff of other relevant agencies receive training so that they are aware of their duties, and can properly**

**identify and refer when people who are currently ineligible for homeless assistance for referral to social services for accommodation support. The NIHE's equality scheme states that "We recognise that awareness raising and training play a crucial role in the effective implementation of our Section 75 duties."**

**Recommendation 8: In line with Objective 5 of this strategy on data collection, NIHE should maintain a central record of what actions were taken for people who are found to be ineligible due to No Recourse to Public Funds (i.e. referrals to the Trust). This is additionally important for NIHE's equality scheme s75 duties on monitoring for racial/ethnic minority groups.**

**Recommendation 9: NIHE should ensure that any barriers to accessing hostels and women's refugees based solely on immigration status be phased out, with immediate priority given to people deemed vulnerable.**

#### Priority Need

Further, it does not follow that if an individual does not meet the test of intentionality, or priority need that should therefore be automatically be denied the full range of services to prevent their homelessness. Indeed, the other regions of the UK have taken steps to remedy this situation. As housing is a devolved matter there is "increasingly divergent approaches are emerging from the four nations" , with Northern Ireland having failed to utilise its room to manoeuvre.

Priority need was abolished in Scotland in 2012, expanded in Wales and new measures are being proposed in England. The gradual removal of priority need tests in Scotland led to the law being called among the 'best homelessness law in Europe' (Shelter).

A House of Commons briefing paper comparing homeless duties across the UK notes: "Wales has placed a statutory duty on local authorities to prevent homelessness for people threatened with homelessness, and to help to secure accommodation for all applicants assessed as homeless for a period of 56 days (this is known as the homelessness relief duty). After this period local authorities must secure accommodation for those unintentionally homeless and in priority need."

It is important to note that a local authority helping to secure accommodation does not necessarily have to provide or source the accommodation itself.

The briefing paper goes on to state:

Homelessness duties in England could soon be changed through the passing of new legislation. The Homelessness Reduction Bill 2016-17, a Private Member's Bill currently progressing through Parliament with Government support, would introduce prevention and relief duties on English local authorities similar to those currently in place in Wales”

Northern Ireland’s homelessness strategy must follow the lead of the example being set in Britain, and seek to expand and then phase out priority need tests for homeless assistance. As with the other tests, the removal of this will logically increase the number of households which the state will owe a duty to. Therefore, the budget for housing and homelessness assistance will need to be increased accordingly.

### Intentionality

On ‘intentionality’ tests in Wales, the above mentioned 2016 House of Commons Briefing paper states:

“individual local authorities have been given the power to decide whether or not to have regard to intentionality. An authority must inform the Welsh Government and publish a notice on whether it decides to apply an intentionality test to applicants.”

The briefing paper continues: “This measure was introduced as a starting point of the Welsh Government’s long-term aim to remove the intentionality test completely”

“For example, Cardiff is applying the test to all priority need categories except 16 and 17 year olds, as ‘it is felt (they) cannot be deemed responsible for any loss of previous accommodation.’”

Northern Ireland’s homelessness strategy must recognise the severe limits of ‘intentionality’ tests, especially in practice. Perceived ‘intentionality’ in terms of homelessness cannot in itself mean that a homeless household receives no support.

### Conclusion

Northern Ireland is behind Scotland, England and Wales in making use of the devolved nature of housing to expand its scope in providing homelessness assistance. Only 50-60% of people reporting as homeless in NI are found to be FDA , and thus there are large numbers of people who are not getting assistance.

Indeed this Homeless Consultation document ends the section on FDA by saying:

“Research produced by Crisis has demonstrated the devastating and long term impact homelessness can have on a household; therefore it is important that any homelessness

strategy not only makes adequate provision for dealing with statutorily defined FDA, but also ensures the provision of appropriate support services to assist all homeless households to find and sustain long term housing solutions” .

Yet it has failed to demonstrate how it will achieve this for non-FDA households. Rather than creating a two-tier system of homeless support, we recommend that the current system of support be adapted so that all homeless household have their human rights upheld.

The NI strategy needs to follow best practice in terms of priority need and intentionality, as well as ensuring that all who reside in the state are providing with adequate assistance.

**Recommendation 10: That the NIHE and Department of Communities researches the full extent of its powers under devolved housing legislation to ensure the greatest number of homeless household are afforded protection. That it learn and implement the best practice from England, Scotland and Wales, as well as jurisdictions in the EU and elsewhere.**

**Recommendation 11: That it begins the gradual phase out of ‘priority need’ tests.**

**Recommendation 12: That the NIHE review and limit its implementation of ‘internationality’ tests.**

**Recommendation 13: Given that only 50-60% of people reporting as homeless in NI are found to be FDA, the removal or limiting of these tests will logically mean a greater number of homeless households receiving assistance. Therefore the budget for the implantation of this strategy must be expanded accordingly.**

b) Do you agree with the actions outlined in the Strategy aimed at preventing homelessness?

YES

**3. Objective Two: Finding appropriate and sustainable housing support solutions?**

a. Do you agree with the person centred housing and support solution approach as detailed in the strategy?

YES

Please provide supporting comments below:

Homelessness can best be prevented by ensuring an appropriate supply of adequate housing. Indeed the consultation document notes that: “key to ending homelessness is the

adequate provision of good quality, affordable housing in Northern Ireland across all tenures.”

The housing must be affordable, in good condition, with strong security of tenure. The consultation document notes that accommodation being not reasonable, for issues such as affordability, is the top reason (accounting for over 1 in 5 cases) under which people are found to be homeless with statutory responsibilities on NIHE. In the evaluation of the previous homelessness strategy, “the supply of affordable housing across NI was repeatedly highlighted as a structural constraint in reducing homelessness”.

However statistics show there is a lack of suitable housing, especially in areas of high housing need and long standing religious inequality, such as north Belfast, which has been the subject of three United Nations interventions on this issue since 2009.

According to the Northern Ireland Housing Executive’s (NIHE) ‘Belfast Housing Investment Plan 2015 – 2019’ there were almost 12,000 people on the social housing waiting list in Belfast in 2015 and almost 7,000 in ‘housing stress’. Around 6,000 families presented as homeless and over 3,000 were accepted as such. To deal with this crisis the government built 542 social homes last year.

With regard to north Belfast, official figures from the Northern Ireland Housing Executive show that in Protestant areas of North Belfast there is a surplus of housing units: 38 units in 2013, 72 units in 2014 and 96 units in 2015. In Catholic areas there was a need for 749 additional units in 2013, 666 additional units in 2014 and 858 additional units in 2015.

Overall, there is a chronic shortage of social housing. Yet this is not due to lack of land or money. Campaigners in Equality Can’t Wait have indentified land around the city which could be used for housing. Recent FOIs by PPR have identified further plots of land owned by governmental departments. The NIHE could vest this land to build social housing, and where plots of land are not suitable (i.e. too small) these should be sold off for the purpose of financing building social homes. These measures would help the NI Executive in meeting its human rights obligations under ICESRC in using all of its maximum available resources to fulfil the right to adequate housing.

Further, the consultation document itself notes that “Single Person Households are the biggest group of homeless presenters in Northern Ireland.” Yet most NIHE/housing association properties are not designed for single people. And the private rental sector, which the NIHE is increasingly using to discharge its duty, also has a low number of

(affordable) 1-bedroom properties, as well as Housing Benefit restrictions on under 35s place barriers.

**Recommendation 14: As the strategy notes, a “key to ending homelessness is the adequate provision of good quality, affordable housing”. Therefore the NIHE must ensure the provision of such housing and consider the vesting of land for either the direct use of social housing or to be sold to finance the building of social housing.**

**Recommendation 15: Noting the NIHE states that “Single Person Households are the biggest group of homeless presenters in Northern Ireland”, the NIHE must ensure that social housing meets. They must remove barriers (such as under-35 Housing Benefit rules) that makes it harder for young single people to find affordable accommodation.**

**Recommendation 16: For the NIHE to play its role in the development of LDPs in Belfast and across Northern Ireland, to ensure adequate land in areas of need is zoned for housing.**

#### Private rental sector

The document notes in “4.2.4 Other Housing Options” that the Department is exploring the further use of the PRS to discharge its duty to FDA homeless households. The PRS is attractive to NIHE staff in that there is greater supply than that of social housing. However, there are serious reoccurring issues with PRS, including higher rents, weaker security of tenure, and conditions of properties. It is our view that an increased emphasis on PRS will lead to repeat homelessness, especially considering (as noted in the consultation document) that the top reason for acceptance of being homeless is not suitable accommodation (for reasons like affordability).

We note that the Department is also consulting about some reforms of the PRS, including limiting the frequency by which rent can be increased, longer notice to quit periods (2 months instead of 1), and obligatory tenancy agreements. While this represents a positive development, it is clear that these measures will only mitigate the problem and not fully address it.

**Recommendation 17: Regulate PRS. More secure tenancy (3 years); rent controls; better notice to quit periods**

## Advice and Housing Solutions

The focus in this document on increasing advice services is an inadequate solution to the problems the strategy is trying to address. Aside from concrete measures such as increasing the supply of available housing, more advice services are simply advocating a better navigating of a broken system. While some advice suggestions are positive, such as “the development of a homeless communication strategy to ensure that households approaching crisis know where to go for help”, if agencies are dealing with finite tools (such as an insufficient supply of adequate housing) then this will not be sufficient to prevent homelessness.

### Appendix

#### List of recommendations

**Recommendation 1: That NIHE lobby for appropriate measures to be set up to mitigate the effects of welfare reform, including debt relief, rent arrears relief.**

**Recommendation 2: Implement ‘Unfair Share’ campaign recommendations which call for an increase in the percentage of the health budget spent on mental health immediately, and increase total budget over time. More information can be found here: <http://www.pprproject.org/more-dough-needed-%E2%80%93-mental-health-rights-campaigners-call-on-the-minister-for-health-to-fund-mental>**

**Recommendation 3: That a full equality impact assessment be carried out for this strategy.**

**Recommendation 4: Set targets for the reduction of number of homeless holds, both annual and over lifetime of strategy.**

**Recommendation 5: Set figures for spend for strategy, both annual and over lifetime of strategy, linking this to the proposed reduction in number of homeless households.**

**Recommendation 6: Increase the budget for the successful implementation of homelessness prevention as needed.**

**Recommendation 7: NIHE should ensure that their staff and staff of other relevant agencies receive training so that they are aware of their duties, and can properly**

identify and refer when people who are currently ineligible for homeless assistance for referral to social services for accommodation support. The NIHE's equality scheme states that "We recognise that awareness raising and training play a crucial role in the effective implementation of our Section 75 duties."

**Recommendation 8:** In line with Objective 5 of this strategy on data collection, NIHE should maintain a central record of what actions were taken for people who are found to be ineligible due to No Recourse to Public Funds (i.e. referrals to the Trust). This is additionally important for NIHE's equality scheme s75 duties on monitoring for racial/ethnic minority groups.

**Recommendation 9:** NIHE should ensure that any barriers to accessing hostels and women's refugees based solely on immigration status be phased out, with immediate priority given to people deemed vulnerable.

**Recommendation 10:** That the NIHE and Department of Communities researches the full extent of its powers under devolved housing legislation to ensure the greatest number of homeless household are afforded protection. That it learn and implement the best practice from England, Scotland and Wales, as well as jurisdictions in the EU and elsewhere.

**Recommendation 11:** That it begins the gradual phase out of 'priority need' tests.

**Recommendation 12:** That the NIHE review and limit its implementation of 'internationality' tests.

**Recommendation 13:** Given that only 50-60% of people reporting as homeless in NI are found to be FDA, the removal or limiting of these tests will logically mean a greater number of homeless households receiving assistance. Therefore the budget for the implantation of this strategy must be expanded accordingly.

**Recommendation 14:** As the strategy notes, a "key to ending homelessness is the adequate provision of good quality, affordable housing". Therefore the NIHE must ensure the provision of such housing and consider the vesting of land for either the direct use of social housing or to be sold to finance the building of social housing.

**Recommendation 15:** Noting the NIHE states that "Single Person Households are the biggest group of homeless presenters in Northern Ireland", the NIHE must ensure that social housing meets. They must remove barriers (such as under-35 Housing Benefit rules) that makes it harder for young single people to find affordable accommodation.

**Recommendation 16: For the NIHE to play its role in the development of LDPs in Belfast and across Northern Ireland, to ensure adequate land in areas of need is zoned for housing.**

**Recommendation 17: Regulate PRS. More secure tenancy (3 years); rent controls; better notice to quit periods**