

The People's Housing Bill: Consultation Response Summary Report

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1. Introduction

This report is a summary of responses received to a public consultation on draft proposals for the 'People's Housing Bill' - a Member's Bill being developed by People Before Profit MLA, Gerry Carroll. The aim of the Bill is to alleviate some of the worst symptoms of the devastating housing crisis being felt in working class communities throughout the North.

48,325 households are on the housing waiting list, with **36,891** in "housing stress"¹. 1 in every 32 people in the North have Full Duty Applicant homeless status². A third of whom are children. Housing supply is at an all-time low while rents are at an all-time high.

The draft proposals consulted upon included:

- Cutting and capping rents
- Increasing housing provision by turning empty houses into homes
- The establishment of a Rental Board to protect renters' rights, hold landlords to account and ensure minimum housing standards
- Implementing a no-fault eviction ban³
- The creation of longer or open-ended tenancies

¹ Defined as those with 30 or more social housing selection list points

² A Full Duty Applicant is an individual who has passed all four homelessness tests, as administered by the Housing Executive. They are in 'priority need', e.g. with dependents or vulnerabilities, and are given higher priority on the social housing waiting list.

³ Private tenants in the north can currently be issued with a notice to quit for any reason, or for no reason at all. One common example of a no-fault eviction is when a landlord evicts a tenant in order to sell the property.

2. Process Summary

The consultation period commenced on 17th October 2024 and closed on 7th February 2025. The consultation survey was hosted on Google Forms.

A total of 348 responses were received.

325 were from individual members of the public. 22 were from organisations.

All responses were assigned the same weight, regardless of whether they were submitted by an individual or an organisation. However, a majority of quotes and extracts from responses in this report are from organisations.

The following organisations responded:

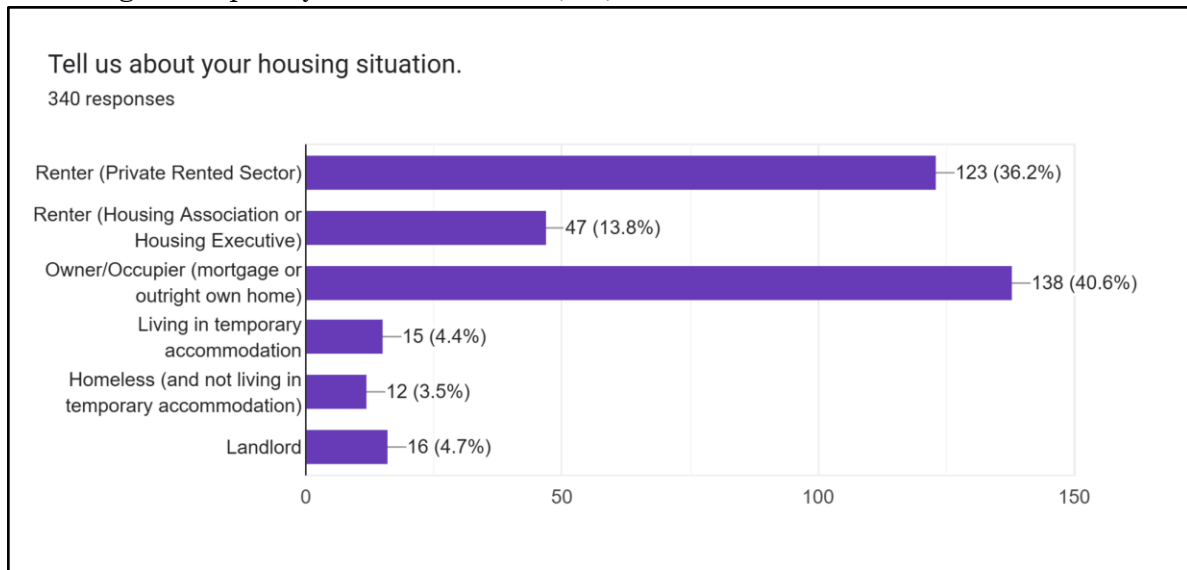
- Housing Rights
- Renters' Voice
- Northern Ireland Federation of Housing Associations (NIFHA)
- Women's Policy Group
- Dogs Trust
- Homeless Connect
- Simon Community
- South-west Food Bank
- Workers Party
- Chartered Institute of Housing Northern Ireland
- Women's Platform
- Northern Ireland Commission for Children and Young People (NICCY)
- NUS-USI
- Northern Ireland Anti-Poverty Network
- P Reid Investments Ltd
- Dunlop Group
- Action Ability Belfast
- Aspire Ireland
- Women's Aid Antrim, Ballymena, Carrickfergus, Larne and Newtownabbey
- Women's Aid Armagh Down
- PPR (Participation and the Practice of Rights)
- Generation Rent

Gerry Carroll met with many of these organisations both online and in person during the consultation period. Additional meetings with stakeholders also took place before the consultation period began, including Community Action Tenants Union (CATU) Belfast and the Northern Ireland Youth Forum.

Mr Carroll requested a meeting with LANI (Landlords Association for Northern Ireland) for feedback on the Bill's proposals, but no meeting was offered.

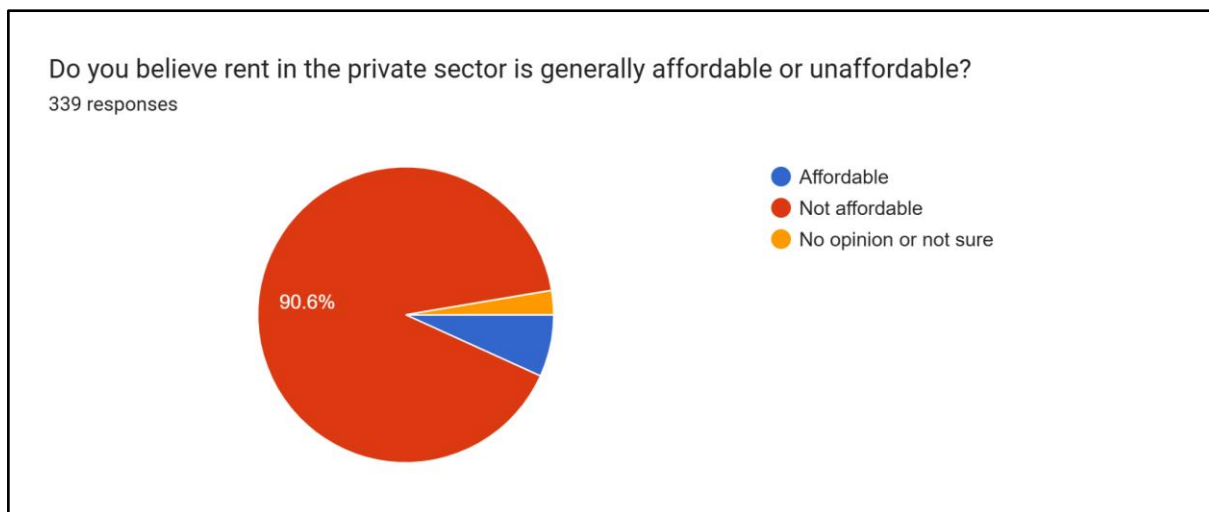
3. Support and opposition for the Proposal

A majority of respondents were owner occupiers (41%), followed by private tenants (36%). 14% were social housing tenants, followed by landlords (5%), those who are homeless and living in temporary accommodation (4%) and those who are homeless and not living in temporary accommodation (4%).



3.1 Affordability

A strong majority (90.6%) of respondents said that private sector rent was unaffordable. 2.7% responded 'no opinion/not sure', and 6.8% said that private sector rent was affordable.



This can be contrasted with respondents' opinions on the affordability of mortgages. 74.6% stated that mortgages are generally not affordable, while 13% reported them to be affordable (and 12.4% were unsure or held no opinion).

One respondent highlighted that the North is “an exception among the constituent nations of the UK in the scale and speed of rent inflation. Northern Ireland has

consistently seen the highest rate of rent inflation since November 2017, with a particularly extreme, rapid and stubborn rise since August 2020. Indeed, rent inflation has not fallen below 9% over a 12-month period since August 2022, peaking at 10% in March 2023. In this respect, Northern Ireland has been an exceptional outlier for a number of years in comparison to Scotland, England and Wales.” (Housing Rights).

Housing Rights also acknowledged that the North is a low-income region with lower poverty levels than England, Scotland and Wales - and noted that this is due to historically lower housing costs, reflecting a wider lower income economy. If housing costs continue to rise at their current rate, therefore, while income levels continue to stagnate, the number of people living in poverty in the North will continue to rise.

Several respondents noted that the most commonly used measurement of affordability is an income-to-rent ratio. It is often suggested that housing is deemed affordable if a household spends the equivalent of 30% or less of its income on rent. However, Women’s Platform noted that this figure is often used as an affordability benchmark, but without clear rationale. One respondent cited [research](#) demonstrating that median rent represents 39.3% of median income in the North.

A Renters’ Voice survey of private tenants, conducted in February 2023 and published in the [‘Cost of Living Crisis Report’](#), found that 47% of all respondents reported paying 40% or more of their total income on rent. 74% of those respondents unable to afford life’s essentials - including food, heating and transport costs - said that they prioritised paying rent over other essentials.

In their response, Housing Rights stated that “*measures must be introduced to tackle the affordability crisis in the PRS*”. This response also noted that such measures would align with policy objectives contained in the NIHE’s Homelessness Strategy and the Executive’s Programme for Government to prioritise homelessness prevention.

The Northern Ireland Federation of Housing Associations (NIFHA) noted that average rent in Belfast was - at the time of NIFHA’s response - £1,107 per month, while housing associations charge an average rent of [£99.09 per week](#) plus an average service charge of £12.64 per week.

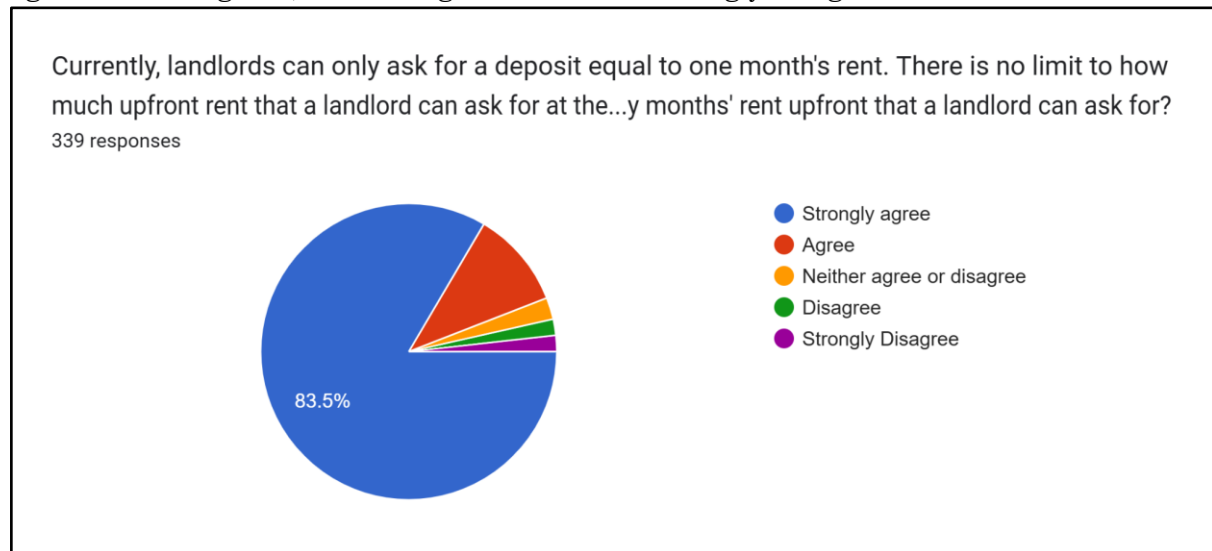
The Northern Ireland Commissioner for Children and Young People (NICCY) referenced their [‘A Place to Call Home’](#) research, where most families and young people engaged in this work were in receipt of financial assistance for housing and housing-related costs. Those in private rented accommodation found that housing subsidies did not cover rising rental costs.

Aside from affordability issues, Action Ability noted that they discourage service users from applying for private rented accommodation, because of a lack of accessibility and adaptations in this type of accommodation.

There was widespread acceptance among respondents that affordability is a major problem in the private rented sector, and that more tenants are struggling to afford their rent and sustain their tenancies, which, in turn, has led to an increase in homelessness and rising demand for social housing.

Rent upfront

A majority of respondents (83.5%) strongly agreed that there should be a limit to how many months' rent upfront that a landlord can ask for. 10.6% agreed, 2.4% neither agreed nor disagreed, 1.8% disagreed and 1.8% strongly disagreed.



Housing Rights were supportive of the proposal to limit the amount of rent in advance that can be charged to **one month**. Housing Rights noted that since the introduction of the deposit limit in the Private Tenancies Act 2022, *“our advisers have experienced a significant increase in the number of callers reporting that they have been asked for several months to a year’s rent in advance”*.

Some concern was expressed that landlords and letting agents *“may place more unreasonable expectations on guarantors”* (Housing Rights) as a result of the introduction of such legislation limiting rent upfront. To determine whether any particular demographic of private tenants would experience disadvantages or barriers in this regard, one respondent recommended that an exercise is carried out by the Department for Communities to research common practices among landlords and letting agents on their demands and expectations of guarantors. Renters’ Voice recommend that any legislation restricting paying in advance must include safeguards to exempt renters without a guarantor - or that this legislation is accompanied by further legislation to ban landlords or letting agents from requesting a guarantor.

Dogs’ Trust note that there is currently no legislation or recommended guidance in place stating that additional rent cannot or should not be charged to tenants who are pet owners. Some pet owners offer to pay additional rent upfront, as a condition of being allowed to keep their pet in the property. Limits to rent upfront would remove this bargaining power from pet owners who can afford it. However, Dogs’ Trust notes that any requirement for ‘pet rent’ places an additional, obstructive burden on pet owners.

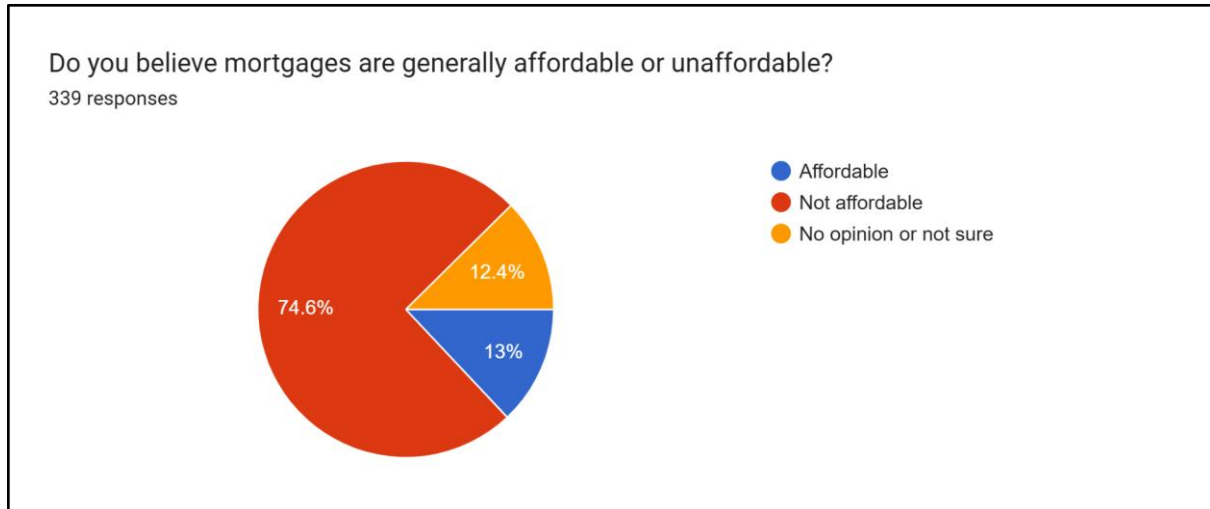
NIFHA noted - *“it seems sensible to advocate for a limit on the number of months’ rent that can be requested upfront. This could help ensure housing remains accessible and affordable for a wider range of people, while still allowing private sector landlords to secure a reasonable deposit”*.

Regarding this proposal, it should be noted that the Renters’ Rights Bill progressing through Westminster features a government-tabled amendment which would ban the payment of rent in advance to more than the equivalent of two months. If this legislation

is passed and enacted, the rights of tenants in the North would once again lag behind those in Britain.

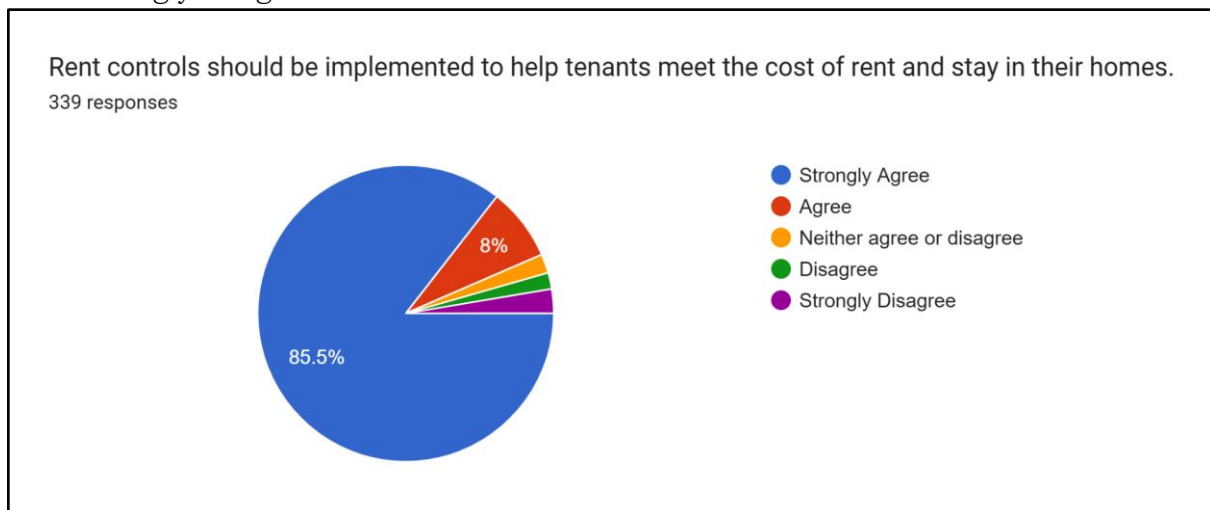
Mortgages

74.6% of respondents believe that mortgages are generally not affordable. 13% said they are affordable and 12.4% had no opinion or not sure.



Rent controls

85.5% of respondents strongly agreed that rent controls should be implemented in the private rented sector. 8% agreed, 2.1% neither agreed nor disagreed, 1.8% disagreed and 2.7% strongly disagreed.



One respondent noted that “*well designed rent regulations could form an important and contributory part of these reforms [to the private rented sector].*” (Housing Rights).

The Northern Ireland Anti-Poverty Network (NIAPN) noted that “*rent controls are standard in most countries across Europe*” and that “*There is no way to compel private landlords and social landlords to treat housing as a social need rather than profit making without regulation*”.

Similarly, Renters’ Voice was supportive of the proposal for rent control, noting that “*the current rental market is unsustainable for renters on the lowest incomes*”. 11% of

respondents to a [2024 survey](#) of private tenants reported 'landlord wanted to charge a higher rent' as the reason for their 'no-fault' eviction.

In addition, Renters' Voice advocated for the Local Housing Allowance rate to be increased to cover the bottom 50% of market rents. Simon Community also called for the Local Housing Allowance to keep pace with increases in private rents.

Several respondents acknowledged [research carried out by the Chartered Institute of Housing](#) (CIH) on rent controls in 2022, which recommended that rent controls should not be implemented in the private rented sector. However, Housing Rights noted that the research's conclusions "*were premised on rent inflation not having as significant an impact on the housing market it currently does*". They recommended that a refreshed examination be carried out, in partnership with stakeholders and experts by experience, examining second and third-generation rent regulation systems, to be laid before the Assembly.

Some respondents noted that the most recent realignment of the Local Housing Allowance in April 2024 was designed to partially alleviate affordability issues. However, Housing Rights noted that after the realignment, their advice team received an increase in calls from private tenants reporting that their rent had increased *alongside* their Universal Credit Housing Component or Housing Benefit. Many tenants who were supposed to have more money in their pockets as a result of the realignment did not benefit from the realignment at all. It is clear that the current system, whereby landlords are given free rein to increase rents by as much as they see fit, and the state hands over subsidies to landlords, is not working.

As noted by Housing Rights:

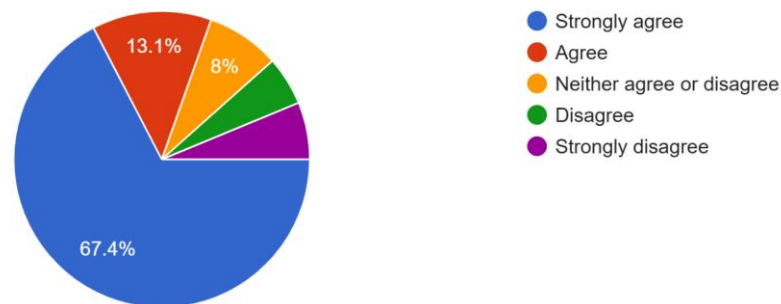
"Further, [rent] regulation would not require the levels of funding that subsidy would, and could potentially save the government significant sums in future. Since 2010, the UK Government has spent over £370bn on housing benefits, of which almost half is supporting private rented tenants, essentially going straight into the pockets of private landlords. If rent inflation continues as it has with no measures to address it, this number will only rise."

Rent control: ability to pay

67.4% of respondents strongly agreed that rent should be capped based on a person's income and ability to pay. 13.1% agreed. 8% neither agree or disagree, 5.3% disagreed and 6.2% strongly disagreed.

Rent should be capped based on a person's income and ability to pay.

337 responses



Some respondents expressed concern that linking rents to an individual's income could *"incentivise landlords to avoid low-income tenants and/or tenants in receipt of LHA [Local Housing Allowance]"* (Northern Ireland Anti-Poverty Network (NIAPN)), possibly *"leading to unfair discrimination against those on lower incomes"* (Simon Community).

Renters' Voice described the proposal to link rents with income as *"unworkable"*, and cautioned against rent caps being tailored to individuals. They stated that this *"would only make private renting more confusing for renters and could lead to an even more invasive application process where additional personal information is required to ascertain a person's ability to pay"*.

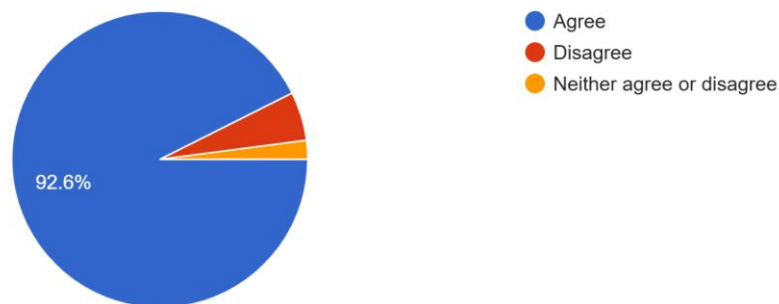
Women's Platform noted that the lack of relationship between incomes and rents has contributed to the affordability crisis in the private rented sector. This has led to higher levels of homelessness, increased demand for temporary accommodation and support with housing costs, *"which in effect shifts the responsibility for covering housing costs to society, while benefits accrue with landlords, thus deepening socioeconomic inequalities while increasing pressure on public funds."*

Rent control: caps on increases

A strong majority (92.6%) of respondents said there should be a monetary or percentage limit on yearly rent increases. 2.1% neither agreed or disagreed and 5.3% disagreed.

There should be a monetary or percentage limit on yearly rent increases.

338 responses



The Chartered Institute of Housing noted that *“a limit on yearly rent increases within a tenancy could provide both tenants and landlords with a degree of assurance, providing the policy is co-designed, set at an appropriate level like CPI+ or a similar index, and implemented well”*.

The Private Tenancies Act 2022 limits rent increases to once per year. NIAPN recommends extending this period, giving the example of three years, and pegging these rent increases to a specific value (e.g. the rate of inflation or a pre-set percentage).

Renters’ Voice expressed confidence that both landlords and renters could easily understand the concept of percentage limits on rent increases, and noted that this method *“would acknowledge inflation and give landlords a reasonable degree of control over their profit margins”*. Renters’ Voice noted the approach taken in Sweden, whereby the Swedish Union of Tenants negotiate annual rent increases with landlords using a collective bargaining approach.

Renters’ Voice expressed the opinion that *“a limit on yearly rent increases, which is attached to the property rather than the tenancy, could be a good method of rent control within the tenancy”*.

Generation Rent noted that most tenants would *“be able to afford a rent increase that is lower than the rate at which prices in the rest of the economy are rising (i.e. CPI), and that is lower than average wages are rising.”* For that reason, Generation Rent *“would favour a cap on rent increases at the rate of inflation or wage growth, whichever is lower in a given year.”*

Generation Rent supports rent controls between tenancies (i.e. attached to the property, rather than the tenancy) but note that these should be introduced in addition to expanding housing supply.

“Do you have any thoughts or opinions about what forms of rent control might be most effective? (Rent controls can take multiple forms (e.g. rent freezes, rent reductions, a limit on yearly rent increases).”

Many respondents who completed this field in the online survey expressed a desire to see rent freezes and/or reductions implemented.

NUS-USI advocated for a mixed model of rent controls, whereby rent freezes could apply during *“significant economic pressures, such as the current cost-of-living crisis, while caps on increases could ensure long-term affordability.”*

Some respondents noted that the pace of rising rents has far outstripped wage growth. In this context, second and third generation rent controls don't go far enough, as they only attempt to curb runaway increases, rather than bring rents down.

“Rent reductions would be a great start, people are getting paid less yet over the past few years both the private and public renting sector have increased their rents.”

Similarly, Women's Platform described rent freezes and limits on annual increases as *“likely to be the most publicly palatable forms of rent control, and should be considered as an initial solution to manage the housing crisis.”* However, they continued, *“this does not address the underlying issue of affordability.”* They added that *“consideration should be given to returning to pre-1980s mechanisms of capped rents, which provide a degree of security for tenants and require greater commitment from landlords.”*

Women's Aid Antrim, Ballymena, Carrickfergus, Larne and Newtownabbey (ABCLN) noted that *“rent should freeze when a person's circumstances change and it is beyond their control e.g. domestic abuse”*

However, Renters' Voice expressed a concern that rent reductions could lead to evictions and landlords selling up. This concern is referenced in more detail in a later part of this section (addressing the question of the financial impact of rent controls on landlords).

A respondent who was a landlord expressed openness to a form of rent control *“that would limit the rogue landlord without punishing the professional landlord”*.

Other respondents who are landlords expressed the below opinions on rent control:

“Rent increases limited to once a year is fair. However, if this limit is increased to two-years then, by definition, the level of increase needs to be greater to cover inflation for the longer period between receiving a market rent.”

“Must be realistic with regard to costs increases”

“Any arrangements would have to take into account such things as mortgage rate rises, maintenance and management cost increases”

“no rent controls are necessary”

The Women's Policy Group suggested a location-based system of rent control, similar to Rent Pressure Zones :

“Introduce targeted rent controls across Northern Ireland, particularly in urban and rapidly urbanising areas where rent is steadily climbing.”

The Northern Ireland Anti-Poverty Network recommended rents pegged to fitness standards, which could *“force an increase in fitness standards, and ensure that there isn't an inadvertent creation of a two-tiered housing sector - with tenants with less money being forced into unsafe and poor quality housing”*.

Please outline your reasons for agreeing or disagreeing with the implementation of rent controls (including caps on increases).

“Housing should be used based primarily on the needs of the occupants rather than for private profit of landlords as it is a basic necessity

“Rent controls prevent further homelessness”

“It would allow young people to save for mortgages, keep communities where they belong instead of potential gentrification.”

“High rents are putting too much pressure on people during a cost of living crisis. People are worried about losing their homes.”

“When inflation soars and costs rise there is no capping system in place”

NUS-USI stated their strong support for rent controls *“to alleviate the financial hardship faced by students and apprentices”*. They cited [NUS-USI research](#) showing that 37% of students in the north struggle to pay rent, and 44% have less than £100 per month remaining after housing costs.

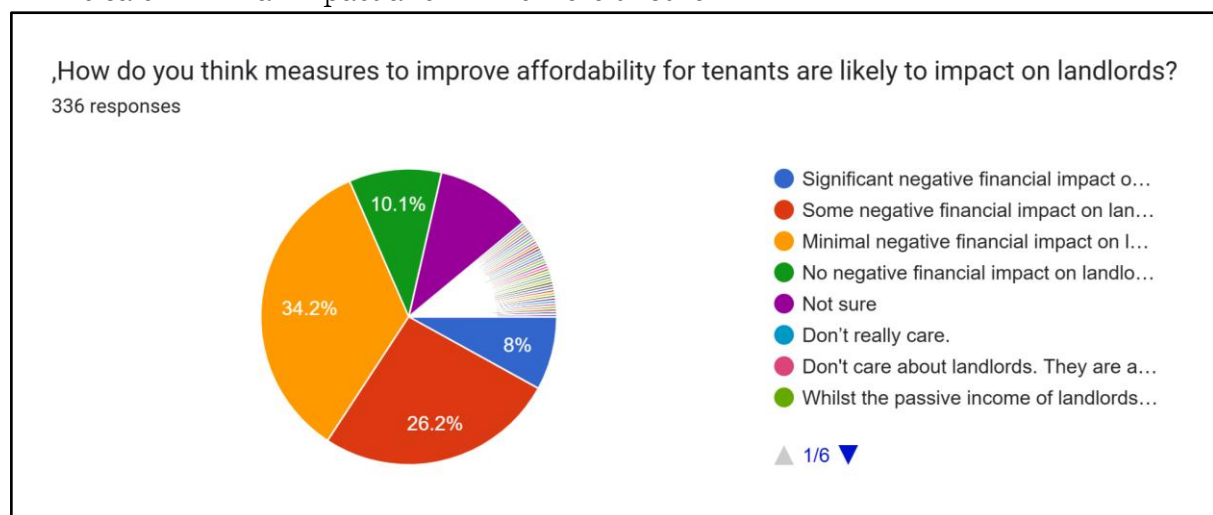
One respondent expressed the view that the cost of implementing any form of rent control would be unjustified:

“Implementing rent control would require additional regulation and oversight, which will increase the administrative burden on the Assembly and regulatory bodies; the cost of imposing this could ‘cost’ the equivalent of building another 100-150 new social sector properties a year – or perhaps more!”

However, some respondents stated that continued inaction on runaway rents in the private rented sector is untenable. For example, Housing Rights noted that *“To disregard a potential policy lever which, if implemented correctly, could contribute to improving the lives of citizens would border on irresponsibility.”*

Impact on landlords

8.5% of respondents said they thought measures to improve affordability for tenants are likely to significantly negatively impact landlords, 28.2% said some negative impact, 37.9% said minimal impact and 13.5% were unsure.



The Women's Policy Group noted that the impact on landlords will depend on their individual circumstances, including how many properties they own and whether they hold a mortgage on their rental profits. However, they noted, "*landlords owning housing as a profit-making enterprise is deeply problematic, and as such these [financial] impacts are justified.*"

Similarly, Participation and the Practice of Rights (PPR) noted - "*Adequate housing is a human right and something that is essential for people's health. This takes precedence over housing as a profit-making investment for people with enough excess income to be able to become landlords.*"

Many respondents referenced the 2022 CIH report on rent controls, which found that between 41 and 60% of landlords surveyed said they would leave the private rented sector if rent regulations were introduced. Similarly, NIFHA stated that rent control "*might initially appear advantageous for tenants in Northern Ireland by tackling affordability issues,*" but cautioned that rent control could "*discourage private sector landlords from investing in rental properties, which would decrease the overall supply of rental housing*".

However, referencing the CIH report on rent controls, Housing Rights noted - "*precedent for similar rhetoric on behalf of landlords can be found in Scotland, where evidence suggests that landlords will not leave the market in vast numbers.*"

Several respondents noted that if landlords did choose to leave the sector, "*many landlords would sell to another landlord willing to stay in the market, and the risk would be mitigated by designing a rent regulation system that protects tenants but does not make it unviable to rent a property.*"

Homeless Connect stated - "*We are not opposed to the principle of rent control measures, especially when the intention is to prevent homelessness.*" They added that care is needed to avoid unintended consequences, which could have the reverse effect of an increase in the number of evictions.

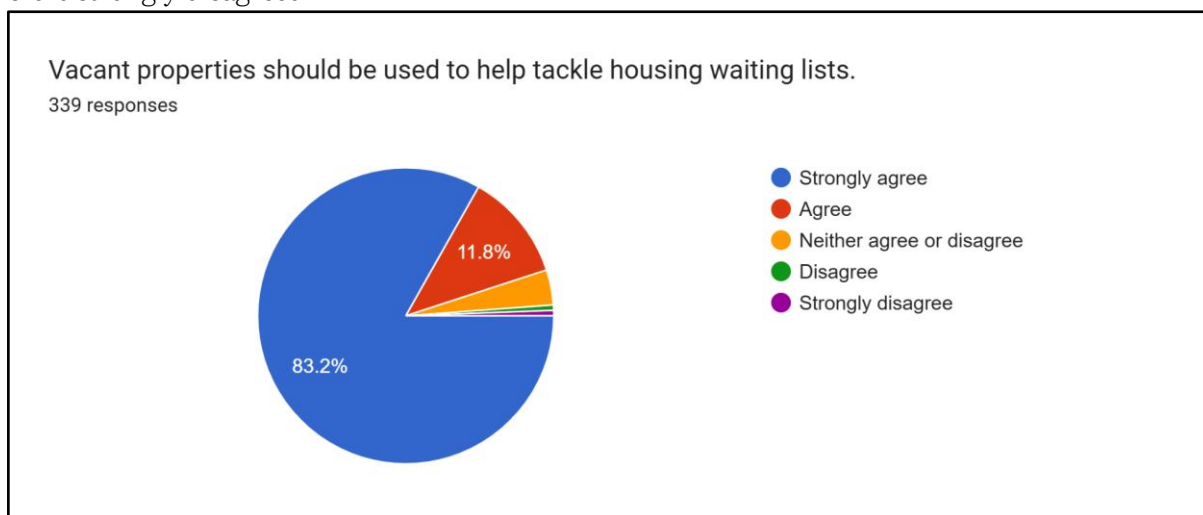
This reflects a commonly-held view that if rent controls are implemented without a no-fault eviction ban, some private landlords will simply choose to evict a tenant in order to increase rent substantially for a new tenant.

However, rent controls that are linked to the property (i.e. *between* tenancies) rather than *within* a tenancy would give a landlord no additional incentive to evict a current tenant; the rent increase they could legally impose on a new tenant would be the same as that they could impose on a sitting tenant.

3.2 Vacant properties

NB - the consultation survey asked several questions regarding the use of empty homes to tackle the housing crisis, premised on two distinct proposals; incentivising property-owners to bring back into use and enabling the state to take these properties into public ownership specifically for use as social housing.

83.2% of respondents said that they strongly agreed that vacant properties should be used to help tackle housing waiting lists. 11.8% agreed, 3.8% neither agreed or disagreed, 0.6% disagreed and 0.6% strongly disagreed.



There was widespread agreement that action taken to date to expand the supply of social housing has clearly been insufficient to meet growing demand. Housing Rights welcomed the commitment in the Housing Supply Strategy to build 100,000 new homes by 2039, but noted that even if this target is achieved, this does very little to address the housing crisis in the present day.

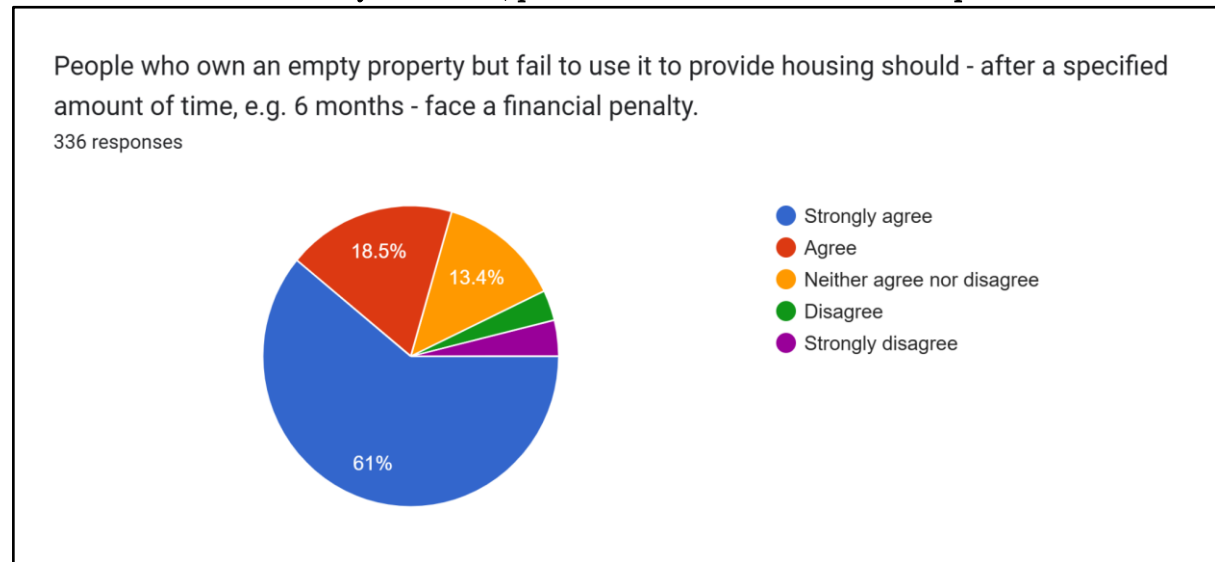
The Workers Party noted that the Executive's commitment to '*new funding models for the delivery of more affordable housing*' lacks clarity and specificity.

Participation and the Practice of Rights welcomed the proposal for bringing empty homes back into use, but stated that this "*will not be nearly enough to address the level of the crisis*".

Similarly, Simon Community described bringing empty homes back into use as "*an important part of the holistic solution*". They identified the Scottish Empty Homes Partnership and Irish Vacant Homes Action Plan as models for learning.

61% of respondents said that they strongly agreed that people who own an empty property but fail to use it to provide housing should after a specified amount of time, e.g. 6 months, face a financial penalty. 18.5% agreed, 13.4% neither agreed or disagreed, 3.3% disagreed and 3.9% strongly disagreed. **This question did not ask respondents whether empty homes brought back into use should be used for social housing. A property that is voluntarily brought back into use by**

its owner could be lived in by the owner, put on the market for sale or let for private rent.



The Women's Policy Group highlighted that six months to bring a property back into use may not be long enough, *"especially when someone comes into ownership of a home through inheritance; it often takes this long to complete the legal process to fully own the home, let alone do any necessary refurbishments to place it on the market as a rental or to sell it."*

In addition, they suggested that exceptions should be made when a property needs extensive refurbishments *"beyond simply redecorating"*, which may be difficult to achieve in a short period of time (especially if multiple contractors are involved).

"If you can think of any possible exemptions for the six-month timeframe in which landlords should let or occupy vacant homes, please list them below"

"If a property is derelict and undergoing renovation. If a property has been inherited in the aftermath of death, it may be appropriate to give the family 12 months to settle their affairs"

"Illness"

"None - if the commodification of housing is to continue, then regulations must work both ways, in order to at the very least level up renters' rights"

"Grace period for inherited properties and those needing extensive renovation."

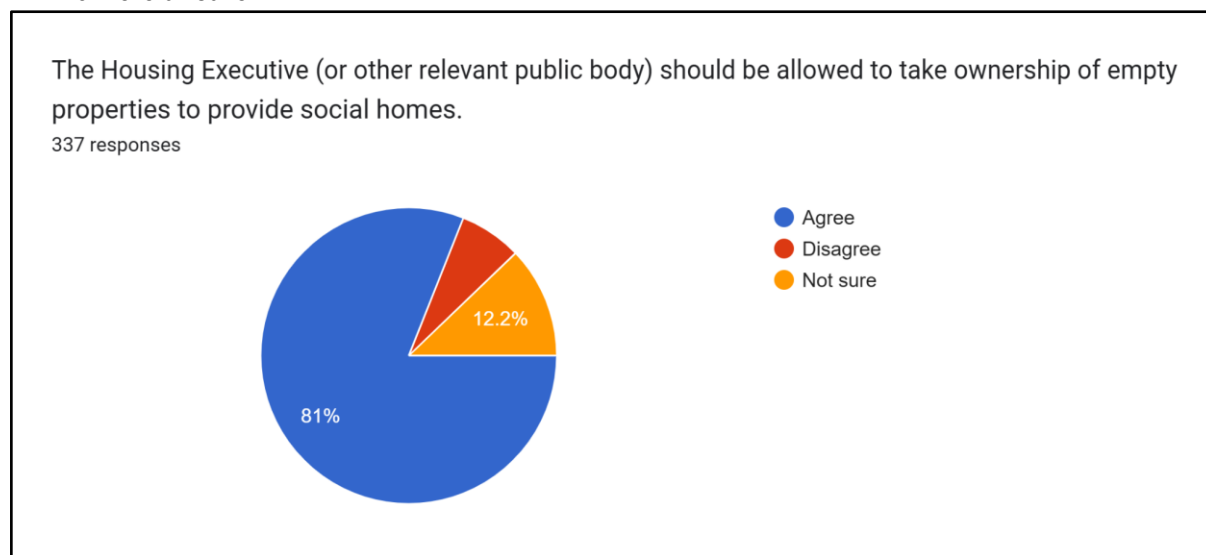
"undecided inheritance, long-term or terminal illness, family emergency in another country"

"A person has fled their property for more than 6 months to live somewhere else for safety reasons (domestic abuse)"

"Don't agree with the timeframe and difficult to comment without a definition of what constitutes an "empty home" but the following spring to mind as exemptions- holiday home, home which is the subject of probate, seasonal accommodation etc, future/retirement project"

Women's Platform noted that exemptions for up to a year could potentially be considered where a property is in need of significant work (such as following a fire, flooding or an extended period of vacancy) and the landlord can demonstrate that work is ongoing. They note that a scheme of inspections would be required to support any exemptions, in order to ensure progress is incentivised.

81% of respondents said that the Housing Executive (or other relevant public body) should be allowed to take ownership of empty properties to provide social homes, 6.8% disagreed and 12.2% were unsure.



“Do you have any other thoughts or opinions on empty homes being used to help tackle housing waiting lists?”

Some respondents advocated for better use of the rates system to incentivise homeowners to bring an empty property back into use.

“Any houses left vacant for more than 6 months should either be taken into council ownership or charged a significantly increased rates bill, the proceeds of which could be used to improve infrastructure and housing elsewhere”.

Similarly, Homeless Connect agreed that *“further measures should be explored to bring empty homes back into use, including consideration of financial penalties”*. CIH also proposed considering financial penalties as *“part of the conversation”* on tackling empty homes.

Women’s Platform also noted that *“the introduction of financial penalties for maintaining empty properties can significantly help address the current tendency of property hoarding, which in some situations is supported by rate rebates for vacant properties.”*

NUS-USI said that penalties should be issued to owners of *“properties that are left vacant, without a valid reason”*, in order to encourage these homes to be brought back into use.

Generation Rent suggested that *“charging double council tax on long term empty homes may provide a spur to owners to carry out refurbishment within a reasonable timeframe.”*

In their response, NIFHA took an alternative approach focused on incentivisation rather than penalties, recommending that securing the cooperation of property owners should be considered. This could entail *“offering financial incentives or tax breaks to property owners who make their vacant properties available for social housing”*.

Some respondents noted that time and resource would need to be invested, to ensure that properties can be made habitable (and brought up to meet social housing standards, if necessary):

“Make them habitable - dry, warm and no damp”

“Ensuring that these homes are at a quality standard for tenants to be able to safely live in.”

NIFHA suggested that public-private partnerships should be deployed to refurbish and convert empty homes into *“affordable housing units”* and noted that using vacant properties to address housing needs requires *“coordinated efforts between government agencies, property owners and housing providers to be successful”*. CIH noted that value for money considerations will come into play for social landlords.

NIAPN noted that in the event that the state takes public ownership of privately-owned empty homes, the Housing Executive or relevant body *“will have to ringfence a significant amount of funding to ensure these homes are in good fitness. Many empty homes have been left to the point of disrepair and would need full gutting to meet the fitness standards of the social sector. But, NIAPN believes this would be a good use of funds.”*

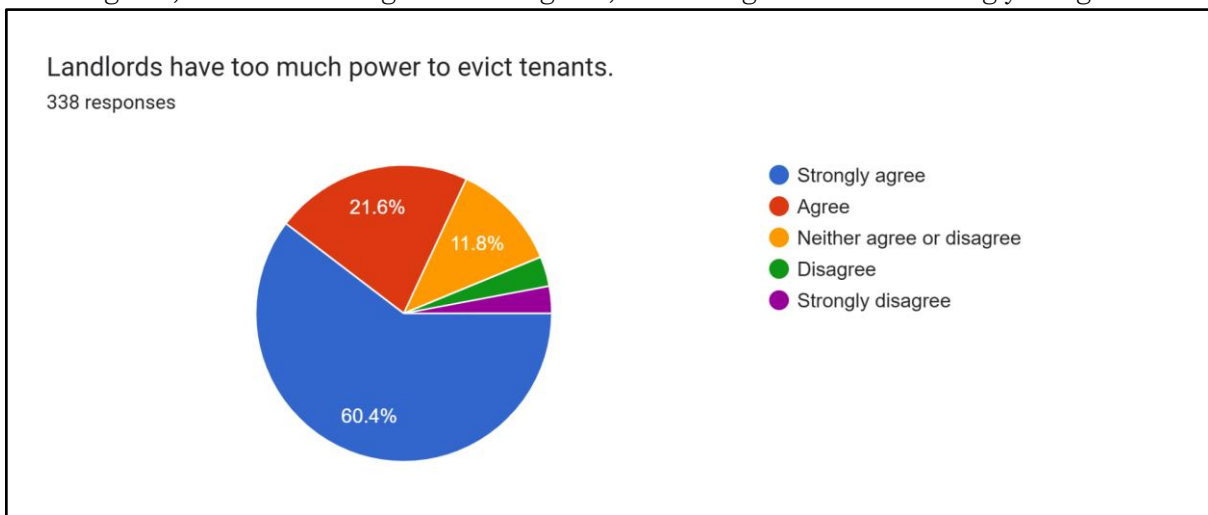
Renters’ Voice expressed concern regarding value for money, and questioned whether bringing older properties in a state of disrepair up to suitable standards is a better investment than directing investment towards the construction of new homes. Renters’ Voice noted that they would be *“supportive of research which examines empty homes in Northern Ireland with the aim of understanding why they are empty and what initiatives have worked in other areas to bring empty homes back into use”*.

The Women’s Policy Group suggested that some reclaimed housing stock should be *“ringfenced for those people leaving shelter accommodation after escaping domestic abuse”*.

Compulsory purchase orders were referenced by many respondents - both individual and organisational. Compulsory purchase orders are explored in more detail in section 4.

3.3 Security of Tenure

60.4% of respondents strongly agreed that landlords have too much power to evict tenants, 21.6% agreed, 11.8% neither agreed or disagreed, 3.3% disagreed and 3% strongly disagreed.



Participation and the Practice of Rights and Simon Community both noted in their responses that despite the Assembly passing a motion to ban no-fault evictions in 2024, the Communities Minister has not moved on this issue.

Housing Rights noted that, in their experience, no-fault evictions are common practice in the private rented sector. While social tenants are protected from no-fault evictions, no such

legislative underpinning exists in the private rented sector. This has fuelled a significant power imbalance between private landlords and tenants, meaning that tenants can be evicted for any reason - or none at all.

Both Housing Rights and Renters' Voice report that tenants feel unable to vigorously challenge their landlord or make complaints to relevant authorities (such as Environmental Health) about property conditions or repairs, *"for fear of a retaliatory eviction"* (Housing Rights). 49% of respondents to the [Renters' Voice survey](#) said they decided not to report their landlord to Environmental Health, for fear of eviction. [A Citizens Advice study](#) of private tenants in England found that 46% of those who complained about disrepair or maintenance issues were served a notice to quit within six months.

"This practice is a major restriction on private tenants exercising the little rights they do have, exacerbates an already imbalanced power dynamic in the landlord-tenant relationship and results in poor-quality housing." (Housing Rights)

In their response, Generation Rent noted that *"renters should have full enjoyment of the home during a tenancy, and must not be treated as second class citizens."* Therefore, they state, tenants *"should only face repossession in the same circumstances as mortgage-holders would."*

Practice and the Participation of Rights (PPR) noted that the Department for Communities 2021 draft Housing Supply Strategy contained a commitment to work towards 'establishing specific grounds for eviction' - in other words, a move towards implementing a no-fault eviction ban - but the final version of the Strategy published this year omits this commitment.

The Northern Ireland Commissioner for Children and Young People (NICCY) referenced anecdotal evidence of young people being evicted, with no other options available to them given the increased cost of the private rented sector and lack of suitable social housing.

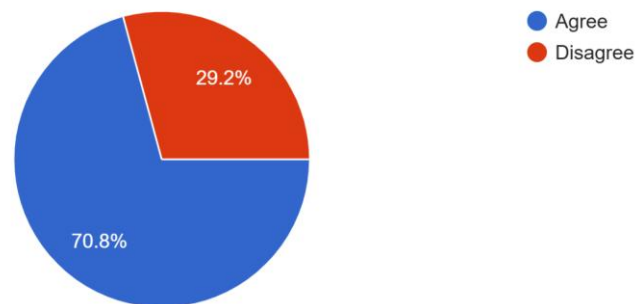
Because social housing and/or homeownership is increasingly inaccessible for many people, private tenants are therefore in greater danger of being evicted into homelessness. Homeless Connect noted that between October 2023 and September 2024, [1,428 households](#) presented as homeless following the sale of rented accommodation they had been living in. A further 232 were made homeless due to affordability issues in the private rented sector.

Housing Rights identifies a lack of government data to demonstrate the scale of no-fault evictions in the private rented sector. They cited a [2024 survey](#) carried out by Renters' Voice, which found that 38% of respondents had experienced a no-fault eviction. Of those renters, almost half reported this happening to them more than once.

These findings are supported by the reported experiences of consultation respondents. A striking majority (70.8%) of respondents reported that they or someone they know has faced eviction due to no fault of their/others own and 29.2% disagreed.

I or someone I know has faced eviction due to no fault of my/their own.

332 responses



Housing Rights notes that with Scotland, England and Wales banning (or moving to ban) no-fault evictions, *“Northern Ireland is becoming not just an outlier on these islands but also among advanced economies across the world, and fears about its implementation causing a mass exit of landlords are unfounded in Scotland.”*

Scotland has effectively abolished no-fault evictions with the abolition of assured/shorthold tenancies, and subsequent introduction of private residential tenancies. Prescribed valid grounds on which to legally evict a tenant include falling into significant arrears, breaking the terms of a tenancy agreement, a landlord moving into or selling a property, and others. Housing Rights notes that, *“While not without flaws, this policy change has guaranteed tenants greater security of tenure across Scotland and offers precedent and learning for Northern Ireland on the successful implementation of ending no-fault evictions.”*

Housing Rights also notes that Britain’s Renters’ Rights Bill, similarly to Scotland, provides prescribed grounds for evictions. One of those grounds is the landlord selling the property. The legislation aims to prevent the reletting of the property for 12 months following the issuing of a notice to quit. This is in recognition of the fact that in the north (and, indeed, across Britain and Ireland) landlords will evict tenants and explain that they are selling the property - only to see the property being relisted online a matter of weeks later, at a higher price. Housing Rights reports a rise in the amount of tenants reporting this scenario in recent months. Housing Rights recommends that the property should be banned from being relet for a period of two years, to discourage a no-fault eviction with the intention of reletting.

Respondents recommended that the following reasonable grounds for eviction (which have already been proposed in other jurisdictions) should be considered for the north:

1. **Landlord selling the property** - with preparation for sale being fully evidenced by the landlord, and the property banned from being relet for a period of two years. Housing Rights and Simon Community recommend that if the property is being sold to another landlord who then intends to sell the property, the sale should be completed with the tenant in situ.
2. **Landlord or family wish to live in the property** - Housing Rights recommends that the property is banned from being relet for a period of two years.
3. **A landlord’s mortgage lender is selling the property.**

4. **The landlord wants to refurbish the property** - Housing Rights recommends that the tenant should only be asked to leave where the refurbishment is substantial and where the tenant leaving is strictly necessary⁴. NIFHA included reconstruction, demolition and change of use under this exception.
5. **Anti-social behaviour** - Housing Rights note that this exception would require a dispute resolution service, and note that eviction on these grounds “*should be the final resort in measures to tackle anti-social behaviour and tenants should have every opportunity to address their behaviour before this action is taken.*”
6. **Arrears** - some respondents suggested that a tenant falling into substantial arrears would be reasonable grounds for eviction. Housing Rights suggested that discretion should be applied where delays in Universal Credit Housing Cost of Housing Benefit are the cause for arrears.
7. **Breach of tenancy agreement** - Housing Rights recommended that this ground should be exercised only for material breaches of the tenancy agreement, such as the tenant causing significant damage to the property.

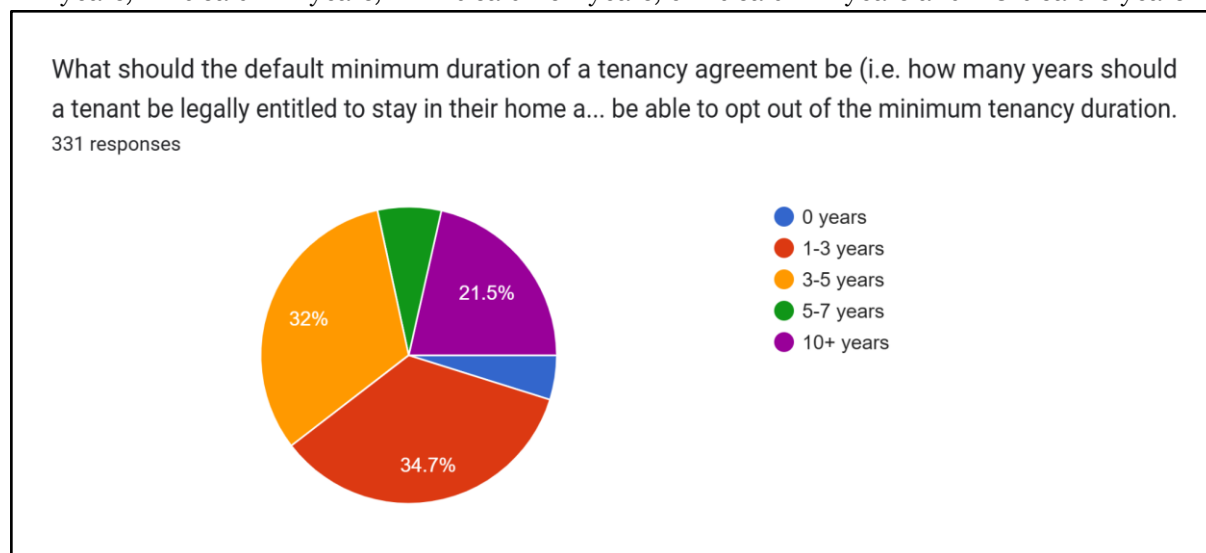
Generation Rent advocated for a notice period of at least four months should apply if landlords are able to evict tenants for their own needs.

The Women’s Policy Group suggested that - “*to remove a person from their home, the landlord ought to be able to demonstrate a serious breakdown of the relationship that is irreparable.*”

Women’s Aid Armagh & Down suggested that those convicted of coercive control or domestic abuse should be included as reasonable grounds for eviction.

Tenancy length

34.7% of respondents said that the default minimum duration of a tenancy agreement should be 1-3 years, 32% said 3-5 years, 21.5% said 10+ years, 6.9% said 5-7 years and 4.8% said 0 years.



⁴ Housing Rights recommend that tenants be compensated for evictions carried out on the above grounds 1-4, since these are landlord-focussed and due to no fault of the tenant. Housing Rights and Generation Rent both recommend that compensation should take the form of non-payment of the final two months of rent. This principle is already established in law, under the Housing Act 1988.

Housing Rights and Renters' Voice advocated for the establishment of indefinite tenancies, with a prescribed list of exceptions. Housing Rights advised that *"tenancies should be indefinite and only able to be ended by a landlord under prescribed grounds."*

Women's Aid Armagh & Down noted that a longer tenancy length of approximately 3 years *"gives someone security to settle in and build on their safety and social network as well as allowing time to engage in wrap-around supports services that may be needed."*

NUS-USI stressed the importance of security of tenure for providing stability for renters, but noted that it is *"important to balance this with the need for flexibility, particularly for students. Many students require tenancy agreements that align with the academic year, typically lasting 9 to 12 months."*

"If you have any other comments about security of tenure, minimum length of tenancy agreements or evictions, please share them below."

There was widespread agreement from all respondents - both from individuals and organisations - that evictions generate instability, and impact on a family's quality of life.

"Long-term leases will offer security for people and give them an opportunity to actually make their houses a home"

"An eviction ban must be put in place"

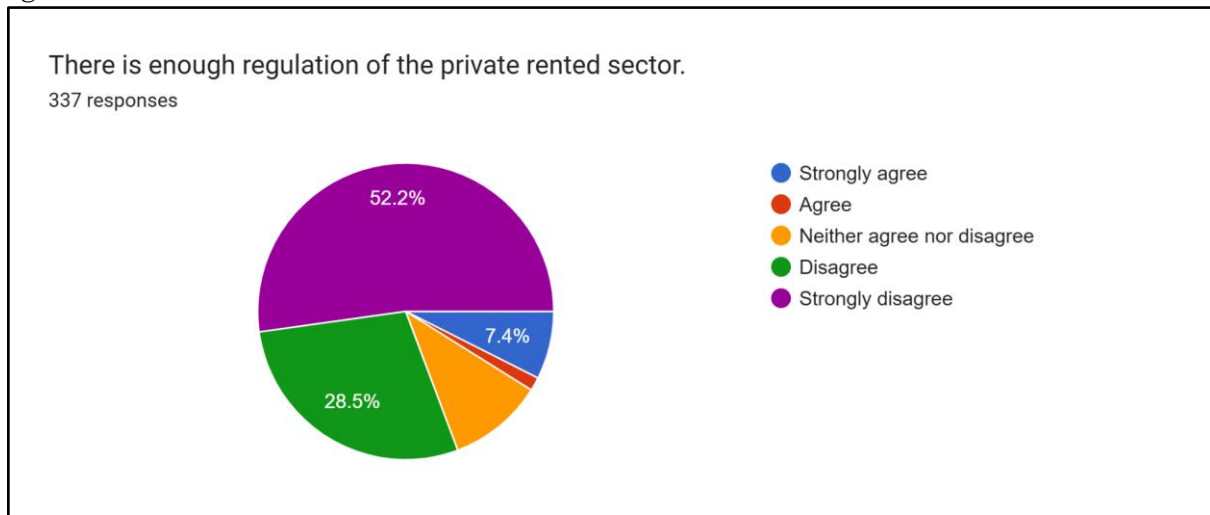
"Families in rented accommodation need stability . Short term stays creates instability and can cause many problems in later years"

"Overall, housing policy should aim to treat housing as a human right, not a commodity, ensuring everyone has access to safe, stable, and affordable homes."

"There should be a ban on no fault evictions. There should be unlimited tenancies for tenants with allowances for rents to be raised, but by a regulated percentage, at regulated intervals, such as every three years as opposed to every year."

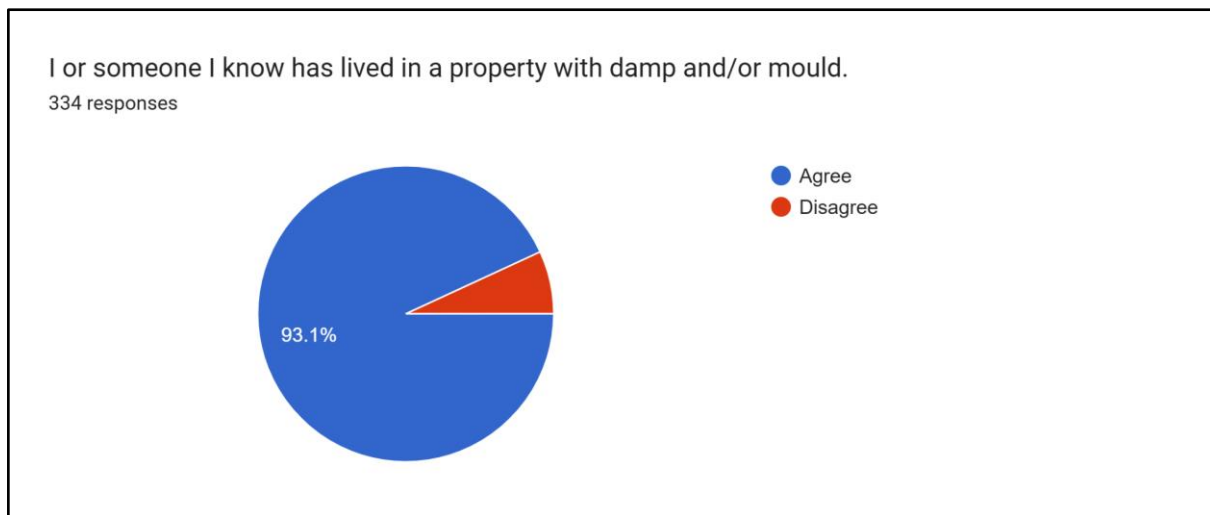
3.4 Housing conditions

52.2% of respondents strongly disagreed that there is enough regulation of the private rented sector. 28.5% disagreed, 10.4% neither agreed or disagreed, 7.4% strongly agreed and 1.5% agreed.



Many respondents attributed issues with affordability, insecurity of tenure and housing conditions to a lack of regulation. Several also highlighted a lack of enforcement of existing legislation. Renters’ Voice noted that this lack of enforcement “*is as important as the regulation itself.*” Many respondents expressed the view that any new regulation must be backed up by proper remedies and enforcement, as well as adequate resources.

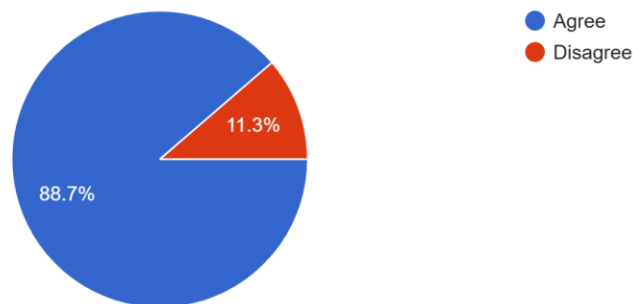
93.1% of respondents agreed that they or someone they know has lived in a property with damp and/or mould and 6.9% disagreed.



88.7% of respondents said that they or someone they know has lived in a property where the landlord refused to respond to maintenance/repair issues in a timely fashion and 11.3% disagreed.

I or someone I know has lived in a property where the landlord refused to respond to maintenance/repair issues in a timely fashion.

336 responses



Several respondents recommended that reform is made to enhance the minimum fitness standard. Housing Rights advised that this should be a physical standard, removing the subjectivity of an inspector. The standard should reflect developments in construction methods, environmental standards and health and safety issues. Similarly, Simon Community noted that the standard should be reviewed *“to ensure it is fit-for-purpose for dealing with modern housing challenges and standards”*.

Of course, if fitness standards are strengthened and more landlords are obliged to carry out repair work, consideration must be given to how to accommodate tenants might be displaced for the duration of these repairs.

Renters’ Voice highlighted the need for a Repair Standard to be included in fitness standards, which would ensure repairs are carried out within a fixed period, depending on the health and safety risk.

PPR advocated for a review of the [Decent Homes Standard](#), as well as an independent enforcement mechanism, *“so that tenants are protected and landlords cannot get away with unacceptable living conditions”*. This standard should be enforced not only for private and social tenants, but those living in temporary accommodation.

Homeless Connect notes that the current fitness standard dates back to 1992, and *“no longer ensures properties in the PRS are up to the requisite standard”*. Their response expresses disappointment that further action has not been taken to introduce new and improved standards, and notes that *“Scotland, England and Wales have implemented reforms in this space without witnessing much evidence of private landlords leaving the sector”*.

If you have any other comments about housing standards and conditions in the private or social rented sector, please share them below.

Respondents shared their own personal stories of poor standards in private rented accommodation, including in areas dense with student housing:

“Lack of immediate action on repairs, bad living conditions, damp conditions”

“Housing in student areas tends to be very manipulative of young, first-time renters - Holylands is notorious for black mould, some people have reported mushrooms growing from walls in those houses.”

“Renters should also have the right to live in a home that is affordable to heat – which is one way of reducing damp and mould. Landlords should be required to meet a minimum Energy Performance Certificate (EPC) rating of C.”

Similarly, Renters’ Voice and Generation Rent also suggested that a minimum Energy Performance Certificate rating of C should be a mandatory requirement of letting out a private rental property.

“It is inexcusable that a landlord can allow a house to get to a state of disrepair and which can detrimentally impact the wellbeing of a tenant.”

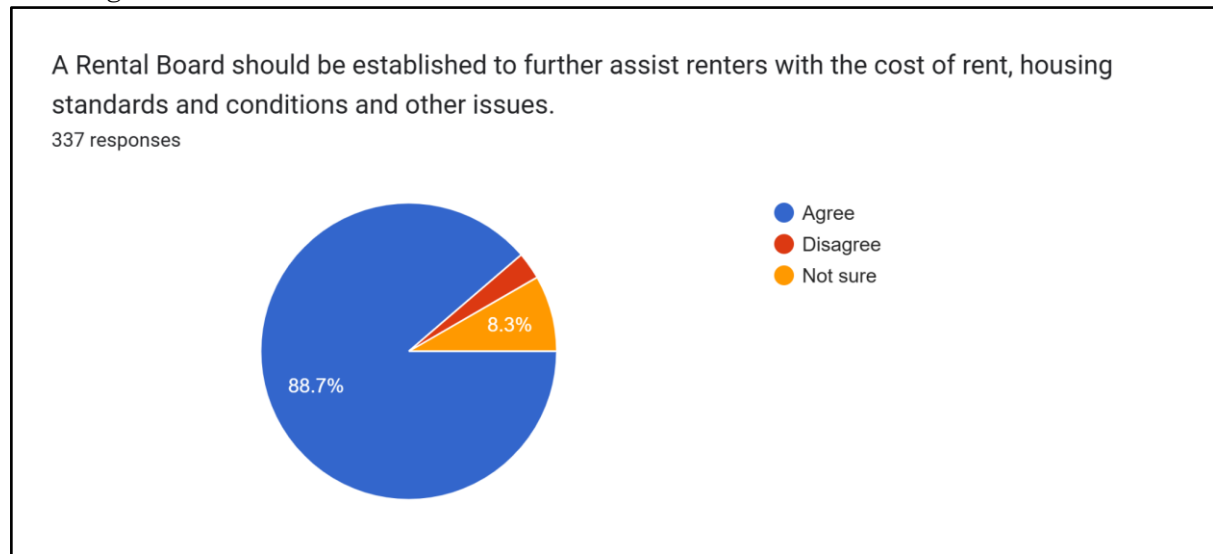
“Both private sector housing and housing executive housing is failing ordinary people. It’s a disgrace. Housing is the biggest issue in Ireland and this crisis has been manufactured by greed and government incompetence as well as landlords holding government positions.”

“The system should stop treating housing as merely an investment vehicle and prioritise tenants’ well-being over landlord profits.”

“Tenants should be able to withhold rent until repairs are made”

3.5 Rental Board

88.7% of respondents agreed that a Rental Board should be established to further assist renters with the cost of rent, housing standards and conditions and other issues. 8.3% were not sure and 3% disagreed.



NIFHA described the establishment of a Rental Board as “*potentially a beneficial consideration*”, in offering a dedicated platform to address concerns related to rent, housing standards and conditions and ensuring tenants’ voices are heard. They noted that such a Board could serve as a mediator in disputes between landlords and tenants.

Homeless Connect stated that “*current enforcement measures in place for the private rented sector here are not fit for purpose*”, noting that the court system is under-resourced and tenants experiencing lengthy delays. Even when tenants are aware of their rights, they “*can live in fear of retaliatory action on the part of landlords if they seek to assert them*”.

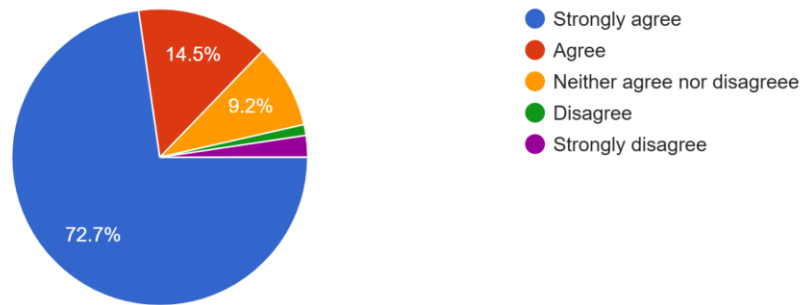
On the proposal to establish a Rental Board, Homeless Connect believe this is “*worthy of consideration*” but that it “*should be considered within the need for wider consideration of alternative dispute resolution*”. A Rental Board is one option, but others could be considered.

The Women’s Policy Group noted - “*at present landlords are vetting potential tenants’ immigration status, gender identity and disability status before agreeing to let properties to them, and this is both a demonstration of discrimination and dangerous to the individual. This may be outside the scope of this Bill but could be incorporated into the scope of a Rental Board proposed in this consultation.*”

72.7% of respondents strongly agreed that the cost of establishing a Rental Board would be worth the investment, in order to better protect tenants’ rights. 14.5% agreed, 9.2% neither agreed or disagreed, 1.2% disagreed and 2.4% strongly disagreed.

The cost of establishing a Rental Board would be worth the investment, in order to better protect tenants' rights.

337 responses

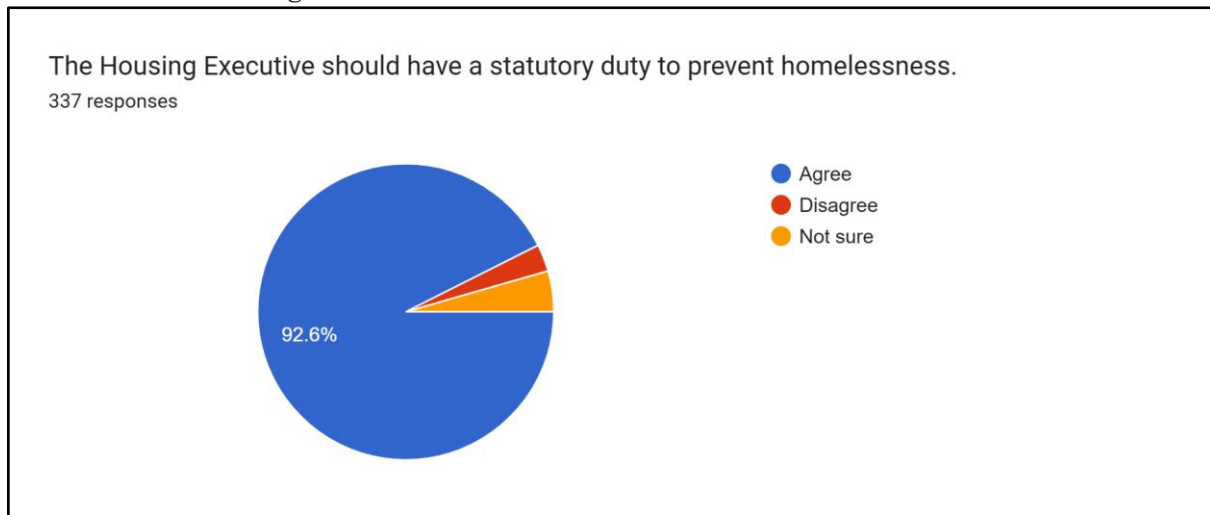


NIFHA noted that establishing a Rental Board “could be a significant expense for the government” and stated that, “Landlords might resist the establishment of a Rental Board, fearing increased regulation and oversight, which could lead to tensions in the rental market.”

However, other respondents believed such a body would be worth the investment.

3.6 Prevention of homelessness

92.6% of respondents said that the Housing Executive should have a statutory duty to prevent homelessness. 3% disagreed and 4.5% were unsure.



Homeless Connect were supportive of the proposal to introduce a statutory duty on the Housing Executive to prevent homelessness, but noted that this should go beyond the Housing Executive and must include other statutory and public authorities.

Scotland's Housing Bill includes provisions for homelessness prevention, including new 'ask and act' duties that make prevention a shared responsibility across the public sector - including health boards, local authorities, police, social landlords and government ministers. This attempts to shift strategic focus away from crisis intervention and towards prevention, *"which can eliminate the need for a household to go through the trauma of homelessness in the first place, but without diluting the [existing rights for people who are homeless](#)"*.

Simon Community was also supportive of this proposal, and echoed the call for a statutory duty to be placed on all relevant bodies across housing, health, education and justice.

3.7 Other issues raised

Some respondents raised issues that were not directly included in these consultation proposals, including:

- Regulation of short-term lets⁵
- The establishment of a state construction body to build housing that is allocated based on objective need (Workers Party)
- Scrapping rental guarantor requirements (Renters' Voice and NUS-USI)
- Issues with lengthy delays returning deposits (Generation Rent)
- Concerns regarding the removal of intimidation points (Women's Aid and individual respondents)

⁵ Notably, respondents who identified themselves as landlords advocated for stronger regulation of short-term and holiday lets.

4. Suggestions to develop the proposal or for alternatives to legislation.

It is worth noting that a comprehensive legislative approach to tackling the housing crisis would incorporate more than just two proposals, and would ideally include a no-fault eviction ban, a move towards indefinite tenancies, the improvement of minimum fitness standards and a fully-resourced enforcement body with legislative authority to address issues in the private and social rented sectors.

However, the initial proposal - as consulted upon - is broad and could conceivably be the subject of more than one piece of legislation. The breadth of the initial proposal could therefore result in substantial legal and technical difficulties.

We also note the Speaker's stated principles that "*a Member's Bill is not an appropriate vehicle to progress significantly complex or cross-cutting legislative change,*" and that a Bill must be "*sufficiently narrow and specific in focus to achieve a single policy objective*".

In this case, the single policy objective is **alleviating the worst impacts of the housing crisis on the most vulnerable in our society**. From conversations with stakeholders, in survey responses and at consultation meetings, we have identified the most vulnerable as those who are experiencing homelessness and tenants on a low income, living in poverty and destitution. These tenants live in the private and social rented sector. We have therefore concluded that action must be taken to **expand the supply of social housing for those experiencing homelessness**, and for **price regulation in the private rented sector**.

In conversations with stakeholders, in survey responses and at consultation meetings, unaffordability of the private rented sector was consistently raised as a key driver of the housing crisis. Regardless of respondents' attitudes towards different forms of rent control, and the perceived unintended consequences of implementation, there was widespread understanding and acceptance that the private rented sector has become increasingly unaffordable for many people:

"Persistent and extreme rent inflation in the PRS in Northern Ireland, therefore, is increasing the risk of poverty, destitution and homelessness for households on low income at a time when these are already increasing." (Housing Rights).

In recognition of the fact that the North is an exceptional outlier in terms of rent inflation in the UK, and the fact that various forms of rent control operate successfully throughout Europe, we suggest that rent control is a necessary and proportionate measure to tackle unaffordability in the private rented sector.

A proposed model of rent control will be outlined in more detail in the Final Proposal.

It should be noted that existing legislation – parts 4 and 5 of the Rent (NI) Order 1978 - provides a possible legislative basis for rent controls, based on protected and statutory tenancies. However, from April 2007, the enactment of the Private Tenancies (NI) Order 2006 meant that no new tenancies could be protected (and therefore rent controlled); only properties built before 1945 that fail to meet the statutory fitness standard can be subject to rent control. It may be possible to amend existing legislation to make every private tenancy a protected tenancy, which is subject to rent control.

On expanding the supply of social housing, several respondents, including Participation and the Practice of Rights (PPR), stated that the Housing Executive should be using vesting or compulsory purchase powers to turn vacant homes and buildings into social homes.

The Northern Ireland Housing Executive (NIHE) has the power, under article 56 of the Housing (Northern Ireland) Order 1981, to acquire land on behalf of housing associations, for the development of social housing.

According to the Department for Communities, there are a number of considerations as to whether it is appropriate to use compulsory purchase powers to ensure that a housing association scheme proceeds. These are:

- housing need – whether there is a need for the scheme;
- justification for vesting – whether the need for the scheme is so great that the use of compulsory acquisition powers is warranted;
- financial viability – whether the scheme is financially viable;
- value for money – whether the scheme represents value for money and will be approved by the NIHE Development Programme Group (DPG); and
- availability of funding – whether finance is available from the NIHE (DPG) within a reasonable timescale to allow the scheme to proceed when vesting is complete.

Generally, compensation payable in respect of land and property compulsorily acquired is assessed on the basis of its open market value. This is of particular relevance when considering the rights implications of bringing private property into public ownership (see section 5 below).

Evidence gathered in Wales and Scotland demonstrates that some local authorities were prevented from using compulsory purchase powers due to financial constraints, lack of expertise or a mixture of these issues. However, Glasgow has been highlighted as the local authority that has made the most use of compulsory purchase powers. However, only [52 homes](#) – a small proportion of the empty homes brought back into use in the area - have been subject to compulsory purchase orders since 2019, reflecting the complexities and resource-intensity involved.

A mixture of greater use of compulsory purchase powers combined with other methods of expanding housing supply might be a suitable alternative. These alternative methods are set out in more detail in section 5 below.

5. Convention Rights and Other Competency Issues

We note that housing matters are transferred. Therefore, the Bill could easily be drafted without impacting on excepted or reserved matters.

Article 1 Protocol 1 of the European Convention on Human Rights protects the right to peaceful enjoyment of property. Property in this context includes land, housing and money, as well as contractual rights. The taking of property into public ownership will engage Article 1 Protocol 1.

This imposes an obligation on the state not to interfere with the peaceful enjoyment of property, deprive a person of their possessions or subject a person's possession to control⁶.

However, the right to peaceful enjoyment of property will not be violated if interference, deprivation or control is conducted lawfully and in the public interests, or if it benefits a section of the community.

⁶ <https://www.libertyhumanrights.org.uk/right/article-one-of-the-first-protocol-protection-of-property/>

A fair balance between an individual's property rights and the interest of the general public must be struck.

The government often determines what is legitimately in the public interest. Any action taken in this regard must strike a fair balance between the demands of the general interests of the public and the fundamental rights of the individual - in this case, a landlord or property owner.

The provision of more social housing is indeed in the public interest, given the more than 48,000 families on the social housing waiting list - a majority of whom are in housing stress - and the unsustainable cost of temporary accommodation ([£38.6 million in 2023/24](#)). It is [acknowledged](#) by both the Housing Executive and the Department for Communities that a higher proportion of households from the Catholic community live in housing stress. While social housing need is on the rise throughout the north, in key urban centres such as Belfast and Derry, need is disproportionately concentrated in [predominantly Catholic areas](#).

Taking privately-owned empty homes into public ownership would expand the supply of social housing, benefiting those in highest levels of need on the social housing waiting list. We note that payment of compensation is normally considered a proportionate response to interference with Article 1 Protocol 1. If compulsory purchase or vesting powers are used, a sum of financial compensation could be given to the owner - perhaps linked to the condition of the property and/or whether it is located in an area of high housing need (see section 4 above).

An alternative for expanding social housing supply could involve an open market purchase scheme, whereby set criteria are defined to permit the Housing Executive to purchase a property for exclusive use as permanent social housing. Appropriate financial compensation could be offered for every property purchased, ensuring that this proposal does not breach convention rights⁷.

Owners of vacant or derelict homes could be given adequate support to bring their properties back into use⁸. If they fail to do so within a reasonable timeframe, the owner could be subject to a financial penalty - or 'empty home premium' - administered via the rates system. The level of penalty, when it begins to apply and any relevant exclusions, would be determined by reference to reasonability and proportionality.

This would not entail the seizure or forcible taking of property, avoiding any question of breaching Article 1 Protocol 1 rights. In addition, an empty homes premium on council tax is a well established policy in Britain - as is Vacant Homes Tax in Ireland.

However, unlike the previous two suggestions for bringing empty homes back into use, incentivising property owners to bring their property back into use - or penalising them for failing to do so - is unlikely to expand the supply of *social* housing. A property owner is free to decide what to do with their property once this is brought up to habitable standard; whether they wish to live in it, sell it, or rent it in the private market.

Rent control may also engage Article 1 Protocol 1 of the Convention, insofar as a property owner has the right to peaceful enjoyment of their property and this may entail the expectation of rental income. However, we note that while a property owner is legally entitled to receive rental income from a property, the monetary amount or profit margin is not protected by law.

Rent regulation will mean subjecting a property owner's possession to control. However, given the fact that the landlord will still be extracting an income from their asset in the form of rent, it is our opinion that the rights of landlords are not significantly diminished by rent price regulation.

⁷ A similar initiative has recently been established for the provision of [temporary accommodation](#), using Landlord Reserve funding.

⁸ See Scotland's [Empty Homes Partnership](#)

It is essential to balance the rights of landlords with the rights of those seeking housing. The UN Committee on Economic, Social and Cultural Rights has highlighted that the right to housing [must not be interpreted narrowly](#), and should be understood in wider context; namely, the right to live in peace, security and dignity. [Affordability](#) is a key element of the right to adequate housing. Housing cannot be deemed adequate if its cost threatens or compromises the occupants' enjoyment of other human rights (such as the right to health, education, freedom of association and expression, and the right to life).

In the case of *Mellacher v Austria*⁹ the European Court of Human Rights found the Austrian system of rent controls to be compatible with Article 1 Protocol 1. In concluding, the Court found,

“The Court thus reaches the conclusion that when enacting the 1981 Rent Act the Austrian legislature, having regard to the need to strike a fair balance between the general interests of the community and the right of property of landlords in general and of the applicants in particular, could reasonably hold that the means chosen were suited to achieving the legitimate aim pursued.”

Similarly, in the case of *Spadea and Scalabino v Italy*¹⁰ the European Court of Human Rights noted:

“that housing shortages are an almost universal problem of modern society. In order to deal with this problem, the Italian Government adopted a series of emergency measures designed firstly to control rent increases through rent freezes mitigated by occasional rises and secondly to extend the validity of existing leases. The situation in Italy became more complex when the industrialisation of the large northern cities sucked in people from the most disadvantaged regions and from rural areas in general”.

The Court went on to conclude: *“having regard to the need to strike a fair balance between the interests of the community and the right of landlords, and of the applicants in particular, that the means chosen were appropriate to achieve the legitimate aim pursued”.*

Finally, we are confident that the proposal could be drafted in such a way to avoid any diminution of rights, safeguards or equality of opportunity. The Bill could also be drafted to ensure that none of its provisions result in discrimination and that it does not modify any entrenched enactments.

⁹ [1989] 12 EHRR 391

¹⁰ [1996] 22 EHRR 514

6. Financial implications

Rent Control

Multiple respondents noted that the proposal for rent control in the private rented sector would need to be supported by an appropriate level of resources for enforcement (NIFHA, Homeless Connect).

Taking a wider view, Housing Rights noted that rent regulation/control “*would not require the levels of funding that subsidy would, and could potentially save the government significant sums in future. Since 2010, the UK Government has spent over £370bn on housing benefits, of which almost half is supporting private rented tenants, essentially going straight into the pockets of private landlords. If rent inflation continues as it has with no measures to address it, this number will only rise.*”

The implementation of rent controls would require a panel or body to enforce rent regulation. The Rent (Northern Ireland) Order 1978 provides for a Rent Officer and Rent Assessment Panel. The post of Rent Officer is still in existence, under the remit of the Department for Communities, to set maximum rents for the very small number of rent-controlled tenancies in the north.

Rather than establishing a new body, the existing Rent Officer model could be expanded, with at least one Officer in each council area. Enforcement powers might rest with Rent Officers, while responsibility for determining rent levels could rest with the Department for Communities.

Empty Homes

Land & Property Services maintain a register of Vacant Domestic Properties. However, the data contained therein cannot be relied upon for accuracy because, since the introduction of the Rating of Empty Homes in October 2011, there is [no financial advantage or requirement for homeowners/ratepayers to notify LPS that the property is vacant](#).

Several respondents, including NIFHA, Simon Community Homeless Connect, noted that due to a lack of reliable data, the condition of vacant properties is unknown. Correctly identifying and cataloguing empty homes will also require appropriate resources.

Scotland’s Empty Homes Taskforce could provide a useful model. [This financial year](#), the Scottish Government has allocated £2 million of funding to the Empty Homes Partnership, which will provide additional empty homes officers across Scotland, investment in local and national initiatives and funding for the core Empty Homes Partnership and enhanced support to local authorities.

Of course, if compulsory purchase or vesting powers were used by the state to take empty homes into public ownership for use as social housing this would require a significant amount of funding to invest in the necessary repairs, renovation and retrofitting to bring homes up to a habitable standard.

Other

Although we do not propose to further progress the establishment of a Rental Board at this time, it is very clear from this consultation that the minimal amount of regulation that already exists in the private rented sector is not adequately enforced (e.g. protection of tenancy deposits in a registered scheme, the limiting of deposits to no more than one month’s rent).

Some form of enforcement body and/or alternative dispute resolution mechanism should be established, in order to better protect the existing rights of tenants.

If you have any comments or questions, please email:
Gerry.carroll@mha.niassembly.gov.uk