

Northern Ireland Executive
Draft Programme for Government 2024-27 Public Consultation
Response from Propertymark
November 2024

Background

1. Propertymark is the UK's leading professional body of property agents, with over 18,000 members representing over 12,800 branches. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.¹

Consultation – overview

2. On 5 September 2024, the Northern Ireland Executive agreed a Draft Programme for Government 2024-2027. The programme outlines the Northern Ireland Executive's priorities for the next three years and invited the public to comment on their proposals. The programme has the following sections:
 - Grow a globally competitive and sustainable economy
 - Deliver more affordable childcare
 - Cut health waiting times
 - Ending violence against women and girls
 - Better support for children and young people with special educational needs
 - Provide more social, affordable and sustainable housing
 - Safer communities
 - Protecting Lough Neagh and the Environment
 - Reform and transformation of public services.

Propertymark response – summary

3. Propertymark welcomes the opportunity to respond to the Northern Ireland Executive's Draft Programme for Government. We agree with the Executive that good housing is essential to the

¹ <https://www.propertymark.co.uk/>

health and wellbeing of the public and that improving access to housing should be encouraged.

This has provided the foundation for our proposals, which include:

- **Ensuring that the right number and type of homes are built over the next 15 years** – given the current gap between the demand and supply of housing, we encourage the Northern Ireland Executive to adopt more ambitious housing targets over the next fifteen years. Additionally, planning reforms must ensure that delivery of new homes, including size, cost and tenure, is evidence-led and responds directly to demand.
- **Regulate property agents to improve productivity** – we welcome the Executive’s position on skills and investment in education, however property agents are not currently required to meet any qualification or skill requirements. To improve the productivity of the housing sector, property agents must be regulated.
- **Energy efficiency** – the introduction of energy efficiency targets for property has been poorly implemented across other UK nations. Financial support is often poor and targeted at specific retrofit programmes that are not always applicable for all homes. The Northern Ireland Executive must ensure that it provides sufficient financial support for a range of programmes to ensure more homeowners and landlords can improve the energy efficiency of their homes.

4. Considering PropertyMark’s expertise, we have omitted questions from the consultation that are not related to housing.

Questions

Question 1: How much do you agree that the priority 'Grow a Globally Competitive and Sustainable Economy' should be included in the Programme for Government?

5. We agree that growing a globally competitive and sustainable economy should be one of the key priorities within the Draft Programme for Government. Out of the four priorities, PropertyMark is most interested in productivity and decarbonisation as they directly impact the housing sector.

Question 2: The draft Programme for Government has set out actions that we plan to take under the priority 'Grow a Globally Competitive and Sustainable Economy'. How much do you agree that these are the right actions to take?

6. **Productivity:** To improve productivity and the quality of service within the property industry, we encourage the Northern Ireland Executive to consider introducing the regulation of property agents. Currently, there are no qualification requirements and few enforceable standards that agents have to sign up to. As the Draft Programme for Government states, the utilisation of skills is one of the key drivers to boost productivity performance. However, without an impetus to take qualifications, property agents across Northern Ireland risk losing out on opportunities to increase their productivity.

7. While we understand that the Department for Communities is considering introducing establishing regulations for letting agents, in much the same way as has been introduced in Scotland and Wales, we would recommend that the Executive work with the UK Government to ensure that any regulations also work alongside and be expanded to all property agents in Northern Ireland; covering sales, lettings, valuation, non-residential, inventory management and property management. A key element of regulation would be the requirement to be qualified and undertake regular continual professional development, both of which will improve the productivity of the sector and ensure a better quality of service for consumers.

8. **Decarbonisation:** While we welcome efforts to decarbonise that are detailed in the Draft Programme for Government, a significant portion of the UK's emissions come from homes (16%) with a further 9% coming from commercial buildings². It is therefore essential that steps are taken to ensure that the energy efficiency of homes can be improved. We recognise the challenge to retrofit properties as retrofitting properties can be considerably expensive, up to 10,000s in many cases³. Retrofitting homes in Northern Ireland is likely to be more expensive for landlords and homeowners, given that average house prices and rents are lower in the country when compared to the rest of the UK. It is therefore essential that landlords and homeowners are given clear guidance on when energy efficiency requirements will be introduced, including multiple years to retrofit their properties. When introduced, the Northern Ireland Executive must ensure that there

² [Net zero possible by 2050 with urgent gov action | UKGBC](#)

³ [2024 Costs To Retrofit Your Home in the UK | Checkatrade](#)

is sufficient financial support available to prevent low energy-efficient homes from being abandoned.

Question 3: Please provide any other comments you have in relation to the 'Grow a Globally Competitive and Sustainable Economy' priority

9. Yes, considering the Northern Ireland Executive's objective is to create an "economy that works for everyone" would we recommend that the Executive introduces a requirement for all letting agents and property managers to join an approved client money protection (CMP) scheme. Letting agents and property managers handle a substantial amount of money paid to them by their clients. This includes deposits, rent payments, service charges and a range of other payments that are held by the agent or are transferred from one party to the other. However, if an agent becomes insolvent, the payment is lost. Additionally, there were cases where agents have stolen client's money before the need to register with a client money protection scheme was introduced⁴. Since there is no guarantee that an agent will have signed up to a CMP scheme, Northern Ireland renters and landlords are at risk of having their rent payments and deposits stolen. CMP allows tenants and landlords to file a claim to any outstanding deposit or rent payments made to be repaid. Additionally, CMP schemes require agents to hold all client money in a separate account, helping to further protect money that is owed to or has been paid by the client.

Question 16: How much do you agree that the priority 'Provide More Social, Affordable and Sustainable Housing' should be included in the Programme for Government?

10. Yes, we agree that providing more social, affordable and sustainable housing must be prioritised and we are pleased to see that this is included within the Draft Programme for Government.

Question 17: The draft Programme for Government has set out actions that we plan to take under the priority 'Provide More Social, Affordable and Sustainable Housing'. How much do you agree that these are the right actions to take?

11. **Increase the supply of homes:** We welcome proposals to address housing stress through increasing the supply of housing across all tenures. However, we urge the Northern Ireland Executive to consider more ambitious targets. In March 2022, Propertymark responded to the

⁴ [Runaway agent finally jailed for stealing tenants' deposits - Property Industry Eye](#)

Department for Communities Housing Supply Strategy 2022-2037 consultation. Within our response we urged the Department to consider more ambitious housing targets, for the Department to aim to build more than 100,000 new homes over the next 15 years, a position we still hold. In the fifteen years between 2005 and 2020, the number of dwelling completions reached 126,166⁵. Considering there have been increasing numbers of applicants on social housing waiting lists since 2017/18, it can be reasonably assumed that there has been a historic under-delivery of homes. We therefore urge the Northern Ireland Executive to aim to build closer to 150,000 new homes over the next 15 years to ensure sufficient housing supply.

12. **Planning reforms:** We are pleased to see that the Northern Ireland Executive is prioritising reforms to the planning system, focusing on its ability to support the delivery of the “appropriate” supply of housing. The planning system must ensure that the homes which are built directly responds to local demand. Prioritisation should be given to planning proposals which can identify local needs and any shortages of houses in a given cost, tenure or size. This will help to ensure that any new homes built can be sold quickly, address supply-issues within local areas and are not left empty.

Question 18: Please provide any other comments you have in relation to the 'Provide More Social, Affordable and Sustainable Housing' priority

13. In addition to the comments made earlier in our response, we would urge the Northern Ireland Executive to consider the following:

- Avoid the introduction of rent controls to prevent landlords from existing the market, reducing the supply of private rented homes.
- Consider devolution of Stamp Duty Land Tax to adopt tax policies that can better reflect the market in Northern Ireland.
- Review actions taken by other UK nations when setting annual limits on rent increases.

Question 29: How much do you agree that the following are the right commitments in relation to the plans for investment in infrastructure?

- **Boost Housing Funds**
- **Improve the Planning System**
- **Deliver Better Public Services**
- **Support Our Net Zero Future**

⁵ [New dwelling statistics detailed reports | Department of Finance](#)

- **Manage Our Water**
- **Upgrade Stadia and Support Local Sports**
- **Retrofit Homes**
- **Improve Our Transport Infrastructure for Safer Travel, Connected Communities and Sustainable Economic Growth**

14. We have no issues with the following commitments and welcome plans to boost housing funds, improve the planning system and retrofit homes.

Question 30: How much do you agree that these are the right commitments in relation to the plans for investment in infrastructure?

15. We agree that these are the right commitments in relation to the plans for investment in infrastructure. As we have stated earlier, the cost of retrofitting a home in relation to the value of the home is particularly high in Northern Ireland. In order to ensure that retrofit plans are effective, landlords and homeowners need flexible funding programmes where they can adopt energy saving measures that will have the greatest impact on their homes at an affordable rate.

Question 31: The Executive have set out a long-term strategy to deliver three Missions, People, Planet and Prosperity, as well as a cross-cutting commitment to Peace. How much do you agree with a Missions-based approach?

16. We agree with the Missions-based approach that the Executive has taken.

Question 32: How much do you agree that these are the right Missions to focus on? (People, planet, prosperity).

17. We have no issues with the Missions chosen by the Executive and agree they are the right Missions to take. Please see earlier in our response for details on retrofitting homes.

Question 40: Do you have any further comments relevant to this consultation?

18. We have no further comments to make at this time.