

## **Housing Strategy 2012-15 – Consultation responses from external stakeholders**

### **1. Comments from Riversmead Housing Association**

#### **Our Response**

We welcome the opportunity to contribute to the East Herts Council consultation on the 2012-2015 draft Housing Strategy. The document builds upon a number of documents that include the Local Investment Plan that Riversmead Housing Association have contributed to in past months. The document sets out the background *what we know* and describes the policy and operational response in *what is happening*. The document is welcomed at a time of unprecedented change in the provision of both affordable and open market purchase housing. The time period of three years seems to be sensible in terms of the pressure for change.

#### **General feedback**

We note that the consultation information is on the East Herts Website but we wondered how you are “signposting to the website” and how you are involving residents and stakeholders.

It is important that a range of communication methods and opportunities are used to ensure that people have the opportunity to provide feedback and also so that they are aware of the proposed changes and the possible implications for them.

*A: Consultation began at the Housing Forum on 7<sup>th</sup> March 2012 at the Council's offices which was attended by developers, housebuilder, registered providers and other stakeholders in housing. Housing Officers brought to the attention of stakeholders and partners the consultation of the Housing Strategy whenever the opportunity arose at meetings held or attended. A decision was made not to undertake resident consultation other than via the council's website as this has in the past been very time intensive for officers and the resources are no longer available to do this.*

#### **Specific Feedback**

##### **Strategic Housing Objective 1-Maximise the delivery of new affordable homes, whilst ensuring the best use of housing.**

- 1 We would wish to see that the proposed strategy supports Housing Register Applicants who are not in receipt of Housing Benefit (HB). This group may be finding it harder to access tenancies charging up to 75% of market rent or the Local Housing Allowance which ever is

lower and could mean that it is unlikely that they will be allocated a social housing property and this may not be conducive to maintaining sustainable communities. Sustainable communities ideally include a diverse number of housing options each of which contribute to the overall success of that community.

- 2 We would welcome a continued discussion about the strategy including the ability to let a proportion of affordable rent homes (both in new developments and relets) for those housing applicants who are working and in receipt of a low wage.

A: As above

- 3 We are aware that tenants in receipt of HB who are in their 40's and 50's and who need to move for under occupation reasons may not be able to move as there may be a shortage of one and two bedroom properties. This will mean that their rent will not be met in full and the implications of this may be:

- increasing rent arrears for social housing landlords and the inability to maximise our income and provide new homes
- increased number of evictions for social housing tenant
- increasing the demand on your homeless service.
- Poor use of social housing assets ( Better use of our existing asset base is a key aim in our 2012/2013 Business Plan ).

- 4 The SHMA forecast referred to on page 21 of the strategy takes account of the future demographics but emphasis should be made of the effect of the Housing Benefit Reform Act and under occupation (see point 3).

- 5 Under occupation (page 24 on your draft housing strategy), it mentions that those who are under occupying and those are over occupying are allocated the same number of points, "twenty points for every bedroom". However, we would welcome discussion as to how we can work together to free up the homes to allow the down and upsizing to take place, (the potential chain effect) whilst still managing the more highly pointed applicants (medical points).

*A: The Council recognises the need to address housing need for all its residents. However the Housing Strategy can only identify that the legislation and reforms that will impact on existing individual policies. The impact of these will need to be considered in more detail as they emerge and come into effect. The Council will shortly begin consultation on changes to its Housing Register and Allocations Policy. Any agreed revisions will need to reflect the changes brought in by the Localism Act and current and proposed future Welfare benefit reforms. The points raised here will form part of the discussions with our stakeholder on changes to our Housing Register and Allocations Policy and the wider implications of those changes to residents and who we allocate homes to. There will be a Housing Forum on 11<sup>th</sup> July to begin this process.*

## **Strategic housing Objective 2: Meeting the needs of a growing elderly population**

Whilst we recognise that there has been significant improvements in the provision locally for housing with care and support (flexicare) for older people, we would also welcome consideration to the provision of specialist dementia care units. With the predicted demographics of an ageing population the demands on this type of housing will increase.

*A: As you are aware the future housing needs of major vulnerable groups is made by Herts County Council and they are currently working on a document for East Herts to assess current and future needs. East Herts District Council would like to work closely with Hertfordshire County Council and their Accommodation Solutions team and registered providers to assess the level of future needs for specific client groups and identify housing solutions.*

### **Strategic Housing Objective 3: Meeting the needs of vulnerable people and stronger communities**

Sharing information in this area would help to ensure a consistent and joined-up approach to meeting housing needs. We would welcome this approach.

We would welcome the opportunity to be involved in the review of EHC's Housing Register Policy referenced on page 37 3<sup>rd</sup> para . At the same time we have to meet requirements placed upon ourselves to put in place a tenancy strategy and ourselves to have a tenancy management policy that fit together. Claire and Chris meet earlier this year to kick start that process further work is necessary over the coming weeks

RHA's Board has an increased appetite to develop and provide a range of new homes for the local community . Our Business plan for the year 2012/13 has a target of 49 homes to be completed and 84 new starts on site. We are in the middle of recruiting a new business manager to help us deliver this more ambitious programme. The new programme could for the first time see an element of out right sale something that to date we have not been able to offer. The new programme already has a higher element of shared ownership included to help meet the costs of providing additional affordable homes. Wherever possible we would seek to work with the *grain* of local community views and wishes hence our commitment to hold pre planning application consultation meetings and to take steps to amend our plans where possible and appropriate.

*A: East Herts District Council support Riversmead to develop their housing offer in the district and we are pleased to see that the organisation is investing in staff to develop business. We would welcome the opportunity to continue the strong working partnership we have established with Riversmead into delivering future affordable homes for residents. On a housing basis, we fully support Riversmead consultation approach to working with the local community on development plans.*

Pg 17 we will be interested to hear the outturn of the Strategic Housing Market Assessment (SHMA) refresh when available.

*A: The SHMA is an area of work of East Herts District Council Planning Policy team and we will ensure that Registered Providers along with other housing stakeholders are informed of any information updates.*

Pg 17 we would like to look closely at going to a weekly Choice Based Letting advertising cycle.

*A: This can be considered but the Council will need to assess the impact of the additional work and changing work cycles for the team that this will bring.*

Pg 19 RHA stock is 100% compliant with Decent Homes so query the 40% non compliant number has come from second para

*A: We are aware that RHA stock is 100% compliant with Decent Homes: the Housing Strategy references the source of this anomaly.*

Pg 26 priorities agree

Pg 28 Our Board have asked us to explore with you and the County Council the need for an flexicare scheme in Ware

*A: Agreed*

Pg 35 Community Alarms we would like to explore the potential to widen this service with you in the coming year(s).

*A: Agreed*

Pg 37 we need to make sure there is a really good pipeline in 2014 for the young persons living in the Crouchfield Foyer who will need to move. We are sure you will have given this thought but we could help with this provision as part of our pipeline of new homes or remodelling of our assets.

*A: The Young Persons Project at Baker Street, Hertford is a key facility which Aldwyck Housing Association are delivering providing accommodation and support for people between 18-24 years old. East Herts District Council will be working closely with Aldwyck and Registered Providers in the district to ensure that the pipeline is secure for transitions to full tenancies.*

Pg 39 Monitoring could include stakeholders going forward.

*A: Agreed*

Christopher Wright  
Director of Housing Services  
Riversmead Housing Association

## **Representations on East Herts Housing Strategy** **On behalf of Bishop Stortford North Consortium Ltd**



1. Representations are made in response to the publication of the East Herts Housing Strategy (2012 – 2015).
2. As a consortium of developers seeking to achieve the delivery of considerable housing, community and transport infrastructure at Bishop Stortford, we are keen to work with the Council to achieve their various objectives set out in the Local Development Framework (LDF), Sustainable Community Strategy (SCS), Local Investment Plan (LIP) and Housing Strategy. We support the development of new affordable housing through registered providers offering intermediate housing and affordable rents, and will work with them to ensure the effective delivery of housing to address the specific needs of the area. The opportunity exists for Bishop Stortford North to achieve the delivery of much needed open market and affordable housing through the implementation of a flexible strategy which maintains the viability of the site and delivery of a range of social and economic infrastructure.
3. Firstly we are broadly supportive of the Council's Strategy which seeks to achieve the development of a range of housing to meet the local needs and aspirations in East Hertfordshire. The strategic housing objectives are supported, particularly the aim to maximise the delivery of a range of new affordable homes, whilst ensuring the best use of existing housing. However, we are concerned about the high level of affordable housing required and particularly the very ambitious proportion of social rented housing which is set.
4. The strategy purports to assess and plan for current and future housing needs of the local population as well as plan and facilitate new supply. However, it is unclear how this has been done and there are no specific targets or policies which demonstrate how the objectives will be implemented or monitored.
5. The findings of the Strategic Housing Market Assessment (SHMA) (2010) are a useful basis for the Housing Strategy, both in terms of the tenure mix, and housing size mix. However, it is not clear how the very useful findings from the SHMA, which indicated that the majority of affordable housing requirements should be made through intermediate affordable housing, are being translated into Council policy which is seeking the exact opposite with

the majority requirement for social rented. A clearer demonstration of how the SHMA has been used to formulate the strategy and also planning policy is required.

6. We understand that a refresh of the SHMA is currently being undertaken and hope that this will be fed into the Housing Strategy and used by the Council to inform negotiations in relation to the delivery of affordable housing on sites.

*A 4-6: These points will be addressed through the District Plan and the Housing Strategy will be updated to reflect changes to planning policy and updates to housing policy.*

7. We note that there is a significant shortage of 2 and 3 bedroom properties and support the Council in their desire to meet identified needs. It is also clear that in recent years there has been a predominance of flats built in East Herts. Discussions with the local Housing Associations Riversmead and Stort Valley have confirmed both these points. New housing should also ensure that these issues are addressed.

*A: East Herts Council supports this view that 2 and 3 bedroom properties are the current identified need, however future Welfare Reforms may have an impact on the profile of future needs groups and the Council needs to be mindful of this.*

8. The Housing Strategy should make clear that affordable housing should be delivered taking account of the specific local circumstances that exist, and not just applying district wide standards. Locally based demographic and market information should be used to inform the delivery of housing. This would ensure that there is not an oversupply of some types and sizes of houses and that the imposition of a standard district wide target for house type, size and tenure results in development that is not needed locally. It is essential that the strategy supports the importance of reflecting the local circumstances and needs that exist in the area in which the housing is being delivered. This is particularly important if there is a lack of a certain type of housing or a predominance of types of household, which may require a different mix of house types, sizes and tenures.

9. The use of up to date demographic information is essential to understand the population and its characteristics. While this has and should be done at a district wide East Herts level, it is also important to understand the existing and future demographic profile of the population at the local ward and parish level. We support the Housing Strategy objective which seeks to meet the needs of a growing elderly population and recognise that there is considerable evidence of an increasing elderly population within East Herts. However, there



will be variations across the area and within the different towns and rural communities. Evidence should be provided to illustrate these differences and recognition of the variation should be included within the Strategy.

10. As highlighted above locally based statistics and other information should be used to inform the delivery of housing for elderly people. This is particularly important in relation to the delivery of large urban extension sites which should respond directly to the existing and future composition of the town and its surroundings.

*A 8-10: Within the East Herts Council Housing Strategy is the New Affordable Housing Commissioning Brief which is a key document providing an overview of the position on affordable housing. The Council works with developers when agreeing individual Section 106 clauses on affordable housing to ensure the right size of property is delivered to meet housing need within the overall agreed scheme being developed. The Council works closely with the County Council to identify future housing need for vulnerable groups such as the elderly.*

11. We support the monitoring of the strategy on an annual basis, however, it is noted that there are no specific targets set out within the strategy setting out exactly what is to be achieved, how and by when.

*A: This will be part of the Action Plan that will be part of the Housing Strategy 2012-2015.*

12. The Draft New Affordable Homes Commissioning Brief – February 2012 at Appendix 5 sets out the standards that are required. This includes 40% affordable homes of which 75% rented and 25% intermediate, with 1/3 1, bed, 2 bed and 3 bed. These standards are applied across East Hertfordshire. These are very ambitious targets which affect viability. It should also be noted that this amount of social rented has rarely been achieved. The targets and proportions do not reflect the findings of the SHMA and there is no flexibility within them to respond more directly to the local needs of different communities. Recognition needs to be included within both the Housing Strategy and the Commissioning brief that District wide standards are a starting point which can be informed by more detailed local information about house types, tenures, sizes to ensure that the best mix of housing is provided for the area

*A: The Draft New Affordable Homes Commissioning Brief sets out an overview of the affordable housing needs in new developments. The Council is very successful at achieving 40% affordable housing on new developments.*

## **Comments Hertfordshire County Council**

**Maddy Hill**

**Commissioning Manager - Accommodation Solutions**

## Health and Community Services

I asked Joint Commissioning Team and other commissioners for comments on the strategy - the following came forward.

### **Mental Health**

Having looked at the East Herts Strategy - it matches the issues/plans we envisage for East Herts.

There has always been a lack of accommodation for MH in East Herts and move on in particular - nominations to property will be particularly good if East Herts can accommodate this in their plan. The strategy does however focus on lower level MH needs.

The current work (mapping and demand) that I am doing will be looking at the need for higher level placements in East Herts. It would be useful to know from East Herts on whether they recognise this as a need?

*A: East Herts Council does recognise that there is a shortage of accommodation and support for residents with mental health issues and will continue to work with the County Council and Registered Providers to identify future opportunities for housing.*

### **Drugs and Alcohol**

In relation to Drug and Alcohol, Vale House Stabilisation services are not currently delivering rehab services in the East although the Floating support aspect continues to be delivered but capacity is limited.

For Drugs and Alcohol we in the process of procuring countywide accommodation services whereby the Vale House Stabilisation rehab building in Hertford may be utilised for a 'recovery' type accommodation provision. This is still very much in the very early stages and due to some issues with the building, there are no guarantees that Vale will be in a position to submit a bid.

### **Learning Disability**

Pleased to see that there is a commitment to adults with learning disabilities and that 13 units have been set aside for nominations - can I ask a bit more about these - which schemes are they, are they fully occupied? In terms of demand for accommodation for adults with learning disabilities in East Herts, this is the district in the county that we believe has the biggest deficit across the county going forward in Supported Living accommodation (i.e. independent flats) so would be keen to look at agreeing further nominations if possible.

*A: There are two schemes in East Herts, one is Bishop's Stortford and one in Hertford which are both parts of a larger development. They are fully occupied and applicants are put forward and supported by the Learning Disability Team at Hertfordshire County Council.*