

ESSENTIAL REFERENCE PAPER 'B'

East Herts Housing and Health Strategy
2016- 2021

Foreword

Councillor Eric Buckmaster, Executive Member for Health, Housing and Community Support

I am pleased to introduce this new Housing and Health Strategy for East Herts which provides the strategic direction for housing services. It outlines the key priorities for the Council moving forward.

The Housing agenda is an area of highly challenging work in a climate of growing housing needs through changing demographics, affordability issues and difficult personal situations for residents who require support. The Council recognises all these issues and works with partners across the District to provide suitable housing options for residents to have a home.

This Strategy deals with the topics under the Housing agenda of homelessness, the private sector, empty homes, new affordable housing, managing the allocation of properties and providing support and accommodation for those vulnerable groups of older persons or with physical and mental health issues.

This Strategy although not a statutory requirement is a key document for the Council to set out its position in a transparent and open manner and I see it as a key Strategy to deliver district wide.

The new title of the strategy reflects the major and integral role that housing plays in promoting health and wellbeing.

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Introduction

This document is not a statutory requirement but is an important public document which allows East Herts to set out its position and direction of travel on key housing issues.

The Housing Strategy is a strategic document which has underneath it daughter documents including details on specialist aspects of housing. These documents are:

- The Homelessness Review and Strategy 2013-2018
- The Tenancy Strategy
- The Empty Homes Strategy 2016-2020
- The Fuel Poverty Strategy 2016
- The Housing Register and Allocations Policy
- It also sits alongside and supports other key strategies such as the East Herts Council's Health & Wellbeing Strategy.

The Housing Strategy is a key document which covers all aspects of housing including the Vision, Strategy and Objectives to be taken forward by East Herts Council.

Review of National Policy

Name	Key Information
Care Act 2014	This imposes a duty on County Councils to ensure well being, including suitability of living accommodation, and a duty on the District Council to co-operate.
Housing and Health Memorandum of Understanding	In December 2014 a national Housing and Health Memorandum of Understanding to support joint action on improving health through the home was agreed between the Local Government Association, Public Health England, Chartered Institute of Environmental Health and others, to work together with the basic principle that 'everyone should have a home in which to start well, live well, and age well'. It recognises that key features of a home include that it should be warm, affordable to heat, free

	<p>from hazards, and is accessible, with support available if needed.</p> <p>It acknowledges that the right home environment can improve health and wellbeing and prevent ill-health, enable people to manage their health and care needs, and allow people to remain in their home as long as they want to. Housing can contribute to delayed/reduced care interventions, timely discharge and reduced hospital re-admission, and rapid recovery.</p>
Deregulation Act 2015	<p>From October 2015 there are new restrictions on the circumstances in which a private landlord can seek possession of their rental property.</p> <p>A notice seeking possession (known as a section 21 notice) cannot be given in relation to an Assured Shorthold Tenancy within six months of the date of service of an Improvement Notice.</p> <p>This is intended to reduce incidences or fear of retaliatory eviction if the tenant makes a complaint about housing conditions. It may lead to an increase in the number of requests to the Council's Environmental Health Service to investigate housing complaints, and may increase pressure for a prompt housing assessment and prompt enforcement action.</p>
Housing and Planning Bill 2015	<p>This Bill is passing through the stages of Parliament and may be subject to change but at the time of publication included: Starter Homes and a duty to promote the supply, Self Build, Rogue Landlords and Letting Agents, Right to Buy on a Voluntary Basis and High Income Social Tenants on a Mandatory Rent.</p>
Welfare and Work Bill 2015	<p>Welfare Reforms have restricted the amount of Housing Benefit that can be payable to private sector tenants have implemented a new rate for those under 35. Social tenants of working age have seen the implementation of the 'under occupying' reforms and the Council is awaiting the introduction of Universal Credit in the District in. These reforms have increased advice sought by residents and a limitation on stock which is available to them.</p>

Code for Sustainable Homes	This is being phased out as the drive to Energy Efficiency is covered by improved Building Regulations.
Green Deal and Renewable Heat Incentive	Green Deal has ended, and Renewable Heat Incentive is under review, with doubt over its future.
National Planning Policy Framework (NPPF) (March 2012)	The NPPF sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development. The NPPF requires that every effort should be made objectively to identify and then meet the housing needs of an area.
Planning policy for travellers sites (August 2015)	This guidance, to be read in conjunction with the NPPF, sets the planning policy context for the provision of accommodation for Gypsies and Travellers and Travelling Showpeople both through local plans and through the planning application process.

Review of Local Policy Position

Name	Key Information
District Plan	East Herts is progressing with its District Plan which will set the framework for guiding development in East Herts until 2031. The document will identify locations for new housing and set out the Council's policies on Affordable Housing, , Housing for Older and Vulnerable People, and Gypsies and Travellers and Travelling People.
Strategic Housing Market Assessment (SHMA) 2015	The Strategic Housing Market Assessment (SHMA) has two objectives: to identify the functional Housing Market Area (HMA) and to establish the Objectively Assessed Need (OAN) for housing (both market and affordable). The SHMA addresses the needs for all types of housing, including private rented sector, people wishing to build

	their own home, family housing, housing for older people and households with specific needs. It also considers they key drivers and relationships within the housing market..
Housing Needs Survey (2015)	East Herts has carried out a Housing Needs Survey to provide supporting evidence for this Strategy and help to identify the key trends, needs and aspirations of the local community in progressing affordable housing in the District.
Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment (2014)	The Assessment was carried out to provide evidence of need to underpin the numbers of Gypsies and Travellers and Travelling Showpeople pitch and plot allocations, respectively, in the emerging District Plan to 2031.
Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update (2015)	The update to the previous Assessment is currently being carried out to provide evidence of need to underpin the numbers of Gypsies and Travellers and Travelling Showpeople pitch and plot allocations, respectively, in the emerging District Plan to 2031 in light of the changes in the Planning policy for traveller sites revision, August 2015 and to align the evidence base with the publication of the SHMA.
Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study (2014)	This study was undertaken to seek to identify potential locations to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople in the emerging District Plan to 2031 that are identified in the Accommodation Needs Assessment.
Health and Well Being – Housing Health Cost Calculator (HHCC)	<p>Housing is one of the major wider determinants of health and wellbeing, and the Council has invested significant resources in the Health and Wellbeing of East Herts residents, summarised in the Council's Health and Wellbeing Strategy 2013-18.</p> <p>The impacts that housing can have on health and wellbeing are recognised by the Housing Act 2004, particularly through the Housing Health and Safety Rating</p>

	<p>System (HHSRS), by which housing of all tenures is assessed for the likelihood and severity of harm arising from a range of hazards, such as excess cold, falls, dampness, and fire.</p> <p>Options ranging from advice and assistance through to enforcement are available to the Council to tackle housing hazards. The Council has a duty to take action to remedy significant (Category 1) hazards, and a power to tackle less significant (Category 2) hazards.</p> <p>The Council, along with other District Councils in Hertfordshire, is inputting data about its interventions to tackle housing hazards under the HHSRS, onto Housing Health Cost Calculator software produced by the Building Research Establishment, to estimate the savings to the NHS and society of our work to remedy housing hazards and thus reduce likelihood of harm.</p>
<p>Joint Strategic Needs Assessment (JSNA)</p>	<p>The Herts JSNA summarises health data from which decisions about local health priorities and funding are made, so it is important that data on the housing impacts on the health of our residents is included.¹</p> <p>The above HHCC data will be collated by the participating district councils in Herts to inform the Herts Joint Strategic Needs Assessment (JSNA) of the impacts of housing on health, and the value of the councils' housing interventions. A Health Impact Assessment planned as part of a stock modelling project will further inform the JSNA.</p>
<p>Smoke and Carbon Monoxide Alarm (England) Regs 2015</p>	<p>From October 2015, the government has introduced Regulations to increase provision of smoke and carbon monoxide alarms in the private rented housing sector. A working smoke alarm is required on each storey with living accommodation. The regulations do not apply to licensed Houses in Multiple Occupation, but do change licence conditions requiring Carbon Monoxide alarms where there</p>

¹ <http://jsna.hertslis.org/>

	<p>is a solid fuel burning appliance in a living room.</p> <p>If the Council has reasonable grounds to believe there is a contravention, the council must within 21 days serve a remedial notice giving 28 days to comply, then must do work in any default, and may issue a civil penalty of up to £5000. In order to impose such charges, and hence recover its enforcement costs, a priority for the Council is to publish a statement of principles.</p> <p>Although risks from fire and carbon monoxide can also be addressed, as with other common housing hazards, through the Housing Health and Safety Rating System (HHSRS), the Regulations contain an imperative for swift enforcement action without the need to assess the relative likelihood of harm. The most common hazards in the home are excess cold and falls, yet these Regulations could divert limited enforcement resources to tackling the hazards from fire and carbon monoxide.</p> <p>The council is liaising with the Herts Fire and Rescue Service over joint publicity, and the Fire Service has a supply of free alarms for landlords.</p>
<p>Disabled Facilities Grant</p>	<p>District Councils have a statutory responsibility for Disabled Facilities Grants. Until April 2015, East Herts Council received government funding towards expenditure on mandatory Disabled Facilities Grants (DFGs). From April 2015, funding for Disabled Facilities Grants transferred to the Better Care Fund, which is paid to County, rather than District Councils. The Government's 2013 Spending Review created this single pooled budget to incentivise innovation and integration across the NHS and Local Government, 'to deliver better outcomes and greater efficiencies through more integrated services for older and disabled people'.²</p> <p>District Councils are therefore working with Herts County Council to ensure Better Care Fund plans make adequate provision to meet local needs and statutory obligations for</p>

² HM Treasury. Spending Round. June 2013. Page 35

	<p>Disabled Facilities Grants.</p> <p>The March 2015 austerity Budget announced that the government is exploring <i>whether</i> improving housing can help people with care needs stay in their homes longer and reduce costs to the NHS.³</p> <p>Therefore to ensure future funding, rather than merely deliver housing improvements and adaptations, there will also be a need for District Councils to refer to the body of evidence on the impacts of housing on health, and to demonstrate how such interventions contribute to NHS and Social Care performance outcomes.</p>
<p>Green Deal and Renewal Heat Incentive</p>	<p>In July 2015 the government announced it was ending funding for its Green Deal household energy efficiency programme, following low take up. Although the scheme was unpopular, the absence as yet of a replacement scheme raises concerns about cutting carbon emissions and fuel poverty. Feed in tariffs to encourage uptake of renewable electricity-generating technologies are also being cut. Some major locally active companies have already gone into liquidation.</p> <p>These moves are likely to cause a further reduction in take up of domestic energy efficiency measures. Excess cold is the most commonly occurring serious housing hazard. The Council therefore continues to offer grants towards the cost of installing certain energy efficiency measures.</p>

³ HM Treasury. Budget 2015. March 2015. Page 30

East Herts Context

The District consists of the 5 market towns of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware. There is also a significant rural hinterland with many villages and hamlets.

The District covers an area of 477 square kilometres and comprises around one third of the area of the county of Hertfordshire.

The District is heavily influenced by the major settlements beyond its borders. The towns of Stevenage, Harlow and Welwyn Garden City are directly on the borders and there are also significant influences of East to West transport movements.

Residents in East Herts enjoy one of the highest qualities of life in rural Britain. In particular residents in East Herts enjoy a good level of health and life expectancy.

East Herts is an attractive place to live, which is reflected in high house prices. There is a pressing need for more affordable housing in the District. Achieving housing development that responds to local needs, whilst recognising the environmental and other constraints in East Herts, is a significant challenge. It is also necessary to recognise the specific accommodation and housing needs of different groups in the local community.

East Herts has an ageing population. Meeting the varying needs of older people will be a challenge, whilst ensuring the district remains attractive and accessible to young people.

Vision

The Council aims to ensure that a sustainable housing offer is available to residents through working with partner organisations in the development and management of housing stock and the provision of advice, support and help..

'To work in partnership to plan for, make best use of and facilitate housing supply and to support and sustain residents in appropriate housing.'

Objectives:

1. Enable affordable housing delivery through partnership working and maximising suitably located and constructed development opportunities, whilst ensuring the best use of existing stock.
2. Focus on meeting the housing needs of active and frail older persons.
3. Work to meet the needs of vulnerable people in the housing market.
4. Seek to support rural communities in meeting their local housing needs.

Objective 1:

Enable affordable housing delivery through partnership working and maximising suitably located and constructed development opportunities, whilst ensuring the best use of the existing stock

Current position

The Council does not own any housing stock as the housing was transferred to the Registered Providers of Riversmead and Circle Housing South Anglia in 2002. Since this transfer the Council has secured affordable housing delivery through planning obligations and working in partnership with Registered Providers on land opportunities. The delivery profile has been strong to date as outlined below:

Information from the Annual Monitoring Reports of East Herts Council

Year	2006/ 07	2007/ 08	2008/ 09	2009/ 10	2010/ 11	2011/ 12	2012/ 13	2013/ 14	2014/ 15
Gross Affordable Housing Completions	191	177	145	142	38	166	196	68	126

Gross Affordable Housing Completions includes new builds and acquisitions but does not take account of losses through demolition.

Housing for rent via a Registered Provider is allocated through the Housing Needs Register and the Choice Based Lettings system. As of September 2015, 2096 applicants were on the Housing Needs Register.

The Council ensures a strong delivery pipeline of affordable housing through its planning policies and relationships with Registered Providers. Nationally, the Government introduced a new rent regime in 2004 which introduced affordable rents to replace social rents. Affordable rents are rents for affordable housing charged at a maximum of 80% of open market rent of that locality. In East Herts this rent level has been introduced on new build properties and on properties receiving a new tenant by Registered Providers who own the affordable homes in the District. These higher rent levels may lead to less mobility through the stock due to tenants wishing to retain historic social rent levels and affordability issues for both working and non-working residents.

The Council seeks to prevent homelessness and consistently has a low figure and works at an early stage to prevent homelessness. The Council uses a range of temporary accommodation options including accommodation for clients with mental health issues and a council owned hostel.

Stock Condition

The condition of properties in the private sector is primarily the responsibility of its owners but the Council recognises limitations on some owners' ability to maintain, heat and improve their homes. The demographic trends in the district are particularly important for housing in the private sector as an ageing population is more at risk from excess cold, may be in greater need of adaptations, and may be less able to afford to maintain their homes and require greater assistance to do so.

Good quality information on the condition of housing stock is essential to inform policy decisions on reducing fuel poverty, carbon emissions, health inequalities or promoting health and wellbeing.

The Council commissioned a House Condition Survey which was carried out in 2010. This estimated that 49% of all dwellings failed the government's aspirational Decent Home Standard, which defines a decent home as "one which is wind and weather tight, warm and has modern facilities".⁴

Rates of non-decency were found to be slightly higher in the privately rented sector than for owner-occupied dwellings, with social housing faring best.

Similarly, costs of necessary repairs were estimated to be highest for the privately rented sector, and lowest for social housing.

The 2010 survey found overall energy efficiency of stock to be better than the national average, but with considerable potential to reduce CO2 emissions and fuel poverty.

With high costs of owner-occupation and limited availability of social housing, the demand for privately rented housing is increasing.

A stock modelling project is proposed for 2015/16, to gather additional information regarding the condition of private sector housing in the district. This will provide modelled data on key housing indicators including significant hazards, fuel poverty, disrepair and energy efficiency, upon which further strategic decisions can be made.

⁴ ODPM. A Decent Home: the definition and guidance for implementation. Feb 2004, updated June 2006

This will encompass a Health Impact Assessment, which will be used to inform the Herts Joint Strategic Needs Assessment (JSNA) as to the impacts of housing on the health and wellbeing of residents, and the needs for investment in housing.

Disrepair and enforcement

All requests from tenants to require landlords to improve the condition of their homes are investigated in accordance with the Council's enforcement policy, which advocates a staged approach, from advice through to enforcement as appropriate. Where enforcement action proves necessary, the Council will generally seek to recover costs associated with serving of notices and carrying out works in default.

Disrepair and assistance

The Council has also helped fund essential works in owner occupied properties through its means tested Decent Home Grants. The Council has reduced its budget for these discretionary grants in order to prioritise use of dwindling resources. Their availability is under review, and currently is restricted to high risk cases or where some works are necessary alongside a Disabled Facilities Grant. The review will also enable funding for capital works under the dementia project, and expansion of energy efficiency grants in the light of the changes to government incentives to be considered.

Houses in Multiple Occupation

Houses in Multiple Occupation, (HMOs) provide much needed lower cost housing in the district, for both short and long term tenancies. Therefore the Council is keen to advise landlords seeking to provide this accommodation. However, HMO's tend, locally and nationally, to contain some of the poorest housing, along with sharing of amenities, and the risk of harm to occupants in the case of fire is also higher. Therefore in addition to responding to complaints from tenants about their housing conditions, pro-active inspections are also carried out to properties known to be an HMO, and action taken according to assessed risk. When resources permit, contact is also made to properties thought likely to be an HMO.

Certain larger HMOs are also required to be licensed, and conditions are generally attached to the licence to bring the property up to the required standard. The Council's HMO licensing fee is lower where the landlord pro-actively applies for a licence. Where the application is as a result of the Council's intervention, a higher fee is charged, reflecting the additional costs generally incurred in such cases.

Affordability

East Herts is a high value and high demand area for market and affordable housing. The average house prices in the District are around 25% higher than the national average. In the five year period 2009-2014, the average property price in East Herts increased by around 20%. In East Herts the average house price is around £325,000 according to the National Housing Federation, just over 13 times the average income for the District. This puts pressure on stock availability and turnover of all tenures.

To access parts of the housing market there is a need to have savings or earning that allow financial criteria to be met to access housing. In the District there is a huge salary spectrum, 21.4% of households earn below £20,000 well below the national average of £27,000 (Housing Needs Survey, 2015).

Shared Ownership properties provide an opportunity to access market housing but the affordability of this is also related to location and size of property. The Housing Needs Survey showed that 25.2% of concealed households have no savings and 90.9% have less than £25,000 which is a barrier to moving out. Households have a low level of funds available to pay rent or mortgage per month with 48.4% willing to pay between £451 and £550pcm (HNS, 2015). This does restrict the housing market available to them significantly.

The rental market is a key tenure of both private rent and affordable rent for residents and there is a good range of stock sizes and locations. The private rental sector is experiencing pressure as demand grows from those who wish to be flexible with their living arrangements and who do not have the funds to access for sale/shared ownership properties. Rental rates are increasing in both the private and affordable sector. In the social housing sector, affordable rent is up to 80% of open market rent and this can be an issue in high price areas for prospective tenants. In private rent there is an increase in the number of households who do not require housing benefit and therefore there is a falling number of landlords willing to accept households in receipt of housing benefit which puts pressure on the Housing Service to provide support.

Empty Homes

Long term empty homes in the private sector present a potential resource to the District. East Herts is fortunate that it has a relatively low number of long term empty homes. Figure 5 compares 2014 levels for East Herts with the total for England, and for Hertfordshire.

Figure 5: Empty homes comparisons 2014

	Total empties	Percent of stock	Private empty for more than 6 months
England	610,123	2.64%	194,093
Hertfordshire	8,151	1.73%	1,929
<i>East Herts</i>	1,130	1.92%	356

Source: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

In 2015 the Council adopted its revised Empty Homes Strategy.. A staged approach to tackling empty homes, from identification through prioritisation, encouragement with support and a range of incentives, through to enforcement where appropriate supports a target of bringing 10 empty homes back into use each year as a result of our action.

East Herts is working in partnership with Chelmsford, Epping Forest, Harlow, Hertsmere and Uttlesford Councils to deliver Private Lease Agreements Converting Empties (PLACE), a scheme targeted at helping the owners of long term empty homes return their properties to use. The scheme offers significant grant or loan funding to convert and/or repair properties and bring them into residential use. Grants are only available where the property is made available to a Housing Association for a three year period following repair.

Whilst the total number of privately owned long term empty properties in the district has fallen to just over 60% of the number in 2010 there remain approximately 60 properties that have been empty for 10 years or more. Changes to the PLACE scheme makes funding available for certain empty property enforcement work where this is the most appropriate action however there remains a significant resource requirement for these cases.

Better Business for All

The Better Regulation Delivery Office, part of the Department for Business, Innovation and Skills, has developed a Regulators Code which came into effect in April 2014, and a Better Business for All tool-kit, both placing emphasis on supporting business growth through effective regulation, and following the principles of the Legislative and Regulatory Reform Act 2006. The Enterprise Bill, if enacted, will extend the obligation, by requiring an annual report on regulators' performance in relation to business growth.

The Council is active in the Herts Better Business for All partnership and Regulators Forum, and those enforcing legislation to improve standards of housing in East Herts have participated in awareness training organised by the partnership.

The Herts Forum and the Herts Public Health Board recognised the potential benefits of cross agency working to tackle poor housing. The Council is involved in a multi- agency working group, being set up to develop a rogue landlord project for participating Herts authorities, subject to confirmation of funding.

Key Strategic Priorities, Task and Timeframe

Strategic Priorities

- Achieve the right mix, tenure and proportion of affordable housing on new developments based on need.
- Maximise funding opportunities for the delivery of new affordable housing.
- Raise standards in the private sector, particularly in Houses in Multiple Occupation (HMOs)

Short term Task and Timeframe

- Utilise and disseminate the information to partners contained within in the Housing Needs Survey by September 2016.
- Commit to projects which ensure best value spending of commuted sums on affordable housing in the District by December 2016.
- For the Council to be involved in a multi- agency working group, being set up to develop a rogue landlord project for participating Herts authorities, subject to confirmation of funding by July 2016.
- To commission and facilitate a stock modelling survey and provide key health data to the Joint Strategic Needs Assessment, by December 2016.
- To inspect and initiate action in at least 10 HMOs per year.
- In liaison with Herts and Beds district and borough councils, to develop and publish a Statement of Principles for imposing penalty charges for breaches of the Smoke and Carbon Monoxide Alarm Regulations, by July 2016

- To review the Housing Enforcement Policy in light of the Deregulation Act restrictions on retaliatory eviction, by June 2017.

Objective 2: Focus on meeting the housing needs of active and frail older persons.

Current Position:

The District Housing Needs Survey 2015 asked a series of questions to understand physical or mental health issues and long term illness and their impact on housing needs.

The key findings were that 16.5% of households contain somebody with a disability/limiting long term illness. The main demographic affected were over 65 years old and the main issue being around walking/mobility issues.

The East Herts population is forecast to increase with a particularly significant increase in persons over 65 years old and also 75 years old. There is also forecast a growth within the working population age group.

These demographic changes have an impact on the size and tenure of properties required. The increase in older persons will impact on both the need for suitable market and affordable sheltered and supported accommodation.

Draft District Plan Position

The NPPF requires local planning authorities to plan for a mix of housing to meet the needs of different groups in the community, including the specific accommodation needs of older and vulnerable people.

It is important that the Council, working with partners such as the County Council, Registered Providers, health care agencies and developers, seeks to plan for increasing housing choices in terms of specialised accommodation, and appropriate dwellings that are in locations close to sustainable transport options and other key local services. In addition, offering attractive alternative housing choices for older people will assist in freeing-up family sized homes that are currently under-occupied.

Accommodation for older people is moving towards more flexible forms of living and support which seek to maintain independence. There are several options where residents can enjoy their own self-contained home within a site offering extra facilities. These include retirement homes, and 'extra care' or 'flexicare' housing, where varying levels of care and support are provided within the home.

The emerging District Plan contains a policy on 'Housing for Older and Vulnerable People' (Policy HOU6). In light of the recently agreed SHMA (2015)

and the Housing Needs Survey (2015), further information on the requirements of older people will need to be reflected in the next draft of the District Plan.

County Council Position via Accommodation Boards

The County Council operate Accommodation Boards in conjunction with District Councils and Registered Providers. Recently, the Accommodation Boards have been rejuvenated and East Herts Council are engaging with the County Council in very early discussions on the capacity for future provision for a range of clients groups, one of which is Older Persons.

The County Council estimates that the ageing demographics will result in a demand for care homes which will exceed current supply and there will be a need to provide at home support in increasing numbers. The County Council continues to encourage the development of extra care and flexicare schemes in the County. Currently, East Herts has popular schemes at Calton Court and Bircherley Court Hertford and Parkside in Bishop's Stortford. The flexicare model is very popular with residents but can be difficult to manage and implement due to the varying entry levels of needs for residents to make the model viable.

Housing Needs Survey

The Housing Needs Survey asked older people aged 65 and over whether they were planning a move within the next 3 years and their future housing requirements. 32.8% of households would be seeking a bungalow, 22% a flat/maisonette and 16.3% supported housing. 63.8% of households would require owner occupier while 32.1% would be seeking Registered Provider rented accommodation. This indicates a huge demand for smaller accessible units as a high number of respondents had walking difficulties. Sheltered Accommodation was indicated as preference for supported accommodation needs, closely followed by independent accommodation with visiting support. The need for Extra Care housing was also expressed by respondents particularly those of 75 years and above.

Traditionally, Sheltered Accommodation has been for those over 55 years old but the trends appear to be that as we experience an aging population 55 years old is not an age when residents seek sheltered accommodation but prefer to remain in the family home with support. The models of accommodation for older people are being updated as there is a demand for a quality downsizing independent living offer for the active older person. Frail older persons seek out Extra Care facilities which provide specialist accommodation and support

services and the District does have existing excellent schemes but is aware that there is a growing market as people understand the concept.

Disabled Facilities Grants (DFGs)

East Herts Council has a statutory responsibility to provide Disabled Facilities Grants to enable those with a disability to safely access their home and the facilities within it. Eligibility is governed by legislation.⁵ The Council is obliged to consult with Herts County Council as to the necessary and appropriate works in each case. These grants have long been a priority within the Council's housing strategy, yet in recent years there has been a drop in the number of referrals for DFG from the County Council, despite an ageing demographic. The Council is working together with the County Council and other District Councils to improve the local arrangements for such grants.

Services are available through the Council's Building Control service and through the Papworth Trust Home Improvement Agency, to assist the applicant with plans, estimates and supervision of works.

In addition to mandatory Disabled Facilities Grants (DFGs), the Council also offers discretionary means tested DFGs for larger schemes costing in excess of the statutory maximum grant, for certain non-mandatory adaptations such as to enable a disabled person to work at home, and to cover the cost of moving home where this would provide a better solution. Again, in recent years there has been reduced demand for such grants.

Herts Healthy Homes

A free information and support service helps vulnerable residents in Herts stay healthy and safe at home. With a focus on keeping warm, the project was expanded to also cover referrals and advice on other services. It provides home visits to give advice and practical support on energy efficiency, advice on bills and budgeting, fire safety and home security checks, provision of draught-proofing and emergency heaters, and information on insulation grants available from East Herts Council.⁶

Operated through the County's HertsHelp call centre, it is well placed to identify residents who would benefit from East Herts' new Dementia Friendly Homes project.

⁵ Housing Grants, Construction and Regeneration Act 1996

⁶ Herts Healthy Homes. www.hertsdirect.org/hertshelp

Dementia Friendly Homes Project

The number of people estimated to have dementia in East Herts in 2012 was over 1500. This is expected to rise to over 2000 by 2020.

East Herts Council in partnership with Crossroads Care Hertfordshire North successfully bid for funds from Hertfordshire Healthy Homes Local Initiatives Fund 2015/16 to develop an innovative project to provide practical actions to help individuals live well with dementia in their home. The project also receives Public Health funding from East Herts Council.

The project supports East Herts Health and Wellbeing Strategy 2013-18 priorities for promoting positive health and wellbeing life quality for all, and to Hertfordshire's Public Health Strategy priorities for longer, healthier lives, and specific priorities under Hertfordshire's Health and Wellbeing Board Strategy 2013-16 for improving mental health and emotional wellbeing, living well with dementia, and enhancing quality of life for people with long term conditions, and for supporting carers.

A checklist of available measures has been developed, and if the household agrees, the project co-ordinator arranges their installation. The impacts of the service will be evaluated with a view to its future development and delivery.

Key Strategic Priorities, Task and Timeframe

Strategic Priorities

- To work with the County Council and Registered Providers to identify opportunities within the district for flexi-care schemes.
- Continue with the Ageing Well Initiative and monitor the outcomes.
- To work with the Dementia Friendly Programme to mainstream the principles into East Herts accommodation.
- To undertake a strategic review with partners of all Older Persons accommodation provided in the District.
- To participate in the countywide review of housing adaptations to support independent living.

Short-term tasks and timeframe

- To engage with the County Council and Registered Providers to seek opportunities for flexi-care opportunities in the eastern side of the District by March 2016.
- To work with Registered Provider partners to implement the Dementia Friendly Programme in their organisations by December 2016.
- To prepare a database of older persons scheme information for the provision in the District and have an information booklet for residents by December 2016.
- To support Planning Policy in looking at the implications of an older population in the District and the impact on type, tenure and location of housing requirements through the District Plan process by April 2016.
- To continue to support Crossroads Care to develop and deliver the Dementia Friendly Homes project to 200 residents, and to evaluate the scheme by end March 2017.
- To continue to participate in the countywide review of housing adaptations services, in accordance with the project plan and timetable.

Objective 3: Work to meet the needs of vulnerable people in the housing market.

Current Position:

In East Herts there is a range of supported housing provision or signposting facilities to services for a number of client groups including young people, those with mental health issues, drug and alcohol issues, learning disabilities and experiencing domestic violence.

The Council will support the County Council through participating in Strategic Partnership Accommodation Board. The Council are awaiting the market position statements on the client groups being produced by the County Council to inform the conversation around future provision.

Care Act 2014

The Care Act 2014 and its associated statutory guidance impose a duty on County Councils to ensure well-being, including suitability of living accommodation, and a duty on the District Council to co-operate. The guidance recognises that housing or suitable living accommodation is a place which is safe, healthy, and 'suitable for the needs of a person, so as to contribute to promoting physical and emotional health and wellbeing and social connections – a healthy home would be dry, warm and insulated and a safe home would meet particular needs, e.g., of an older person.'

⁷Suitable housing is explicitly listed in the Care Act's definition of wellbeing, and the statutory guidance states that Local Authorities should consider the central role of housing within integration, with associated formal arrangements with housing and other partner organisations.

Thus working with the County Council to develop effective partnerships for appropriately assessing and addressing housing impacts on wellbeing will be a priority within this strategy

Homelessness Data

Part 7 of the Housing Act 1996 and the Homelessness Act 2002 place statutory duties on local housing authorities to provide assistance to people who are homeless or threatened with homelessness. Authorities must consider all applications from people seeking accommodation or assistance in obtaining accommodation. A main homelessness duty is owed where the authority is satisfied that the applicant is eligible for assistance, unintentionally homeless and falls within a priority need group.

⁷ Department of Health. Care and Support Statutory Guidance issued under the Care Act 2014. October 2014

Where a main duty is owed, the authority must ensure that suitable accommodation is available for the applicant and his or her household until a settled home becomes available for them. Where households are found to be intentionally homeless or not in priority need, the authority must make an assessment of their housing needs and provide advice and assistance to help them find accommodation for themselves.

Where the applicant is found to be intentionally homeless but falls in a priority need category the authority must also ensure that accommodation is available for long enough to give the applicant a reasonable opportunity to find a home.

The table below shows the number of homelessness presentations and acceptances over the last 3 years for East Herts.

	2010/11	2011/12	2012/13	2013/14	2014/15
Homeless applications	93	99	79	69	99
Homeless Acceptances	39	40	35	33	49
Percentage of acceptances against applications	42%	40%	44%	48%	49%

The Council has a Homeless Review and Strategy 2013-2018 in place which provides greater detail on the responsibilities and processes in place in East Herts.

Temporary Accommodation

Under Section 188 of the Housing Act 1996 local authorities are obliged to provide temporary accommodation for homeless households who have no other home in which they can reasonably be expected to live.

The Council will continue to monitor the use of temporary accommodation and the use of bed and breakfast. The Council have low numbers of clients needing to use temporary accommodation but has seen an increase in larger family groups requiring assistance. This increase has put pressure on the Council's own Hostel accommodation and the Housing Team look at all the options to ensure that length of stay and cost implications are minimised.

Rough Sleepers

The Communities and Local Government office has issued guidance that says Local

Authorities should use local intelligence from partner agencies about the extent of rough sleeping in its area. Where this indicates that there are more than 10 rough sleepers in an area on any one night then they should carry out a full official count. The Council has monitored annually, since 2004, the number of rough sleepers in one particular week. The last count was November 2014 and four rough sleepers were identified in one night in one week. The Council recognises that there are not many housing options for this client group other than the private sector and has therefore consistently targeted its Rent Deposit Scheme at non-priority homeless people to prevent rough sleeping.

County Council Position via Accommodation Boards

The County Council works with the District Council and partners to look at specific vulnerable groups through Accommodation Boards. These groups include learning disability, physical disability, mental health, aspergers and Housing Related Support.

The District supports these groups through partnership working and looking at housing needs of residents. Often, the key issue is the revenue support required for these groups to provide support and care within the accommodation. The physical housing stock is often suitable for a majority of vulnerable users apart from those that require adaptations such as wheelchair accessible, wetrooms or stairlifts.

Young Persons

The District works with Aldwyck Housing Association with their Young Person's Scheme at Rose Court, Hertford and with the YMCA in Bishop's Stortford. They both provide a flexible accommodation model providing self contained units with support services to enable young people to move on into a tenancy which they can sustain. These are important services as young people find it increasingly difficult to begin and sustain a home in the property market with high deposits and rents required.

Gypsy and Travellers

Local authorities have a legal responsibility to plan for the accommodation needs of the Gypsy and Traveller community. Section 225 of the Housing Act 2004 requires local authorities to consider Gypsy and Traveller sites as part of their Accommodation Assessments and to prepare strategies to meet those needs. In March 2012 the Government, in tandem with the publication of the National Planning Policy Framework (NPPF), issued its 'Planning policy for traveller sites' (PPTS) document, which set the overarching policy context for the provision of traveller

accommodation (to include both Gypsies and Travellers and Travelling Showpeople). This guidance was subsequently superseded by revised version of 'Planning policy for traveller sites', which was issued by the Government in August 2015.

The Planning policy for traveller sites guidance requires local planning authorities to “make their own assessment of need for the purposes of planning” (paragraph 4) and that local planning authorities, in producing their Local Plan, should *[inter alia]* “identify and update annually, a supply of specific deliverable sites sufficient to provide five years’ worth of sites against their locally set targets” and “identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15” (paragraph 10). Thus, an onus is placed on the Council to demonstrate that it can both quantify what the accommodation needs of Gypsies and Travellers and Travelling Showpeople will be for the Plan period and identify locations in which that need can be met, in the same way that it has a duty to meet general housing needs.

The East Herts Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment (ANA), April 2014, produced by ORS on behalf of the Council, identified the accommodation needs of the district to 2031. At the time of writing this Strategy, the ANA is in the process of being updated to take into account the provisions of the revised 'Planning policy for traveller sites' Government guidance and to align timelines with the SHMA. Therefore, it should be understood that the following information regarding projected need may be subject to change following reporting of the ANA update in due course. The table below (taken from Figure 9 of the 2014 ANA) illustrates the requirement for additional pitch provision across the Plan period for Gypsies and Travellers as understood at that time:

Extra Pitch Provision in East Hertfordshire in 5 Year Periods

	2013-2018	2018-2023	2023-2028	2029-2031	Total
Total	7	1	2	2	12

For Travelling Showpeople, the table below (taken from Figure 11 of the 2014 ANA) illustrates the findings of the study in relation to the requirement for extra plot provision across the Plan period:

Extra Plot Provision in East Hertfordshire in 5 Year Periods

	2013-2018	2018-2023	2023-2028	2029-2031	Total
Total	1	1	2	1	5

As stated above, these figures are potentially subject to revision as part of the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, which is currently underway.

Following on from the 2014 ANA, Peter Brett Associates (PBA) completed the East Herts Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, October 2014, (IOPS) aimed at the identification of potential locations where Gypsies and Travellers and Travelling Showpeople accommodation needs might be met, through the provisions of draft District Plan Policy HOU7.

In this context it is important to note that, from both the NPPF and PPTS perspective, the Council must demonstrate a five year land supply of pitches and plots through the identification of 'specific deliverable sites' to meet its needs. Beyond the first five years, it has to identify 'a supply of specific developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15'. Identified sites need to be available, suitable, and developable (i.e. viable and deliverable).

As the findings of the IOPS have concluded that it is not possible to identify a sufficient five year land supply in locations beyond the Green Belt, a Joint Member/Officer Working Group has been established to consider how the Council can meet its requirements through other limited options. Recommendations of the Working Group will be brought forward through the District Plan process via the District Planning Executive Panel's consideration of, currently draft, Policy HOU7 'Gypsies and Travellers and Travelling Showpeople', in due course.

Caravan sites

Caravans include mobile homes and park homes and the types of site include permanent residential sites, and touring and holiday sites.

East Herts has 9 mobile home sites currently listed on the public register.

To run a caravan site a licence is required and this is issued by Environmental Health.

Standard Conditions are attached to a licence to help protect the health, safety and welfare of the residents and visitors. Conditions cover a variety of issues, for example, the number and positioning of the mobile units, safe access around the sites including roads and pathway construction, fire safety, and the supply and maintenance of utilities and equipment on site.

New legislation relating to Mobile Homes came into force in 2013 (Mobile Homes Act 2013) which brings the mobile homes sites licensing regime more closely in line with other local authority licensing processes. The changes address the concerns highlighted in the Communities and Local Government select committee report following an inquiry into the industry.

The Act provides opportunity to raise standards where needed and encourages site owners to offer a more professional service. It removes the opportunity for blocking sales and allows the Council to take effective enforcement action against those operators who fail to comply with their licence obligations.

The changes also allow the Council to charge a licensing fee for 'relevant protected sites'. Before doing so, the Council must publish a fees policy and this is planned to take place during the Council's annual fees and charges review.

Key Strategic Priorities, Task and Timeframe

Strategic Priorities

- To engage with private landlords with the aim of increasing the availability of privately rented homes for households in housing need.
- To work with the Accommodation Boards to undertake a strategic review of Vulnerable Peoples Needs in the District
- To ensure that our Temporary Accommodation offer is fit for purpose.
- To seek to work with the county council to develop effective partnerships for appropriately assessing and addressing housing impacts on wellbeing.

Short-term Tasks and Timeframes

- To have a dedicated Officer in the Housing Team to deal with private rent sector and have networks in place to aid those in housing need by December 2016.
- Undertake a review of temporary accommodation provision in the District by December 2016.
- To review the effectiveness of the referral and move-on process with the Young Persons Project and the YMCA by July 2016.
- To publish a fees policy for relevant protected caravan sites by December 2016.
- To provide a checklist of key housing hazards requiring referrals by health and care professionals for housing assessment.

Objective 4: Seek to support rural communities in meeting their local housing needs.

Neighbourhood Planning

Neighbourhood Planning was introduced by the Government through the Localism Act 2011 and on the 6 April 2012 the Town and Country Planning England Neighbourhood Planning (General) Regulations 2012 came into force.

Neighbourhood Planning gives communities the right to shape development through the production of Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders. Neighbourhood Development Plans can set out a vision for an area and planning policies for the use and development of land.

Neighbourhood Planning has been progressed by a number of areas in the District and they are at various stages. One of the first stages to neighbourhood planning is to apply for area designation, the following areas are undertaking the Neighbourhood Planning process:

- Hertford Heath
- Brickendon Liberty Parish
- Buntingford Area
- Bishop's Stortford Central, South and All Saints and part of Thorley
- Walkern
- Standon
- Braughing
- Eastwick and Gilston and Hunsdon Parishes
- Much Hadham
- Sawbridgeworth

Those who have adopted plans are:

- Bishop's Stortford Silverleys and Meads Wards

Neighbourhood Planning is a key way for rural communities to identify and meet their local housing needs. It is a community based plan that can help to look at the size, tenure and potential locations of new developments in the parish or village.

Parish Housing Needs Surveys

The Council supports the Rural Enabler based at the Community Development Agency for Hertfordshire. The Rural Enabler can help Parishes to identify current and concealed housing needs in the parish through a Parish Housing Needs Survey.

Parish Housing Needs Surveys can provide key information on who in the Parish is seeking a move within the Parish or who would like to return to the Parish.

Rural Exception Sites

An exception site is one that would not usually secure planning permission for housing. It is important that rural exception affordable housing schemes are needs led, the starting point being that a need for affordable housing exists in the parish, rather than the availability of a particular site.

The ability of the proposed scheme to meet identified local affordable housing needs must be clearly demonstrated. This will be assessed using the Council's Housing Register and other available up-to-date housing needs assessments.

Localism will have an increasingly important influence on the shape of smaller rural settlements and the balance of rural housing stock. Parish Councils will be encouraged to identify sites in Neighbourhood Plans suitable for community-led affordable housing, including rural exception affordable housing sites.

Policy HSG5 (Rural Exceptions Affordable Housing) in 2007 Local Plan sets out the current policy position. The emerging District Plan contains a revised policy (Policy HOU4) which includes a criterion to ensure that housing permitted through this policy remains 'affordable' in perpetuity,

Energy Efficiency

Higher levels of fuel poverty may be found in the rural north of the district, particularly in homes which are off-gas, poorly insulated and hard to treat. The Council's recently adopted Fuel Poverty strategy action plan will allow for targeting of assistance to such homes.

Key Strategic Priorities, Tasks and Timeframes

Strategic Priorities

- to work with Parishes to identify local housing needs through Neighbourhood Plans and Parish Housing Needs Surveys.
- to ensure that any potential Exception Sites are delivered in partnership with all interested stakeholders.

Short-term Tasks and Timeframes

- to engage with a Parish on carrying out at least one Parish Housing Needs Survey by December 2016.
- To provide information as requested to aid with Neighbourhood Planning as an ongoing initiative.

Monitoring

This Strategy will be monitored through an annual update to the East Herts Council Scrutiny Committee where the progress on short-term tasks will be reported and new tasks and timeframes set out.

Summary

This Strategy documents sets out the current policy position at national and local level on aspects of housing tenures and their delivery in the District. The Strategy is a strategic document which signposts to daughter documents with greater detail. The key aspects to note are the Strategic Objectives, Strategic Priorities, Short-term Tasks and Timeframes which are summarised in the table below:

Strategic Objective 1: Enable affordable housing delivery through partnership working and maximising suitably located and constructed development opportunities, whilst ensuring the best use of existing stock.	
Strategic Priorities	Short-term tasks and timeframes
<p>Achieve the right mix, tenure and proportion of affordable housing on new developments based on need.</p> <p>Maximise funding opportunities for the delivery of new affordable housing.</p> <p>Raise standards in the private sector, particularly in Houses in Multiple Occupation (HMOs)</p>	<p>Utilise and disseminate the information to partners contained within the Housing Needs Survey by September 2016.</p> <p>Commit to projects which ensure best value spending of commuted sums on affordable housing in the District by December 2016.</p> <p>For the Council to be involved in a multi-agency working group being set up to develop a rogue landlord project for participating Herts authorities, subject to confirmation of funding by July 2016</p> <p>To commission and facilitate a stock modelling survey and provide key health data to the Joint Strategic Needs Assessment, by December 2016.</p> <p>To inspect and initiate action in at least 10 HMOs per year.</p> <p>To develop and publish a Statement of Principles for imposing penalty charges for breaches of the</p>

	<p>Smoke and Carbon Monoxide Alarm Regulations by July 2016.</p> <p>To review the Housing Enforcement Policy in the light of the Deregulation Act restrictions on retaliatory eviction, by June 2017.</p>
Strategic Objective 2: Focus on meeting the housing needs of active and frail older persons.	
Strategic Priorities	Short-term tasks and timeframes
<p>To work with the County Council and Registered Providers to identify opportunities within the district for flexi-care schemes.</p> <p>Continue with the Ageing Well Initiative and monitor the outcomes.</p> <p>To work with the Dementia Friendly Programme to mainstream the principles into East Herts accommodation.</p> <p>To undertake a strategic review with partners of all Older Persons accommodation in the District.</p> <p>To participate in the countywide review of housing adaptations to</p>	<p>To engage with the County Council and Registered Providers to seek opportunities for flexi-care opportunities in the eastern side of the District by March 2016.</p> <p>To work with Registered Provider partners to implement the Dementia Friendly Programme in their organisations by December 2016.</p> <p>To prepare a database of older persons scheme information for the provision in the District and have an information booklet for residents by December 2016.</p> <p>To support Planning Policy in looking at the implications of an older population in the District and the impact on type, tenure and location of housing requirements through the Local Plan process by Spring 2016.</p> <p>To continue to support Crossroads Care to develop and deliver the Dementia Friendly Homes project to 200 residents, and to evaluate the scheme by end March 2017.</p> <p>To continue to participate in the countywide review of housing adaptations services, in accordance with the project plan and timetable.</p>

support independent living.	
Strategic Objectives 3: Work to meet the needs of vulnerable people in the housing market.	
Strategic Priorities	Short-term tasks and timeframes
<p>To engage with private landlords with the aim of increasing the availability of privately rented homes for households in housing need.</p> <p>To work with the Accommodation Boards to undertake a strategic review of Vulnerable Peoples Needs in the District.</p> <p>To ensure that our Temporary Accommodation offer is fit for purpose.</p> <p>To seek to work with the County Council to develop effective partnerships for appropriately assessing and addressing housing impacts on wellbeing.</p>	<p>To have a dedicated Officer in the Housing Team to deal with private rent sector and have networks in place to aid those in housing need by December 2016.</p> <p>Undertake a review of temporary accommodation provision in the District by 2016.</p> <p>To review the referral and move-on process with the Young Persons Project and the YMCA to ensure it is working effectively by July 2016.</p> <p>To publish a fees policy for relevant protected caravan sites by December 2016.</p> <p>To provide a checklist of key housing hazards suitable for referrals by health and care professionals for housing assessment.</p>
Strategic Objective 4: Seek to support rural communities in meeting their local housing needs.	
Strategic Priorities	Short-term tasks and timeframes
To work with Parishes to identify local housing	To engage with a Parish on carrying out at least one Parish Housing Needs Survey by December

<p>needs through Neighbourhood Plans and Parish Housing Needs Surveys.</p> <p>To ensure that any potential Exception Sites are delivered in partnership with all interested stakeholders.</p>	<p>2016.</p> <p>To provide information as requested to aid with Neighbourhood Planning as an ongoing initiative.</p>
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Glossary

Affordable housing: This includes social rented and intermediate housing provided to specified eligible households whose needs cannot be met by the market. Affordable housing should cost less than similar sized housing on the open market and be available at a sub market price in perpetuity.

CBL: Choice Based Lettings: the aim is to allow households on the housing register to make informed choices regarding their future homes. Homes are advertised to eligible households people on the housing register who bid for homes they would like to live in. East Herts participates in a sub-regional scheme called HomeOptions.

District Plan: The strategic planning document in the East Herts Local Development Framework that sets the principles of development and identifies broad locations for growth.

Dwelling: A self-contained unit of accommodation where all the rooms and facilities available for the use of the occupants are behind a front door.

Flexicare: Very Sheltered Housing: self-contained housing with care for older people requiring at least 4 hours care per day. Also known as Extra Care Housing

Household: One person living alone or a group of people who have the address as their only or main residence and who either share one meal a day or share a living room.

HCA: Homes and Communities Agency (HCA): the single national housing and regeneration agency for England.

Housing need: The situation in which households lack their own housing or are living in housing which is inadequate or unsuitable and are unlikely to be able to meet their needs in the housing market without some assistance.

Housing Register: A database of all individuals or households who have applied to a local authority or RP for a social tenancy or access to some other form of affordable housing.

Intermediate housing: A generic term for a number of different types of housing which lie between social rented housing and market housing in terms of costs to the householder. Shared equity, sub market rent and low cost homes for sale are examples of intermediate housing.

Registered Providers: Independent not for profit organisations registered with and regulated by the Housing Corporation. Also known as Registered Social Landlords or RSLs, and Registered Providers (RPs)

Shared Ownership: A means of helping people into home ownership. The buyer purchases a share of their home, with the remaining share being held by another party, usually a housing association. The other party will redeem their share when the home is sold.

SHMA: Strategic Housing Market Assessment; technical study that assesses housing need and demand.

Social rented housing: Decent homes provided to rent at below market cost for households in need by Local Authorities or Registered Social Landlords (RSLs).

Sustainable communities: Places where people want to live and work, now and in the future. They meet the diverse need of existing and future residents, are sensitive to the environment, and contribute to a high quality of life. They are safe, inclusive, well planned, built and run, and offer equality of opportunity and good services for all.

Under-occupation: An under-occupied dwelling is one which exceeds the bedroom standard by two or more bedrooms.