

At home in Tewkesbury Borough

A housing strategy for our borough 2017-2021

Consultation Response Report

October 2016



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1. Purpose of report

1.1. This report has been prepared to demonstrate how Tewkesbury Borough Council have involved the public and other key stakeholders in connection with the preparation of the Housing Strategy 2017-2021, including the council's Homelessness and Homelessness Prevention Strategy (in accordance Homelessness Act 2002) and Tenancy Strategy (in accordance with the Localism Act 2011).

1.2. The Homelessness Code of Guidance for Local Authorities¹ states that:

“Under the Homelessness Act 2002 all housing authorities must have in place a homelessness strategy based on a review of all forms of homelessness in their district...The strategy must set out the local authority's plans for the prevention of homelessness and for securing that sufficient accommodation and support are or will be available for people who become homeless or who are at risk of becoming so. Housing authorities will therefore need to ensure that all organisations, within all sectors, whose work can help to prevent homelessness and/or meet the needs of homeless people in their district are involved in the strategy.”

2. Process of developing and consulting on the Housing Strategy

2.1. The housing services team prepared an evidence base that aimed to draw in all aspects of housing, including new-build development, homelessness and housing-related services.

2.2. The evidence base included a range of data to illustrate the current position of Tewkesbury Borough from which 4 key priorities and supplemental objectives could be extracted. The team consulted on this to identify if there were any gaps in the council's evidence.

2.3. The consultation was open to all for a period of 6 weeks from Tuesday 6th September 2016 to Tuesday 18th October 2016. Emails were sent to our partners including housing and housing-related services, housing developers both social and private, social care services and health, the Tewkesbury financial inclusion partnership, parish councils and borough councillors linking them to the papers online where they could respond formally via a questionnaire.

2.4. A consultation event was held on Tuesday 12th October 2016 at Tewkesbury Borough Public Services Centre in Tewkesbury Town. The consultation event representatives were asked for their views similarly as per the consultation questionnaire. They were able to express their views at the event and/or submit a full consultation questionnaire response. The majority opted to not give additional views via the questionnaire.

3. Organisations attending the partner session

3.1. The partner's session ran from 1pm-3pm on Wednesday 12th October. In addition to Tewkesbury Borough Council's service teams present – planning policy, finance, housing and community development – there were 10 organisations attending the partners session as follows:

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7841/152056.pdf

- Severn Vale Housing Society – affordable housing provider
- DB Land and Planning – private developer of affordable housing
- Stonewater – affordable housing provider
- Furniture Recycling Project
- Stroud District Council
- Mears Safe at Home
- Youth Support Team (Prospects) Gloucestershire County Council
- National Landlords Association
- Department for Work and Pensions
- Gloucestershire Rural Community Council

4. Representations made during public event

4.1. The open session ran from 4pm-6pm on Wednesday 12th October and the following made representations.

- Tewkesbury Borough Councillor
- Gotherington Parish Council
- Highnam Parish Council
- Twyning Parish Council
- Winchcombe Parish Council
- Boddington Parish Council
- Norton Parish Council
- Gretton Parish Council
- Save the Countryside
- Wheatpieces Parish Council
- Minsterworth Parish Council
- Member of the public

5. Review of consultee representations

5.1. A full review of all consultee representations will be undertaken by the Housing Strategy Working Group. This group consists of service managers and councillors that oversee the development of the Strategy.

5.2. Many of our respondents have already been contacted regarding their representations.

5.3. Many issues raised by the consultees that, whilst the evidence base did discuss, were felt that not enough onus placed on. An example older people and housing our growing elderly population.

5.4. The evidence base will be further updated where possible and necessary to do so.

6. Approval of the Strategy

6.1. From the updated evidence base and the consultee representations, a Draft Housing Strategy will be developed by the Housing Strategy Working Group.

- 6.2. The draft will be presented to Tewkesbury Borough Council's Overview and Scrutiny Committee on 10th January 2017.
- 6.3. The final Housing Strategy document will go to Council on 24th January 2017 for adoption.

Appendix 1: Consultation event responses

The following points were all those expressed at the consultation event on Wednesday 12th October 2016. The points are written verbatim.

Priority 1 - Increasing the supply of housing

Objective 1 'Encouraging new developments to meet the aims of the Joint Core Strategy'

- Strongly agree with this priority
- Make sure there's the right dwelling size to meet local needs (SHMA)
- Pre-fab housing can support and fill a need, it is also possibly a temp. temporary) measure so land can be leased rather than bought.
- Speed up local plan process to provide more robust planning framework leading to less ad hoc but more sustainable development

Objective 2 'Develop housing policies in the Tewkesbury Borough Plan that facilitates and enables affordable housing delivery'

- Strongly agree
- Should state if preference is to have affordable housing on site.
- Enforcing a 40% affordability on developments
- Affordable housing to be TBC's (Tewkesbury Borough Council's) No.1 priority
- Location of affordable housing - rural in parishes where no housing *problems with cost effectiveness
- Type, tenure and cost most important
- Constantly update housing needs surveys so that they can always current

Objective 3 'Using financial sums from development to fund the building of more specialist and affordable homes'

- Developers should support local needs
- Need to encourage parishes to have housing needs surveys
- Parishes could pay through CIL
- Carefully identify which specialist accommodation is required

Objective 4 'Bring empty homes back into use across the borough'

- Empty homes lo*** (unreadable)
- Promoting this and guarantee a minimum income
- Use empty homes fund
- Not that easy. Difficult to bring empty homes into. Standards. In practice. Longer leases for RSLs (registered social landlords). Financial consideration. Look at different models. Product standards.
- Think about purchasing town centre properties, redeveloping the empty flats etc then re-letting them.

Objective 5 'Investigate how alternative constructive methods can speed up delivery of new homes'

- A good way to meet housing need at an affordable cost
- Not a priority until it become mainstream

- Could be useful
- Exploring private rented
- Some registered providers looking to move into private rental

Objective 6 'Maximise the opportunities of the private rented sector'

- Guarantee scheme covering rent and damage. Direct payments. Act as managing agent. Better job, better price.
- Identify suitable private rent landlords or organisations willing to provide basic cheap accommodation for vulnerable young people care leavers
- Make renting attractive to landlords e.g. rent guarantee for vulnerable tenants. Make landlords want to present themselves to Local Authority
- Landlord incentive schemes. Works in exchange for renting on LHA (local housing allowance) tie them in for 5-10yrs.
- Range of products/options; rent to buy, open market sales for x subsidy (cross-subsidy), not limited by definition.

Other/ general comments under this priority

- Share good practice other authorities who are further advanced with this [housing strategy] process
- Responsive planning officers
- Training for councillors to enable them to support housing planning applications
- Look at funding other ways of getting social housing
- Meeting aspirations
- Planning compensate cash to disaffected residents blocking planning (alternative use of s106 money)
- Joined-up thinking and planning - we still seem to have planning silos not talking to each other.
- Council to hold yearly seminars with parish councils; discuss the benefits of affordable housing
- Predisposition in rural village where development takes place to build smaller homes to balance the loss of smaller homes through extensions.

Priority 2 - Prevent Homelessness

Objective 1 'Continue to improve the proactive homelessness prevention programme'

No specific comments given

Objective 2 'Implement and follow the GOLD Standard'

- What is the GOLD Standard? - Does this lead to following funding opportunities
- Not sure how useful this is? What to gain?
- So what is it; why a good thing; and why help to achieve housing strategy

Objective 3 'Evaluate implications of Welfare Reform changes and establish options to minimise the risk of homelessness'

- Biggest priority
- Definitely agree on evaluating implications of welfare reform

Objective 4 '

- Increase temp. (temporary) accommodation - private and social LL (landlord) - rent guarantees
- Yes - provide other alternatives to this

Objective 5 'Review the provision of temporary accommodation in the borough'

- Disagree with use of the word 'stop'. There might always be a need.
- B&B is very inefficient. A management company who are publically accountable better.
- Provide t/a (temporary accommodation). S106, RPs, Empty homes, PSL (private sector lettings) schemes
- FRP (Furniture Recycling Project) - furnished accommodation T/A (temporary accommodation).

Other/ general comments under this priority

- Local Authority to purchase 1 per development a s106 property and social engineer that family into the area to mitigate social problems
- Publicising help available
- Looking at planning - what's needed. S106 monies for appropriate accommodation. Flexibility in approach
- Improve access to the private rented sector e.g. help deposits etc.

Priority 3 - Meet housing needs of those who need it most

Objective 1 'Consider updated SHMA and GTTSAA outcomes to assess the needs of our communities'

- Should we act on outcome rather than consider
- We query the word communities? Most communities won't want travellers
- Balancing communities i.e. number of travellers vs the settled community
- Council should identify land for gypsies/travellers, buy the land (partner with via housing associations?) and let them (the gypsy and travelling community) buy it with all the appropriate facilities built ready for occupation.

Objective 2 'Promote and facilitate rural affordable development'

- Fix the number of years that a HNS (housing needs survey) is current for and educate parish councils of that period.
- Strongly agree (Derek's portfolio!) Important to keep local connection. Important to support economy and vitality of rural areas.
- Ensure a flexible range of housing is available in rural areas.

Objective 3 'Work with the health and social care sectors to provide effective housing-related support for vulnerable people'

- Add in using HA's, PRS, social services + 3rd sector partners. Needs to be a collaborative approach across all sectors, Should wording be - continue and provide these services.

Objective 4 'Build relationships with partners to collaboratively seek housing solutions as early as possible'

- As above, is this most business as normal rather than a strategic objective

Objective 5 'Evaluate the provision of accommodation-based support for specific groups

- Making sure something suitable is available. S106 - adaptable properties i.e. bungalows
- Breaking the cycle re: supported housing and those 'failing' in the time SP (Supporting People) are expecting them to then be fully functioning adults with high enough incomes and able to sustain tenancies/

Objective 6 'Work with partners to facilitate appropriate accommodation for refugees and asylum seekers as legislation and policy requires'

- What can Tewkesbury Borough [Council] do to ensure that re-housed refugees are welcomed and supported within the borough and through local town and parish council links.
- Also how can refugees receive mentoring etc to help alleviate isolation.

Other/ general comments under this priority

- Information base important. V. (very) important for partners to know where need is
- Priority: health i.e. social care connections, need to work with them
- Should there be something about making the best use of existing housing!!

-
- Clarification: what is need it most!! Which groups are these: does it mean elderly for example??
 - Greater focus on provision of Retirement Homes to unlock family homes to facilitate greater mobility.
 - Properties should not require aids and adaptations but have particular features; this would also decrease costs such disabled facilities grants.
 - Lifetime homes as standard
 - Bungalows on each 106 site – just a couple – affordable
 - Housing need is not only for poor people. Single older people can be asset rich and cash poor. Loan scheme or swap scheme.
 - Build more bungalows and offer incentives for tenants in larger houses to downsize
 - Housing associations are not good. Far better to do the reduced equity schemes suggested. No fat cats getting fatter.

Priority 4 – Enabling local people to find their own solutions

Objective 1 ‘Promote opportunities for first time buyers and economically active households to access the market’

- Encourage small developers and Housing Associations to register for the Help to Buy Scheme.
- Support but how will TBC promote this and make communities aware. Mayne work with GRCC.
- Help to Buy roadshow could go to university to promote access
- Do people know about Help to Buy
- Does this mean all housing/any housing e.g. new development
- Add into s106 as a planning condition that developer must register for the Help to Buy Scheme
- “Education” for local people – how does it work; how do you get a house? For example!! (Manage expectations)

Objective 2 ‘Work with private landlords to ensure their properties meet basic standards and support them to improve the condition of properties in the Borough’

- Landlords forum; event; attract landlords interest.
- Strongly agree

Objective 3 ‘Continue working with and supporting schemes that provide advice and assistance to vulnerable households to help them reduce fuel costs and promotes safety through the installation of minor adaptations in the home’

- Disrepair properties in private sector should be repaired and used for homeless households
- Not quite sure what this means...is it about informing people about possible solutions...?

Objective 4 ‘Work with our partners to actively encourage individuals to take up educational, employment or other activities to support independence and create a sense of worth’

- Establish better communications with DWP staff regarding universal credit/JSA/ESA claimants and their housing needs or situation.
- Weren’t sure if this fitted here? Might be that nowhere else for it to be put.
- Increase communications with local people, town and parish councils etc about opportunities.
- What are the barriers to work? Can the council better link with DWP et al to facilitate this?

Other/ general comments under this priority

- Clauses around how people behave when in rental are a must
- Increase communications with local people and increasing contact with parish councils – councillors and clerks – and borough councillors.

Responses to the question: Please state one action you believe the council should take in the next 12 months?

- Preventing homelessness as a priority
- Key priority - Increasing supply of housing
- Ageing population - rural needs
- Prioritise funding for the prevention of homelessness
- Key priority - Develop housing policies in the Tewkesbury Borough Plan that facilitates and enables affordable housing delivery
- Complete its Local Plan
- Re-educate council members on the importance of supporting affordable housing at committee
- Work with Parish Councils rather than imposing solutions on them – be consistent with local NDPs (neighbourhood development plans)
- Councillors be brave enough to disagree with the parish council and residents
- Ensure there is appropriate affordable homes in the rural villages
- Identify suitable housing stock for move on accommodation for vulnerable young people and in particular care leavers.

Responses to the question: How can your organisation support Tewkesbury Borough Council in meeting the priorities of the Housing Strategy?

- GRCC - Work with TBC, Housing Associations – to identify housing needs and identify opportunities to provide affordable housing
- Mears - Advice and information on keeping homes in repair and carrying out adaptations; provision of housing, extra care and new build (always open to discussion)
- FRP – can supply quality affordable furniture and appliances to the people who most need it; we can and do accept vouchers and purchase orders from all departments.
- Stonewater – can offer a flexible range of affordable housing, including older housing need, supported housing, foyers and a mix of tenures rent and shared ownership, rent to buy, market sale.

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Appendix 2: Questionnaire responses

The following points were all those expressed via the questionnaire. The points are written verbatim.

Respondent 1

General comment - I've just scanned your consultation document and see that one of your actions will be to evaluate accommodation-based support services. This is just to say that [my colleague] and I will be very happy to work with you on that.

Respondent 2

General comment - There's loads of really great content in here, but can I suggest that the Strategy is passed to another staff member – preferably not a housing person – to proof read? I think there's some jargon in there which could do with being explained, and none of us can ever see our own drafting errors, no matter how carefully we look!

Respondent 3

Slowly but surely, this village is losing its full time population. Each year some 3 or 4 houses/cottages come on the market and they are, more often than not, purchased as second homes. Eventually this trend will have an economic impact on the village, the pub and the Church. In my view, there is a need to build a limited number of lower priced homes to balance this trend. Somewhat inevitably, the view amongst residents is mixed but unless this change is made, the village will die.

Respondent 4

Priority One - These are ok, but we have one or two points to feedback;

Regarding this objective - Develop housing policies in the Tewkesbury Plan that facilitates and enables affordable housing delivery to meet our Council Plan target of 150 new affordable homes per annum.

We didn't think this was ambitious and wondered how the 150 linked back to the JCS?

Regarding this objective - Using financial sums from development to fund the building of more specialist and affordable homes.

[Name of employee] thought that there was case law preventing you from being able to do this. He's going to have a look to see if he can find anything. If he can, we'll forward it on.

Regarding this objective - Maximise the opportunities of the private rented sector

We thought this was too vague. Need to clarify what you intend to do here.

We thought that what was missing here was an objective about working with developers through the planning process.

Priority Two - We thought this objective should say 'reduce' rather than stop -Stop the use of B&B accommodation for homeless households.

Regarding this objective - Implement and follow the GOLD Standard.

We are not sure what the strategic relevance of this is and we couldn't see reference to what this is / what it means in the draft Strategy – if you are going to refer to this as one of the authority's key objectives, you need to explain what it is / why it is a good thing and why it'll help housing need strategically.

Not knowing what the above Gold standard is, we would like to propose a review of homelessness services – decisions made (intentionality v's accepted duty for homeless applications) and how often the PRS is used to discharge homelessness.

We think a key objective should be an increased use of PRS to discharge homeless duty.

Building on the homeless prevention objectives above, we think there's an opportunity to prevent homelessness by working proactively with landlords prior to warrants being requested.

Priority Three - Regarding-Consider the outcomes of the SHMA and GTTSAA to assess the housing needs of our communities. Should you not add 'Consider and act on the outcomes....'

Regarding-Evaluate the provision of accommodation-based support for specific groups including survivors of domestic abuse, young people and teenage parents. Why target these groups specifically; survivors of DV, young people and teenage parents? The data shows an increasing unmet housing need for older people. We feel that the Strategy needs to focus on this group. We could not see the evidence to support focussing on the groups identified in this objective.

Regarding-Build relationships with our partners to ensure that housing solutions are sought at the earliest possible stage.

We thought this more business-as-normal, rather than a strategic objective.

Regarding-Working with the health and wellbeing sector to provide effective housing-related support for vulnerable people

Don't forget housing associations, PRS, social services and third sector partners. Needs to be collaborative approach across all sectors.

Priority Four - We thought that what was missing from this was; Use of brownfield sites (e.g. garages); working with partners to make better use of this land / build homes to meet housing need.

How will TBC promote housing options / raise awareness (other than Homeseeker) to ensure local people find their own solutions?

Table 4 – page 7 – it would be good to reflect surrounding local authority price difference (home ownership), rather than just UK difference.

Regarding - Work with private landlords to ensure their properties meet basic standards and support them to improve the condition of properties in the Borough.

Unable to see in the Strategy that this is a particular issue. Would be interested to see the data that supports this as a priority.

Regarding - Continue working with and supporting schemes that provide advice and assistance to vulnerable households to help them reduce fuel costs and promotes safety through the installation of minor adaptations in the home.

And, Work with our partners to actively encourage individuals to take up of educational, employment or other activities to support independence and create a sense of worth.

We're struggling to understand how these support the priority Enabling Local People to find their own solutions. Do these sit here?

Top three actions for the next 12 months:

1. Finalise JCS
2. Homelessness prevention and welfare reform
3. Focus on developing an integrated solution for older people

How your organisation can support Tewkesbury Borough Council to deliver these priorities:

1. Contribute to building new homes in support of JCS.
2. Look at innovative solutions to brownfield sites, working in partnership with TBC
3. Contribute to the provision of retirement housing in the borough.

General Comment - Too much information in the housing strategy on welfare reform, but no strategic vision for managing the impact across the borough (e.g. investing in shared accommodation provision / investing in a pilot with social landlord/s to ensure provision of accommodation for those under 35 years).1) "...will be required to" – this isn't right. Pay to Stay is only mandatory for local authority landlords. Housing associations can choose to introduce it or not. You might wish to comment in the Strategy how this might impact on Tewkesbury residents as different landlords may or may not choose to implement this. What could TBC do in response – if anything? Do you need to say that you'll seek to engaged RPs to try and establish a common approach locally? Might TBC want to try and influence these discussions?

Devolution – needs housing to be an integral part of this. Also need clarification from the housing strategy how you intend to do this.

No mention of reablement services for older people to prevent bed blocking – working with social landlords and health partners to explore this.

There's too much focus in the housing strategy on young people & homelessness – what about the needs of older people across the borough? Also, we know there's a problem accommodation a number of single homeless men who have complex needs. We couldn't see mentioned in the Strategy how this was going to be dealt with.

In the Housing & Planning Act 2016, local authorities have to sell higher value assets. We don't want to assume that as TBC is a non-stock holding LA that this doesn't apply (does the Act require TBC to sell other non-housing assets?). If it does, what is the strategy to deal with this?

How are you going to reinvest RTB receipts in ensure the provision of new affordable accommodation.

How does TBC want to respond to VRTB? Strategically, are you going to try and influence your local RPs or are you going to accept whatever RPs decide to do? What impact could this has for TBC if all RPs decided that the only stock that they'll open up to VRTB is their rural stock? What about the larger RPs who could VRTB properties in Tewkesbury borough, but rebuild using the income elsewhere – somewhere cheaper – if they're national, they could sell in Tewkesbury, build in Leicester!

What is TBC's definition of 'affordable' – is this the same as the government (e.g. low cost homeownership)?

What about council tax on second homes?

On page 29 – Affordable rent conversion rate. It is quoted that social rents have risen by 35%, but you have not explained the context within which social rent are set. Given that this Strategy is a public document, it's important that people reading it understand how social rents are regulated.

First point to make is that all social rents are set using a government prescribed formula. Social housing providers do not have a choice about how they set their rents. For a number of decades, the government wanted social rents to be more in line with market rents and therefore implemented a rent conversion rate.

Next point to make is that the government introduced a new 'affordable' rent (80% of market rent) to enable housing associations to build new properties whilst the government reduced the amount of public grant that was available for new builds.

The latest government imposed rental change was the 1% rent cut.

The Strategy doesn't comment on the impact of these challenges for housing and what this means specifically for Tewkesbury. Does TBC want to support social landlords strategically and if so, what can you do as part of the housing strategy to support them building new accommodation to help ease housing need in the borough?

Regarding the below paragraph on page 45;

"Discussions with our local Registered Providers have indicated that following the 1% rent reduction and assessments of their financial position, they are seeking alternatives to their current ways of working. This is particularly important when the council has become increasingly more reliant on them to provide Affordable Housing. Some are looking to reduce non-essential elements of the business such as community work, levying service charges to counteract the impact of these reductions and also bringing in stricter affordability levels to house only those tenants with good payment histories to guarantee rent is paid".

This feels completely out of place under the section 'Housing Standards'. It appears to be a standalone comment, with no link to the Housing Strategy – there's certainly no strategic vision linked to the changing national context within which social housing providers operate and how this might link to TBC / residents of Tewkesbury borough and what Tewkesbury is going to propose in response.

It also doesn't read that the council understands and supports the need for RPs to manage their resources effectively in order to maximise the development of new homes.

This paragraph says that some RPs looking to reduce non-essential elements of the business such as community work, but we don't believe that this is the case. For our part, we may have stopped funding a team out of

core rent, but in its place we have created a new Grants & Social Value Officer post that so far has submitted £1.5million of community investment bids in partnership with local organisations that will directly benefit our communities if successful.

Likewise, there's little appreciation in the above statement that RPs that have good processes in place and are able to collect legitimate service charges and effectively manage the risk to their income streams through their allocations are more likely to have the financial viability needed to create / build new homes.

It just reads like a bit of a moan and not strategic.

Page 29 – Rent in Advance. You say that RPs are applying this sensitively and that TBC will continue to work with partners to ensure sensitivity / no financial hardship. What the Strategy doesn't say is what TBC can do to help prepare Housing Applicants for the responsibilities that come with accepting a tenancy (PRS or social); what can TBC do to ensure tenants wishing to apply for accommodation are prepared financially? Can you promote money advice services / encourage people to look at their income and expenditure?

Re the above, again, you've not set the context for this recent development across the sector – welfare reform.

Page 30 Affordable Rents – the Strategy states that it has been confirmed that LHA will apply to supported and sheltered from April 2017. This is not correct. Damian Green announced in July that he was reviewing this decision and we are relieved to confirm that the Government have decided not to implement LHA to supported or sheltered. A new funding approach will be implemented for supported & sheltered from 2019 (please see attached). There's no section that sets the strategy within the national context; a lot of the above comments could easily be resolved if you laid out at the start the huge changes that have been enforced across the housing, the drive for home ownership / the increase in PRS, diminishing stock of social housing, no government investment in new build social housing, and the significant welfare changes; how this has impacted on housing locally and then you can start to outline how TBC are going to respond.

Respondent 5

General Comment - I am disappointed that there is no recognition of care leavers as a vulnerable group and therefore no clear strategic pathway on how TBC will ensure their duty as a corporate parent is delivered. As housing becomes even more restricted I feel it important that we set out in strategies some consideration and our commitment to all vulnerable groups which includes young people leaving care. I welcome any feedback from yourselves on how we can ensure this is addressed in the current strategy.

Respondent 6

Priority One - The Housing Strategy identifies the greatest increase in population growth is from people aged 65+. In past council reports (Housing Need 2009), it suggests 84% of older people are owner occupiers either owning their home in full or with a mortgage. The same report shows over half of these people (53.5%) under occupy their home.

A recent report 'State of the Nation's Housing: An ILC-UK Factpack' from the International Longevity Centre (ILC) highlights a major national issue of baby boomers being stuck in housing that is unsuitable for their needs. This has the affect of stifling the housing movement in the property market.

Hanover supports initiatives that encourage the building of more specialist homes and especially those that create aspirational, future proofed retirement communities. To stimulate the housing market new homes need to appeal to a wide audience and provide choice with mixed tenure and outright sale solutions. 84% of older people in Tewkesbury own their own home and generally people aspire to stay in the same housing tenure. Hanover would welcome opportunities that stimulate sale and affordable development for older people. Specialist accommodation, such as Extra Care targeted for the low to mid-market requires subsidy to make sites viable we therefore support this objective.

The Housing Strategy identifies a significant population growth for the older old, those over 80. An aspirational private rented offer which combined health and wellbeing services would provide a further choice for existing owner occupiers and encourage people to Downsize.

As part of the above objectives it would be helpful for these points to be considered.

Priority Two - In addition to the above, which [Name] agrees are sound preventative measures to reduce homelessness, Hanover would also like to see initiatives to encourage people to Downsize into aspirational retirement housing. Stimulating housing movement at the end of the property chain will increase the supply of family and other housing. Purpose built retirement housing provides solutions for older homeless people, those unable to stay in their current home because of care and support needs.

Priority Three - [Name] fully supports the approaches detailed above. The objectives [Name] can provide the greatest support to the council are:

- Working with the health and wellbeing sector to provide effective housing-related support for vulnerable people
- Build relationships with our partners to ensure that housing solutions are sought at the earliest possible stage.

The Housing Strategy makes reference to a 30% increase in older peoples housing needs especially those who are frail elderly, have mental health conditions or have a need for housing support. Further it describes how 96 people have a medical condition made worse because of their housing conditions.

This shows the demand for support that helps people to live independently for longer.

To meet future customer's needs proactively, Hanover is redesigning our offer and services. Our new retirement model dovetails with our Health and Wellbeing Strategy. Features include a community navigator who will connect and identify links to local services and encourage customers to be outward looking as they build relationships. A wellbeing menu of services will provide choice and opportunities to buy services to increase people's wellbeing and independence for longer. A contact centre will provide proactive support through assistive technology.

[Name] fully supports the need for connected services as this stimulates health, social care and the voluntary service to create innovations that improve people's quality of life. An example of this at [Name] is combining re-

ablement services within our Extra Care buildings in partnership with care providers.

At our scheme at [Name] in Tewkesbury we work closely with Gloucestershire County Council providing a Therapy and Wellbeing Suite and outdoor fitness area available to both our residents and the community.

Priority Four - It would be helpful to see initiatives that promote opportunities for first time buyers being extended to also include older people – for example home buy to provide assistance for older people to be able to afford retirement housing where their equity isn't enough to buy a property outright. This may encourage older people to move to purpose built homes that better meet care and support needs, increasing their health and wellbeing. [Name] fully supports the objective to provide advice and assistance to maximise people's incomes and the fitting of safe adaptations. We have experience of both initiatives – for example Be Wise: Hanover's free and confidential advice service to customers.

The Be Wise service employs four advisors and a manager. It was set up in September 2012 and is based in [location]. It offers the following services to Hanover customers through a 0800 helpline and regular promotional events at our schemes:

- Money Wise: Financial Rights benefits advice
- Energy Wise: Energy switching and general energy advice
- Insurance Wise: promotion of our contents insurance offer
- Home Wise: promotion of our Aids and Adaptations service

In 2015/16, Money Wise achieved its objective of bringing an additional £2 million to customers in unclaimed benefits and made over 200 disability claims. Our service seeks to maximise isolated people's income and to help improve their quality of life. For example reducing pressure on household living expenses and fuel poverty.

The recent announcement confirming supported housing would be affected by the LHA cap and the 1% rent reduction is disappointing. [Name] is working in partnership with Housing and Care 21 and Anchor to show the collective impact to local areas as a result of the policy change. An increase in ineligible costs, combined with threats to benefits like Attendance Allowance threaten the sustainability of supported housing. Vulnerable older people benefit from sheltered housing in terms of improving their lives and saving money for the NHS and this continued uncertainty is hugely unhelpful for older people and providers.

[Name] has also been piloting a Handyman service where our resident customers and people in the community can benefit from safe maintenance/repairs.

Top three actions for the next 12 months:

1. LHA cap and how devolved budgets will operate
2. Continuing to bring added value by commissioning supported housing and connecting this to agencies to make it a powerful housing and health product
3. Creating an enabling package that encourages the supply of older person's housing

How your organisation can support Tewkesbury Borough Council to deliver these priorities:

[Name] is a national housing provider with over 50 years experience in specialising in retirement housing and services for older people. We have 20,000 homes and a portfolio that includes 70 Extra Care developments.

- [Name] can provide advice and share our knowledge citing both local and national examples.
- Identifying opportunities to maximise the added value our existing stock can generate to help support Tewkesbury in meeting its objectives. For example, initiatives to pilot health and wellbeing services.
- [Name] operates a 24/7 telecare service exploring ways this may generate local savings.
- [Name] already has a mixed tenure extracare scheme in Tewkesbury town as well as a rented retirement schemes and works in partnership with other stakeholders including care and support services in Gloucestershire.

General Comment - Of our 2 schemes in Tewkesbury, [name of scheme] is adversely affected by the LHA cap due to the level of services and facilities at the scheme.

Respondent 7

Priority One - [Name] will continue to invest in new homes in TBC and support the council's aim of developing 150 new affordable homes each year. [Name of organisation]'s strategy is to continue to invest in appropriate S106 sites but to also look at developing new homes outside of S106 to further increase the supply of new homes. We will work closely with TBC to ensure new schemes fulfil the needs of the borough and it's customers

Priority Two - [Name] will continue to work closely with new and existing customers to ensure they are able to maintain their tenancies and furthermore improve their circumstances. We take tenancy management and arrears very seriously, and by making our relationships with our customers more efficient we will be better able to support customers and prevent tenancy or arrears action. Our aim has always been to utilise all options before considering taking any action against a customer's tenancy, and our new way of working and the Neighbourhood Coach role, will mean we are better placed to achieve this. We are also proactively working with new and existing customers to educate and support customers through Welfare Reform changes, helping to mitigate the detrimental effects these changes may have on our customers

Priority Three - Our new way of working will improve our ability to provide effective housing related support and we will continue to work closely with other agencies who will help us achieve this, as well as develop new working relationships which will be beneficial to our customers.

Priority Four - Our aim is to work with customers to achieve their aspirations, and if appropriate support customers to change their accommodation according to their needs and situation, for example supporting customers into home ownership (this may be particularly prevalent with the Pay to Stay initiative being introduced in 2017/18). I understand this can be a particular challenge in Tewkesbury due to the difference in house prices and average earnings. Once guidance is released, we will also develop a RTB policy that will benefit both our customers, the community and Bromford.

General comment - I've had the opportunity to review the Housing Strategy and agree that the 4 streams you have identified are effective areas to concentrate on. Our aim will be to work collaboratively with TBC to support these aims as best we can. The evidence provided in the strategy was extremely detailed and useful; however I would like to learn more about the detail behind the strategy, to find out what actions the council plan on taking with regards to the areas they have identified.

Respondent 8

Priority One – We agree, but consider that in small parishes such as ours, funds from developments should be used within this/our village.

Priority Two – We are not aware that homelessness is an issue in our Parish. We agree that homeless families should be given help, but at the same time we consider that provision should not be so freely available that it would lead 'to intentional homelessness'

Priority Three – Partial agreement. We have concerns (page 19) that there now appears to be "Aff. Ho." (affordable housing) provision for non-travelling travellers, as we were unaware that a true assessment had been made for this category. We consider that it is very important that both settled and non-settled communities are considered when permitting further G&T (gypsy and traveller) sites (as per para 14 of G&T doc). Current areas of high density G&T can lead to issues. More sites should be found in Glos and Chelt. We agree that we could take limited nos (numbers) of refugees spread thro' (through) our community.

Priority Four - Agree

Top three actions for the next 12 months:

- 1.Prevent expansion of current G&T sites
- 2.Enforcement officers to ensure that G&T sites have to comply with same planning and other regs (regulations) as settled community.
- 3.Section 106 funds to be used within the local community wherever possible.

How your organisation can support Tewkesbury Borough Council to deliver these priorities:

Maintain good communication and collaboration – as we do at the moment!

Respondent 9

Priority One – Agree a planning predisposition to build smaller homes in rural villages instead of more large homes to balance the loss of small homes through extensions. Irrespective of tenure this would make village more accessible. Encourage more rural housing enabling downsizing.

Priority Two – Agree – but how can risk be minimised unless there are more 1 and 2 bed properties available where required to rehouse these hit by welfare restrictions.

Priority Three – Agree. As a village which has provided housing via an exception site we would feel this needs to be pursued more strongly – especially from land owners selling for development.

Priority Four – All fine – but much depends on available housing. Tenure is becoming less of an issue as affordable sized homes.

Top three actions for the next 12 months:

- 1.Planning policy to encourage more small homes irrespective of tenure
- 2.Increase properties of homes for social rent
- 3.Help with access to home ownership for younger people

How your organisation can support Tewkesbury Borough Council to deliver these priorities – The parish council encourages small development (up to 10 homes) with a high propensity of smaller homes.

Respondent 10

Priority One - Housing needs assessment is important, not just to assess numbers, but types and specific needs of householders to match the supply and demand. Your assessment of affordable homes required for each of the next 4 years is 126, not 150. Why the difference between your objective and your target?

Re need: You quote the Homeseeker figures, but how accurately/fully does this reflect actual need? What proportion of people does this NOT include?

How can the Authority achieve the number of affordable houses required when sites of 10 and fewer houses will not deliver any?

Where will affordable housing happen? In the town where the larger sites will be, and not in the villages who might need such houses? The health of the villages may be compromised.

The mismatch of dwelling size and household size is notable, particularly in rural areas which have a high proportion of larger dwellings, but often an older and younger population with a need for smaller housing.

The increasing number of people in the 40-59 age group which you note, implies even more in the plan to follow this. There needs to be awareness at the planning stage of the need for new housing to be lifetime homes, so that some people's requirements are catered for, and the modifications are more easily achieved later.

P9 starter homes: are discounted by 20% or more, not as you state by UP TO 20%

P7 According to you the median gross income is £30,866 in 2015 (Table 4). Checking the Annual Survey of Hours and Earnings, and their figures for Tewkesbury are £29, 421 ie £1500 difference. The relevant 25th percentile is £21,252: most critical for this audience.

Empty houses, the proactive approach is noted. Would be interesting to know whether there is a significance in the number available in the towns as opposed to rural/ is there a concentration of empty homes. If this is town orientated, does that fit the need and demand?

Please can you add into the strategy an awareness of the potential improvement in terms of resilience by incorporating flood resilience measures in construction, where appropriate e.g. reflecting EA flood zones. Whilst planning permission requires zero effect in terms of flooding, the cost- both emotional and financial- of being flooded would be less if measures are taken at the start.

There are a variety of possible measures: for ref and illustration see: <https://floodrepairable.wordpress.com> <http://www.ukfloodbarriers.co.uk/2016-the-changing-face-of-uk-flood-defence>

Priority Two - The provision of advice and guidance at an early stage is vital to everyone. Once the review is complete for temporary accommodation, it should be acted upon swiftly.

Priority Three - See also comments in 1. The implementation of the policy to promote rural exception sites is important to keep communities functioning as the residents would like. There is scope for investigating the benefits of community shops alongside such planning. Schools, village halls, social networks and health provision are also part of the picture when affordable housing is being considered. The link between housing, planning and infrastructure is again important.

Suitable temporary accommodation means in terms of location, type of dwelling, and security even in a temporary situation.

Accessibility is relevant both inside and outside the house – the planning of estates must consider the needs of people now, and into the future as they become less mobile, sight decreases, hearing is lost etc. Width of pathways, surfaces, alleyways are relevant outside as hearing loops are relevant indoors. Isolation is noted as a real problem.

Partnership working is valuable to gain the wider picture, but monitoring the performance of those partners to effect and improve upon the outcomes is also needed.

Priority Four - The community work undertaken by registered social landlords is decreasing, but that is a major part of making communities feel safer. It allows different sorts of problems to be worked through in an agreed way. Can social landlords be influenced to reverse this trend and increase this work?

Starter homes: Government have placed a selling price maximum of £250,000 outside London. How is Tewkesbury going to ensure that these will help their first time buyers?

Could this be by encouraging smaller, more flexible dwellings which the first time buyer might be able to afford with a 20%+ discount? Given that there is no rental possibility for starter homes, then Tewkesbury needs to recognise the rental market for younger people too.

Chart 25 How was more awarded in 2014/15 than was received? If it was through underspend, why was there such a previous underspend?

Top three actions for the next 12 months:

1. Building more homes in the right place, of the right type, at the right price/rent to match the housing need
2. Tewkesbury Borough and its key stakeholders should engage with communities to listen and work through partnership to meet housing needs wherever they are in the Borough

How your organisation can support Tewkesbury Borough Council to deliver these priorities:

[Name] advises and informs local communities regarding affordable housing. This includes working with parish councils, social landlords, landowners and developers, Borough planners and housing officers to assess need and help them to meet needs.

[Name] also supports communities who are working on Neighbourhood Development Plans., They also help in the setting up of community shops, which may relate to housing provision. In some key areas, [Name] is helping people to improve their resilience from flooding.

Respondent 11

No further comments to make

---End---