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Incomplete early draft Strategy, which is subject to further revision prior to consideration by Management Board and Cabinet

HEREFORDSHIRE COUNCIL INTERIM HOUSING STRATEGY

2016-2020

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1. Introduction

Herefordshire council faces a diversity of challenges in its role as a strategic housing authority. In common with other councils across the country, it no longer holds its own housing stock and its resources and direct control over social housing provision has been substantially reduced over the years.

However, the council still retains significant responsibilities in relation to:

- Affordable housing development.
- Prevention and relief of homelessness.
- Housing conditions and enforcement in the private rented and owneroccupied sectors.
- Assistance to sustain healthy independent living through promoting safe, appropriate housing and affordable warmth.
- Provision of specialist housing with care.
- Policy for the allocation of social/affordable rented housing in the county.

Herefordshire Council's Housing Strategy 2016-2020, is an overarching document. It connects to a number of other housing related strategic documents and plans that, taken together, provide the framework through which our housing and housing related priorities will be achieved.

The Strategy has been developed against the backdrop of national austerity and substantial local budgetary constraint, the uncertain impact of radical reforms to housing and social welfare policy and increasing pressures on local services.

For context, since 2011, the council has saved £49 million. From now until 2020, it will need to save an estimated additional £42 million. The impact of this for Herefordshire, as for councils nationally, is that it no longer has the resources to pay for all the services that have traditionally been provided. Inevitably, difficult decisions will have to be made about how housing responsibilities are prioritised and delivered and an even greater emphasis placed on joint working across inter-related parts of the council and with our external statutory and voluntary sector strategic partners.

The Housing Strategy contributes towards the Council's wider strategic aims and priorities, which are to:

- Keep children and young people safe and give them a great start in life.
- Enable residents to live safe, healthy and independent lives.
- Invest in projects to improve roads, create jobs and build more homes.

In fulfilling its strategic housing responsibilities, the council works in partnership with:

- Property developers, including housing associations.
- Housing associations / Registered Providers of local social and affordable housing.
- Voluntary sector and statutory agencies in preventing or relieving homelessness.
- Neighbouring local authorities, specifically Shropshire, Telford and Wrekin and District Housing Authorities in Worcestershire.

There are also partnerships within Herefordshire council, between teams responsible for Housing Strategy and Development, Planning, Environmental Health, Corporate Finance and Adults Wellbeing Operations.

2. Housing priorities and themes

Housing of the right type, in the right place which is comfortable, safe, affordable and appropriate to needs is intrinsic to emotional and physical wellbeing. The Strategy has three overarching priorities which reflect this, supported by a number of housing themes:

Priority 1: Improving Housing Supply and Access to Housing

- Ensure a programme of affordable housing development, consistent with local housing need and national and local targets.
- Establish new models of partnership with housing developers, which deliver optimum benefit from the council's resources.
 - ➤ Deliver new models of investment including private rented and new-build, custom and self-build homes.
 - Establish new ways of development using council land, including support for privately rented new builds, self-build and custom build homes
- Ensure that the social housing Allocations Policy meets statutory obligations, is fair and realistic in the context of the exclusions policies of Home Point partners.
- Enable the local housing sector to operate economically and optimise take up of social housing.

Priority 2: Improving Housing Support

- Ensure development of sufficient market rent and affordable housing and appropriate housing with care to meet the future needs of older people.
- Use an evidence based approach to delivering diverse, appropriate specialist housing, with care options, for disabled people, people with mental health needs and vulnerable young people, including those leaving care.
- Prevent homelessness happening whenever it is possible to do so and, where this has not been possible, prevent it happening again.
- Enable appropriate and enduring housing solutions for those homeless people who often face the greatest barriers in accessing and sustaining a stable home, including rough sleepers, young people, people with substance dependencies or mental health issues, people with challenging behaviours and people who are socially marginalised.

Priority 3: Improving Housing Quality

- Enable improved quality and safety of private sector accommodation.
- Ensure that the links between health and housing are recognised across the council.

3. Strategic Links

This Strategy does not exist in isolation. It provides an overarching framework for housing and housing related activity within the county. It also has important links with other Herefordshire Council strategic documents and plans including:

- Older People's Housing Strategy and Pathway.
- Homelessness Review 2016-2020 and Homelessness Prevention Strategy 2016-2020.
- Herefordshire Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2015.
- Learning Disabilities' Commissioning Plan 2015.
- Herefordshire Autism Strategy 2014-2017.
- Domestic Abuse Needs Assessment 2013.
- Mental Health Integrated Needs Assessment 2015.

- Looked After Children and Complex Needs Assessment 2014-2019.
- Health and Wellbeing Strategy 2015.

The Strategy takes account of the significant changes, which have affected housing at the national, regional and local level and draws on a number of evidence sources, including the following:

- Understanding Herefordshire: An Integrated Needs Assessment 2015.
- Herefordshire Core Strategy 2011-2031.
- Local Market Housing Assessment, update 2014
- Herefordshire Affordable Warmth Strategy 2015-2018
- Healthy Housing Report 2012

Whilst there is an existing evidence base to inform the strategic priorities and intended direction of the core elements of the strategy, it is probable that the unfolding impact of national government housing, planning and social welfare policy will require a flexible response that looks to incorporate any new opportunities for effective and focused joint working with partners, which may arise.

4. National Policy Context¹

The Strategy builds on the work of the previous Herefordshire and Shropshire Joint Housing Strategy 2012-2015. However, the legislative and commercial context in which the housing market operates has changed substantially and government reforms are affecting every aspect of housing within Herefordshire.

Fundamental change in recent national housing policy has included:

- Reforms to how social housing is provided and allocated.
- Changes in entitlement to Housing Benefit and the introduction of Universal Credit.
- Abolition of regional planning structures with an emphasis on local decision making.

¹ It is important to note that the information contained below was correct at the time of writing, but as supplementary announcements from central government on housing and social welfare policy continue there may be some change.

- The introduction of the National Planning Policy Framework (NPPF), which raises the threshold under which affordable housing is required to be delivered.
- Changes in the way that health and social care is commissioned through the Health and Social Care Act 2012.
- Government pledge to extend the Right to Buy to housing association tenants.

4.1 Localism Act 2011

The Localism Act 2011 introduced very significant changes to housing policy and planning in what the government described in, 'Laying the Foundations, A Housing Strategy for England, November 2011 as a 'radical programme of reform of social housing.'

Key reforms relating to housing and planning include:

- Social housing reform: This gives individual social housing providers new powers to grant tenancies for a specified fixed-term, where they choose to do so, rather than a 'life-time' tenancy.
- Allocation reform: This gives local authorities greater control over who is entitled to register for social housing.
- Reform of homelessness legislation: This gives local authorities powers to discharge their housing obligations to homeless people through the private rented sector on a minimum one-year Assured Shorthold Tenancy.
- National Planning Policy Framework (NPPF) 2012: This establishes a presumption in favour of sustainable development, the introduction of Neighbourhood Plans and the abolition of Regional Spatial Strategies.

4.2 Welfare Reform ACT 2012

The Welfare Reform Act 2012 contained important changes to benefit entitlement, each of which is intended to reduce the overall cost to the Treasury. These include:

- The introduction of Universal Credit, which merges a number of different benefit entitlements, including Housing Benefit and Job Seekers Allowance, into a single monthly payment. There is a benefit cap that limits the amount of benefit a household is entitled to receive.
- Universal Credit is being rolled out in Herefordshire from March 2015 for single persons, who would have been eligible for Job Seekers Allowance. It remains to be seen if this will impact negatively on access to the private

rented sector through, for example, any reluctance by landlords/lettings agencies to offer tenancies to claimants on Universal Credit.

- From April 2013 new rules were introduced to restrict the amount of Housing Benefit working-age council or housing association tenants could claim if they were deemed to be under-occupying their home. For one spare bedroom, Housing Benefit entitlement was reduced by 14% per week and for two or more bedrooms by 25%.
- In October 2012 a new harsher sanctions regime for Job Seekers Allowance was introduced by the Welfare Reform Act. This set out three levels of fixed periods of sanction for failure to undertake agreed work search activity, ranging from four weeks up to a maximum of three years for repeated failures. Some research² has indicated that sanctions are having a disproportionate impact on vulnerable groups, including homeless people, single parents and disabled people.

4.3 Affordable Rent Regime:

The concept of 'Affordable Rent' was introduced as part of the Homes and Communities Agency's (HCA) Affordable Housing Programme (AHP) 2011-2015. This form of tenure, where providers can charge up to 80% of the market rent, essentially shifts the balance between grant support and rental income as the means of financing new development. The model permits housing associations to convert vacant Social Rent properties to Affordable Rent when they are re-let, but only where a delivery agreement for a new supply of social housing has been agreed with the HCA.

4.4 Summer Budget July 2015: Key measures relating to Housing and Welfare

The Budget announced around £17 billion of spending cuts, including £12 billion by 2019-2020 from welfare reforms. The main reductions are as follows:

- From April 2017, the overall benefit cap, currently set at £500 per week (£26k per year) for a working age household with children, will be reduced to £385 (£20k per year) or £442 (£23k per year) in London.
- Housing Benefit will be frozen for four years from April 2016, along with both Child and Working Tax Credits and a number of other working age benefits, including Jobseekers' Allowance, Employment and Support Allowance, Income Support and Child Benefit.

² The Homelessness Monitor, Crisis and JRF, February 2015

• From April 2017 parents claiming Universal Credit, including lone parents, will be expected to prepare for work when their youngest child is two and to look for work when they are three.

Removal of Housing Benefit entitlement for 18-21 year olds

- From April 2017, 18-21 year olds submitting a new claim for Universal Credit will not be automatically entitled to receive the housing costs element (the equivalent of Housing Benefit). There will be exceptions for:
 - > Those who are parents and whose children live with them.
 - Vulnerable groups.
 - ➤ Those who had previously been living independently and working continuously for 6 months.
- 18 -21 year olds receiving Universal Credit will also be subject to a new youth obligation. They will be expected to participate in a programme of support at the start of their claim and to apply for an apprenticeship or traineeship, gain work place skills or go on a work placement after six months.

Following these announcements, the Chief Executive of Crisis claimed that more young people were likely to become homeless as a result of the proposed cuts.

"Under-25s already make up a third of homeless people and there is a real danger these changes could make things even worse. For many young people, living with their parents simply isn't an option."

Social Housing Rents

- From April 2016, government will require all social landlords to reduce their rents by 1% every year for the next four years (rather than increasing them by Consumer Price Index (CPI) +1%, as previously identified). This will be taken forward via the Welfare Reform and Work Bill and will apply to both social and affordable rents.
- Tenants in social housing who earn more than £30,000 per year (outside London), will be expected to pay market or near market rents. This was subsequently withdrawn and replaced by a voluntary system for housing association providers, whilst being retained for council tenants.

The National Housing Federation (NHF)⁴ has responded to the announcements in the Summer Budget as follows:

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³ Jon Sparks, Chief Executive, Crisis, July 2015

⁴ National Housing Federation Briefing Paper: Summer Budget 2015, July 2015

- Whilst a cut in rents over the next four years will be a real help to some tenants, the reduction in rental income will impact on housing associations ability to plan for and invest in new housing development. An initial estimate suggests that at least 27,000 new affordable homes will not built as a result of this loss.
- Modelling indicates that the reduction in the benefit cap could affect 205,000 households including 68,000 households living in housing association properties. The lower cap will impact on affordability in all areas of the country and a lower benefit cap outside London takes no account of regional variations in rents. Initial analysis indicates that, for a couple with three children, the weekly shortfall for a three-bedroom property is likely be in the region of £44.34 using average rent data.
- Whilst there are plans for a national living wage for over 25s (set at £7.20 per hour from 2016 and rising to £9.00 per hour by 2020) estimates in the Institute for Fiscal Studies post-budget briefing paper⁵ indicate that this will not provide full compensation for the majority of losses that are likely to experienced overall.

4.5 Autumn Statement and Comprehensive Spending Review

In November 2015, the Chancellor of the Exchequer presented his Autumn Statement for 2015 and the Comprehensive Spending Review covering the period up to the 2020 General Election.

Main announcements affecting housing include the following:

- Funding for new affordable homes will be doubled, but will be refocused so that most of the funding will be spent supporting new homes for low cost home ownership, rather than to rent.
 - Whilst additional spending on housing is to be welcomed, focussing government support only on home ownership will not help those in housing need who are not able to save a deposit or get a mortgage. This will include substantial number of families and single people and families in need in Herefordshire.
 - Information in the 'Understanding Herefordshire Report,' 2015 confirms that the county is still one of the worst areas within the West Midlands region for housing affordability, where house prices at the lower end of the housing market cost around 8.1 times the annual earnings of the lowest earners.

⁵ Paul Johnson, Institute for Fiscal Studies, July 2015

- The cuts to working tax credits announced as part of the summer budget will not now be implemented. However cuts to child tax credits will still go ahead as planned.
- There will be changes to the way the management of temporary accommodation is funded. The management fee currently paid by the Department for Work and Pensions to local authorities on a per household basis will end from 2017-2018 and instead an up front fund will be established.
- Housing benefit in the social housing sector will be capped at local housing allowance rates for new tenants. This includes extending the shared room rate, whereby single people under 35 are only eligible for enough support to cover the cost of a room in a shared house. The change will apply to tenancies starting from April 2016 and will take effect from 2018.
- As at December 2015, the Department for Work and Pensions (DWP) has clarified that it does intend to apply the cap to housing benefit for tenants in supported and sheltered housing, but that it will seek to protect people as far as possible through the local system of Discretionary Housing Payments.
 - ➤ Capping housing benefit for new tenants in the social housing sector to Local Housing Allowance (LHA) rates could also have a major impact on households. At the time of writing further information on how this will be applied is awaited. However, in December 2015 Davie Orr, Chief Executive of the National Housing Federation (NHF) wrote to the Minister of State for Housing and Planning expressing concern that this would have a 'catastrophic' impact on, in particular, supported housing providers, as follows:

'The impact of the LHA on the amount of Housing Benefit payable for supported housing will make it extremely difficult for any housing association to develop new supported housing. Without existing levels of benefit being available, providers across the country will be forced to close schemes.'

5. Housing and Planning Bill 2015

Extending the Right to Buy to housing association tenants:

The government's proposed Housing and Planning Bill will:

- Extend the Right to Buy to housing association tenants, offering discounts worth up to £102,700 in London and £77,000 in the rest of England, but not in Scotland or Wales, where Right to Buy is being abolished.
- There are around 2.5 million housing association tenants. Whilst they already have the Right to Acquire, the discounts are much less generous, ranging from £9,000 to £16,000 depending on location. In addition, the Right to Acquire is currently not available in rural areas where there are fewer than 3,000 properties.
- To fund the policy the Housing and Planning Bill will require stock-owning councils to sell 5% of their most valuable housing properties when they become vacant and replace them with cheaper homes. Cash from the sale proceeds will be used to create a £1bn Brownfield Regeneration Fund.
- The government has made a commitment to ensure there would be 'one-for-one' replacement for all the properties sold under extended RTB. However, figures released by the Department for Communities and Local Government (DCLG), June 2015, show that 12,304 homes were sold under the Right to Buy in England in 2014-2015, whilst only 1,903 homes were started or acquired to replace them.
- Locally, it is possible that there could be a loss of social and affordable rented housing association properties but at present there are too many variables to allow any valid predictive analysis.

5.1 National Planning Policy:

National planning policy requires local planning authorities to plan proactively to meet all housing needs in the area, including market and affordable housing. The current definition of affordable housing⁶ includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.

⁶ As at January 2016

Starter Homes:

The Housing and Planning Bill contains measures to deliver an extra 200,000 new homes through the new Starter Homes initiative, which will offer a 20% discount to first-time buyers under 40 years of age. It introduces a statutory duty on local authorities to promote the delivery of starter homes, and a requirement for a proportion of starter homes to be delivered on all suitable reasonably-sized housing developments.

The Bill defines starter homes as new dwellings for first time buyers under 40, sold at a discount of at least 20% of market value and at less than the price cap of £250,000.

The Bill puts a general duty on all planning authorities to promote the supply of Starter Homes, and provides a specific duty to require a certain number or proportion of Starter Homes on site.

It was originally stated that Starter Homes will be built predominantly on brownfield sites that were not previously identified for housing development. However, at the Conservative Party Conference in October 2015, the Prime Minister announced that developers will be permitted to provide Starter Homes, instead of traditional affordable housing, on private sites to satisfy Section 106 planning requirements. These homes will be sold directly by the developer, with no need for housing association involvement.

Self-build and custom housebuilding:

The Bill adds to and amends the Self-build and Custom Housebuilding Act 2015, which requires local authorities to keep a register of people seeking to acquire land to build or commission their own home.

Section 106 contributions:

Section 106 contributions, sometimes known as 'planning obligations' or 'planning gain,' stem from agreements made under section 106 of the Town and Country Planning Act 1990. They are agreements made between the developer and the Local Planning Authority (LPA) to meet concerns about the costs of providing new infrastructure or affordable housing levels.

Community Infrastructure Levy:

In November 2015 the Government announced that an independent group would be set up to conduct a review of the Community Infrastructure Levy (CIL), with the remit of:

 Assessing the extent to which CIL does or can provide an effective mechanism for funding infrastructure Recommending changes that would improve its operation in support of the Government's wider housing and growth objectives.

DCLG Consultation on proposed changes to the National Planning Policy December 2015:

In December 2015, the DCLG issued a consultation document seeking views on some specific changes to national planning policy, as follows:

- ➤ Broadening the definition of affordable housing, to expand the range of low cost housing opportunities for those aspiring to home ownership.
- Increasing the density of development around commuter hubs, to make more efficient use of land in suitable locations.
- Supporting sustainable new settlements, development on brownfield land and small sites, and delivery of housing allocated in plans.
- Supporting delivery of starter homes.

Introduction of Fixed-Term Tenancies:

- A government amendment, introduced at the Committee Stage of the Housing and Planning Bill, proposes the use of mandatory fixed-term term tenancies of between two and five years. Although the amendment relates specifically to council tenants, it is likely that the government will introduce similar measures for housing association tenants through regulatory change.
- Whilst not originally part of the Housing and Planning Bill, a government announcement in early January 2016, stated its intention to directly commission the building of up to 13,000 new starter homes, defined as above, on public land. The pilot scheme will start on five sites in north-west London, Dover, Cambridgeshire, Chichester and Gosport.

6. Key achievements since the 2012-15 Herefordshire and Shropshire Joint Strategy

As at 31st March 2015, 400 new affordable homes had been delivered since the start of the Joint Strategy in 2012.

- The target of 140 affordable homes for the 2014-2015 financial year has been exceeded.
- 34 units of accommodation have been delivered in rural areas for local people in housing need through Community Led Development Funding.

- £2 million has been secured through the 2015-2018 HCA Bid Round to develop affordable housing across Herefordshire.
- A major regeneration project in a deprived area of Hereford City has been supported, which included the development of 259 new sustainable homes; 130 of which are affordable rent properties and 129 are for home ownership.
- An Older People's Housing Strategy and Pathway has been published, following a major research project, which identified older people's housing need across the county up until 2031. The document provides clear guidance on the housing and other related services that the council wishes to develop, in partnership with a range of other organisations, to address the housing and service challenges of our ageing population.
- An assessment of the accommodation needs of Gypsies, Travellers and Showpeople has been completed and current and projected permanent, transit and other accommodation needs identified.
- 171 empty properties were brought back into use in 2013-2014, of which 55 were classed as 'long-term empty.'
- Herefordshire was one of five innovation areas in England selected for the delivery of the Department of Health (DoH) Homeless Link project, which aimed to improve outcomes for homeless people with mental health and substance misuse needs. An audit report, which identifies the findings from the project, has been published.
- B&B has not been used as emergency temporary accommodation for homeless families and other adult households since 2012.
- Herefordshire Healthy Housing Survey completed and report published October 2012.
- Adoption of the regional Midland Landlord Accreditation Scheme in April 2014.

7. Herefordshire Housing Market and Key Challenges

Housing is a fundamental requirement for good health and wellbeing. Inequalities in a range of health issues can often be tracked to the quality of housing or its absence.

Unless otherwise stated, the following information is taken from 'Understanding Herefordshire' 2015. The report provides strategic intelligence for commissioning and business planning for the whole county.

- Within the West Midlands region, Herefordshire is ranked as the third most expensive unitary or shire authority when median rents for all dwelling sizes are compared.
- The difficulties in acquiring housing are compounded by having one of the worst affordability levels within the West Midlands region; with houses at the lower end of the market costing around 8.1 times the annual earnings of the lowest earners. This puts greater pressure on the affordable housing options that are available across the county and, given a high demand against limited supply, there is a substantial shortfall.
- Research published by the Halifax Building Society in November 2014, concludes that rural house prices across Great Britain are 26% higher than in urban areas. Whilst the rural premium exists across all regions it is greatest in the West Midlands at 57%. This puts rural owner-occupation out of the reach of many, particularly young first-time buyers.
- The Local Housing Market Assessment (LHMA) published November 2013⁷ identified that, to balance the housing market over the longer term (2011-31), an average of 35% of new homes built would be a viable level of affordable housing. The report recommended a range of tenures to cater for the breadth of housing needs and circumstances, particularly for people who can afford to pay more than social rents, but have insufficient resources to access the market.
- Flood risk is a key issue and in some areas a significant constraint to new development.
- The Herefordshire Local Housing Requirements Update, September 2014,⁸ states that the private-rented sector is likely to continue to be used for the foreseeable future by households who cannot acquire a social rented home, given the existing shortfall. Whilst not identified in the study there is however, some circumstantial evidence to suggest that there may be barriers to accessing the private-rented sector for low-income and other households and this needs to be investigated more rigorously.
- Through 2001-2011, the number of over-crowded properties increased by 34% and the number of people living in houses in multiple occupation

⁷ G L Hearn

⁸ GL Hearn

(HMOs) grew by 44%. This is above the levels seen in Shropshire as well as regional and national averages, indicating that the situation in Herefordshire is more acute than elsewhere.⁹

- The last decade has seen a large increase in the number of concealed families, i.e. those that live in a household containing more than one family (including grown-up children who have a spouse, partner or child living in the household; elderly parents living with their family; or unrelated families sharing a home).
- In 2011 there were almost 850 concealed families, an increase of 87% on 2001 compared with 70% nationally. This increase could be related to:
 - A combination of the affordability of housing and the availability of finance since the credit crunch.
 - ➤ There may also be some connection to increased migration following the expansion of the European Union. The 2011 Census shows that a relatively large proportion of people in the white non-British ethnic group live in some form of shared housing.
- The 'heads' of just over half of the concealed families were aged under 34, mostly either lone parents with dependent children or couples with no children.
- Fuel poverty is a significant challenge in Herefordshire. Department of Energy and Climate Change (DECC) figures indicate that there were c11,000 fuel poor households across Herefordshire in 2013. This equates to 14.1% of all households, placing Herefordshire amongst the worst 10% of English Local Authorities in terms of fuel poverty levels. Fuel poverty has been identified as a significant health and wellbeing challenge and features in two of the seven priorities identified in Herefordshire's Health & Wellbeing Strategy.
- The Herefordshire Healthy Housing Report 2012, confirmed that Herefordshire, as a large rural County, faces exceptional challenges in relation to the age and type of housing, the availability of mains gas, and the population profile.
- Weekly and annually work based earnings are low in Herefordshire compared to those regionally and nationally and comparator areas.
- A relatively large proportion of employment is in low paid sectors such as wholesale and retail and agriculture, which affects the overall productivity of the county.

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⁹ GL Hearn, as above

- Herefordshire has the 4th lowest overall population density in England with a population scattered across the 842 square miles of the county.
- 25% of the population live in areas classified as 'very sparse,' which is higher than any other county.
- Rural households have additional costs associated with transport and heating the home, which for residents of villages are estimated to be 25% higher for pensioner household and at least 10% higher for the population as a whole.
- Almost all the county's 842 square miles fall within the 25% most deprived in England in terms of geographical barriers to services.
- Some areas of South Hereford, Leominster and Ross-on-Wye are amongst the 25% most deprived in England and have become more deprived relative to other areas.
- People using secondary mental health services have an employment rate which is 66 percentage points lower than that the population as a whole.
- People with learning disabilities have an employment rate which is 59 percentage points lower than that the population as a whole.

7.1 General Housing Needs

The National Planning Policy Framework (NPPF), Department of Communities and Local Government (DCLG) March 2012 and Planning Practice Guidance on Housing and Economic Development Needs Assessments (DCLG, March 2014), sets out how the Objectively Assessed Need for housing is expected to be identified and other factors, which are relevant in translating this into policy targets for housing provision in local plans.

The Herefordshire Local Plan – Core Strategy 2011-31 set out the overall strategic direction of land use for housing development and economic growth, taking into account environmental protection, transport and other infrastructure needs. Its latest version, published May 2014, demonstrates a need for a total of 16,500 new homes over the plan period, as follows:

- Hereford City 6,500
- Market Towns 4,700
- Rural Villages 5,300

Of the above, the identified need is for the delivery of, in the region of, 4,800 affordable homes over the Core Strategy period. For the purpose of delivering affordable housing across Herefordshire, the council considers affordable housing for local people to be:

'Housing provided at below market price and allocated on the basis of need to people who live or work in Herefordshire, or need to move to Herefordshire to receive/provide support and who are unable to purchase or rent houses generally available on the open market without financial assistance, as their only home.'

Social Rented: Rented housing, usually owned and managed by housing

associations, for which guideline target rents are determined

through the HCA national rent regime.

Affordable Rented housing, usually owned and managed by housing Rented:

associations, with rents set at up to 80% of the open market

rent.

Homes for purchase and rent provided at a cost above Intermediate:

> social rent, but below market levels. They can include homes for Shared Ownership, Low Cost Market and

Intermediate Rental.

The Herefordshire estimated target for affordable development over the next five years is in the region of 1,500 affordable homes located in urban and rural areas. However, In November 2014 a Written Statement by the Minister of State for Housing and Planning established that no affordable housing or other tariffbased infrastructure contributions could be required on residential development proposals of 10 dwellings or less and a maximum combined floor space of no more than 1,000 square meters, except in areas of outstanding natural beauty or on rural exemption sites. This development threshold is a mandatory requirement through restrictions to the Section 106 process, with immediate effect.

In the Rural Housing Policy Review Group report, 'A fair deal for rural communities, February 2015, it was suggested that this would have a substantial detrimental impact on councils' ability to negotiated affordable housing development in rural areas.

Following a Judicial Review of the planning amendment, brought by two local authorities, these policy changes were quashed by the High Court in July 2015.

7.2 First Time Buyers

GL Hearn, 2014 states that the tight lending criteria initiated by the 'credit crunch' has continued to have an impact on mortgage lending over the last four years, with households' ability to obtain mortgage finance functioning as a constraint on demand for market homes. This has led to substantial difficulties for first-time buyers trying to access home ownership. Whilst the council is constrained in the extent to which it can influence the market, where there is an identified need,

intermediate housing such as low cost market and shared-ownership is secured through planning processes.

The extent to which the government's 'Starter Homes' initiative will improve opportunity for first time buyers in Herefordshire remains to be seen. Concerns remain that, even at a discount of 20% below market value, home ownership will still remain out of reach of many of Herefordshire's under 40 year olds who aspire to home ownership.

7.3 Older People's Housing

Herefordshire's population already has a relatively old age structure with 22% of people aged 65+ compared to 17% nationally. Population projections indicate that by 2031 almost a third of the county's population will be aged 65+ and the number of people aged 85 or over will have doubled.

Many older people in Herefordshire are active and healthy and through the provision of informal care to family and friends, and through volunteering activities, provide a significant contribution to the sustainability of their communities. There are however, significant longer-term implications for the provision of care and support as the proportions of very elderly people in the population increase.

To compound this issue residents who are aged 65-84, are more likely to live in rural villages and dispersed areas than the population as whole (49% of people aged 65-84 compared to 43% of all Herefordshire residents). The impact of significant cuts to budgets also has to be considered alongside the pre-existing challenges arising from demography and rurality.

Herefordshire's Older People's Housing Strategy and Pathway 2015, builds on the major research undertaken by Peter Fletcher Associations (PFA) and Arc4 2012, updated January 2015. The research highlights that:

- 80% of older people are able to purchase a property outright or with a mortgage and would prefer to purchase rather than rent. For general needs older peoples' housing development and/or remodelling there should be an average mix of 80% sale/20% rent, depending on the local market.
- There is a major shortage in the county of housing which is desirable, appropriate to needs and aspirations and presents an attractive option for older owner-occupiers wishing to move from larger family homes.
- There is equity in the older persons' market and the potential to use new housing development as a stimulant to rebalance a housing market that currently lacks sufficient choice and diversity.

The Older People's Housing Strategy and Pathway provides detailed analysis of the profile of general and specialist need for older people's housing in each of Herefordshire's seven local Housing Market Areas. This analysis is not, therefore replicated here.

7.4 Younger People aged 18-34 years

Access to suitable affordable housing in Herefordshire is a major challenge for young people in the current economic climate, particularly in the county's rural areas where there may be very limited availability of suitable accommodation.

Home ownership is out of the reach for the majority of young people, whilst social housing is inaccessible to all but the most vulnerable households and potentially, there are also barriers to accessing the private-rented sector in Herefordshire.

A report from the Institute for Public Policy Research¹⁰ claims that nationally the inaccessibility of both home ownership and social housing for young people has meant that many are living in private rented accommodation, or with their parents or in shared housing.

In Herefordshire, whilst the data in not age specific, GL Hearn's analysis shows an overall reduction in home ownership and a growth in the private rented sector in Herefordshire between 2001 and 2011. This information does not however, identify significant, but elusive factors such as; the type of household accessing the sector, the average length of stay, the type and quality of the accommodation and if there are pre-existing barriers to access such as age and entitlement to housing benefit. Anecdotally the latter is considered to be the case for younger people and this needs further investigation.

From 1st January 2012 housing benefit entitlement for young people, aged 34 years and under and renting in the private sector was restricted to the rent payable for one room in shared accommodation (SAR), with some specific exemptions.

Contributory evidence to the Work and Pensions 2014 report Work and Pensions Report,¹¹ suggested that the SAR has led to young people getting into debt in accommodation that they can no longer afford and to increased 'sofa surfing' hidden homelessness where affordable accommodation cannot be accessed or unaffordable accommodation has been moved out of.

That homelessness and threatened homelessness is an issue for young people in Herefordshire is confirmed by data contained in the Homelessness Review 2016-2020.

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¹⁰ No Place to call Home, December 2012

¹¹ Support for housing costs in the reformed welfare system, March 2014

7.5 Learning Disabled People

Learning disabled people have poorer health than the general population, much of which is avoidable. These health inequalities often start early in life and are serious.

In general, learning disabled people die at a younger age than their non-disabled peers. Research has found that on average men die 13 years younger than men in the general population, whilst women die on average some 20 years younger than women in the general population.¹²

In Herefordshire, our aim is to ensure that the health, housing and support needs of learning disabled people are effectively met and that they have choice and control over their lives so they can live as independently as possible. In order to help us achieve this we are currently in the process of identifying a number of different housing models, which will be designed to meet needs and aspirations for supported and independent living.

'Building the Right Support,' October 2015 is a national plan to develop community services and close inpatient facilities for learning disabled and/or autistic people who display behaviour that challenges, including those with a mental health condition. The document states that, whilst the numbers living in institutional care settings has significantly reduced in recent years, there is still an over reliance on this type of care.

The national plan has been built on the recognition that learning disabled and/or autistic people have the right to the same opportunities as anyone else to live satisfying and valued lives and to be treated with dignity and respect. They should expect, as non learning disabled/autistic people, to live in their own homes, to develop and maintain positive relationships and to get the support they need to be healthy, safe and an active part of society.

In order to speed up and shape the national approach, six 'fast track' areas including Herefordshire and Worcestershire, have drawn up plans to transfer resources away from institutional to community settings. Further information on the Herefordshire and Worcestershire approach is detailed in the body of the 'Building the Right Support,' report.

In 2013-2014, 540 people with learning disabilities, between the ages of 18-64 years, were known to social services in Herefordshire. Accommodation and employment data is shown below.

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¹² Confidential Inquiry into the Premature Death of People with Learning Disabilities, Heslop et al, 2013

¹³ Public Health England Community Mental Health Profiles 2013-14

	Herefordshire	England	WestMids	Similar L/As
Living in settled accommodation	77.0%	74.9%	68.9%	75.4%
In employment	4.5%	6.7%	4.9%	7.2%

7.6 People with Autism

Autism is the name given to a spectrum of conditions that have a lifelong impact on people. The term broadly describes differences and impairments in social interaction and communication, combined with rigid and repetitive behaviours.

There is little certainty in data on the local numbers of adults with Autism. The National Autistic Society estimates on prevalence in the UK population as a whole would suggest that in Herefordshire there are likely to be approximately 2,000 with some form of Autism.

In December 2014 Herefordshire Council submitted a self-assessment to Public Health England on how well it was doing in meeting the requirements of the National Autism Strategy. One of the key findings from the self-assessment was the pressing need to improve housing provision and opportunities for people with autism in the county

7.7 Looked After Children 16+ population

Herefordshire's overarching vision for looked after children and those with complex needs is the same as for all of Herefordshire's children and young people – that we keep them safe and give them a great start in life.

The 16+ population includes young people who:

- Have been looked after by the local authority and have reached 16-21 years of age.
- Are homeless 16-17 year olds or are at risk of homelessness.
- Have been remanded into the care of the local authority by the Court.
- Are a risk to themselves or others, with history of offending, mental health issues or drug and alcohol misuse.

The Looked After Children and Complex Needs Placements: Commissioning & Sufficiency Strategy 2014–2019, forms part of Herefordshire's overall approach to commissioning services for children, young people and families and represents a key priority area. The strategy recognises that:

There are gaps in provision for care leavers who are 18 years or over and have left care. Further work is necessary to develop an understanding of the housing and support needs of these young people so that appropriate services can be commissioned.

For homeless 16 and 17 year olds housing options, which provide security and safety are usually very limited. With restricted access to welfare benefits, requirements for rent in advance and bond payments and tenancy law issues, very few reputable private sector landlords are willing to offer a tenancy.

This is why is it so important that local authorities have protocols in place that clearly identify respective responsibilities under the Children Act 1989 and the Housing Act 1996 and how statutory duties will be fulfilled.

However, Research published by the Law Centres Network concluded that some local authority protocols for dealing with homeless 16 and 17 year olds did not comply with the law, resulting in homeless young people failing to receive the support they are entitled to.

7.8 Mental Health

The Department of Health (DoH) 'No Health without Mental Health Implementation Framework,' July 2012 states that at least one in four people will experience a mental health problem at some point in their lives and that more than £2 billion is spent annually on social care for people with mental health problems.

In 2013-2014, Herefordshire Clinical Commissioning Group allocated £15.3 million to its contract with the current provider of secondary and community mental health services. A safe and secure place to live is essential for emotional and physical health and wellbeing. For many people however, poor mental health is linked to insecure, poor quality and overcrowded housing and homelessness.

The Mental Health Implementation Framework acknowledges that housing service commissioners and providers have a key role in improving mental health outcomes, providing both settled housing and the services people need to maintain their homes as independently as possible and in providing specialist support.

There is also recognition that good use of Health and Wellbeing Boards needs to be made to ensure effective alignment of joint resources across Clinical

¹⁴ Mental Health Needs Assessment, HCCG, March 2015

Commissioning Groups (CCGs) and local authority housing and social care commissioners.¹⁵

Adult Social Care outcomes show the following information 2013-2014 (Health and Social Care Information Centre).

			Herefordshire	England	WestMids	Similar L/As
Living accommo	in dation	settled	50.5%	60.8%	72.2%	59.3%
In employment		7.1%	7.0%	10.4%	8.9%	

The measures are for those on the Care Programme Approach only and so may not include all of those in contact with secondary mental health services. They do, however, show that, for both indicators for 2013-2014 Herefordshire, averages were below those for the West Midlands, similar local authorities and England as a whole.

In order to increase availability of affordable settled accommodation, we are currently in the process of identifying a number of different housing models, which will be designed to meet needs and aspirations for supported and independent living.

In addition, some people with mental health problems will require a stay in hospital and the integration of housing with discharge planning is critical if delayed discharges are to be avoided.

7.9 Gypsies and Travellers

Various research has shown that Gypsies and Travellers are one of the most disadvantaged and socially excluded groups in the country. Often their life experience is one of considerable prejudice and discrimination and they are particularly susceptible to a range of inequalities relating to health, education and quality of accommodation.

There are significant health inequalities particularly around infant and maternal mortality and life expectancy, which is 10-12 years below that of the settled population.

In order to assess needs in Herefordshire, the research consultants Arc4 were commissioned. The results were published in the 'Herefordshire Gypsy and

¹⁵ Housing and Mental Health, Mental Health Network, December 2011

Traveller and Travelling Showperson Accommodation Assessment,' January 2015.

8. Health and Housing

8.1 Health and Social Care Act 2012

Local authorities' statutory responsibilities for public health services are set out in the Health and Social Care Act 2012.

The Act introduced substantial changes to the way that the NHS in England is organised. At the local level, Upper tier and unitary authorities took on new responsibilities to improve the health of their populations, backed by a ring-fenced grant and a specialist public health team, led by the director of public health.

Section 12 of the Act lists some of the steps to improve public health that local authorities and the Secretary of State are able to take, including:

 Providing assistance to help individuals minimise risks to health arising from their accommodation or environment, including improving poor housing where this impacts on health.

8.2 Care Act 2014

The Care Act 2014 is a landmark piece of legislation, which places a fundamental emphasis on prevention and the implementation of a system which intervenes early to prevent, reduce or delay the need for care and support.

The Act recognises housing authorities and housing providers as critical partners in the promotion of healthy independence and emotional wellbeing, making it clear that housing is a health-related service. In addition, the HCA acknowledges the positive relationship between good mental health and good housing and that it is core to social inclusion and recovery from mental illness.¹⁶

Specifically, Section 195 of the Act imposes a duty on Health and Wellbeing Boards (HWB) to encourage integrated working between commissioners of NHS, public health and social care services for the advancement of the health and wellbeing of the local population. A Health and Wellbeing Board must provide advice, assistance or other support in order to encourage partnership arrangements such as the developing of agreements to pool budgets or make lead commissioning arrangements under section 75 of the NHS Act.

¹⁶ Care and Support Specialised Housing Fund, HCA, February 2015.

There is an impressive and growing evidence base that shows housing related services can improve outcomes and reduce costs for the health services and other areas of public expenditure. Delivering services in the community, rather than in institutions also brings a sharper focus on social capital: helping people with health needs or long term conditions to build links with the community give and get support through informal social networks as well as specific services.

Housing has been defined as a health 'social determinant.' Social determinants of health are the key social factors that affect people's health over their lifetime and can either increase or reduce health inequalities between different groups in society. In comparison to other important social determinants of health, investing in housing and related services are one of the few interventions shown in systematic reviews to narrow inequalities in health outcomes between social groups.¹⁷

The section also enables the HWB to encourage those who arrange for the provision of services related to wider determinants of health, such as housing, to work closely with the HWB; and to promote close working with commissioners of health and social care services.

8.3 Market Shaping and Facilitation

The Care Act places new duties on local authorities to facilitate and shape their market for care, support and related services.

'Market shaping' requires local authorities to understand and identify existing, unmet and future needs for care, support and related services and to link this into Joint Strategic Needs Assessments and strategies. There is the expectation that a diverse provider market will be encouraged to invest in innovative and cost-effective service solutions, which support prevention and early intervention.

There are clear links between the Housing Strategy and market shaping in the fundamental importance of the identification of existing and projected longer term needs for housing, care and related services and in our work with providers to ensure that these needs are met.

8.4 Market Facilitation – Housing Need

In terms of housing need, market facilitation includes consideration of issues around:

How much housing and of what type and size is needed in each of Herefordshire's seven local market areas?

¹⁷ Public Health Research Consortium (2010) Tackling the Wider Social Determinants of Health and Health Inequalities: Evidence from Systematic Review

- What potential does supported or specialised housing have in avoiding the need for a move into residential care or enabling a move out of it?
- The importance of healthy housing in the private and owner occupied sectors as a 'prescription' to prevent costly health and social care interventions.
- What impact does the quality, design and affordable warmth of existing housing have on repeat hospital admission for people who are vulnerable?
- What types of communities will enable people with care needs to remain living in them or what needs to be done to support this?

In the document, Market Position Statements and Housing, ¹⁸ effective facilitation of housing markets starts from access to good market intelligence. This can then be used to encourage the market in particular directions, and to inform discussions with providers, consumers and planners about the type of accommodation that might be needed now and in the future.

8.5 Financial Costs of Poor Housing

In 2010 the BRE Trust published the results of a research project which sought to quantify the cost of people living in poor housing in England to the National Health Service. This was possible because of the availability of information from the English Housing Survey on the risk of a home incident occurring and its likely impact on health, measured through the Housing Health and Safety Rating System (HHSRS), combined with information from the NHS on treatment costs.

The March 2015 Briefing Paper updates the BRE models and calculations in the original research and also widens the definition from 'poor housing' to include all 'sub-standard' housing.

The data shows that the hazards of excess cold and falls are those which have the most impact on health. In terms of the costs of remedial action, excess cold dominates, while some hazards might be remedied for a relatively small cost, for example installing handrails on unsafe stairs or changing dangerous cooker positions.

The 2015 estimate for the cost of poor housing is £1.4bn, compared to £600m in the 2010 report.

The 'Improving the public's health: A resource for local authorities,' 19 report quotes research which quantifies the extent of the financial savings to health that can be achieved through 'healthy housing' interventions. Some examples include:

¹⁸ Institute of Public Care, December 2012

¹⁹ Kings Fund, December 2013

- Meeting the NICE guidelines on safety assessments and installing safety equipment in homes would cost £42,000 for an average local authority. If this prevented 10% of injuries, it would save £80,000 in prevented hospital admissions and emergency visits, with further savings in associated GP visits and for ambulance, police and fire services (NICE 2010).
- In the 10 best-performing Safe At Home scheme areas, hospital admissions fell by 29% (Laser Alliance 2012). This equated to an overall saving of £27 million, while the cost of implementing the programme in these areas was just £1.7 million.
- A Birmingham City Council health impact assessment established that a total outlay of £12 million achieved savings of £24 million a year, with the 'quickest wins' arising from improvements related to excess cold and reducing falls amongst older people.

8.6 Healthy Housing - Herefordshire

The Herefordshire Council Healthy Housing Survey 2011 was undertaken to provide a comprehensive review of current housing conditions across Herefordshire, to assess the impact of past policies and initiatives, and to inform future strategy and policy.

The fieldwork was completed during the period October 2011 to January 2012, and consisted of 1,264 individual property surveys, representing a 1.5% random sample of all residential properties in Herefordshire.

Information in the report confirms that the county's older housing profile, restricted access to mains gas, relatively low income levels and lower than average social housing options, combine to create complex housing challenges, each of which has a cumulative adverse impact on the other.

Survey Key Findings:

- 27% of private housing within Herefordshire fail the Decent Homes Standard overall, with a total cost implication of £37,395,278, an average of £1,680 per failing dwelling. Nationally 26.5% of private sector dwellings were non-decent, therefore Herefordshire is performing marginally below the national average.
- 21% of dwellings were assessed as exhibiting Category 1 Housing Health and Safety Rating System (HHSRS) hazards. The English Housing Condition Survey (EHS) 2010-11 reported that nationally 17.1% of private dwellings contained a HHSRS Category 1 failure.
- 26% of households classed as vulnerable, occupy dwellings which fail the Decent Homes Standard, almost half of which are pre 1945 properties.

- In the owner occupied sector 28% of homes are non-decent and 20% of these are occupied by vulnerable households.
- In the private rented sector 32% of dwellings are non-decent and 55% of these are occupied by vulnerable households.
- More than half (52.4%) of households are not in a position to improve the condition of their home. More than a third (37%) are not homeowners, and therefore not responsible for home improvements.

8.7 Fuel Poverty

A fuel poor household is one that cannot afford to keep adequately warm at reasonable cost. Many of these households often face the difficult choice of either paying for sufficient fuel to keep warm or paying for other basic necessities.

16.4% of Herefordshire households were classed as fuel poor in 2012. These figures were higher than those in other parts of the West Midlands region, neighbouring Shropshire and Worcestershire and England as a whole.

Fuel Poverty has become a significant public health priority. Preliminary excess winter death (EWD)²⁰ figures for the period 2012-13 showed an increase of 29% on the equivalent period from 2011-2012.

Public Health England's 2014 Cold Weather Plan demonstrates that winter weather has a direct effect on the incidence of heart attack, stroke, respiratory disease, flu, falls and injuries and hypothermia. Indirect effects include, mental health problems such as depression, and the risk of carbon monoxide poisoning if boilers, cooking and heating appliances are poorly maintained or poorly ventilated.

8.8 Herefordshire Council's Affordable Warmth Strategy 2015-18

The strategy makes the following points:

- Nationally, Fuel Poverty remains a key priority. 2013 figures show that 2.35 million English households live in Fuel Poverty, approximately 10.4 percent of all households in England.
- The government's Fuel Poverty Advisory Group is strongly encouraging the Department of Health, NHS England and Public Health England to support the development of preventative action with a strong focus on fuel poverty alleviation.

²⁰ These are deaths which are directly related to the cold weather. These are people who generally have underlying health problems, but would not have been expected to die during this period.

- Households on fixed low incomes are particularly vulnerable to fuel poverty. These include older people, (especially those who live alone), people with a disability, a long term or life-limiting illness, or mental ill health, single parents with dependent children and those out of or unable to work.
- People living in inefficient housing are also vulnerable. Typically, older properties are less energy efficient and are often less likely to have had insulation improvements installed. They are also often harder to insulate due to the complexities of their construction.

Fuel Poverty remains a significant public health issue. Cold-related illness, stress and excess winter deaths can all be linked to the prevalence of fuel poverty.

Analysis in the council's Affordable Warmth Strategy suggests that, using Age UK (2012) and Herefordshire population data, it can be estimated that the cost to the NHS in Herefordshire owing to cold homes is £4,706,935 and that reducing fuel poverty would lead to consequential reductions in local health spend, GP referrals and hospital admissions.

It is clear therefore, that initiatives promoting healthy housing, affordable warmth and other related services, which are integrated and jointly commissioned across health, housing and social care have significant potential as a preventative activity to help vulnerable people remain well and independent in their own homes.

In addition to the clear health benefits an increase in energy efficiency measure installed in homes could also have a positive impact on the local economy through increased employment opportunities and skills development.

8.9 Home Improvement Agency

A priority for Herefordshire is to provide a range of choice, advice and support to enable older people, disabled and vulnerable people to live safely and independently in their own homes. Latest reports from Age UK showed that 1.9 million bed days were lost to the NHS in the four years to June 2014 as older patients, who were ready to leave hospital, were delayed whilst waiting for home adaptations or care packages to be put in place.

Herefordshire Council's Home Improvement Agency supports vulnerable people to live independently by providing, enabling or signposting to services which promote continued independent living. They also oversee major work such as the installation of level access showers and stair lifts carried out through Disabled Facilities Grants (DFG), which are now part of the Better Care Fund.

9. Actions to Achieve our Priorities

It should be noted that all identified strategic priorities have been developed on the basis of existing, or known, proposed changes to national housing, planning and social welfare policy. However, as at January 2016 this remains in a state of flux and firm futures on which to base our strategic housing priorities remain uncertain.

9.1 Priority 1 Actions: Improving Housing Supply and Access to Housing

Overall, it should be recognised that there are limits on the amount of control that councils' have on the operation of the provider market and consequently on issues such as how much housing is delivered, its affordability and tenure balance.

The majority of new homes will be built by private developers for sale to those seeking and able to buy on the open market. The type, size and location of developments will be directly influenced by housing demand and the affordability of the properties. Additionally a number of affordable rented or intermediate homes will also need to be built for those unable to meet the financial commitment necessary to buy.

However, at the heart of the Government's policy in the National Planning Policy Framework March, 2012 is a presumption in favour of sustainable development. Herefordshire Council intends to achieve this presumption in its published 'Presumption in favour of sustainable development policy.'

In addition, the delivery of new housing will be supported through the following actions:

Delivering New Homes Policy SS2

- A supply of deliverable and developable land will be identified to secure the delivery of a minimum of 16,500 homes in Herefordshire between 2011 and 2031 to meet market and affordable housing need.
- Hereford will be the focus for new housing development to support its role as the main centre in the county. Outside Hereford, the main focus for new housing development will take place in the market towns of Bromyard, Kington, Ledbury, Leominster and Ross on Wye.

Affordable Housing Policy H1 – thresholds and targets

- All new open market housing proposals on sites of more than 10 dwellings, which have a maximum combined gross floor space of more than 1000 sqm will be expected to contribute towards meeting affordable housing needs.
- ➤ We have set Indicative affordable housing targets of 35% and 40% have been established for different parts of the county, based on evidence of need and viability in the county's housing market and housing value areas.
- Affordable housing provided under the terms of this policy will be expected to be available in perpetuity for those in local housing need.

Rural Exception Sites Policy H2

- We recognise that the provision of affordable housing is more difficult in rural areas where often the scale and location of new development is more restricted. Proposals for affordable housing schemes in rural areas may be permitted on land, which would not normally be released for housing in accordance with the criteria set down in the policy.
- ➤ The policy enables the provision of affordable housing outside of villages, in areas where there is generally a restraint on open market housing, so as to help meet affordable housing needs in rural areas in perpetuity.
- In order to enable the delivery of affordable housing some market housing may be permitted, as part of the development, to subsidise a significant proportion of affordable housing provision. This will need to be evidenced through a financial appraisal as set down in the policy.

Traveller sites Policy H4

- The accommodation needs of travellers will be provided for through the preparation of a Travellers' Development Plan Document (DPD) which will include site specific allocations.
- Traveller sites include those considered necessary to meet the residential needs of gypsies and travellers, who will remain in a location permanently or for substantial periods, transit sites for those moving through the area as well as plots for travelling show people.

Individual or Group Self and Custom Build

The council recognises that individual or group self and custom build projects will contribute to the delivery of homes over the plan period. These may be in the form of affordable, low cost market and open market housing. We will encourage and support this type of development where the proposals are in line with the relevant policies of the Core Strategy and neighbourhood plans.

Ensuring sufficient housing land delivery Policy SS3

- A sufficient supply of housing land will be maintained to ensure the delivery of the Core Strategy housing target over the plan period. The rate of housing delivery and supply will be assessed though the annual monitoring process.
- If monitoring demonstrates that the number of new dwelling completions is below the cumulative target figure, over a financial year, we will prioritise increasing housing supply in the following monitoring periods.
- In respect to the housing target for the county, the expectation is that the highest rate of housing completions will be towards the latter end of the plan period.

Joint Venture Developments

• We will explore the opportunities for undertaking Joint Venture developments, potentially, as a funding mechanism for the delivery of new student accommodation for Hereford's new university.

Maximise External funding Opportunities

We will continue to work with the Homes and Communities Agency, the Local Enterprise Partnerships and other partners to maximise the amount of external funding that can be drawn into Herefordshire to promote and deliver housing and economic growth.

Increasing Housing Options and Choice for Older People

We will ensure development of sufficient market rent and affordable housing and appropriate housing with care to meet the future needs of older people, through implementing the actions identified the Older People's Housing Strategy and Pathway Action Plan.

Review the Home Point Choice Based Lettings (CBL) Allocation Policy

The Home Point Allocations Policy is currently being thoroughly reviewed following consultation with partner agencies and other stakeholders. The review identified a number of issues with the policy, which the reviewed draft policy addresses. Remaining key actions include:

- Modelling the draft policy to ensure it meets identified objectives.
- Undertaking the necessary work to facilitate policy implementation in Autumn 2016.

Priority 2 Actions: Improving Housing Support

Accommodation Based and Floating Support

Housing related support services are commissioned through a competitive tender process, which reflects our commissioning approach of service delivery based on the outcomes to be achieved and the most effective way of securing value for money.

- We will continue to provide accommodation based and floating support to vulnerable people including people with recent offending behaviour, substance misuse, mental health and mild learning disabilities, through a delivery partner.
- We will continue to provide accommodated based housing support for young people, through a delivery partners.
- Discussions are currently between Adults and Wellbeing Directorate, Children's Services and a provider for the development of support specifically targeting young people.

Increase Housing Options and Support Choice for Vulnerable People

 We are working towards delivering a range of housing and support options to address the needs of learning disabled people, autistic people and people with mental ill health.

Preventing Homelessness

- We will ensure that we continue to prevent homelessness occurring through implementing the actions identified in our Homelessness Prevention Strategy 2016-2020. The Homelessness Review 2016-2020 provides the evidence base for the following Strategic Objectives:
 - i. Minimise rough sleeping and increase tenancy sustainment opportunities for rough sleepers and people with complex needs.
 - ii. Maximise homeless prevention activity by building on current success and promoting positive opportunities for homeless people.
 - iii. Help improve the health and wellbeing of homeless people and those who are at risk of homelessness.
 - iv. Ensure homeless people are able to access affordable housing and that support services are targeted effectively.

Maximising External Funding Opportunities

 We intend to maximise investment opportunities to ensure that our housing priorities are delivered. We will work will with partners, including RSLs, voluntary and community groups, charitable foundations, the HCA, DoH and any appropriate organisation to secure additional funding with which to increase the range of services available.

Promoting Independent Living

- We will continue to provide a range of choice, advice and support to enable older people, disabled and vulnerable people to live safely and independently in their own homes.
- Herefordshire Council's Home Improvement Agency (HIA) supports vulnerable people to live independently by providing, enabling or signposting to services which promote continued independent living. The HIA also oversee major work such as the installation of level access showers and stair lifts carried out through Disabled Facilities Grants (DFG), which are now part of the Better Care Fund.

Priority 3 Actions: Improving Housing Quality

As previously identified there are clear links between health and housing. The March 2015 BRE Briefing Paper, 'The Cost of Poor Housing the NHS, estimates the cost of poor housing to be in the region of £1.4bn. This includes the impact of cold homes on health.

- We will ensure that we address the issue of cold homes and fuel poverty in Herefordshire through implementing the actions identified in the Affordable Warmth Strategy 2015-2018.
- We continue to follow up all complaints about disrepair or poor management from tenants and take any necessary enforcement action to make sure that there is no risk to the health and safety of the occupants.
- The council no longer has the financial resources to improve the condition of all non-decent private sector homes and needs to identify other ways to help fund work. This may include considering equity release schemes.
- We are considering the resource feasibility of developing hosing and health profiles in accordance with Housing and Health Toolkit developed on behalf of the Chartered Institute of Environment Health and commissioned by Public Health England.