

# Local Housing Strategy 2021-2026

**Updated using feedback from Community Consultation** 

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The aim of this strategy is to provide an overview of the housing related work delivered by Herefordshire Council. It outlines what is being delivered currently and why, as well as detailing the improvements that the council intends to make over the next five years based on existing plans and strategies. The Strategy does not seek to duplicate existing strategies, policies or action plans. Whilst this strategy refers to planning policy, it is not a planning document and cannot change existing planning policy.

Many of the actions outlined in this strategy are already underway or planned using existing resources; the local housing strategy is an overview of the work. Where it is possible to do so, external funding will be sought to support elements of the work.

Herefordshire had a total dwelling stock of 85,995 dwellings in April 2019. Of this 86.5% was in private sector ownership and 13.1% by Registered Providers (of social housing), and 0.4% by other public sector bodies. Just over two thirds of the County's housing stock comprises familysized housing with three or more bedrooms[1]. There is a concentration of smaller dwellings in Hereford City and the larger market towns. Detached properties represented 42.7% of the housing stock in the County compared to 23.7% across the West Midlands and 22.6% across England and Wales.

Affordability is a key issue in Herefordshire. The median value of house sales across the county in 2019 was £235,000. The median house price-to-earnings ratio in Herefordshire in 2019 was 11.9[2]; this is significantly higher than both the West Midlands and national averages, at 6.2 and 7.1 respectively, pointing to stronger relative affordability pressures.

There are a number of challenges facing Herefordshire Council and our partners, which will influence the delivery of priorities in this Housing Strategy. These include changes to the welfare system and the amount of benefits that people receive, Covid 19 both in terms of its immediate and long term impact, environmental challenges including climate change and phosphates in the rivers Lugg and Wye, our aging population and the availability of funding.

Having reviewed and considered the current housing market area needs assessment, population changes, health data, environmental and housing policy, four priorities have been established for the next 5 years.

#### Eliminate the negative impact that our homes have on the environment

The accelerating impact of climate change is a global concern that affects Herefordshire. The council have recognised this and declared a climate and ecological emergency. We have set out our carbon reduction goals in our carbon management and housing and building action plans.

The council has range of environmental, ecological and climate policies set out in the Core Strategy 2011 - 2031. These are complimented by the Herefordshire Future Homes standards, which were agreed by Cabinet in September 2021. The document sets the standard for new homes built by the council and acts as guidance for other developers bringing housing forward in the county.

#### Increase the number of affordable homes available for rent or buy in line with need.

Affordability of housing in Herefordshire is a challenge, set against a back drop of wider socio economic issues including the need for wage growth, skills development and increasing the number of skills job opportunities in Herefordshire. Affordable housing, as defined by the National Planning Policy Framework, is housing for sale or rent for those whose needs are not met by the market. The provision of affordable housing is a key element of the Government's plan to end the housing crisis, tackle homelessness and provide aspiring homeowners with a step onto the housing ladder. [3] There are a range of different tenures that are considered to be affordable housing, including the provision of social housing. More detail about these is in our technical data on the provision of affordable housing and in the glossary at the end of this document. Herefordshire Council negotiates with developers to ensure the provision of affordable housing.

<sup>[1]</sup> Draft Housing Market Area Needs Assessment – August 2020, p20, Iceni Projects Limited

<sup>[2]</sup> This is based on workplace-based earnings.

<sup>[3]</sup> https://www.gov.uk/guidance/apply-for-affordable-housing-funding - 23.02.21

Registered providers are an essential partner in the delivery of housing in Herefordshire. The Council does not have any general needs housing stock<sup>[4]</sup> instead social housing in Herefordshire is supplied by a range of registered providers. The Council works in partnership with registered providers to allocate social housing to those most in need via Herefordshire Home Point.

# Improve the quality and accessibility of homes in Herefordshire and bring long-term empty properties back into use.

We know that good quality housing is also likely to lead to better health through its indirect impact on other factors including improved outcomes in the early years, better employment prospects and strong community resilience and wellbeing, which are all associated with good health<sup>[5]</sup>.

Housing is particularly important in ensuring a healthy start in life and is a key factor in the generation of health inequalities. Health inequalities are unfair and avoidable differences in health across the population and between different groups in society.

The cost of poor housing to the NHS is estimated at £1.4 billion a year<sup>[6]</sup>. It is estimated that reducing excess cold in homes to an acceptable level would save the NHS £848 million per annum and reducing falls in the home could save the NHS £435 million.

The council contributes to the quality of new builds via the planning process and through building regulations. We also work to improve the quality of existing homes through the provision of the <a href="Keep Herefordshire Warm">Keep Herefordshire Warm</a> service and through environmental health enforcement action when conditions are so poor that they are considered hazardous in line with the Housing Health and Safety Rating System (HHRSS).

There were 284 long term empty<sup>[7]</sup> properties in Herefordshire in January 2021. An empty property is a waste of a valuable resource and they have a significant impact on the local environment and community. Empty properties can have an impact on anti-social behaviour, property prices and other environmental issues. Herefordshire Council is working with property owners to address the reasons for empty homes which are often complex, offering practical support and funding where the empty property meets set criteria.

#### Work in partnership to assess and deliver solutions to identified housing need.

Our housing need changes throughout the course of our lives. In order to understand more about changing need and how to meet this Herefordshire Council gather intelligence about existing demand and use a range of information including population forecast to map future demand on services. The council uses a range of tools, data and specialist advice to assess current and forecast future housing need, but it is not an exact science. Being in housing need is sometimes the result of other complex issues, which need to be addressed more broadly.

The council works closely with registered providers, supported housing providers, residential care providers, private landlords and short term accommodation providers in order to offer housing solutions for those with high levels of housing need. In 2021 Herefordshire Council became a registered landlord; we are currently proving housing for vulnerable young people and are expanding our small portfolio to include transitional accommodation in 2022.

In order to meet the priorities outlined above we will work with a wide range of partners including statutory organisations, developers, registered providers, private sector landlords, individual homeowners and charitable organisations across Herefordshire.

#### Introduction

<sup>[4]</sup> Note: General needs housing means housing that is not purpose built, adapted or managed for a particular client group.

<sup>[5]</sup> Buck D, Gregory S (2013). Improving the Public's Health

Building Research Establishment (2015). The cost of poor housing to the NHS

<sup>&</sup>lt;sup>17]</sup> Note – DLUHC classes problematic empty properties as those that are inactive in the housing market and have been empty for more than 6 months.

The aim of this strategy is to provide an overview of the housing related work delivered by Herefordshire Council. It outlines what is being delivered currently and why, as well as detailing the improvements that the council intends to make over the next five years based on existing plans and strategies. The Strategy does not seek to duplicate existing strategies, policies or action plans, but will signpost to these throughout. The council has a range of statutory powers and roles in relation to housing including:

- Assess local housing needs and understand the local housing market.
- Develop effective partnerships to increase the supply of affordable housing.
- Prevention and relief of homelessness.
- Improve housing conditions in the private sector.
- Enable people to live independently in their own homes.
- Ensuring safe and controlled development of new homes across the county through the Core Strategy.
- Reducing the contribution that housing makes to climate change.

Please note that whilst this strategy refers to planning policy, it is not a planning document and cannot change existing planning policy. Changes to planning policy can only be made via a formal core strategy review or via legislative changes at a national level.

On 9 November 2020 the Cabinet Member for Infrastructure and Transport took the decision to agree to <u>update the Herefordshire Local Plan Core Strategy</u>, following a review of the adopted plan and in the light of the proposals set out in the <u>governments White Paper: Planning for the Future</u>.

Many of the actions outlined in this strategy are already underway or planned using existing resources; the local housing strategy is an overview of our work. Where it is possible to do so, we will seek external funding to support elements of our work. A wide range of strategies and delivery plans have contributed to this document. The strategy does not include a direct delivery plan, concentrating instead on performance indicators from existing delivery plans.

#### **Herefordshire County Plan**

The <u>County Plan</u> shapes the future of Herefordshire and aims to encourage and strengthen our vibrant communities, create a thriving local economy and protect and enhance our environment to ensure Herefordshire remains a great place to live, visit, work, learn and do business. Underpinning this plan are the themes of **connectivity, wellbeing and sustainability**, which sit at the core of our policy making, planning and design for the future.

The plan says that Herefordshire needs more genuinely affordable homes delivered through carefully planned policies for growth and commits to the following actions:

- We will use our Herefordshire Area Plan, communities' own Neighbourhood Development Plans, and an updated Core Strategy to make sure we deliver sustainable development, which meets the needs of local people while respecting our heritage and our natural environment.
- Investing in improved community infrastructure is an important factor in delivering community resilience as the county's population grows.
- We will work with housing associations and developers to enable them to build more homes for sale and for long-term rent. To drive the delivery of affordable housing, the council will look to develop its own housing stock to provide over 1,000 additional genuinely affordable homes for local people in Herefordshire.
- Increasing the number of private properties to rent is also important, so we will work with landlords and local people to speed up the rate at which empty properties are brought back into active use and to support community land trusts and community-owned housing projects to succeed.

#### **Development in Herefordshire – Core Strategy**

The <u>Core Strategy</u> seeks to balance environmental issues with economic and social needs and ensure that development is sustainable and does not cause irreversible harm to important resources and features in line with the <u>National Planning Policy Framework</u> (NPPF). It sets a vision as to how the county should look and function and how development needs will be met up to 2031. The Core Strategy has a range of aims including meeting the housing needs of all sections of the community (especially those in need of affordable housing), by providing a range of quality, energy efficient homes in the right place at the right time.

Policy SS2 sets out a housing requirement for the delivery of a minimum of 16,500 homes (825 per annum) in Herefordshire between 2011 and 2031 to meet market and affordable housing need. It outlines a distribution of development across the County, which seeks to focus development in Hereford (providing 6,500 dwellings); followed by the market towns of Bromyard, Kington, Ledbury, Leominster and Ross on Wye (4,700 dwellings), with more limited development in rural settlements (5,300 dwellings). Please note that this target increased to 846 homes per annum in 2018.

#### **Understanding the Local Housing Market and Housing Need**

Herefordshire Council commissioned a Housing Market Area Needs Assessment in 2020 (HMANA). This document is a used to assess housing need across the county and inform our plans, strategies and projects. A copy of the document can be found here.

#### Review of this strategy

Progress against the actions in this strategy will be monitored via the performance indicators detailed in appendix 1 and will be accountable to the Housing Board, which brings together the teams involved in the delivery of housing related services across the Council. The full strategy will be reviewed towards the end of its five-year term. It may be reviewed sooner if prompted by central government legislative changes or significant council policy developments which impact upon it.

#### **Herefordshire in Context**

#### **Key Facts about Herefordshire**

- Population: As of mid-2019, Herefordshire's resident population was estimated to be 192,800.<sup>1</sup>
- Herefordshire's land classification: 95% of land classified as 'rural'. Over half of the population live in rural areas.
- Distribution of population (mid-2017): Just under a third of the population lives in Hereford city (61,400 people), and just under a fifth in one of the three largest market towns of Leominster (12,200), Ross (11,400) and Ledbury (10,100).
- Population aged 65 years or above (mid-2018): 24% (Herefordshire); 18% (nationally).
- Number of dwellings: Herefordshire had a total dwelling stock of 85,995 dwellings in April 2019.
- Cat 1 Hazards: An estimated 19,358 owner occupied dwellings and a further estimated 3,813 dwellings in the private rented sector had a category 1 Housing Health and Safety Rating System (HHSRS) hazard in 2019.
- Households in fuel poverty (in 2018): 12.9% (Herefordshire); 11.4% (West Midlands); 10.3% (England).
- EPC data: 17,149 (23.8%) of private owned and occupied dwellings and 3131 (20.6%) of private rented dwellings in Herefordshire are estimated to have an EPC rating below band E.
- Housing affordability: The median house price-to-earnings ratio in Herefordshire in 2019 was 11.9, which is significantly higher than both the West Midlands and national averages, at 6.2

<sup>&</sup>lt;sup>1</sup> https://understanding.herefordshire.gov.uk/population/ - 06.01.2021

- and 7.1 respectively, pointing to stronger relative affordability pressures. This is based on workplace-based earnings.
- Earnings in Herefordshire are consistently significantly lower than the average in England and the West Midlands. In 2018, the median weekly earnings for people who work in Herefordshire were £461.10, compared to £536.60 in the West Midlands and £574.90 in England.
- Geographical Barriers to Services is one of the domains that make up the Index of Multiple Deprivation (IMD). In 2015, almost half (55) of Herefordshire Lower Super Output Areas (LSOAs) [1] were among the 10% most deprived in England. In contrast, there were just eight LSOAs among the 25% least deprived in England.

# Housing tenure profile

Herefordshire had a total dwelling stock of 85,995 dwellings in April 2019. Of this 86.5% is in private sector ownership and 13.1% by Registered Providers, and 0.4% by other public sector bodies. Private sector ownership is above the England average (82.6%). Over the period since 2011, whilst levels of both affordable and market housing have grown, the strongest growth has been in market housing resulting in growth in the proportion of market housing rising from 85.8% to 86.5% of the stock; with a corresponding reduction in affordable housing as a proportion of the stock<sup>2</sup>.

A detailed profile of the split of market housing between owner occupied, private renting and shared ownership is not commonly available. The 2011 Census showed that 68.7% of households were owner-occupiers in 2011 in Herefordshire compared to 65.6% across the West Midlands and 64.2% across England. The social rented sector accommodated a lower proportion of households in 2011 at 13.1% compared to 19.0% across the West Midlands and 13.9% across England. Within Herefordshire, private renting accommodated 15.2% of households across the County in 2011, compared to 14.0% across the West Midlands region and 16.8% across England<sup>3</sup>.

# House type

The 2011 Census data showed a profile of homes of different sizes, in Herefordshire this leans more towards larger properties. Just over two thirds of the County's housing stock comprises family-sized housing with three or more bedrooms<sup>4</sup>. There is a concentration of smaller dwellings in Hereford and the larger market towns. Detached properties represented 42.7% of the housing stock in the County compared to 23.7% across the West Midlands and 22.6% across England and Wales. Semi-detached properties represent 28% of stock across the county. Conversely, flatted and terraced properties are less well represented. Flats/maisonettes represented a notably smaller proportion of housing stock within the County at 12.1% compared to 16.2% housing stock in the West Midlands and 21.6% within the England and Wales.

There is a mismatch between existing social housing stock and demand, with the greatest demand being for one bedroom accommodation. We have larger numbers of two and three bedroom properties available. Occasionally there is a requirement for large family homes, which are hard to secure via registered providers in Herefordshire, due to their exceptional nature.

# House prices and affordability<sup>5</sup>

- The median value of house sales across Herefordshire in 2019 was £235,000. The
  median house price-to-earnings ratio in Herefordshire in 2019 at 11.9 is significantly
  higher than both the West Midlands and national averages, at 6.2 and 7.1 respectively,
  pointing to stronger relative affordability pressures. This is based on workplace-based
  earnings.
- Over the last 15 years, the median house price-to-earnings ratio has increased by almost 4 points, from 8.0 in 2003 to 11.9 in 2019. It has seen significantly greater comparative

 $<sup>^{\</sup>rm 2}$  Draft Housing Market Area Needs Assessment– August 2020, p18, Iceni Projects Limited

<sup>&</sup>lt;sup>3</sup> Draft Housing Market Area Needs Assessment – August 2020, p19, Iceni Projects Limited

<sup>&</sup>lt;sup>4</sup> Draft Housing Market Area Needs Assessment – August 2020, p20, Iceni Projects Limited

<sup>&</sup>lt;sup>5</sup> Draft Housing Market Area Needs Assessment – August 2020, p41-42, Iceni Projects Limited

- growth than has been evident across the West Midlands or nationally pointing to a stronger comparative deterioration in affordability in the County. Much of this increase (60%) has occurred over the last 5-year period (2014-19).
- Median monthly rents vary from £412 for a Room and £380 for a Studio to £995 for 4+ bed properties in Herefordshire. Whilst the median rent for all properties is 7% below the West Midlands average (£600 per month compared with £645 per month), rents in Herefordshire for rooms in particular, and for 3-bed properties are above the regional average; £412 compared to £355 per month and £750 compared with £715 per month respectively<sup>6</sup>.

#### Overall housing need

The calculation for overall housing need has changed since Herefordshire's Core Strategy was published in 2015. It was revised in 2018 through the revised National Planning Policy Framework. Using the current methodology Herefordshire's minimum annual housing need is 846 per annum. This can be met by the development of new build homes and bringing empty properties into residential use and includes all types of housing. A more detailed assessment of housing need has been undertaken through the Housing Market Area Need Assessment, this includes local calculations about housing need for specific tenures e.g. affordable and social housing for rent and ownership. These should be considered separately from the national housing target as they use different methodologies.

#### Social housing in Herefordshire

Registered providers are an essential partner in the delivery of housing in Herefordshire. The Council does not have any general needs housing stock<sup>7</sup> instead social housing in Herefordshire is supplied by a range of registered providers. The Council works in partnership with registered providers to allocate social housing to those most in need via Herefordshire Home Point.

Home Point is a choice based lettings scheme that enables registered customers to bid on properties, as they become available, giving people more choice about where they want to live. Home Point advertises approximately 75% of social housing for rent through the main housing associations operating across the county; the remaining 25% is managed directly by the registered providers. A new <a href="housing allocations scheme">housing allocations scheme</a> was introduced in June 2020. The new scheme introduces an increased number of criteria within the Bands A to D, to help us to better understand housing need across the county. It also introduced the option for people with a housing want, rather than need, to register for properties. This is called Band E and enables registered providers to advertise properties that sit outside of the housing allocations scheme (e.g. the remaining 25% of their stock), or properties that have not been allocated through the Home Point system; enabling and encouraging effective use of housing stock. Band E is open to existing housing association tenants and general applicants.

In addition to this, registered providers support the work of the Council in delivering specialist housing for vulnerable groups, by developing bespoke housing schemes on a needs led basis. They also contribute to the wider housing market by building new, mixed tenure, developments across the county.

#### **Future Impacts**

<sup>&</sup>lt;sup>6</sup> Draft Housing Market Area Needs Assessment – August 2020, p36, Iceni Projects Limited

<sup>&</sup>lt;sup>7</sup> Note: General needs housing means housing that is not purpose built, adapted or managed for a particular client group.

There are a number of challenges facing Herefordshire Council and our partners, which will influence the delivery of priorities in this Housing Strategy. These include:

#### Changes to the welfare system

Welfare Reforms will continue to reduce the income of many households across the county, particularly households who are already facing financial exclusion; the roll out of Universal Credit is not yet complete across Herefordshire. Universal credit and local housing allowances have been increased in 2020 due to Covid 19. This came to an end in October 2021, the impact of the withdrawal of this increase is forecast to propel even more households into poverty.

#### • Intensive housing management

Supported Housing is provided to tenants who have changing needs and / or who are facing specific challenges on their route to independent living within the community. Intensive Housing Management is essentially a series of Housing Benefit eligible tasks that go beyond normal housing management functions because of the tenants' greater needs. Supported Housing Schemes across Herefordshire are finding it difficult to qualify for Intensive Housing Management, meaning that it is increasingly challenging to run supported housing schemes in the county.

# Changing legislation

There are a number of Bills and Whitepapers in progress through government that will influence our work over the lifetime of this strategy. These include the Renters Reform Bill, Domestic Abuse Bill, Environmental Bill, Changes to the Planning System and Planning for the Future whitepapers, and the Future Homes standard (changes to building regulations).

#### Changes to local authority funding

The council has had to make substantial savings in response to reductions in central government funding, meaning that we have less human and cash resources. Herefordshire has a higher than average proportion of people in the county over the age of retirement, resulting in a growing demand for, and cost of, adult social care provision. The costs related to severe flooding across Herefordshire and the delivery of Covid 19 support for people in need across Herefordshire in 2020/2021 has placed further pressure on the council's budget. It is not currently possible to assess the impact of the United Kingdom's withdrawal from the European Union.

#### External funding programmes and opportunities

The Government issues housing related funding programmes on an ad hoc basis and Herefordshire Council, along with local registered providers, will seek to respond to these opportunities where they meet an identified housing need

#### • Environmental issues

The accelerating impact of climate change will continue to affect weather patterns across the UK, leading to in an increase in flooding and unpredictable weather events. Herefordshire Council have recognised this and declared a <u>climate and ecological emergency</u>. This impacts on every part of the Local Authority's work including the delivery of new net zero carbon homes and work to minimise the negative environmental impact of existing housing e.g. issues related to thermal comfort such as insulation and space heating. The issue of phosphate's in the River Lugg and the related monitorium on development is having a significant impact on housing delivery in Herefordshire.

#### Demographic changes and challenges

Herefordshire's population is growing. The latest (2018-based Sub National Population Projections) predict that Herefordshire's population will have grown to 209,878<sup>i</sup> by 2041. Analysis

suggests that the largest growth will be in people aged 65 and over. In 2041 it is projected that there will be 67,200 people aged 65 and over. This is an increase of 18,900 from 2020, representing growth of 39%. The population aged 85 and over is projected to increase by an even greater proportion, 81%. Looking at the other end of the age spectrum the data shows a projected decrease in the number of children (those aged Under 15), with modest increases or decreases shown for adult age groups. This projected increase in older residents will be a significant pressure on resources available to meet housing need and promote independence. The recent Market Area Needs Assessment indicates that there is a lack of suitable housing for older people and that this will need to be a focus for future supply.

#### Covid 19 pandemic

Government data indicates that there were 24,800 claimants on the Government's Coronavirus Job Retention Scheme in August 2020 representing 31% of employees. Whilst this is marginally below the West Midlands average of 34%, it remains very significant. In addition, 72% of those self-employed had taken up Self-Employment Income Support from Government. As the support mechanisms come to an end there is potential for both further increase in unemployment and in homelessness levels<sup>9</sup>.

The full impact of Covid 19 and the resulting national recession on the demand for, and affordability of housing in Herefordshire is not yet known. This applies to all types of housing from temporary accommodation, used to house the homeless during the initial local down period, through to the implications for the wider housing market. The Joseph Rowntree Foundations annual report <a href="UK Poverty 2020/21">UK Poverty 2020/21</a> assesses the initial impact that the pandemic has had on people in the UK and most specifically on those who were already living on the margins of poverty, or in poverty before the pandemic started.

Covid 19 has also had an impact on the council's ability to deliver some of our housing related work as staff have been redeployed to Covid 19 related tasks, this is particularly the case for the environmental health and public health teams.

#### Key achievements over the last 5 years<sup>10</sup>

- Registered Providers have delivered 464 units of affordable housing since January 2016, including 124 units of shared ownership.
- 671 units of accommodation have been developed through section 106 agreements since January 2016 of which 270 were affordable.
- 746 disabled facilities grants have been awarded across all housing sectors for essential adaptions to support independent living.
- The Government's Help to Buy scheme has supported the purchase of 41% (380 out of 936) new build sales between 2014 and 2019.
- Empty Property Officer appointed in December 2019. Progress in this area has been hampered by Covid 19, but 6 empty properties were still brought back into use during 2020.
- Development of eighteen new units of supported accommodation for vulnerable young people.

<sup>&</sup>lt;sup>8</sup> Draft Housing Market Area Needs Assessment – August 2020 Iceni Projects Limited

<sup>&</sup>lt;sup>9</sup> Draft Housing Market Area Needs Assessment – November 2020 p29: Iceni Projects Limited

<sup>&</sup>lt;sup>10</sup> Note- 5 years between January 2016 and January 2020 unless otherwise stated.

- Development of six new units of supported accommodation for people with a learning disability.
- With key partners, the development and delivery of a purpose built refuge for survivors of domestic abuse.
- A grant of £285,000 was secured in 2016 through the Department of Health's Housing and Technology Fund. This enabled the retrofitting assistive technology such as assisted automated doors, video door entry/contact systems and telecare systems into 12 existing Learning Disabled designated supported living/housing schemes (81 units of accommodation) during 2017/18.
- £1,495,437 grant funding secured to support Rough Sleepers, people at risk of rough sleeping and homelessness during 2019/20.
- Secured agreement from full council to build new council owned houses in Herefordshire.
   Potential sites have been identified and £2million has been secured for flood alleviation works for Merton Meadow from the Brownfields Land Release Fund.

#### Our housing vision

To effectively meet the housing needs of people living in Herefordshire, promote independence and create healthy and sustainable communities.

Having reviewed and considered the current housing market area needs assessment, population changes, health data, environmental and housing policy, we have established four priorities for the next 5 years:

- 1. Eliminate the negative impact that our homes have on the environment
- 2. Increase the number of affordable homes available for rent or buy in line with need.
- 3. Improve the quality and accessibility of homes in Herefordshire and bring long-term empty properties back into use.
- 4. Work in partnership to assess and deliver solutions to identified housing need.

In order to achieve this vision we will work with a wide range of partners including statutory organisations, developers, registered providers, private sector landlords, individual homeowners and charitable organisations across Herefordshire.

#### Priority 1 - Eliminate the negative impact that our homes have on the environment

The accelerating impact of climate change is a global concern. The council have recognised this and declared a <u>climate and ecological emergency</u>. We have set out our carbon reduction goals in our <u>carbon management</u> and <u>housing and building</u> action plans.

The main source of emissions from residential sectors is the use of natural gas for heating (and for cooking in the case of the residential sector). It should be noted that emissions from these sectors do not include emissions from the generation of electricity consumed, as these emissions are included in the energy sector. In 2020, the residential sector emitted 67.7 MtCO2, accounting for 20.8% of all carbon dioxide emissions<sup>11</sup>.

As a county we are in carbon decline, but there is still much to be achieved in order for Herefordshire to become carbon zero by 2030. For more information on our progress to date please see the <u>Understanding Herefordshire website.</u>

The council has range of environmental, ecological and climate policies set out in the Core Strategy. These are complimented by the <u>Herefordshire Future Homes</u> standards, which were agreed by Cabinet in September 2021. The document sets the standard for new homes built by the council and acts as guidance for other developers bringing housing forward in the county.

#### Energy efficiency of privately owned housing stock

Herefordshire, as a large rural county, faces exceptional domestic energy challenges in relation to the age and type of housing and the availability of mains gas; from a sample of the 83,765 homes in Herefordshire, BRE (2019)<sup>12</sup> estimates that:

- The average Energy Performance Certificate (EPC) rating for all private sector dwellings in Herefordshire is 52 (E), which is worse than both England (60) and the West Midlands (58), meaning that there are a significant number of houses that will potentially contribute higher greenhouse gas emissions than similar sized higher rated (D+) properties.
- 28% of homes in Herefordshire were built before 1919, a large proportion of these are solid wall properties making them much less efficient from an energy efficiency and CO<sub>2</sub> emissions perspective.
- Mains gas is available to only around two-thirds (65-70%) of properties, compared to 87% nationally- leaving a large proportion of these relying on expensive high CO<sub>2</sub> emission fuels such as oil, electric, LPG and in some households solid fuel.
- The scale of the challenge of retrofitting existing housing stock is the topic of a recent report from the Environmental Audit Committee. The Government's response can be found <a href="here">here</a>.

#### Energy efficiency of the private rented sector

The 2019 BRE report estimates that 20.6% of dwellings in the private rented sector have an EPC below band E. Under the Energy Act 2011 legislation that came into force in 2018, these properties would not be eligible to be rented out to new or renewed tenancies as they don't meet the minimum energy efficient standard, which has been set at band E. It is worth noting that not all homes are subject to EPC ratings, for example, listed buildings are excluded, as are Homes of Multiple Occupation (HMO's), so it does have some limitations as a measure.

# What are we doing to improve this?

- Deliver actions in housing and buildings action plan.
- The <u>Keep Herefordshire Warm</u> team offers energy efficiency advice on a number of topics from simple changes you can make to save energy, grants for insulation or heating,

<sup>&</sup>lt;sup>11</sup>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/972583/2020\_Provisional\_emissions\_statis\_tics\_report.pdf

<sup>12</sup> BRE Integrated Dwelling Level Housing Stock Modelling and Database for Herefordshire Council, 28th June 2019

- switching energy supplier, to information on renewable technologies. This is a free resource for residents across Herefordshire.
- Full funding is available to install first-time central heating systems and gas network
  connections for eligible households through the National Grid's Warm Homes Fund
  scheme via Keep Herefordshire Warm. Funding towards insulation and renewable energy
  incentives is also available; please see the website for more details.
- Private renters too will benefit, as the government strengthen energy efficiency requirements for private sector landlords. To support those least able-to-pay, they will extend the Energy Company Obligation to 2026, so suppliers can help improve the draughtiest and coldest homes<sup>13</sup>.
- Continue to apply for government funding to support households across Herefordshire to improve the thermal comfort of their homes and reduce carbon emissions.
- Herefordshire Council, working with Shropshire Council have secured Green Homes Grant Local Authority Delivery (GHG LAD 2) funding. This will be used to target fuel poor households with a combination of renewable heating and energy efficiency measures.
- The council are also working with Shropshire Council and registered providers to apply for the <u>social housing decarbonisation fund</u>. This fund is local authority led and enables registered providers of social housing to apply for funding to improve the energy performance of their social homes.
- New government grants of £5,000 will be available from April 2022 to encourage
  homeowners to install more efficient, low carbon heating systems such as heat pumps that
  do not emit carbon when used, through a new £450 million 3-year Boiler Upgrade
  Scheme. The aim of this grant scheme it to encourage people to choose to install a heat
  pump as they will end up paying a similar amount that they would to install a traditional
  gas boiler.

The government published a heat and building's strategy in October 2021 that gives clear guidance on the steps needed to decarbonise our homes in order to reduce its greenhouse gas emissions to net zero by 2050. The £450 million Boiler Upgrade Scheme mentioned above is part of more than £3.9 billion of new funding from the government for decarbonising heat and buildings. This will fund the next three years of investment through the Social Housing Decarbonisation Fund, the Home Upgrade Grant scheme, the Boiler Upgrade Scheme and the Heat Networks Transformation Programme and reducing carbon emissions from public buildings through the Public Sector Decarbonisation Scheme<sup>14</sup>.

#### Sustainable development of new homes

New housing standards are set nationally. In January 2021, the Government set out the Future Homes Standard with the aim of delivering homes that are zero-carbon ready from 2025 onwards. As part of the Future Homes Standard<sup>15</sup> the government intend to:

- Set the performance standard of the Future Homes Standard at a level which means that new homes will not be built with fossil fuel heating, such as a natural gas boiler.
- Ensure homes will be future-proofed with low carbon heating and high levels of energy efficiency.
- Ensure that no further energy efficiency retrofit work will be necessary to enable them to become zero-carbon as the electricity grid continues to decarbonise.
- Existing homes will also be subject to higher standards if they are extending or undertaking a thermal upgrade. It is estimated that these changes will lead to a 75% to 80% carbon reduction compared with pre 2021 levels.
- Ensure that all parts of industry are ready to meet the Future Homes Standard from 2025, which will be challenging to deliver in practice, by supporting industry to take a first step

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<sup>&</sup>lt;sup>13</sup> https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution/title

Plan to drive down the cost of clean heat - GOV.UK (www.gov.uk)

<sup>&</sup>lt;sup>15</sup>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/956094/Government\_response\_to\_ Future\_Homes\_Standard\_consultation.pdf

towards the new standard. Deliver a 2021 interim uplift will deliver high-quality homes that are in line with our broader housing commitments and encourage homes that are future-proofed for the longer-term. These homes will be expected to produce 31% less CO2 emissions compared to current standards.

We have set out more ambitious goals for housing in Herefordshire in line with the councils <u>carbon reduction</u> and <u>housing and building</u> action plans. The council has developed a guidance document called Herefordshire Future Homes, which sets the standard for future developments and retrofit of housing schemes across the county..

The governments <u>Ten Point Plan</u> for a Green Industrial Revolution focuses on building back better, supporting green jobs, and accelerating our path to net zero including developing greener buildings. They set out the following policy impacts of developing greener buildings:

- an ambition of 600,000 heat pumps installations per year by 2028
- homes built to the Future Homes Standard will be 'zero-carbon ready' and will have 75– 80% lower carbon dioxide emissions than those built to current standards
- our green home finance initiatives could help to improve the energy efficiency of around 2.8 million homes, improving around 1.5 million to EPC C standard by 2030.

The national design guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. It was issued in 2019 and forms part of the government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on <u>design process and tools</u>.

Further to this guidance, the Building Better Building Beautiful Commission issued their final report in January 2020. The report, entitled '<u>Living with Beauty'</u> makes a range of recommendations to support the creation of beautiful communities.

The governments 'Planning for the Future' proposals build on this report and include a focus on the development beautiful and sustainable places.

#### Sustainable water management

Sustainable water management means minimising our impact on the healthy functioning of the water cycle and is considered when development proposals are being determined. Changes occurring to the climate mean that we are likely to experience an increase in the intensity, severity and frequency of extreme weather events such as droughts, storms and floods, which could dramatically affect the way we need to manage water. There is a finite capacity within the environment, and it cannot simply provide more and more water because of increased consumption rates or overall demand. Equally, there is a limit to the amount of waste water that can be safely returned to rivers without having a detrimental effect. The council has developed a guidance note on <u>sustainable water management</u>.

The water quality of Herefordshire's main rivers and their tributaries is of strategic importance. The River Lugg catchment covers predominantly the north of the Herefordshire administrative area. The River Lugg is currently exceeding its limits for phosphates, because of water pollution from both 'point' source (in particular sewage outlets) and 'diffuse' source (in particular agricultural run-off).

Previously the approach taken by the council with the agreement of Natural England has been to allow development to proceed within the River Lugg catchment area despite its exceedance of its phosphate target, as it was considered that the combination of phosphate reductions (planned works at waste water treatments and adaptations to land use through schemes such as Catchment Sensitive Farming) as set out in the Nutrient Management Plan were sufficient to bring the river back into compliance. However, following the judgement in the case of *'Cooperatie Mobilisation'* handed down in October 2018 by the Court of Justice of the European Union (Joined Cases C-293/17 and C-297/17) (Known as the Dutch Case) this approach has been reviewed and as an interim measure development within the area can only proceed if they are nutrient neutral or would lead to betterment.

# What are we doing to improve this?

It is envisaged that in the long term the solution will be provided through the revision of the <u>Nutrient Management Plan</u> which will reflect the measures implemented by Welsh Water through their Asset Management Programme as well as more stringent requirements placed upon land owners to ensure the minimisation of diffuse pollution through appropriate infrastructure and updated environmentally friendly farming techniques. However, it is understood this is unlikely to take effect in the short term and an interim approach is required. The council have therefore agreed to take the following actions:

- Design, construct and manage up to eight integrated wetland sites set in strategic locations in order to provide tertiary treatment to waste water treatment works within the River Lugg catchment area.
- Commission the development of an interim delivery plan including a phosphate calculator and a suite of recommended mitigation measures appropriate to the River Lugg catchment area. This will enable developers to calculate the phosphate load of their development proposals and therefore agree measures independently with landowners to mitigate or offset the identified phosphate load, although this has to demonstrate with scientific certainty that it will be phosphate neutral or show betterment and any offsetting has to comply with the Habitat Regulations. This has the potential to be further developed as a trading platform for offsetting identified loads in future developments.
- Appoint an environment officer to lead on reductions in levels of diffuse pollution. To liaise
  with the regulatory bodies and carry out an audit in the River Lugg catchment area,
  identifying through mapping and farm visits where risk of pollution occurs and working with
  the farming community to introduce improvements to infrastructure and farming
  techniques.
- Continue to monitor and manage watercourses via the nutrient management plan and related multi agency board.

Progress against these planned actions is available here.

# Air quality management

Overall air quality levels across Herefordshire are good<sup>[1]</sup>. The main source of poor air quality in Herefordshire is vehicle emissions. We use local transport plans to improve accessibility, air quality and safety, and ease congestion. There are two Air Quality Management Areas in Herefordshire:

- The A49 (T) corridor in Hereford, extending from Holmer Road in the north to Belmont Road in the south and extending east along New market/Blue School Street and west along Eign Street as far as Barton Yard. There are approximately 160 houses within this zone.
- An area encompassing the junction between the A44 (Bargates) and B4361 (Dishley Street/Cursneh Road) in Leominster. There are approximately 20 houses within this zone.

## What are we doing to improve this?

The Council monitor air quality in these areas <u>an air quality strategy</u>. The Council also monitor nitrogen dioxide (NO2) from a number of diffusion tubes located in roadside locations around the city, market towns and county. As a new initiative, we are currently testing mobile air quality sampling kits. These portable sampling kits will provide us with detailed air quality measurements in real-time data of particulate matter and nitrogen dioxide. This information will in the future enable us to identify localised hotspots of pollution.

<sup>[1]</sup> Air Quality – A strategy for Herefordshire and Worcestershire July 2009, p. 6

The Council has recently reviewed the Hereford Transport Package (HTP), which covers the A49 Corridor in Hereford City. There is a continued focus on the reduction of city centre congestion. In June 2021 the council <u>approved funding</u> for the progression of an eastern road link and river crossing as well as safer routes to schools and the development of a walking and cycling master plan for Hereford City.

#### Waste management

We collect over 87,000 tonnes of waste from households and businesses across Herefordshire each year. 41.3% of the waste we collect from households is recycled, composted or reused. Our household waste sites are invaluable for our residents to be able to take recycling items that we cannot collect from your home. Last year our household waste sites recycled between 71% and 80% of waste brought to site.

Household waste collected from black bins in Herefordshire is taken to <a href="EnviRecover">EnviRecover</a>, a state of the art energy from waste facility, where it is used as a fuel to generate electricity. The facility started taking waste from households in both Herefordshire and Worcestershire in October 2016 and it provides the county with a reliable, safe and cost-effective means of dealing with our waste.

#### What are we doing to improve this?

The council has the ambition to make sweeping changes to bring about a more sustainable county. Resource management, production and waste are significant contributors to carbon emissions. By making changes to how materials are used in production, minimising use of raw materials, discouraging waste, maximising reuse, recycling and recovery we will be able to bring about large reductions in carbon emissions in response to the Climate and Ecological Emergency.<sup>17[2]</sup> In line with this ambition, the Council have recently undertaken a <u>strategic review</u> of waste services across the county. There were three main drivers for this review:

- Arrangements for providing this service expire at the end of 2023.
- The governments Resource and Waste Strategy 2018 labelled a "once in a generation policy change" has significant implications on how the waste management service is provided from 2023 onwards. Further implications are also being considered because of the Environment Bill 2019-2020.
- The Council is ambitious in wishing to tackle the climate and ecological emergency.

The review has informed a <u>new waste strategy</u> for the county, which sets out the changes that will be taking place to the way that household and business waste is collected and then treated, and schemes that support and encourage a reduction in the amount of waste being produced. These include:

- Reduce promoting schemes that reduce the amount we throw away such as community fridge schemes.
- Reuse supporting organisations that repair and reuse items, community share schemes and encouraging donations to charity.
- Recycle composting garden waste, supporting people to recycle more.
- Recover introducing a new curbside food waste collection and producing energy from food waste.

<sup>16</sup> https://www.herefordshire.gov.uk/rubbish-recycling/waste-management-herefordshire?documentId=881&categoryId=200138

<sup>&</sup>lt;sup>17</sup> Waste, A Strategic Review – September 2020 p. 6

#### Connectivity

Transport is vital to the people of Herefordshire. An efficient transport network is essential for the county's economy, supporting delivery of new homes and jobs. The ability to access services and maintain independence is also important and particularly challenging in a large rural county with an aging population<sup>18</sup>. The Local Transport Plan covering the period 2016-2031 was adopted by the council in May 2016. The Local Transport Plan (LTP) reflects Herefordshire's <a href="Core Strategy">Core Strategy</a> 2016-2031 and sets out the council's strategy for supporting economic growth, improving health and wellbeing and reducing the environmental impacts of transport.

The Council is focused on sustainable growth e.g. more homes (including affordable housing) and jobs in the right locations. The Core Strategy sets out our plans for sustainable growth including 16,500 new homes, more jobs at the Hereford Enterprise Zone and other employment sites around the county and enabling infrastructure, which will support this new development.

#### What are we doing to improve this?

In order to ensure compliance with the ambitions set out in the LTP, a <u>policy statement</u> has been adopted which includes guidance for developers on sustainable transport infrastructure and the developer's responsibility to mitigate the impacts of developments on the transport network.

There is no quick fix for the lack of public transport in rural areas, but it is acknowledged nationally as an area in of investment. In February 2020, the Prime Minister announced that bus services across the country would be transformed with simpler fares, thousands of new buses, improved routes and higher frequencies. In March 2021 the government launched its bus back better strategy which sets out the vision and opportunity to deliver better bus services for passengers across England, through ambitious and far-reaching reform of how services are planned and delivered. The rural mobility fund is part of the government's <u>better deal for bus users</u>. Seventeen English local authorities are now piloting on-demand bus services in rural or suburban areas. The outcomes of these pilots will be used to inform future provision in rural counties like Herefordshire.

The Council is currently reviewing its transport strategy and Core Strategy. Coordination of this work will ensure consistency and clarity for development.

#### Digital connectivity

The importance of digital connectivity for our homes has become even more of an issue during the Covid 19 pandemic; enables us to work, shop, learn, stay connected and remain independent, all of which has been critical during this period.

In 2012 of only 0.6 percent of premises in Herefordshire with superfast broadband (30Mbps and above), there are now over 92 percent of premises, based on independent figures from <a href="Think">Think</a> Broadband. There are however still areas across the county that don't have good digital access.

#### What are we doing to improve this?

Fastershire is a partnership between Herefordshire Council, Gloucestershire County Council and national Government. This is part of our commitment to the digital transformation of Herefordshire, which is vital for the future of our local economy and those who live and work in our communities.

Fastershire is not just about technology. The project also includes social and digital inclusion activities, and an extensive business support programme, designed to help small and medium size businesses get the most from fibre broadband and be more competitive.

<sup>18</sup> https://www.herefordshire.gov.uk/downloads/file/2912/local transport plan 2016-2031 strategy p. 4

The programme is being delivered in phases in line with the objectives outlined in the <u>Fastershire</u> <u>broadband strategy 2019-22</u>. For more information about the Fastershire programme please see the <u>website</u>.

#### Planning and the environment

The purpose of the planning system is to contribute to the achievement of sustainable development. This means planning to meet the needs of the present without compromising the ability of future generations to meet their own needs. The National Planning Policy Framework has three objectives economic, social and environmental. This document guides local planning policy. Herefordshire's Core Strategy was adopted in October 2015 and includes a range of environmental measures including the requirement that development proposals include measures, which will mitigate their impact on climate change<sup>19</sup> as well as:

- Focusing development on the most suitable locations.
- Delivering development that encourages travel options including walking, cycling and public transport.
- Designing developments to reduce carbon emissions and use resources more efficiently.

Core strategy policy SD1 sets out the current criteria for sustainable design and energy efficiency.

#### What are we doing to improve this?

- The council has now begun to review and update the Core Strategy in order to plan for a longer timescale up to 2041.
- The council has set a target of zero carbon by 2030 and has published an updated <u>carbon</u> management plan and associated action plan for council emissions.
- The council has developed and adopted the Herefordshire Future Homes environmental building design standards, which will set the standard for future developments and retrofit of housing schemes across the county.

<sup>&</sup>lt;sup>19</sup> Policy SS7 – Addressing Climate Change

#### Priority 2 - Increase the number of affordable homes available to rent and buy

ONS data indicates that the average house price in Herefordshire in March 2021 was £257,284. Average house prices in the West Midland in March 2021 were £220,982 and across England they were £274,615; although this average includes London and the South East were property prices are significantly higher<sup>20</sup>.

Affordability of housing in Herefordshire is a challenge, set against a back drop of wider socio economic issues including the need for wage growth, skills development and increasing the number of skills job opportunities in Herefordshire. These issues are all addressed in the councils revised economic strategy. The Local Housing Strategy doesn't seek to address these wider issues directly, but they are included here to demonstrate that the affordability is not a standalone issue.

Affordable housing, as defined by the <u>National Planning Policy Framework</u>, is housing for sale or rent for those whose needs are not met by the market. The provision of affordable housing is a key element of the Government's plan to end the housing crisis, tackle homelessness and provide aspiring homeowners with a step onto the housing ladder.<sup>21</sup> There are a range of different tenures that are considered to be affordable housing, including the provision of social housing. More detail about these is in our <u>technical data on the provision of affordable</u> housing and in the glossary at the end of this document.

Between 2011 and 2020/21 6253 new homes were delivered in Herefordshire, of this 1169 were affordable. The vast majority of the delivery of affordable housing across the county is attributable to Registered Providers (RPs). A list of RPs that work in Herefordshire can be found <a href="here">here</a>.

Census data tells us that there were 6904 second homes in Herefordshire in 2011. At the time there were 82,549 dwellings in the county, so second homes made up 8.36% of the counties total housing stock. This includes holiday homes and buy to let homes / investments.

The English Housing Survey undertaken in 2018/19 indicates that 3% of households nationally report owning a second home and that there were 772,000 second homes in the UK at that time. The survey includes information on the reasons why people own second homes, the most common reasons were as a holiday / weekend home (39%), long term investment / income (35%), previously main home (16%). This figure does not include commercial holiday lets.

More up to data will be available on the number of second homes in Herefordshire once the 2021 census data is released from June 2022 onwards. Second home and holiday home ownership bring with them a range of advantages e.g. increased local spend and job creation and disadvantages e.g. pushing up house prices beyond local affordability and changing the profile of communities making them less sustainable.

In communities that have a very high level of second home and holiday home ownership such as St Ives in Cornwall and Northumberland, specific policies have been adopted by local authorities to ensure that new homes are affordable or that they are sold to full time residents in order to stop the erosion of communities.

The housing market area needs assessment for Herefordshire 2021 (HMANA includes a detailed assessment of affordable housing need and indicates a need for 422 rented affordable homes per year, and 175 affordable home ownership homes per year. It should be noted that a significant proportion of this need is related to existing households who are resident in Herefordshire but need (or aspire to) to live in a different tenure<sup>22</sup> and that this is a separate calculation from the governments assessment of housing need in Herefordshire.

The government amended the NPPF in 2018, so that at least 10% of the homes on developments of 10 or more units would be classified as 'affordable'. There are policies within the Core Strategy 2011-2031 that relate to Affordable Housing; Policy H1 establishes affordable housing targets,

<sup>&</sup>lt;sup>20</sup> https://www.gov.uk/government/news/uk-house-price-index-for-march-2021

https://www.gov.uk/guidance/apply-for-affordable-housing-funding - 23.02.21

<sup>&</sup>lt;sup>22</sup> Draft Housing Market Area Needs Assessment – August 2020 p56: Iceni Projects Limited

Policy H2 refers to rural exception sites in relation to affordable housing in rural areas and Policy H3 ensures there is an appropriate range and mix of housing e.g. house type and size On sites that come forward as 100% affordable we would look for a range of tenures e.g. for sale, rent and rent to buy in order to ensure a cross section of people and progression.

Core Strategy Policy H1 sets out an affordable housing targets for new developments of 25% in the Leominster; 35% in Hereford and surrounding areas and West Herefordshire; and 40% in Ledbury, Ross-on-Wye and the Rural Hinterlands and the Northern Rural areas on eligible sites of over 10 dwellings/ 1000 sg.m<sup>23</sup>.

#### How will we achieve this?

#### Affordable home ownership

- The council will continue to work proactively with developers and housing providers to maximise housing growth across Herefordshire, including affordable housing on sites of more than 10 units.
- Exceptionally, affordable housing may be permitted on land within or adjoining an established rural settlement which would not normally be released.
- Affordable home ownership continues to be a priority for the government and grants are available for providers committed to developing affordable homes, including the Homes England affordable homes programme for 2021-2026. This programme provides grant funding to support the capital costs of developing affordable housing for rent or sale.
- The Government's Help to Buy Scheme, which offers an equity loan of up to 20%, mainly to first time buyers, has proven a popular route to affordable home ownership. Take up of this scheme has grown year on year and has assisted 760 households to purchase a home in the county since 2015.
- The minimum percentage of affordable varies between market areas, but is between 25% and 40% of the overall number of houses on the proposed site. The Strategic Housing team negotiate with developers about the number and composition of this percentage. There are times when we might end up taking fewer units in order to deliver a bespoke solution for a vulnerable group e.g. flats for people with learning disabilities or a fully adapted bungalow for someone who needs a wheelchair accessible home.
- The governments First Homes initiative will now account for 25% of the affordable sum e.g. If we have a site with 100 houses on it and 35 of them are affordable, then 9 (rounded up from 8.75) of the 35 will now be first homes.
- First Homes are intended to be homes available to buy with a minimum discount of 30% below their full market value. Local authorities will have the ability to prioritise these homes for local people and / or key workers, as required locally, and require higher discounts if they can demonstrate a local need and the units will be capped to £250,000. These homes, like our other affordable and discounted market housing will be subject to restrictions which ensure that the homes retain their discount in perpetuity (subject to certain specific exclusions) they will need to be sold on to other eligible purchasers at a discounted price, ensuring communities continue to benefit from these affordable homes for generations to come.
- The Government's 'Changes to the Planning System' and 'Planning for the Future' proposals will shape development in Herefordshire, if and when they become legislation.

#### Affordable housing for rent

The council will continue to work with a range of registered providers, including housing
associations and charities, to deliver affordable rented homes. Herefordshire Council runs
a choice based lettings system called Home Point.

 Social housing falls under the government's definition of affordable housing. There are a range of rent levels that can be used; social rent levels are determined through the

<sup>&</sup>lt;sup>23</sup> Draft Housing Market Area Needs Assessment – August 2020 p56: Iceni Projects Limited

- national rent regime whereas affordable rent is subject to rent controls which require a rent of no more than 80% of the local market rent.
- There are over 10,000 units of affordable housing in Herefordshire; this includes a mixture
  of rented units and home ownership options. Affordable housing to rent in Herefordshire is
  mainly provided by RPs. There is more information about this subject on our website.
- Most RPs secure Homes England grant funding towards the developments of new homes in order to make them financially viable. Homes England funding can only be used for homes to be let at affordable rent levels; this is not a policy that the council can change. We can, and do negotiate social rent through planning gain, but only where there is no Homes England grant in place.
- Most new affordable properties in Herefordshire are subject to section 106 agreements, which means that they are offered to people with a local connection (live, work or family or special circumstances) in the first instance (expect for grant funded shared ownership properties developed by RP's). If there is no one with an immediate local connection the offer is cascaded to surrounding parishes on the same basis. If there are no local people who meet the qualification criteria for the property it might be offered more widely to someone in Herefordshire in need of an affordable property. When the property becomes available again, the same process for allocation is followed.

#### Self-build

The Herefordshire <u>self and custom build register</u> was established in April 2016. It allows us to monitor the demand for self and custom build within Herefordshire. The Council continues to develop its support for people to build their own homes. Between the 1<sup>st</sup> April 2016 and the 31<sup>st</sup> May 2020, there have been 530 registered expressions of interest in a serviced plot of land. A number of these are from outside the county and the Council is introducing a local connection test to enable it to gather further information on this..

The Council, as the local planning authority, is required to meet the demand, in terms of the number of entrants, on the self-build register through the granting of suitable planning permissions. The register is made up of different base periods for the purposes of monitoring. The council has 3 years from the end of each base period to grant suitable planning permissions to meet the demand from each base period. Monitoring for the first and second monitoring periods indicate that sufficient planning permissions were granted during those periods; 174 from 1st April 2016 to 30th October 2016 and a further 139 to the 30th October 2017.

Self-build can potentially be a means of securing an affordable home but within Herefordshire only 16% of registrants would be first time buyers, with just under half of the total registrants not requiring a mortgage to deliver their new home indicating that no borrowing is needed. In 2019 the council, recognising the multi benefits that can be associated with group self-build projects, transferred land to Stonewater Housing to enable the <a href="Veteran self-build">Veteran self-build</a> in Leominster, a development of 19 new homes.

#### **Community led housing**

There are clear benefits from community ownership of housing in terms of supporting affordability and long-term stewardship of the asset. The Marches Community Led Housing Hub is currently working with around 12 groups across Herefordshire which are at different stages with some progressing to development, whilst others are at an early stage or dormant<sup>24</sup>. There are a range of Community Land Trusts (CLT) in Herefordshire who aim to deliver low-cost homes for sale and rent in their locality. The national picture would indicate that CLT groups face a range of challenges including the acquisition of land and access to funding to bring forward schemes.

<sup>&</sup>lt;sup>24</sup> Draft Housing Market Area Needs Assessment– August 2020 p115: Iceni Projects Limited

#### Rural and entry level exception sites<sup>25</sup>

Rural exception site development and the new 'entry level exception sites' have a role to play in helping younger households and family households to secure suitable housing within their local community. The NPPF identifies that local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless such needs are already being met within the authority's area.

Rural exceptions sites are different to entry-level exception sites; and described as small sites used for affordable housing in perpetuity where sites would not normally be used for housing. The purpose of rural exception site development is to recognise that more rural communities need new housing to help maintain their vitality and also to assist residents to find accommodation that meets their changing needs. For younger individuals and households this includes offering genuine opportunities to secure affordable housing in the area where they have grown up. Rural exception housing therefore offers a policy and financial mechanism by which the choice and mix of accommodation available to younger age groups can help support access to appropriate housing. Rural exception sites also offer opportunities for the ageing population; with the ability to provide for individuals wishing to downsize amongst other avenues.

Monitoring data suggests a relatively modest uptake of rural exception sites, with 4 sites completed in 2014 and 2015, which each delivered between 8-14 dwellings, but no delivery of rural exception sites since. There has been no delivery of entry-level exception sites in the county since 2015. It is noteworthy that many rural development sites are for 10 or less homes making it more difficult to secure affordable homes for people in rural communities. There are sometimes viability issues on rural sites due to the lack of services and smaller plots meaning fewer economies of scale.

#### Infrastructure challenges for rural developments

- Infrastructure is a challenge in rural locations; this is acknowledged in the Core Strategy.
   Larger developments have to address these challenges through their design and through
   section 106 contributions to local amenities, but they do not contribute to the revenue
   costs associated with running services.
- The government have recognised the need for improved bus services in the <u>National Bus</u>
   <u>Strategy</u> for England and have invested in some rural mobility pilots across the country to
   trial on demand bus services for rural or suburban areas.
- There is a defined need for affordable housing in rural areas for parishes across Herefordshire, evidenced by both in the HMANA and in Neighbourhood Development Plans (NDPs). Many NDPs contain local level policies regarding affordable housing and are considered alongside the policies of the <u>Core Strategy</u>. The policies within NDPs can differ from parish to parish. NDPs have the ability to allocate sites specifically for affordable housing. NDP's are taken into consideration when planning permission for developments is being sought.
- The council have recently published an <u>affordable housing supplementary planning</u> <u>document</u> to give developers further guidance on the issue of affordable housing. This document is supplementary to the Core Strategy and existing policies, and is a material consideration in planning decisions.
- Policy SC1 in the Core Strategy outlines the planning policy requirements around social and community facilities in Herefordshire.

## New council owned affordable housing

The County Plan 2020-2024 set out the council's ambition to provide 1,000 affordable net zero carbon housing units in the county over four years. The term affordable is taken in its widest sense – to provide a range of housing that is genuinely affordable to both rent and purchase given

<sup>&</sup>lt;sup>25</sup> Draft Housing Market Area Needs Assessment – August 2020 p116: Iceni Projects Limited

local earnings. The council has not owned its own general needs housing stock<sup>26</sup> since 2002 and a review has therefore been undertaken as to the most appropriate role for the council in delivering its ambition. The options and delivery proposals suggested recognise the structures already in place and available to the council.

In November 2020, cabinet agreed that the council should proceed and that a pipeline of sites suitable for <u>development as affordable housing</u> should be established in order to support discussions with key partners including Homes England. In order to meet our ambition of providing 1000 new affordable homes across the county, we will need to work in partnership with RPs and developers as well as developing our own stock.

<sup>&</sup>lt;sup>26</sup> Note: The Council do own some specialist housing stock and become a registered provider in 2020.

# Priority 3 - Improve the quality and accessibility of housing in Herefordshire and bring long-term empty properties back into use.

Good quality housing is critical to health across the life course<sup>27</sup>. There are long-term consequences for health as a result of poor housing, including increased respiratory conditions, accidents, poor mental wellbeing and excess winter deaths.

We know that good quality housing is also likely to lead to better health through its indirect impact on other factors including improved outcomes in the early years, better employment prospects and strong community resilience and wellbeing, which are all associated with good health<sup>28</sup>. Herefordshire has poor housing affordability resulting in increased housing costs. This can also have an impact on key staff recruitment such as for health and social care staff in the county as well as viability and resilience of rural areas.

Housing is particularly important in ensuring a healthy start in life and is a key factor in the generation of health inequalities. Health inequalities are unfair and avoidable differences in health across the population and between different groups in society. Unintentional injuries due to poor quality housing are a key cause of morbidity and mortality in children. Children are also more likely to be living in overcrowded housing, particularly in low-income families (Department for communities and Local Government 2015). Evidence suggests that children living in cold, overcrowded or unsafe housing are more likely to be bullied, to not see friends, to have a longstanding health problem, disability or infirmity and to be below average in key academic areas<sup>29</sup>. Children living in cold homes are twice as likely to develop respiratory problems as those living in warm homes and there are clear effects of fuel poverty on the mental health of adolescents<sup>30</sup>.

The cost of poor housing to the NHS is estimated at £1.4 billion a year<sup>31</sup>. It is also estimated that reducing excess cold in homes to an acceptable level would save the NHS £848 million per annum and reducing falls in the home could save the NHS £435 million. Suitable housing can support early discharge from hospital and allow people to safely remain in their own homes for longer. Good supported housing can allow people with mental health conditions to live independently for longer improving quality of life and reducing the need for out of area placements. Outcomes are much worse for those who are homeless.

Due to the substantial impact of housing on health Herefordshire's Health and Wellbeing Board have 'the impact of housing' as one their priorities.

#### Improving the quality of new homes:

The quality of new homes is managed through planning and building control systems. The government have introduced a new future homes standard for housing, which will see changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings. The National Housing Federation provide a clear explanation of what this means:

"Homes built under the Future Homes Standard should produce **75-80% less carbon emissions** compared with current levels and become net zero as the electricity grid continues to decarbonise. The intention is that homes built to the Future Homes Standard will **not need to be retrofitted** with any additional measures or technology to become net zero. The Future Homes Standard should see homes fitted with **low carbon forms of heating**. The expectation is that heat pumps will become the main source of heating system for most new homes. The government has also confirmed that it will introduce an **interim uplift in building standards** from

<sup>&</sup>lt;sup>27</sup> Marmot M, Allen J, Goldblatt P, Boyce T, McNeish D, Grady M, Geddes I (2010). Fair society healthier lives [online]. Available at: <a href="https://www.instituteof healthequity.org/resources">www.instituteof healthequity.org/resources</a>

<sup>&</sup>lt;sup>28</sup> Buck D, Gregory S (2013). Improving the Public's Health

<sup>&</sup>lt;sup>29</sup> https://www.kingsfund.org.uk/sites/default/files/2018-03/Housing\_and\_health\_final.pdf (1), 87-94.

Marmot Review Team (2011). The health impacts of cold homes and fuel poverty
 Building Research Establishment (2015). The cost of poor housing to the NHS

2021 as a first step towards the Future Homes Standard in 2025. Homes build to the interim standard should produce 31% less carbon dioxide emissions compared to current levels."32

Feedback from RP partners suggests that they are looking to adopt the 2025 standards as soon as possible in order to future proof their housing stock.

Herefordshire Council are planning to develop affordable homes that meet the future homes standard in advance of it becoming enforceable in line with our Carbon Management Plan and aforementioned Herefordshire Future Homes standards

#### Issues with existing housing stock

#### **Fuel Poverty:**

In 2019, a report by BRE<sup>33</sup> on behalf of Herefordshire Council found that 9797 households were in fuel poverty, which equates to 11.7% of the total number of households in the county. These figures are close to government sub regional data released in 2020 of 10,000<sup>34</sup>. The BRE report found that higher concentrations of private sector households in fuel poverty are found in the more rural parts of Herefordshire. This, combined with reduced access to healthcare services in more rural areas of the county, demonstrates the importance of prioritising housing quality and eliminating fuel poverty for the local populations' health.

# How will we improve this?

- Actively promote the Keep Herefordshire Warm scheme, this is an energy advice and referral service run by Severn Wye Energy Agency. Keeping Herefordshire Warm has secured funding for a two-year project in which an energy advisor to work within the social prescribing teams in Herefordshire.
- Full funding is available to install first-time central heating systems and gas network connections for eligible households through the National Grid's Warm Homes Fund scheme via Keep Herefordshire Warm. Funding towards insulation and renewable energy incentives is also available; please see the website for more details.
- To support those least able-to-pay, the government have said that they will extend the Energy Company Obligation to 2026, so energy suppliers can help improve the draughtiest and coldest homes<sup>35</sup>.
- The council has a Statement of Intent V4 to take advantage of the ECO3 Flexible Eligibility scheme. The statement is to direct assistance towards local private sector homes at risk of fuel poverty and those with vulnerabilities including health conditions.
- Work with developers to ensure a mix of housing that meets the needs of vulnerable and people; from housing with support through to general needs housing that enhances people's ability to live independently.
- Improve the quality of housing for homeless people; moving away from shared facilities and updating accommodation to modern standards.
- First contact alert and signposting service for staff entering older people's homes and spotting risk factors (for example, cold home, slips and trips, no smoke detector).
- Maximise the use of assistive technologies to enable people to live safely and independently in their own homes.
- Training about Fuel Poverty and its effects is available for frontline staff through Keep Herefordshire Warm.
- Directly apply for relevant government funding e.g. Green Homes Grant Local Authority Delivery 2 funding secured as opportunities This is a means tested scheme that aims to improve up to 150 of the worst performing homes in Herefordshire.
- Promote community fuel purchasing schemes via the Home Energy Webpage.

https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution/title

https://www.housing.org.uk/news-and-blogs/news/new-future-homes-standard-building-regulations/
BRE Integrated Dwelling Level Housing Stock Modelling and Database for Herefordshire Council, 28<sup>th</sup> June 2019

https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2020

#### Health and safety hazards

The housing health and safety rating system (HHSRS) is a risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. It was introduced under the Housing Act 2004 and applies to residential properties in England and Wales<sup>36</sup>.

The system assesses 29 housing hazards and the effect that each may have on the health and safety of current or future occupants of the property. The HHSRS provides a way that hazards can be assessed and identifies the best way of dealing with them. If a hazard poses a serious and immediate risk to a person's health and safety, they are called a Category 1 hazard. If a hazard is less serious or less urgent, they are called a Category 2 hazard<sup>37</sup>.

Hazards include excess cold, excess heat, damp and mould growth, falls hazards, overcrowding as well as electrical, fire and structural hazards. Herefordshire Council has a duty to act upon reports of Category 1 hazards e.g. hazards that are a serious or immediate risk to a person's health and safety. To understand more about the condition of homes across Herefordshire, the council commissioned BRE to undertake a series of modelling exercises on private sector homes.

In 2019 there were 83,765<sup>38</sup> dwellings in Herefordshire, 68% owner occupied, 18% private rented and 14% social rented. BRE estimated that 19,358 dwellings in the private sector had a Category 1 Housing Health and Safety Rating System (HHSRS) hazards. The report indicates that compared with the regional average, Herefordshire's private housing stock has higher rates of all hazards (27% compared to 14%) and excess cold (19% compared to 3%)<sup>39</sup>.

#### How are we improving this?

Herefordshire Council carry out a wide range of legal duties under housing related legislation. These duties are applied by carrying out programmed inspections of premises, responding to complaints and offering advice. When we become aware of a hazard, we will first talk to the owner/landlord to try and get them to reduce the risk in a reasonable time. Where improvements are not made within a reasonable time period, we may take formal action to deal with Category 1 hazards.

We will make sure that the requirements of the housing legislation are met through:-

- Education/Advice
- Informal action e.g. a letter or telephone conversation with schedule of works
- Formal action
- Any appropriate notice with a schedule of works

The types of formal action will be dependent on how serious the case is but may include:-

- Serve a hazard awareness notice
- Serve an improvement notice (the most common formal action taken)
- Make a prohibition order
- Take emergency remedial (corrective) action
- Make an emergency prohibition order
- Make a demolition order

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/15810/142631.pdf - 24.09.2020

<sup>37</sup> https://www.staffordbc.gov.uk/housing-health-and-safety-rating-system-the-29-

hazards#:~:text=The%20HHSRS%20provides%20a%20way%20that%20hazards%20can,this%20is%20known%20as%20a%20Category %202%20hazard. 24.09.20

<sup>38</sup> Note: These figures are different from those in the more recent Draft Housing Market Area Needs Assessment, but remain relevant.

<sup>&</sup>lt;sup>39</sup> BRE Integrated Dwelling Level Housing Stock Modelling and Database for Herefordshire Council, 28<sup>th</sup> June 2019

#### Declare a clearance area

We have a <u>housing enforcement and prosecution policy</u> that gives more details about <u>housing</u> enforcement actions and processes.

# Overcrowding

The statutory overcrowding standard was first introduced in 1935. In practice, the standard has not been updated since that time. It is currently found in Part X (10) of the Housing Act 1985.

The English Homes Survey 2019/20 found that around 3.5% of all households in England are overcrowded (around 829,000 households). Overcrowding is more common for renters than owner-occupiers: 1.2% of owner-occupiers are overcrowded compared to 8.7% of social-renting households and 6.7% of private-renting households<sup>40</sup>. A bid to change the overcrowding standards as part of the Housing Act 2004 wasn't progressed due to concerns that updating the standard in the absence of a significant increase in affordable housing supply could place additional pressure on local housing authorities. Governments since 2010 have considered and implemented other means to incentivise households to downsize and free up properties for overcrowded households, e.g. the under-occupation deduction from Housing Benefit for working-age claimants in social housing<sup>41</sup>.

The coronavirus (Covid-19) pandemic has highlighted and intensified existing housing problems including overcrowding.

#### What are we doing to improve this?

The social housing allocations policy in Herefordshire uses two measures for statutory of severe overcrowding, (a) The room standard set out in part 10 of the Housing Act 1985; overcrowded by at least two bed space or (b) failing the bedroom standard of the Housing Health and Safety Rating System (HHSRS) by at least three bed spaces. Only if these standards are met will they be eligible to be added to the housing register in Band A. Where the criteria for severe overcrowding are not met, applicants may fall into Band B 'overcrowding'. For HMO's the standards are set out in Herefordshire Councils amenity and facility standards.

HHSRS provisions of the Housing Act 2004 includes 'crowding and space' and these are used by the Council's Environmental Health Team to determine overcrowding in preference to the statutory overcrowding standard in Part 10 of the Housing Act 1985<sup>42</sup>.

The HHSRS operating guide outlines the ideal conditions for space depending on age and gender mix, and the size and number of the rooms available for sleeping; these generally mirrors the bedroom standard. Unlike all other housing risks, crowding and space hazard is assessed in two stages by considering the property with and without the current occupants.

An Order prohibiting use of the property should only to be served in the event of a Category 1 hazard where there is "severe overcrowding" (the property lacks 2 or more bedrooms based on the bedroom standard) and there is a strong threat to health or safety. In these cases, action should be co-ordinated between all parties including the landlord, Homeless Prevention Team, Home Point and Environmental Health Housing to re-house affected individuals as soon as possible.

Where there is an identified need the council is working with registered providers s to develop larger properties e.g. 5, 6, 7 beds as required. Discussions are being held with registered providers about flexible housing design to enable this and future use.

<sup>40</sup> https://researchbriefings.files.parliament.uk/documents/SN01013/SN01013.pdf

<sup>41</sup> https://researchbriefings.files.parliament.uk/documents/SN01013/SN01013.pdf

https://www.herefordshire.gov.uk/downloads/file/5225/housing-enforcement-policy

#### Increasing demand for accessible homes

Planning Practice Guidance on *Housing for Older and Disabled People* published by Government in June 2019 sets out that the need to provide housing for older people is critical, as people are living longer and the older population is increasing. It sets out that the health, lifestyle and housing needs of older people will differ greatly with housing needs ranging from accessible and adaptable general needs housing to specialist housing with high levels of care and support. The recent Housing Market Area Needs Assessment indicates that there is not enough suitable housing for older people in Herefordshire for this growing area of need.

The incidence of a range of health conditions is an important component in understanding the potential need for care or support for a growing older population. The 2020 Housing Market Area Needs Assessment includes an analysis of Health Related Population Projections to help forecast future need, this is outlined in the table below:

#### Projected Changes to Population with a Range of Disabilities<sup>43</sup>

Disability	Age Range	2020	2041	Change	% Change
Dementia	65+	3,361	5,527	2,166	64.5%
Mobility problems	65+	8,849	13,731	4,882	55.2%
Autistic Spectrum Disorders	18-64	1,097	1,137	40	3.7%
Autistic Spectrum Disorders	65+	459	657	198	43.2%
Learning Disabilities	18-64	2,807	2,928	121	4.3%
Learning Disabilities	65+	1,010	1,425	414	41.0%
Challenging behaviour	61+	52	54	2	4.2%
Impaired mobility	65+	6,720	6,789	69	1.0%

Source: POPPI/PANSI and Demographic Projections

Of particular note are the forecast large increases in the number of older people with dementia (increasing by 64% from 2020 to 2041) and mobility problems (an increase of 55% over the same period). Changes for younger age groups are smaller, reflecting the fact that projections are expecting older age groups to see the greatest proportional increases in population.<sup>44</sup> The Housing Market Area Needs Assessment indicates that we do not currently have sufficient stock of suitable housing for older people and that this is an area of growing need.

Whist Herefordshire does have an aging demographic profile that we need to take account of in our planning, we are clear that accessibility isn't just an older persons issue. Over 1 in 5 people in the UK are disabled, that's 14 million people across the UK. It is a number that has continued to rise as people are living longer and treatments and technology in healthcare improve.3

<sup>&</sup>lt;sup>43</sup> Draft Housing Market Area Needs Assessment – August 2020 p92: Iceni Projects Limited

<sup>&</sup>lt;sup>44</sup> Draft Housing Market Area Needs Assessment– August 2020 p91: Iceni Projects Limited

#### What are we doing to improve this?

The government issued a National Disability Strategy in July 2021. This national strategy recognises and builds on the progress that has been made since the Disability Discrimination Act was introduced more than 25 years ago. There have been many improvements in services, access and opportunities for disabled people, but there is still much more to be done to improve the quality of life for people living with a disability. There is a whole section in the strategy dedicated to Housing: creating more accessible, adapted and safer homes. Some of the key actions in the housing section are things that are already happening, but some are new:

- New guidance will be issued to improve the efficiency of the Disabled Facilities Grant process.
- DLUHC will confirm plans to improve the framework to deliver accessible new homes by December 2021.
- DLUHC is commissioning new research to develop the statutory guidance on meeting Building Regulations, covering access to and use of buildings (Approved Document M).
- There is increasing demand for supported housing and we are committed to boosting supply through the Affordable Homes Programme.
- For people unable to access the new standard Shared Ownership model on new build homes, there is the home ownership for people with long-term disabilities (HOLD) scheme. This allows people to buy a suitable home on the open market on Shared Ownership terms. DLUHC will make the new Shared Ownership model, including the reduced (10%) minimum initial stake, available to disabled people buying a home under the HOLD scheme.
- DHSC also provides funding to build specialised housing through the Care and Support Specialised Housing (CASSH) Fund. This is designed to help adults with a learning or physical disability, those with mental health conditions and older people. DHSC, working with DLUHC, will invest £71 million in the CASSH Fund in financial year 2021 to 2022.
- Equalities Act right to require landlords to make reasonable adjustments to common areas in buildings e.g. halls / stairs etc.
- Creation of a centre for assistive technology.

The council run an accessible homes register to assist people in need of social housing with adaptations to access properties where these are already in place. This service sits within the Housing Solutions Team. Working with registered providers means we are able to make the most effective use of our adapted housing stock. Over the next year, we will be working with registered providers to encourage them all to use the accessible homes register. The council does not currently have a policy that includes the development of lifetime or accessible new homes, but standards will be considered as part of the Core Strategy review process.

The Councils Planning and Strategic Housing teams negotiate with developers to ensure that new housing developments address the areas of housing need in Herefordshire. This is done through the Core Strategy and supported by a supplementary planning document, which uses information from the latest Housing Market Area Needs Assessment to ensure developers are aware of housing need in Herefordshire. The Council also has an <u>older peoples housing strategy and pathway</u> in place.

In line with Government legislation, Herefordshire Council offers a wide range of grants and services aimed at improving the accessibility and safety of people's homes.

 Mandatory Disabled Facilities Grants – This means tested assistance is provided in accordance with statute, and is subject to a maximum limit of £30,000 for adaptions to facilitate access into and around the home and for essential provisions within it. A further discretionary grant of up to £15,000 is also available in specific circumstances. In 2019/20 275 applications were received, 178 grants were approved, 99 of these were for £5000 or under. During the same year 163 grants were completed; 56 for owner-occupiers, 115 for registered provider tenants and 11 for tenants in private rented accommodation.

- Professional and Technical advice The Home Improvement Agency offers an advocacy style service to help people stay warm, safe and independent in their own homes by arranging repairs, improvements of adaptations. The advice, guidance and practical support that the agency may be able to offer can range from small repairs and minor adaptations such as fitting a new lock or grab rail, to guiding the client through large adaptations schemes or an emergency repayable grant, or helping to find and manage a reputable contractor to carry out the necessary work.
- Emergency Repayable Grant This is a discretionary grant for emergency and essential
  works of repair that remedy a serious hazard that could adversely affect health or safety,
  determined using the housing health and safety rating system. It is intended to provide a
  safety net for urgent repairs for those most vulnerable in the community. The grant is repaid
  when the ownership of the property changes, or on transfer of the property to family
  members.
- Technology Enabled Care Services The council also operates an in-house technology team which helps support vulnerable people to remain living in their own homes with appropriate equipment and technology to summon assistance where required, or to control their home environment and activities within the home safely and appropriately. In addition, the service offers advice and installations to help facilitate effective assessment of people's needs to support them to remain living at home.

Information about all of the grants and services available, along with the eligibility criteria can be found in the council's <u>home adaptations and assistance policy</u>.

#### Understanding the quality of housing stock in Herefordshire

**Social housing** - Herefordshire Council does not currently own any general needs housing stock; instead, we work with local registered housing providers to meet housing need. Registered providers are responsible for the maintenance and management of their own stock. The <u>Decent Homes Standard</u> is a minimum standard that all social rented housing must meet and means that homes provided by registered providers should:

- Be free of category one hazards under the Housing Health and Safety Rating System.
- Be in a reasonable state of repair.
- · Have reasonably modern facilities.
- Provide a reasonable degree of thermal comfort.

There are nine active registered providers in Herefordshire with 12,290<sup>45</sup> properties. Registered Providers are required to report to the Housing Regulator about the condition of their stock. The Sector Risk Profile 2019 indicated that the importance of ensuring that stock meets high standards for health and safety and that overall stock condition has been increasingly identified as a major issue for many providers. <sup>46</sup>

The 2019 BRE report estimated that 10% of social housing stock in Herefordshire had one or more category 1 hazards, the vast majority of which are related to excess cold or fall hazards<sup>47</sup>.

 $^{\rm 46}$  Sector Risk Profile 2019; Regulator of Social Housing, Updated 6 March 2020.

<sup>&</sup>lt;sup>45</sup> Herefordshire Council Housing Stock Summary – September 2020.

<sup>&</sup>lt;sup>47</sup> BRE Integrated Dwelling Level Housing Stock Modelling and Database for Herefordshire Council, 28<sup>th</sup> June 2019.

**Private rented housing stock** - Poor housing conditions continue to be an issue within the private rented sector and so improving the quality of these homes is a priority for the Council. The BRE report estimated that:

- 3,813 dwellings in the private rented sector have category 1 HHSRS hazards. This equates to 25% of properties in the private rented sector.
- 23.8% (17,149) of *private sector* dwellings and 20.6% (3,131) of *private rented* dwellings in Herefordshire are estimated to have an EPC rating below band E.

Comparing Herefordshire to the English Housing Survey (EHS) England average figures for the private sector stock suggest that Herefordshire again has significantly higher levels of all hazards and excess cold<sup>48</sup>. Herefordshire Council have developed a <u>heat loss map</u> for Hereford and the market towns using EPC data. The map enables people to view the EPC rating for their property, compare it with other local houses / buildings and signposts residents to the Keeping Herefordshire Warm service.

**Homes of multiple occupancy (HMO's)** - The quality of HMO's across Herefordshire is a particular concern. A property that is let to five people or more, in two separate households, who share either bathroom or cooking facilities, is required to be licensed by the Local Authority. In 2019, there were an estimated total of 1,590 HMOs in Herefordshire, of which approximately 544 would come under the Government's mandatory licensing scheme. The quality of un-licenced HMO's varies hugely.

# What are we doing to improve this?

- Carrying out inspections of properties (owner occupier, private rented and social rented) that
  we receive complaints about. There are a wide range of <u>enforcement</u> measures available to
  the council.
- Publicising the <u>Midland Landlord Accreditation Scheme (MLAS)</u>, which is managed by <u>Homestamp</u> on behalf of Herefordshire Council and other partners with the primary focus of accrediting professional landlords and agents across the Midlands.
- Working with Registered Providers through the Strategic Housing Forum to drive up standards of Social Housing and promote funding opportunities.
- Leading by example; Herefordshire Council are committed to becoming <u>carbon neutral</u> by 2030. This includes all of our buildings and properties.
- Taking proactive approach to HMO inspection, carrying out approximately 80 inspections per annum. Inspections are used to determine what type of HMO it is, as there are a range of classifications, and for inspecting risk in line with the HHSRS process. We offer advice and support to landlords and where standards are not improved, are able to use enforcement powers.
- The <a href="Herefordshire Handyperson Scheme">Herefordshire Council's</a> 'You at Home' service. All visiting Handyperson staff have been police checked and carry identity cards. Our experienced home improvement team can help with support and guidance for all home improvements and adaptations. We also sometimes provide financial assistance for small-scale emergency repairs. Our handyperson team may be able to help with small adaptations like ramps, half steps, handrails, home safety and security work, and a wide range of small repairs to help people to remain independent or to ensure they can return home from hospital. In some cases, a small fee will be charged for work undertaken.
- The handyperson service completed 1759 jobs during 2018/19 and a further 1676 during 2019/20.

<sup>&</sup>lt;sup>48</sup> BRE Integrated Dwelling Level Housing Stock Modelling and Database for Herefordshire Council, 28<sup>th</sup> June 2019 p5.

#### Long term empty properties

Statistics published by the Department for Levelling Up, Housing and Communities (DLUHC) (formally the Ministry of Housing, Communities and Local Government) put the number of empty homes in England in October 2019 at 648,114. This represents a 2.2% increase on the previous year's total. Of this, 225,845 were classed as long-term empty properties (empty for longer than six months)<sup>49</sup>. There were 284 long term empty<sup>50</sup> properties in Herefordshire in January 2021. An empty property is a waste of a valuable resource and they have a significant impact on the local environment and community. Empty properties can have an impact on anti-social behaviour, property prices and other environmental issues.

Most long-term empty properties are privately owned. Common barriers that prevent owners from returning their property into use include:

- Issues with inheritance and/or delays with probate;
- Lack of finance to carry out necessary repairs and /or refurbishment;
- Perceived problems associated with letting of properties;
- Owner unwilling to bring the property back into use.

#### What are we doing to improve this?

- Herefordshire Council employed a dedicated Empty Properties Officer in December 2019 to
  work with homeowners to look at the options for bringing the property back into use. A long
  term <a href="Empty Property Strategy">Empty Property Strategy</a> has recently been approved by the council. This document
  gives more detail about the councils policy and processes to encourage the reuse of empty
  properties and the enforcement powers that the council can use in order to ensure the most
  efficient use of our housing stock.
- If a property is empty for more than two years, the owner of the property is subject to increased council tax as follows:
  - ➤ From 1 April 2019 the 50 percent premium increases to 100 percent for vacant properties of 2 years or more
  - From 1 April 2020 where a long term empty exceeds 5 years the premium increases to 200 percent
  - > From 1 April 2021 where a long term empty exceeds 10 years the premium increases to 300 percent
- Long term empty property owners renovating their properties can contact the council for a letter reducing the VAT on renovations works to 5%.
- An Empty Property Grant scheme is in place to support property owners to bring properties back into use. Grants of up to £10,000 are available.
- The Empty Properties Officer monitors empty properties to ensure they are brought back into use within agreed and appropriate timescale.
- The council follows an investigation process in order to trace owners of empty properties with a view to encouraging them to bring their properties back into use. However, in certain circumstances it is not always possible to identify or make contact with owners, or owners are reluctant or unable to bring properties back into use. Under these circumstance, if there is an imminent risk to health and safety the council will consider a number of enforcement options. The options available include but are not limited to:

<sup>&</sup>lt;sup>49</sup> House of Commons Library Briefing Paper Number 3012, 21st October 2030 – Empty Homes (England)

Note – DLUHC classes problematic empty properties as those that are inactive in the housing market and have been empty for more than 6 months

- Empty Dwelling Management Order (EDMO) Enables the council to secure occupation and responsible management of some privately owned houses and flats that have been empty for two years or more.
- Compulsory Purchase Order (CPO) Enables the council to purchase and sell an empty property for the purpose of providing housing accommodation or facilities connected to housing accommodation
- ➤ Enforced Sale Allows the council to force the sale of a property to recover debts owed to the council that are registered as a charge on the property.

## **Empty shops and retail units**

In March 2021, the Government issued <u>new planning law</u>. The new rules support the conversion of commercial premises into residential accommodation with the duel aim of creating new homes while also giving high streets a new lease of life – removing eyesores, transforming unused buildings and making the most of brownfield land.

This legislation is new and conversions of this type can be costly, so we don't expect to see an instant impact on the high street. It may not be cost effective to improve all long-term empty properties. In some circumstances is might be more economical to demolish a building and rebuild on a site, although this very much depends upon the site and its location / potential and any listing associated with the exiting building(s) or the site.

Herefordshire Council have been promoting the opportunity presented by accommodation above commercial units in Hereford City. Many of these premises are owned by companies, which can make it difficult to contact the owner directly. Many have upper floors that are only accessible via the ground floor shop, making conversion more challenging and costly.

# 4. Work in partnership to assess and deliver solutions to identified housing need.

Our housing need changes throughout the course of our lives. In order to understand more about changing need and how to meet this Herefordshire Council gather intelligence about existing demand and use a range of information including population forecast to map future demand on services. The council uses a range of tools, data and specialist advice to assess current and forecast future housing need, but it is not an exact science.

The value of supported housing as an economic option for commissioners depends on the specific accommodation costs being met. Negotiations around what constitutes intensive housing management for supported housing schemes can be lengthy and challenging; with some providers deciding not to deliver, much needed supported housing as a result.

Delivering new build housing is a long term and inexact process involving many factors, which are often outside the council's control. After planning permission is granted developers have 3 years in which to start work on site; needs can change during this period.

As a local authority, we work with a wide range of partners, both formally (via commissioning) and informally. With regards to accommodation for people in need of extra support and those who are vulnerable we work closely with registered providers and with developers via planning gain negotiations to develop bespoke housing solutions. There is more information about this on our website. We also work with other organisations, charities and faith groups to offer support to those in need. This can be formally via commissioning or informally via multi agency working arrangements.

There is a range of approaches that the council can take to sourcing accommodation as follows:

- Work with registered providers to ensure that the accommodation that they develop meets identified need.
- Negotiate with housing developers through the planning gain process. This accommodation tends to be developed, owned and managed by registered providers.
- Refurbishment of existing council assets and purchase of stock from the open market. This
  is something that we have started to do over the last 2 years in order to create housing for
  vulnerable groups including young people and people who are homeless. The council do not
  currently have a housing management function so we work with other providers via a formal
  commissioning process to run these properties and provide tenants with support.
- Development of council houses; this is a new and existing phase for the council. The
  accommodation we are seeking to develop will help us to address housing need more
  directly. At this point the council will either need to develop a housing management team or
  commission these services to ensure compliance with the Regulator of Social Housing.

Talk Community is the council's strategic approach to prevention, enabling people to get the assistance they need and managing demand for more specialist services. It conveys an aspiration and culture which prioritises prevention, innovates and intervenes at the earliest possible point to make independence and wellbeing inevitable. Through Talk Community, the council has made a commitment to maximise independence and wellbeing within Herefordshire communities and reduce demand on formal care. The focus is on communities being able to help people to help themselves, with emphasis on what people can do for their community as well as what the community can offer them. For vulnerable people it is important that they feel safe in taking up opportunities and participating in their communities, including linking with <u>Talk Community Hubs</u>.

#### Summary of housing needs for vulnerable adults

#### Older People - current and future demand

- 1,210 older adults (aged 65 and over) who are frail and/or disabled supported
- Around half (580 customers) have their accommodation related support funded by adult social care; the majority of whom live in a care home (36% residential and 26% nursing home).
- Increased demand for services will be seen through an increase in the base number of people by 26% over the next 10 years, an estimated increase of 314 people, indicating a rise in the demand for care homes, more specifically complex care nursing homes.
- Analysis in the Housing Market Area Needs Assessments shows a notable growth in the
  population of older persons aged 65+ in Herefordshire over the period to 2041 with the
  number of people expected to grow by 20,400 equal to 42% growth.
- A growing older population is expected to result in the growth in the population with mobility problems by 4,800 to 2041 and with dementia by 2,170. The Council would therefore be justified through policy in requiring new homes to be delivered as 'accessible and adaptable' homes as defined in Part M4(2) of Building Regulations.
- Growth in older persons, particularly in the older age groups, will also generate a need for provision of housing with support and housing with care. The assessment indicates a need for around 3,500 housing units with support (sheltered/retirement housing), particularly in the market sector; a need for around 1,400 additional housing units with care (e.g., extra-care), around 43% in the affordable sector; as well a need for additional care home bed spaces to 2041.
- This data means that we can negotiate with housing developers via the planning gain
  process to develop housing that will meet the growing accessibility needs of our aging
  population, although we have already acknowledged the challenge of being able to negotiate
  affordable housing on smaller sites. Rural sites tend to be smaller and often under the 10
  house threshold needed for affordable housing.

#### Proposed solutions to meet future demand - older people

Future growth will be achieved via a mixture of the following:

- Increase the number of nursing homes beds over the next 10 years, including provision for people with dementia.
- Increase the number of residential beds in the current market.
- Where possible we will seek to divert some people who would have a care pathway to residential care, into alternatives, which will include staying at home.
- Home care provision will continue to be a core offer and the increased opportunity of the live in care model of support.
- Additional growth of the extra care model in Herefordshire.
- Shared Lives growth to include older people.

# Adults with a learning disability - current and future demand

- 591 adults supported by adult social care have a learning disability.
- Just under half (264 customers) have their accommodation related support funded by adult social care; most of whom are aged under 65 and live in either a care home or a supported living scheme.
- It is estimated that there will be an increase of 4% to this customer group in the next 10 years, equating to 23 people.

#### Proposed solutions to meet future demand – Adults with a learning disability

The accommodation pathway to consider alternatives to residential care and to divert people away where appropriate from residential care. This will include:

- Enhanced supported living offer for people with complex / forensic history/ dual diagnosis through an enhanced framework
- Increase in accommodation models to support tenancies with a minimum number of selfcontained accommodation units in one location.
- Development of sites and models of accommodation to support the enhanced supported living cohort.
- Scope the opportunities for deregistration of some current residential homes for under 65's.
- · Growth of the Shared Lives offer.
- · Access to general needs housing as appropriate
- Growth of background support (both 24/7 and night time) through the use of assistive technology/core and cluster models

### Disability and long term conditions - current and future demand

- 560 Adults (aged 18 to 64) with a physical disability and/or long-term conditions are supported.
- Just over a quarter (154 customers) have their accommodation related support needs funded by adults social care; of these customers over half (58%) live in a care home, over a third live in a supported living scheme.
- There is a projected increase in numbers for this cohort of 1% over the next 10 years, an additional five people.

# Proposed solutions to meet future demand – adults with a disability or long term condition

- Adaptations to current property where possible and access to DFG's (Disabled Facilities Grant).
- Accessible homes register.
- Supported living schemes to have a small number of ground floor/accessible homes where possible.
- Growth of background support (both 24/7 and night-time) using assistive technology/core and cluster models.

# Adults with an acquired brain injury - current and future demand

26 adults with an acquired brain injury are supported. Of this number, 11 have their accommodation related support funded by adult social care. There is no anticipated increase in this figure

• Projections in the next 10 years show this cohort increasing by 11%, an additional 49 people.

# Proposed solutions to meet future demand – adults with a learning disability

- Increased access to specialist supported living providers.
- Continued access to General needs housing as appropriate.
- Growth of background support (both 24/7 and night-time) using assistive technology/core and cluster models.

#### Housing need for children and young people

Herefordshire's Children and Young People's Partnership is committed to supporting the resilience of families to ensure that children only become looked after when there is no other safe alternative and if they do, that a permanency plan that enables them to leave the care system safely is achieved at the earliest opportunity. We endeavour to ensure there is a continuum of services to address the range of needs so that families are equipped to appropriately care for, and meet the

needs of, their own children. Where this is not possible and a child comes into care, the council becomes their Corporate Parent and shares parental responsibility with their parents. Herefordshire's looked after children population has continued to grow and was 336 in November 2020.

- Herefordshire has an above average number of looked after children; we should expect 180-220 looked after children compared to statistical neighbours.
- Looked after children have a wide range of needs.
- The council spent £18m on placements in 2019/20.

There is a range of accommodation routes for children and young people in care depending upon their age and needs which are outlined below. In May 2021 the council was issued with a non-statutory improvement notice for its children's social care service by the Department for Education, following a High Court judgment which raised significant concerns about the service. Since this time the council has worked to develop a <a href="Children and Families Strategic Improvement Plan">Children and Families Strategic Improvement Plan</a> for the service. This includes the requirement to develop an all ages commissioning strategy to support a corporate approach, which includes prevention and early help, service specific commissioning and an update of the Sufficiency Strategy. The all ages commissioning strategy will be available in March 2022. The following information is therefore based on the current Sufficiency Strategy:

**Fostering and kinship care** – Enables children to be looked after in a family home, either with foster carers, or with wider family members. Negotiations are sometimes undertaken to increase the size of a property to enable sufficient space for the larger family unit, especially where the family are living in social housing. This is done on a case-by-case basis, via Home Point or via direct negotiation with the relevant registered provider, depending upon the circumstances.

Children returning to parents – Where it is safe to do so, the council seeks to return children home to their family. Where children have been removed from the family home for a period, the housing needs of the family will have changed and they may have moved into smaller accommodation either privately, or via Home Point. Reunification of the family may result in a larger home being required. In these circumstances, the council will support the family to consider their housing options and undertake negotiations to enable the family to move to larger accommodation wherever possible.

**Residential care** – Herefordshire Council does not have any in-house residential children's homes meaning that all placements are purchased from the independent sector including those for mainstream looked after children and children with complex behaviours or disabilities. At end of September 2020 there were 41 children placed in residential care, of these 10 were placed within 20 miles of home. In order to improve this situation the council are:

- Ensuring in-house recruitment targets specialist foster carers to reduce reliance on residential care.
- Strengthening strategic relationships with registered managers of local children's homes to improve access to vacant beds.
- Developing additional relationships with new homes as they open in and around Herefordshire.
- Joining new regional agreement for the purchase of residential placements from January 2019
- Consider short-term residential care as breathing space before a child returns home or to foster care.

**Plus 16 supported living** – These are placements that are provided by in-house 'hosts' and external agencies. The aim is to provide accommodation and support to help young people to achieve independence. At least 104 young people will transfer into the 16+ service between 2019-2024. Estimates suggest that approximately 30 young people in care aged 16 to 17, and 20 care

leavers, will require supported living placements each year. There is currently not enough supported accommodation available in Herefordshire so the authority have to place young people out of county. This is costly and means that Young People settle outside of the county. Based on local intelligence and assumptions of the impact of Early Help and Edge of Care work, and combined with comparisons against Herefordshire's statistical neighbours, it is anticipated (October 2018) that Herefordshire could have c.232-276 looked after children by 2024<sup>[1]</sup>. In order to improve this situation, Herefordshire Council have:

- Purchased and refurbished buildings in central Hereford, developing eight units of new accommodation for young people with moderate / complex needs. These supported accommodation schemes opened in August 2020.
- Commissioned a specialist support service that launched in 1<sup>st</sup> March 2021. The support focuses on providing accommodation-based support, family mediation and a community outreach service. Mediation and community outreach services are being delivered throughout Herefordshire using a strength based approach. All those supported are vulnerable young people who are in care, care experienced young people or those homeless or at risk homelessness in order to enable them to live independently in the community. Support is tailored to the individuals needs and can be tapered up or down according to their changing circumstances and needs with the aim of increasing each individuals independence with a view to them becoming fully integrated into the wider community and living independently.
- New accommodation has been sourced in partnership with a registered housing provider.
  The accommodation is located in Hereford city. All referrals into the accommodation and
  associated support service will be made exclusively by Children's Services (ten places) and
  the Housing Solutions Team (six places). All the young people supported must be aged
  between 16 to 25 years and have a local connection to Herefordshire.
- A 24-hour support service will operate from within the accommodation based support service and this will operate seven days a week throughout the year. The service will support up to 16 young people at any one time. This includes the emergency accommodation.
- We are developing a local young person's accommodation and support framework to enable quick and effective provision of accommodation as required.

More information about this subject can be found in the Councils <u>Looked After Children & Complex Needs Placement Sufficiency Strategy</u> 2019 – 2024 which is due to be updated in 2022.

## Resettlement of refugees in Herefordshire

Ninety-five refugees were resettled in Herefordshire through the government's previous resettlement scheme by February 2020. In June 2020, the Council committed to welcoming a further 125 refugees to Herefordshire over the next five years. The Home Office provides the local authority and health with funding to provide services for resettled refugees on government resettlement schemes. The aim of the resettlement scheme is to enable refugee families to develop their independence so that they have the skills and information required to live independently in the UK by the end of the 5th year of their resettlement.

To date, accommodation for refugee families has been secured through the private rental market. Demand for private rented accommodation continues to be high, so as we look to settle afghan refugees into our community we will also work with registered providers to find suitable housing solutions for new families as they settle into the county. It is the council's belief that communities are enriched by a more diverse population.

<sup>[1]</sup> Looked After Children & Complex Needs Placement Sufficiency Strategy 2019 – 2024, p8.

# Rough sleeping and homelessness prevention in Herefordshire

A review of homelessness in Herefordshire undertaken in 2019 found that Herefordshire has been very successful in preventing people from becoming homeless. However, more needed to be done in our response to rough sleepers and those at risk of rough sleeping, who have complex needs. The latest rough sleeper count in Herefordshire (taken on the 30<sup>th</sup> August 2021) indicates that there were ten people rough sleeping in the county at that time Of these four had received offers of accommodation and had been evicted or abandoned their accommodation, one had accommodation that was still available to them. Five had not had offers of accommodation at that time, four of these were new to rough sleeping.

The health and wellbeing of people who experience homelessness is poorer than that of the general population. They often experience the most significant health inequalities. The longer a person experiences homelessness, particularly from young adulthood, the more likely their health and wellbeing will be at risk.<sup>51</sup>

Co-morbidity (2 or more diseases or disorders occurring in the same person) among the longer-term homeless population is not uncommon; an example of this would be someone who has a mental health condition alongside drug and/or alcohol dependency. Among homeless people, the mean age at death was 45.9 years for males and 43.4 years for females in 2019; in the general population of England and Wales, the mean age at death was 76.1 years for men and 80.9 years for women<sup>52</sup>.

During 2019 - 2020 Herefordshire Council:

- Assisted 1124 households who were experiencing housing difficulties.
- Prevented 262 households from becoming homeless from their existing home.
- Helped to find alternative accommodation for 246 households before they became homeless.
- Accepted a full homeless duty to 42 households who would have been provided with temporary accommodation, pending rehousing, if needed.
- Provided outreach support to 91 rough sleepers and those at risk of rough sleeping.

The proportion of households that lost their last settled home due to the ending of a private sector Assured Short hold Tenancy has increased dramatically, becoming the biggest single reason given for statutory homelessness nationally and locally in the last few years. A Prevention or Relief duty was owed to 191 households (out of 348) in Herefordshire due to termination of Assured Short hold Tenancy.

Prior to the Covid 19 pandemic, the four main causes of homelessness, or being at risk of homelessness, in Herefordshire were:

- Private sector and social housing evictions
- Family/friends no longer willing/able to accommodate
- Non-violent relationship breakdowns
- Domestic abuse and other violence

The government introduced a ban on section 21 evictions during the pandemic and as a result, the number of private sector and social housing evictions have reduced dramatically; however this has now been lifted. In September 2021 there were 71 households in temporary accommodation, well above the average of 48 households during 2020.

<sup>&</sup>lt;sup>51</sup> Homelessness: applying All Our Health. Public Health England 06.06.2019

<sup>&</sup>lt;sup>52</sup> ONS Report – Death of homeless people in England and Wales 2019 registrations.

For most people who are at risk of, or experiencing, homelessness and rough sleeping there is not a single intervention that can tackle this on its own, at population, or at an individual level. Action is required to support better-integrated services including health and social care, and to help people to access and navigate the range of physical and mental health and substance misuse services they require in order to sustain stable accommodation<sup>53</sup>.

### What are we doing to improve this?

The review of homelessness in Herefordshire informed the Rough sleeping and homelessness prevention strategy 2020 – 2025. This strategy examines the causes of homelessness and sets out Herefordshire Council's priorities for preventing homelessness and rough sleeping across the county. The strategy recognises that homelessness, in its causes and consequences, is a crosscutting issue, which cannot be tackled by one agency or organisation alone. In order to achieve positive outcomes it is essential that all partner agencies work together in a coherent and integrated way. The council is a member of the Herefordshire Homelessness Forum that brings together organisations across the county that are working to prevent or relieve homelessness. The forum includes representatives from the voluntary sector, faith organisations, commissioned delivery partners and statutory organisations and is focused on meetings the diverse and often complex needs of people who find themselves homeless in Herefordshire.

Our work with rough sleepers and those at risk of rough sleeping and homelessness changed dramatically in March 2020 as a result of the Covid 19 pandemic and the Governments 'everyone in' directive. The council has received 156 presentations as homeless since lockdown began, with up to 80 people placed in temporary accommodation at any one time.

The huge partnership effort required to accommodate and support this vulnerable group of people during the pandemic has been called 'Project Brave'. Project Brave has a purposeful and holistic approach to eradicating homelessness across the county and includes support for people to access and engage with services e.g. substance misuse and mental health Homelessness is often a complex and multi-faceted issue, there is no one size fits all solution.

Move on accommodation for those accommodated during the lock down period is now being sought through registered providers and the private rented sector. The council has secured funding from DLUHC for the following activities:

- Funding to keep those accommodated in temporary accommodation because of the Pandemic in that accommodation until 31.03.2021.
- A private landlord's incentive scheme for up to 20 properties for homeless people who need low levels of support.
- Development of a Homelessness Hub in Hereford city including eight units of emergency accommodation and four self-contained flats in 2021.
- Continuation funding for two full time rough sleeping support workers.
- Commissioning of a support contract with Vennture, a local faith based charity, to enable wrap around support.

The Council have been working closely with Hope Scott House, a local homelessness charity, to develop their accommodation and support offer over the last two years, creating ensuite accommodation and two self-contained living pods, enabling people who have been homeless to make incremental steps towards independent living. In addition, we are in the process of converting two city centre properties into six one-bed units of sustainable 'move on' accommodation for completion at the end of 2021. This will enable people in need of support to gain experience of

<sup>53</sup> Homelessness: applying All Our Health. Public Health England 06.06.2019

managing a tenancy whilst also being supported to learn the skills that they need for independent living.

The <u>Renters Reform Bill</u> 2019-20 lays out legislation focused on resetting the balance of rights and responsibilities between landlords and tenants including bringing to an end 'no fault' section 21 evictions.

The Government have committed another £151 million to tackle rough sleeping and homelessness during the 2021/22 financial year. The council will continue to bid for funding as it becomes available to move homeless people into supported long term safe and secure

In spring 2020, WMWA, Connexus and the Council secured funding from the Ministry of Housing, Communities and Local Government (now DLUHC) for four units of additional accommodation for survivors and children fleeing domestic abuse. Connexus provided the houses, which are all occupied by families in need. The funding, which runs to March 2021, also covers additional advocacy and housing management support for families in the community houses, as well as wider one to one support for 'complex' cases and children. The council is looking at the options around sustainability for this project beyond April 2021.

The council and partner organisations are pro-active in pursuing funding opportunities for domestic abuse projects as and when they become available. However, many of these opportunities are short term and sustaining the benefits of short-term projects can be challenging.

The Government's new <u>Domestic Abuse Bill 2020</u> has implications for the way in which councils operate. The Bill will place a duty on councils to:

- Complete a needs assessment and domestic abuse strategy every three years, with an annual refresh.
- Provide adequate safe accommodation for survivors of domestic abuse and their children in accordance with the needs analysis. Safe accommodation may be a refuge but can extend to various other housing options depending on the need.
- Create a Local Partnership Board with the police, health, registered housing providers and other relevant organisations to ensure that responsibilities detailed within the Bill are being met, in line with local need.

## Housing needs of the Gypsy, Traveller and Travelling Show people

According to a 2019 Government report, Gypsy, Roma and Traveller people have some of the worst outcomes of any ethnic group across a huge range of areas, including education, health, employment, criminal justice and hate crime<sup>54</sup>. Traveller communities are diverse; many Gypsies and Travellers choose to live within small kin-based groups where they can enjoy the benefits of their extended family support, which is an essential part of their culture.

Data analysis for the Herefordshire Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA) published in July 2017 identified a total of 129 pitches, 119 households (3 of which have 2 pitches each, bringing the total number of occupied pitches to 122) and 7 unoccupied pitches.

The GTAA found evidence of Gypsy and Traveller pitch need over the next five years (2017/18 to 2021/22) equating to 48 pitches under a cultural definition, and as a subset of this number, 17 pitches under the PPTS 2015 definition of Gypsy/Traveller (those who still travel and/or intend to travel). For the remaining local plan period (2017/18 to 2030/31), the GTAA has identified a cultural need for 74 pitches and, as a subset of this number a PPTS need for 27 pitches.

<sup>&</sup>lt;sup>54</sup> Herefordshire Council Equality Policy p 15

Taking into account an anticipated annual turnover of six pitches on local authority sites during the remainder of the plan period (2017/18 to 2030/31), this equates to eighty-four pitches becoming available. Therefore, both the cultural and PPTS shortfalls are likely to be addressed.

Notwithstanding this, it is recommended that the council should continue to consider applications for appropriate small sites to address the needs of local Gypsy and Traveller families should they be forthcoming over the plan period.

### What are we doing to improve this?

- The Council is committed to improving both the quantity and quality of the
  accommodation it offers for rent, and has committed significant amounts of capital
  expenditure in order to facilitate this. Funds have been agreed to continue this
  programme of works and is well supported by both officers and Elected Members.<sup>55</sup>
- The six Council-owned sites provide fifty-three pitches and are audited regularly. Stock condition surveys are carried out to help us identify areas for improvement and plan modernisation works.
- New pitches are proposed on some of the council sites and this is detailed in the <u>Traveller Site Development Plan</u> adopted in October 2019. This plan also identifies a temporary stopping place that will provide an area of hard standing where basic facilities can be brought onto the site.
- The council reviewed and updated its <u>Gypsy and Traveller Allocation Policy</u> in 2019. This document sets out how the local authority prioritises applicants to ensure that those with a recognised need are given access to register. This Allocation Policy sets out in detail who is, and who is not, eligible to become a member of the site waiting list and how this assessment is carried out.
- The council has commissioned a new GTAA, which will be researched and published in 2022. This will further the council's understanding of the accommodation needs for the Gypsy, Traveller and Travelling Showperson communities.

### Housing need of armed forces personnel and veterans

During 2020, Herefordshire's Armed Forces Covenant Partnership carried out research to gain a deeper understanding of the Armed Forces community in Herefordshire. The resulting report, The Armed Forces Community in Herefordshire, includes the following information:

- As at April 2019, 1,670 members of the Regular Armed Forces were stationed in (not resident in) Herefordshire; a 15% increase since 2012 (1450).
- According to the 2011 Census, there were 1,200 people employed by the Armed Forces living in Herefordshire with an associated 1,450 family members (spouse, partner, child or step-child) living with them: a total of at least 2,650 members of the currently serving Armed Forces community.
- As of July 2019, there were 309 properties in Herefordshire owned by the MoD for service personnel use.
- It is not known how many Armed Forces personnel own homes in Herefordshire. However, given the number of Armed Forces stationed in Herefordshire there may be a large percentage that are homeowners or renting privately. It is worth noting that a relatively high number of the serving population may be stationed in Herefordshire, but do not necessarily live in the county.
- The Annual Population Survey 2017 estimated that there were around 14,000 Veterans resident in Herefordshire; 1% of the United Kingdom's Veteran population.<sup>56</sup>

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<sup>&</sup>lt;sup>55</sup> Herefordshire Council Equality Policy p 15

<sup>&</sup>lt;sup>56</sup> Annual population survey: UK Armed Forces Veterans residing in Great Britain 2017, *op cit*.

- Nationally, around 76% of veterans are homeowners, similar to 78% of the non-veteran population. In the local veteran survey, 82% of respondents live in owner occupied housing. However, it is well documented that the younger the veteran is the least likely they are to be a homeowner, particularly early service leavers and single veterans.
- Veterans and service leavers' access to social housing has improved significantly in recent years due to changes in the 2012 Housing Regulations. These changes have been fully adopted by Herefordshire Council in their social housing allocation policy.
- According to Herefordshire's social housing register, over the past five years there have been twenty-five registered and either housed, removed or currently trying to still register. Of those, eight veterans have been housed in the past 12 months (2019/20).

# What are we doing to improve this?

- A great deal of work has been done by the <u>Armed Forces Covenant</u> and local authorities to
  ensure those who serve or who have served in the Armed Forces, and their families, are
  treated fairly. This commitment has been integrated into the Councils <u>Equality Policy 2020-</u>
  2023.
- Regular Armed Forces personnel are eligible for the Forces Help to Buy scheme. Service men and women are able to borrow up to 50% of their salary to a maximum of £25,000, interest free to buy their first home or move home. The scheme was launched in April 2014 and has been extended to 2022 to address low rates of home ownership in the Armed Forces. As of 31<sup>st</sup> March 2018 around 37,600 applications had been received and payments had been made to around 17,800 applicants totalling around £267 million and averaging £15,000 per claim.<sup>57</sup>
- In line with legislation, Herefordshire Council has adopted the qualification criteria for the Armed Forces and the revised housing regulations into its housing allocations policy. This means that while applicants normally must have lived in Herefordshire for the past five years, this does not apply to veterans in the first five years after they have left the Armed Forces.
- Work is underway to better understand the housing landscape through more robust and regular data from Home Point and also to provide more transparent information on accessing social housing for the Armed Forces.

### **Examples of housing projects for veterans in Herefordshire**

Herefordshire has two initiatives that not only provide housing for homeless veterans but also the opportunity to gain new sustainable skills and qualifications:

- The <u>veteran self-build</u> project based in Leominster was completed at the end of 2020, and has enabled nine veterans to obtain construction qualifications whilst building their own home.
- The <u>Buchanan Trust</u> offer a range of short-term accommodation alongside land-based skills training and work experience.

Both of these projects have had direct support from Herefordshire Council.

### Housing need for prison leavers and ex-offenders:

Repeated studies have established that securing adequate housing for ex-offenders reduces rates of recidivism. Getting prisoners into settled housing can act as a gateway to effective resettlement and prisoners who have housing arranged on release are four times more likely to have

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<sup>&</sup>lt;sup>57</sup> Forces Help to Buy Quarterly Statistics Q4 2018-19, Ministry of Defence, 2018.

employment, education or training than those who do not have housing in place.<sup>58</sup> Because housing problems are often a key underlying factor for people's involvement with the criminal justice system, housing interventions can help lessen criminal justice involvement in the first place.<sup>59</sup>

In the case of individuals who have served a custodial sentence, the support a prisoner can expect will depend on the sentence they received: prisoners with shorter sentences are supported by the relevant Community Rehabilitation Company (CRC) within the prison, although some may be supervised by The National Probation Service. In either case, the CRC or probation representative can offer help with the prisoner's housing situation, for example by contacting the relevant local council on the prisoner's behalf. However, those with very short sentences may not have time to get an appointment with a CRC or probation worker before release. Prisoners with a sentence of 12 months or more will be allocated an offender manager, who is appointed by the Prisons and Probation Service. The offender manager has a broad role in integrating the offender back into a settled way of life in the community, which may include help in finding suitable housing in order to reduce the risk of reoffending.<sup>60</sup>

Despite this, ex-offenders continue to be at a disproportionately high risk of homelessness: people who have been to prison just once experience homelessness at a rate nearly 7 times higher than the public and those who have been incarcerated more than once have rates 13 times higher than the public.<sup>61</sup> This "revolving door of incarceration" is perpetuated when people are not connected to the housing services they need after release.<sup>62</sup>

If an individual held a tenancy at the time of their incarceration, the tenancy will continue provided that the prisoner intends to return to their home in the future. Case law has confirmed that even where a prisoner is given a long sentence, provided their rent is maintained, the property is looked after and there is an intention to return, then the tenancy will continue.<sup>63</sup> If the prisoner held a mortgaged property, contractual mortgage payments must be maintained during the period of the prison sentence in order to reduce the risk of possession action by the lender. If there is another person left in the property, such as the prisoner's spouse, they can continue to make payments even where they are not named on the mortgage.<sup>64</sup> Inevitably, maintaining a tenancy or mortgage while in custody is, for many, unsustainable and they will need to find new accommodation upon their release. It is suggested that around two-thirds of prisoners need help to find accommodation when approaching a release date, or probation. Gaps in the system mean that a proportion of them find themselves homeless, or in temporary and unstable homes.<sup>65</sup> Barriers to securing suitable accommodation can include:

- A shortage of affordable housing for offenders and other low income groups nationally.
- A scarcity of supported and temporary housing for people with lower end needs.
- Many offenders have a poor tenancy history and appear to be treated less favourably as a group by many housing providers.<sup>66</sup>

The prevalence of housing need amongst ex-offenders in Herefordshire is a gap in our current understanding and one that we will seek to address over the term of this strategy. Statistics indicate

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<sup>58</sup> Kimberly Burrowes, Housing Matters, (27 February 2019). 'Can Housing Interventions Reduce Incarceration and Recidivism?'

<sup>&</sup>lt;sup>59</sup> National Homelessness Advice Service (NHAS), (October 2017). A guide to housing options for offenders (England): Positive steps and good practice in preventing homelessness and improving access to housing amongst offenders and their families. p.6.

<sup>60</sup> Nowhere to Go: Homelessness among formerly incarcerated people. Lucius Couloute, Prison Policy Initiative, August 2018.

<sup>61</sup> Return to Nowhere: The Revolving Door Between Incarceration and Homelessness. Texas Criminal Justice Coalition, February 2019.

<sup>&</sup>lt;sup>62</sup> A guide to housing options for offenders (England): Positive steps and good practice in preventing homelessness and improving access to housing amongst offenders and their families. National Homelessness Advice Service (NHAS), October 2017, p.7.

<sup>&</sup>lt;sup>63</sup> A guide to housing options for offenders (England): Positive steps and good practice in preventing homelessness and improving access to housing amongst offenders and their families. National Homelessness Advice Service (NHAS), October 2017.p.8.

<sup>63</sup> Housing support for ex-offenders (England and Wales). Wendy Wilson, House of Commons Briefing Paper, No.2989, 17 October 2017, p.4

<sup>&</sup>lt;sup>63</sup> <u>Impact Pathways</u>

that 10 people approached the Housing Solutions Team during 2019/20 having left institutions without accommodation. This is in addition to those being released from prison who had preplanned accommodation in place.

Herefordshire does not have any hostel accommodation (also known as approved premises), so the only route available for those leaving prison is through the Housing Solutions Team. There are thirty supported housing units for single adults including ex-offenders and those who suffer from mental health and / or substance misuse issues spread over two locations in Hereford city. These units are designated to those in housing crisis, not solely ex-offenders.

# What are we doing to improve?

- Herefordshire Council commissioned Caring for Communities and People (CCP) to deliver a Housing-related Support Service for vulnerable adults aged 18+ who are homeless or at risk of homelessness in 2019. In addition to supported accommodation, the service can provide advice and support for tenancy issues, housing rights & homelessness, budgeting & benefit take-up, housing-related debt, training & employment and social & community inclusion. Customers may or may not have complex needs, including ex-offenders and people with substance misuse or mental health needs. The service helps turn customer's lives around by offering an alternative to homelessness services and supports the development of life skills. Tailored support packages, developed and delivered in conjunction with a range of key partners, will support a move back to independent living and integration within the community.
- Ex-offenders who are homeless will also be linked into the Project Brave work outlined above.
- During 2020, the council supported the development of 6 units of en-suite accommodation and 2 units of move on accommodation at the local charity based in Hereford City, who provide accommodation and support to homeless people, including ex-offenders.
- In 2021 the council, working in partnership with Citizen Housing, developed a homelessness HUB in Hereford City. This includes accommodation for people in need, including prison leavers.
- Further research is needed into the barriers that prison leavers and ex-offenders face when accessing services, including housing, in Herefordshire, so that they can be overcome.
- Explore funding opportunities that aims to improve the outcomes of people leaving prison.
   We know that when people leave prison they face a wide range of challenges, such as securing employment and financial security, obtaining safe and stable accommodation, and building positive relationships with family, friends and the wider community.

### **Glossary of terms**

**Affordable housing** - Annex 2 of the National Planning Policy Framework (NPPF) defines affordable housing as 'Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)'. Below is a summary of some of the affordable housing products that are available in Herefordshire:

- Affordable housing for rent (no more than 80% of local market rent including any services charges).
- Social Rent Owned by local authorities or RPs providing dwellings available for social rent
   – these rents are in line with guideline target rents which are determined through the
   governments <u>rent standards</u>.
- Starter homes This is a government tenure that has to be discounted by at least 30% below market value.
- Discounted market sales housing This is a government tenure, which has to be discounted by at least 20% below market value.
- Low cost market This is a local tenure through which affordable properties are sold at a
  discount of at least 20% below market value. Eligibility is determined with regard to local
  incomes and local house prices. The LA sets the discount thresholds
- Shared equity 100% of the title is transferred to the qualifying purchaser at no more than 80% of the open market value subject to a legal charge in favour of the council for 20% of the unit equity value.
- Rent to buy Housing provided by RPs that is let at an affordable or intermediate rent for a
  defined period to a household that wishes to buy but are unable to save for a deposit.
- Shared ownership under the terms of the lease by which a lessee may acquire a share or shares of the equity from the RP who retains the remainder and may charge a rent.
- First Homes. This is a new tenure that has been introduced by government from 28<sup>th</sup> June 2021 as is housing that is provided for first time buyers as a minimum discount of 30% of market value that applies on first and future sales. There is a £250,000 price cap and it is restricted to households with a combined income of £80,000 per annum.

**Core strategy** - The Core Strategy is a key document in the Local Plan, which provides the strategic planning framework for the county's future development needs up to 2031. A range of policies sets out how these needs can be met while at the same time achieving social and environmental objectives.

**Herefordshire home point** - Home Point the choice based lettings scheme set up in partnership between Herefordshire Council and the main housing associations who have properties available to let across Herefordshire. The aim is to give you more choice in deciding where you want to live.

National planning policy framework (NPPF) - The National Planning Policy Framework (NPPF) sets out the Government's economic, environmental and social planning policies for England. The policies set out in this framework apply to the preparation of local and neighbourhood plans and to decisions on planning applications. The NPPF covers a wide range of topics including, but not limited to, housing, business, economic development, transport and the natural environment.

Office for national statistics (ONS) - Office for National Statistics is a government department with the responsibility for the collection and publication of statistics related to a Nation's economy, population and society at national, regional and local levels.

Owner occupier - someone who has bought a residential property and lives in it.

**Private rented** - This is where you rent a room or residential property and are given a tenancy and have the responsibility of managing this property yourself.

**Supplementary planning document (SPD) -** Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

# **Appendix 1 – Performance Indicators**

	Housing Strategy Performance Monitoring Data											
Environmental Health Department	2020/21		2021,	/22			Progress Report / Comments	2022/2	2023/2 4	2024/2	Progress Report / Comment s	
		Qtr 1	Qtr 2	Qtr 3	Qtr 4	Annua I Total						
Number of HMO inspections	5 to Sept 20	7	27									
Number of single family dwelling inspections	1 to Sept 20	4	15									
Number of HMOs registered	14 to Sept 20		11									
Housing enforcement notices served per year	10 to Sept 20	6	18									
Successful housing prosecutions / fixed penalty notices / formal cautions per year	0 to Sept 20	2	2									
<b>Housing Solutions</b>	2020/21		2021/	/22		1	Progress Report / Comments	2022/2	2023/2 4	2024/2 5	Progress Report / Comment s	

		Qtr 1	Qtr 2	Qtr 3	Qtr 4	Annua I Total			
Number of households assisted that were experiencing housing difficulties	1171 YTD		587						
Top 3 Causes of homelessness	S21 Notice to Quits, Domestic Abuse and parental / other evictions	D/A - S21 Parental/oth er evictions							
Number of household provided a Prevention or Relief duty who would otherwise have become homeless.	371 YTD		290 preventio n / relief 306				the relief figures skew the figures as the majority of cases progress from Prevention to relief		

Number of households provid ed with temporary accommodation, pending rehousing, where needed.		66				
Number of people provided with proactive outreach support - rough sleepers and those at risk of rough sleeping.		121		this number fluctuates as outrach also offer ongoing support as part of PB		
Number of people rough sleeping in Herefordshire - annual rough sleeping count.	17	23		r/s count will be on 13/10/21 one month early to represent the upsurge in numbers due to the end of tied accom		

Number of ex- offenders / prison leavers supported by the Housing Solutions Team			42								
Number of veterans supported by the Housing Solutions Team			17								
Number of Domestic Abuse cases supported by the Housing Solutions Team			197 YTD				Noticable increase in presentations particularly from males				
Sustainability Team	2020/21		2021/	/22			Progress Report / Comments	2022/2	2023/2 4	2024/2	Progress Report / Comment s
Sustainability Team	2020/21	Qtr 1	2021 <i>)</i> Qtr 2	/22 Qtr 3	Qtr 4	Annua I Total					Report / Comment
Number of households living in Fuel poverty (government data)	2020/21 13902 (2019)	Qtr 1	<u> </u>	ı							Report / Comment

Domestic Carbon Sum	295 KtCO2 (2019)- 38% reduction						
Number of households assisted by Keep Herefordshire Warm	1298	272 (Q1 Apr- Jun)			Target- 1000- on track		
Number of Local Authority Delivery Green Homes Grants	0- Phase 1a to complete Sept '21	0	Awaiting data				
Residual household waste per household (kg/household)(Ex NI191)		33.55	97.07		Data only available to June- outturn marginally below target. Still awaiting official DEFRA outturn 20/21		

Percentage of total waste we collect from households that is recycled, composted or reused		38.95	31.77				Data only available to June- outturn below target. Still awaiting official DEFRA outturn 20/21				
Percentage of municipal waste sent to landfill (Ex NI193)											
Strategic Housing and planning	2020/21		2021,	/22			Progress Report / Comments	2022/2	2023/2 4	2024/2 5	Progress Report / Comment s
		Qtr 1	Qtr 2	Qtr 3	Qtr 4	Annua I Total					
Total number of affordable units developed	228	41	65	60							

Number of affordable units developed for sale (low cost market / shared ownership / shared equity/Rent to buy)	90	18	38	13				
Number of affordable units developed for rent	114	52	53	47				
Number of supported housing units developed / refurbished	29	0	1	0				
Number of long term empty properties in Herefordshire (Council tax data)	262		254	319				
Number of empty properties brought back into use	21	0	5	3				
Number of new homes built by Herefordshire Council	N/A	0	0	0				

Number of people that have moved into a new adapted property via accessible homes register (new build & DFG's)	3	5	1	0							
Number of new sites identified for gypsy, traveller and travelling showpeople.	5	0	0								
Accessible Homes and Adaptions	2020/21		2021/	/22			Progress Report / Comments	2022/2	2023/2 4	2024/2 5	Progress Report / Comment s
		Ot 1	Otra 3	Ot 3	Qtr	Annua					
		Qtr 1	Qtr 2	Qtr 3	4	l Total					
Number of formal applications received for home adaptations	270 enquiries - 123 formal applicatio n	24 enquiries - 2 formal application	93 enquiries - 23 formal applicatio n	175 enquirie s - 71 formal appli	4						

Number of disabled facilities grants completed	115	0	23	87				
Number of grants completed for owner occupiers?	45	0	8	38				
Number of grants completed for Registered Providers/Housing Association tenants?	57	0	13	41				
Number of grants completed for occupants living in privately rented accommodation?	13	0	2	8				
For all grants approved, what was the average number of working days between the date of receipt of the formal application and the date of approval?	50	57	94	56				

For all grants completed, what was the average number of working days between the date of approval and the certified date of installing the adaptations?	65 #	65	78				
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Adults	2020/21		2021/	/22			Progress Report / Comments	2022/2	2023/2 4	<b>2024/2</b> 5	Progress Report / Comment s
		Qtr 1	Qtr 2	Qtr 3	Qtr 4	Annua I Total					
Permanent and short term placements into care homes											
Number of people in supported living			30								
Number of capacity/voids in supported living			0								
Number of women and children in refuge accommodation											

Number of refugees resettled in Herefordshire as part of the Govnts resettlement schemes											
Children and Young People	2020/21		2021/	/22			Progress Report / Comments	2022/2	2023/2 4	<b>2024/2</b> 5	Progress Report / Comment s
		Qtr 1	Qtr 2	Qtr 3	Qtr 4	Annua I Total					
Total number of looked after children	336						Data being processed				
Percentage of care leavers in suitable accommodation							Data being processed				
Number of young people in plus 16 supported accommodation			24				Data being processed				