

**Draft Housing Strategy 2008/09 to 2010/11
Summary of comments received**

Comments received from	Detail of comment	Reference in Draft Strategy	Response to comment	Action Proposed	Action Taken
Government Office North West	The Strategy needs to demonstrate more clearly how it will deliver on the priorities contained within the Sustainable Community Strategy.	Appendix 1 on page 50 summarises Halton's contribution to Strategic Priorities contained within the SCS	New guidance on developing Housing Strategies is, we are told, likely to place strong emphasis on the links between housing and the Sustainable Community Strategy. However, references to Housing within the Sustainable Community Strategy are few and far between.	To examine the SCS and priorities and actions contained within the Service Plans of each directorate for links between housing and other agendas e.g. health and education and to amend the document accordingly.	The priorities of the Housing Strategy have been revised to mirror the priorities identified in Halton's Community Strategy. Housing's contribution is more explicitly linked in the main body of the document by way of a table on page 47.
	The Strategy doesn't deal with the links between social housing and worklessness.		The tackling worklessness agenda is relatively new and was not at the forefront of housing policy when the Strategy was drafted. However, we understand that a number of initiatives to help people into work are being developed as part of the Neighbourhood Management pilots.	To speak to the NM Team about worklessness initiatives. To speak to Policy and Performance about worklessness actions within the Local Area Agreement.	The revised Strategy contains a new section on worklessness on page 34 of the document and also includes a number of actions to tackle worklessness under the Employment, Learning and Skills priority.
	More information is expected on what the Council would like to see in terms of new affordable housing, particularly split between LCHO and rent	Page 19 deals with affordability in the Borough as found from the Housing Needs Survey	This is not straightforward as, while we have the high level numbers on affordable need from the Housing Needs Survey, it has not yet been decided how the numbers will be spatially allocated.	Speak to Planning regarding an appropriate form of words which sets out the likely general approach in terms of Borough wide housing numbers and the likely recommended split between LCHO and rent.	The revised document goes into more detail about the recommended split from the Housing Needs Survey on page 19.
	Information on spatial priorities was expected, given the concentrations of social housing in particular areas	Page 26 refers to spatial priorities of Castlefields and West Bank	Castlefields is named as the Council's priority area for regeneration, however, much of the evidence about other estates such as Windmill Hill is anecdotal. The Liverpool City Region Housing Strategy does name vulnerable housing market areas in the Borough but for some of these the vulnerability is due to issues such as access to amenities etc.	Following discussions with Major Projects we propose to include a section on "Other priority areas" (without naming them specifically so as not to cause blight) detailing the anecdotal information and the need for further research. Include an action under Aim 4 to commission further research to inform our approach.	A section on other regeneration priorities is included on page 27 – we have also included an action to commission consultants to undertake research to prioritise regeneration in the New Town estates within the Urban Renewal priority. (A bid for Growth Point funding is to be made to fund this).

Comments received from	Detail of comment	Reference in Draft Strategy	Response to comment	Action Proposed	Action Taken
Government Office North West (cont)	More information is expected on how the Council intends to link with partners on tackling worklessness, ASB and aspirations beyond decent homes.	Partnership working is covered in section 4 on page 13 and information on ASB on page 38 in the Wider Service Developments section.	The tackling worklessness point is covered above. Joint working arrangements on ASB are already in place. We are not clear exactly what GONW are expecting regarding "aspirations beyond decent homes".	Actions on tackling worklessness as above. Speak to ASB Officer on how we can strengthen the section on partnership working with RSLs. Seek clarification from GONW on "aspirations beyond decent homes".	Section on worklessness included on page 34 and included in Action Plan. An action has been added to work with housing providers to reduce the incidence and perceptions on ASB. More information has been provided on the Decent Homes Plus standard on page 24 and an action included to work with RSLs to ensure plans are in place to meet DHS.
	A new allocations methodology is coming forward for LASCP with private sector stock condition playing a major part. The lack of an up to date PS Stock Condition Survey doesn't position Halton well.	Page 24 refers to the fact that the Council has been unable to commission a SCS.	The commissioning of a Private Sector Stock Condition Survey is listed as an action for 2008 in the Action Plan at Appendix 6 (page 58). Given this advance warning, it would be wise to complete this asap.	SMT are requested to consider funding to undertake this project in the current financial year (£40/50K est.).	Funding streams being explored are Growth Point and PCT funding which would enable commissioning of Private Sector SCS.
	The Strategy should anticipate the growth point announcement and deal with the provision of new housing especially given the rising affordability agenda.	Page 8 makes passing reference to the Growth Point bid and a little more detail is given on page 39 (under Planning Policies).	Housing growth is an emerging agenda and at the time of drafting the Strategy it was unclear whether the bid was likely to be approved, so further detail was omitted pending the announcement. It is likely that the announcement will be made by the time the Strategy, therefore, it would be prudent to include detail on housing growth within the Strategy.	To include an objective on housing growth within the Strategy and Action Plan. Hopefully an announcement on bids will be made in July which will enable a clearer message to be included in the Strategy.	A new section on Housing Growth has been included on page 23
	The Strategy does not deal with the emergence of the Homes and Communities Agency and the potential for new working and partnerships.		The Council has already developed successful partnerships with both the Housing Corporation and English Partnerships.	Within the document emphasise the long history of successful joint working and the intention to seek opportunities for further work once the HCA is established.	A new section on the provisions of the Housing and Regeneration Act (including the emergence of HCA) is included at page 10 and reference made to working closely with HCA on page 27.

Comments received from	Detail of comment	Reference in Draft Strategy	Response to comment	Action Proposed	Action Taken
Government Office North West (cont)	While the reasons for delaying the development of an Affordable Housing Policy are understood, GONW make the point that this doesn't paint a picture of an authority looking to position itself to maximise housing resource.	The Options Appraisal on page 45 documents the reason for delaying development of a AHP.	Our hands are somewhat tied on this issue. While our colleagues in Planning tell us that it is possible to develop a policy before the Core Strategy is adopted, it would be open to challenge by developers since the current UDP states that Halton does not have an affordability issue.	Speak to Planning to establish whether any other interim measures could be introduced to address the concerns raised.	Discussions with Planning conclude that any interim measures would be unlikely to stand up to recent challenge, particularly in the light of recent rulings (e.g. Blythe Valley) and the need to update Housing Needs data in the light of changing market conditions.
	The table on housing investment gives no explanation for the reduction in RHP resources from 2005/06 to 2006/07 (stock transfer)	Table is on page 41	Agreed.	To add a note to the table to explain the reason for this.	The table (now on page 44) has a footnote to explain the reduction
	The Strategy needs a strong action planning element with clear objectives, SMART targets and outputs which clearly contribute to the outcomes in the Sustainable Community Strategy.	The draft action plan is on page 55, Appendix 6	It is clear that we need to rethink the action plan so that it is much more focused and a more integral part of the main document.	To revisit the draft action plan and amend accordingly.	The action plan has been amended so that the objectives now reflect the SCS priorities and it contains SMART targets and outcomes.
Halton Housing Trust	Consideration should be given to developing stronger strategic alliances and maximising the potential that exists from the formation of the new West Cheshire Council.		The West Cheshire LAs are engaged with the Liverpool City Region joint working arrangements, therefore, strategic links have already been forged. The LCR agenda places emphasis on sub regional working within functional housing market areas. For Halton, this means linking with St Helens and Warrington as part of the Liverpool East HMA.	It is not proposed to amend the Strategy in light of this comment.	None as agreed

Comments received from	Detail of comment	Reference in Draft Strategy	Response to comment	Action Proposed	Action taken
Halton Housing Trust (cont)	The Strategy could be used as a lever to ensure a distinction is made on the importance of housing within the CAA model and as a mechanism for a requirement for all housing associations to demonstrate how they are contributing to CAA.		We are not entirely sure what is meant by this – it could be a reference to the Hills agenda which encourages RSLs to contribute towards local Sustainable Community Strategies.	To seek clarification from HHT on what is expected.	A paragraph has been added on page 43 which anticipates the forthcoming CAA.
	Consideration should be given to updating the Housing Needs Survey in 2009 due to the rapidly changing housing market.		The recently developed Liverpool City Region Housing Strategy Action Plan contains an action for a Strategic Housing Market Assessment to be conducted in Liverpool East HMA in 2009. A commitment will be required from SMT to enable this to happen.	To amend the Strategy to reflect relevant actions contained within the Liverpool City Region Action Plan. SMT consider the provision of an Annual Research budget for the Directorate to fund research projects arising from wider strategic assessments.	The Strategy contains an action to implement the LCRHS Action Plan, which includes conducting a Strategic Housing Market Assessment for the East HMA in 2009.
	There should be a stronger emphasis on developing an increased range of joint working initiatives with Halton and St Helens PCT.		Effective joint working arrangements with the PCT are already in place through, for example, the Supporting People Core Strategy Board and local Implementation Teams, although there will be ongoing opportunities to forge new links as the need arises, it is not felt necessary to reference this in the Housing Strategy.	It is not proposed to amend the Strategy in light of this comment.	None as agreed
	The document could be shorter and more focused with the main focus on the forward looking statements and actions and supporting information as an information pack to the shorter main document.		The current format of the document has largely followed the prevailing CLG Guidance on Housing Strategies. However, we would agree that the key messages could be more prominent and suggest that once the main document is agreed a succinct and “punchy” executive summary should be produced.	To produce an Executive Summary for the Strategy once the main document has been agreed.	Executive Summary to be produced following consideration by Urban Renewal PPB

Comments received from	Detail of comment	Reference in Draft Strategy	Response to comment	Action proposed	Action taken
Halton Housing Trust (cont.)	The Strategy may want to consider how housing providers could contribute to the wider reorganisation of education and surplus places across the Borough and the BFS programme.	Page 11/12	The part of the Strategy referred to relates to the context of the Liverpool City Region Housing Strategy which had a housing in relation to employment focus rather than educational. We are not entirely sure how it is envisaged that housing providers could contribute to this agenda.	To seek clarification from HHT on how housing providers could contribute.	Housing contribution to BSF felt to be more a matter for individual RSLs and CYP Strategies
	There is no mention in the data sources listing of the data supplied via the Worker Registration Scheme referred to later in the document.	Page 16	Omitted in error.	To amend the Strategy to include this data source.	Included on page 16
	<ol style="list-style-type: none"> 1) The requirement for RSLs to produce Energy Performance Certificates will provide the Council with improved baseline data on energy efficiency. 2) The Council could use its strategic role to encourage all RSLs working in the Borough to undertake an assessment by the Carbon Trust. 3) New developments or regeneration could have a stronger emphasis on energy efficiency and environmental stewardship into the assessment criteria. 	Page 25	<ol style="list-style-type: none"> 1) Noted and will add something to reflect this in the Strategy. 2) While this is a good idea, if the assessment relates to RSL buildings rather than domestic dwellings, it would not be appropriate to include in the Housing Strategy. 3) The Housing Strategy can't be all things to all people and to include this would just be replicating Planning documents, Building regulations and Housing Corporation design standards. 	<ol style="list-style-type: none"> 1) To amend the Strategy to reflect this. 2) No action is proposed. 3) No action is proposed. 	<ol style="list-style-type: none"> 1) Sentence added on page 26 2) No action as agreed 3) No action as agreed

Comments received from	Detail of comment	Reference in Draft Strategy	Response to comment	Action proposed	Action taken
Halton Housing Trust (cont.)	There is nothing in the section on empty dwellings to reflect the increasing problem of vacant speculative buildings or developments.	Page 28	At the time the Strategy was drafted there was only anecdotal information to suggest that there may be a problem caused by speculative purchases in the Borough and this was not borne out by the official statistics which showed a reduction in the number of long term vacant dwellings. Hard evidence of this is only just beginning to emerge as the Council has been contacted by a number of developers requesting support for bids to the Housing Corporation to use some of their vacant new dwellings for affordable housing. It would suggest that there is a need for more research into the reasons why homes are vacant, which could be incorporated into the Action Plan.	To include an action to conduct research into the reasons why dwellings are vacant to help develop the Strategy and establish the need for a stand alone Empty Homes Strategy.	Action included on page 55 (Action Plan)
	The Trust would welcome and support a specific reference to protocols for 16/17 year olds and the requirement to review emergency accommodation standards.	Page 32	The Young Persons Protocol is referred to on page 35 under the section on Care Leavers. However, these issues are more appropriate for inclusion in the Council's Homelessness Strategy which is currently being developed.	No action proposed.	No action as agreed
	The Trust has 6,100 homes and not 6,500 referred to in this section.	Page 42	Error - this will be corrected.	To be amended.	Amended (on page 45)
	When referring to supported housing for an ageing population consideration could be given to an increasingly incentivised and targeted approach e.g. through consultation with underoccupying tenants.	Page 45	Good idea but not sure whether all RSLs will be carrying out a similar exercise. While the information gained could be fed into development plans of RSLs, the Strategy needs to consider the current and future needs of the wider population and not just existing tenants.	No amendments to Strategy but to ask Chair of Housing Partnership to raise at Housing Partnership meeting.	A section on overcrowding and underoccupation is now included in the document on page 29 as this is an emerging Government priority. We have also included an action to reduce overcrowding (which may include incentivising moves for under occupying tenants) on page 53

Comments received from	Detail of comment	Reference in Draft Strategy	Response to comment	Proposed action	Action taken
Halton Housing Trust (cont.)	It is unclear who is leading on actions within the Action Plan and not all of the actions contained in the Action Plan are SMART.	Page 55. Appendix 6	Agreed.	Action Plan to be revised in light of these and GONW's comments.	Action Plan has been revised
Children and Young People Senior Management Team	<p>Would it be possible to include an analysis of issues of</p> <ol style="list-style-type: none"> 1) rent arrears, 2) vulnerable families in non decent accommodation 3) homelessness impacts upon children and young people in the Borough? 		<ol style="list-style-type: none"> 1) This is monitored by the RSLs concerned and they may be unwilling to share this information unless there were clear strategic reasons for doing so. 2) The absence of an up to date stock condition survey has meant that we have been unable to establish an accurate baseline on vulnerable households living in non decent private sector homes. In the social rented sector, RSLs are required to bring all their homes to the Decent Homes Standard by 2010 anyway. 3) It is felt that this is more appropriate for the Homelessness Strategy rather than the Housing Strategy which takes an overarching view. 	<ol style="list-style-type: none"> 1) No action proposed 2) To request data on vulnerable families in non decent accommodation as part of the Private Sector Stock Condition Survey 3) To forward comments to the Principal Homelessness Manager for consideration in Homelessness Review and Strategy. 	<ol style="list-style-type: none"> 1) No action as agreed 2) Action to be taken as part of SCS 3) Comments forwarded as agreed

Comments received from	Detail of comment	Reference in Draft Strategy	Response to comment	Action proposed	Action taken
Children and Young People Senior Management Team (cont.)	<p>Could something be included in the performance action plan on:</p> <ol style="list-style-type: none"> 1) Reduce the number/percentage of children and young people living in non decent accommodation ? 2) Reduce the % of families with children living in temporary accommodation. 3) Reduce the number of 16 and 17 year olds who are homeless or at risk of homelessness 	<p>Page 54 Appendix 5 Page 55 Appendix 6</p>	<p>The Performance Indicators listed in Appendix 5 are statutory indicators.</p> <ol style="list-style-type: none"> 1) The Action Plan contains an action to reduce the proportion of non decent private sector homes occupied by vulnerable households (the former PSA target) which should pick up the children and young people element. 2) This is picked up in BVPI 203 in Appendix 5 – we could incorporate into the Action Plan but may be more appropriate for Homelessness Strategy? 3) Again, this needs to be considered in Homelessness Strategy development. 	<p>To forward comments to the Principal Homelessness Manager for consideration in Homelessness Review and Strategy.</p>	<p>Comments forwarded as agreed</p>
	<p>Does the Strategy detail the statutory responsibilities and powers in respect of homeless 16 and 17 year olds, care leavers, intentionally homeless families and the arrangement of temporary accommodation?</p>		<p>It is not the purpose of the Housing Strategy to go into detail about LA duties and powers, it is more to describe the general direction in which we are going based on evidence of need. These issues will be picked up by the Homelessness Strategy.</p>	<p>To forward comments to the Principal Homelessness Manager for consideration in Homelessness Review and Strategy.</p>	<p>Comments forwarded as agreed</p>

Comments received from	Detail of comment	Reference in Draft Strategy	Response to comment	Action proposed	Action taken
Children and Young People Senior Management Team (cont.)	Section 4 focuses upon older people, PSD, ALD etc. Can there be an equivalent focus upon children and young people e.g. CYP with a learning disability?	Page 29 - 37	The client groups focused on in section 4 are those recommended in current CLG guidance on Housing Strategies and are all groups who may require specialist housing possibly with an element of care/support. Presumably, children with learning disabilities will be housed with parents or guardians who provide that support in mainstream housing and families with a disabled child are included within the people with a physical or sensory disability bit. Younger client groups such as care leavers and teenage parents where specialist accommodation may be required are covered in this section.	No action proposed	No action as agreed
	Can section on care leavers be strengthened and a commitment to performance reporting agreed as part of the evaluation of the Strategy?	Page 35	I'm not sure what additional information can be included to strengthen this section. I could add a sentence to say that the protocol will be monitored through the Housing Partnership but otherwise it is an operational issue that would be dealt with in more detail by the Homelessness Strategy.	To forward comments to the Principal Homelessness Manager for consideration in Homelessness Review and Strategy.	Comments forwarded as agreed
	Joint non-statutory guidance has been produced between CLG and DCSF to support joint working to meet the needs of children and young people who are homeless or at risk of homelessness. It would be helpful if the Strategy could incorporate this.		I wasn't aware of this guidance but it sounds like an operational issue that would be more appropriate for the Homelessness Strategy.	To forward comments to the Principal Homelessness Manager for consideration in Homelessness Review and Strategy.	Comments forwarded as agreed