

	North Herts Homes	Hightown Praetorian	Codicote Parish Council	Royston Town Council
Introduction				
Are there any key pieces of legislation that have not been included in the introductions?	Yes	No comment	Yes	No
If you answered yes, please give details in box below	We would suggest that your draft strategy needs to take into account the new Care Bill. Aside from care cost capping, care standards and assessments, there is now a requirement for care assessments to include consideration of housing situation ("settled accommodation"). NHF and CIH are pressing for further amendments to cement the housing/care link. More information is included in the NHF briefing paper dated 17th September 2013.		Immigration Bill Oct 2013 Code for sustainable homes (NPPF) Building Regs amendments Quality development 2013	
Housing and Households in North Hertfordshire				
Does the content of this chapter provide sufficient data and explanation for an overview of housing issues in the district?	Yes	No comment	No	Yes
If you answered no, what additional information would you like to see?			Needs to be more emphasis and evidence on families who are coping with boomerang children and their spouses and children living in one household sometimes with elderly parent/parents because they can't afford to live independently	
Do you agree with the priorities for housing in North Herts?	Yes		No	Yes
If you answered no, please what priorities would you suggest are included and/or excluded?			1. making best use of existing stock i.e. empty dwellings private and public to include shops, vacant pubs etc 2. sustainable energy efficient and quality design developments i.e. warmer, safer etc 3. Local people first particularly in rural areas 4. Management and prevention of homelessness so that it is within the law i.e. no unauthorised housing/mobile units/or living rough	
Make the Best Use of Current Stock				
Does the content of this chapter cover all the main issues?	Yes		No	Yes
If you answered no, please suggest what additional issues should be covered	In this section, and elsewhere in the document, you refer to housing for older people as "sheltered accommodation". Throughout the housing industry this term is now considered anachronistic as it implies an institutional form of older peoples accommodation that no longer holds true. Preferred terms are retirement living, retirement housing, or older people's housing.		Empty commercial units and shops and pubs etc should be considered alongside empty residential dwelling both private and public	
Is our strategic response satisfactory?	No		No	Yes
If you answered no, what responses would you add or remove?	The strategy states that you will investigate the possibility of registered providers providing houses in multiple occupation. The provision of HMO's is outside what NHH is currently considering. We would be interested however in seeing how this initiative develops. We note your concerns about the private rented sector. Are you aware that a number of registered providers, NHH included, are now considering entering into the private rented market as a provider? Perhaps those that do so can help you achieve your objective of improving accessibility and sustainability of private rented sector accommodation for low income/workless households.	One of the action points is to investigate the possibility of registered providers providing houses of multiple occupation - should you add here that you also want providers to build smaller homes to facilitate best use of stock through down-sizing? This is stated at 6.8 (increase the delivery of 1 and 2 bedroom new build properties in the social sector) but may be relevant here too. It is unclear how monitoring of the social housing allocation scheme will ensure that social housing stock is put to best use; should this be clarified?	Remove: Investigate incentives for older vulnerable people to move to sheltered accommodation	

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	In relation to the action for investigating incentives older under occupying tenants to move to sheltered accommodation, NHH already has an effective strategy for this, and we would be happy to share this approach with others.			
Maximise New Housing Supply				
Does the content of this chapter cover all the main issues?	Yes		No	Yes
If you answered no, please suggest what additional issues should be covered			Location, particularly in rural areas to be near good public transport access links. this is not met it is difficult to access employment, benefits and services.	In principle yes, but is 10,700 a sensible figure for the district. Investment for social housing should be for those who live or come to work in the District only. Housing supply should only be for local people or those that come to work in the area. (Concerns are over-development)
Is our strategic response satisfactory?	No		No	Yes
If you answered no, what responses would you add or remove?	<p>Given that you correctly identify that funding for affordable housing may well reduce even further after 2015, we were surprised that your strategy does not reflect the fact that an increasing number of registered providers, NHH included, are seeking to generate their own subsidy for affordable housing by building and selling market homes. Perhaps the Council could increase the supply of affordable housing in the District by working with such RPs to ensure that they had opportunity to develop land for sale in the District provided that the resulting cross subsidy was spent in the District. For example, this could be achieved by selling NHDC land to approved RPs at an assessed market value rather than by tendering it on the open market.</p> <p>On this subject, you have included an action to develop a policy and procedures on the allocation of local authority capital funding (should it be available) and the use of Council land for affordable housing. However, the Council is currently selling via open market tenders land that could otherwise have been used to provide affordable housing. Presumably this is because the Council also has the need to generate capital receipts to offset their own funding short-falls. If this is the case, then how realistic is this action in the current economic climate?</p> <p>Your strategy also includes actions around making shared ownership scheme more attractive and affordable, and for working with Lea Valley Homes to promote low cost home ownership. Firstly, all your RPs currently provide shared ownership schemes, so promoting them should not just be the responsibility of Lea Valley Homes and the District Council. You can call upon other housing associations in this regard as well. Secondly, this action plan seems to us to be too narrow in scope. We think that the Council should work with all partner RPs to review the full range of intermediate products that can be made available, and not just concentrate of shared ownership and low cost homes ownership. For example, national research shows that private renting is becoming not only a necessity for many households, but also an active choice. Perhaps the Council can work with RPs to develop a more comprehensive range of intermediate products that are attractive to those who do not want to buy as well as those who do.</p> <p>Your strategy states that you will “consider the potential for recovering council subsidy, (capital funding and discount on land), for affordable housing development post delivery”. The meaning of this is unclear, can you please clarify for the published version?</p> <p>Finally, your draft strategy also states that Affordable Rents can be set at a maximum of 80% of local market rents. This is in fact incorrect. The maximum is 80% including any service charges. If service charges are applied, then the maximum actual rent must be reduced accordingly.</p>	[HPCHA welcome a number of strategic responses] ... we do not agree that it would be appropriate to produce guidance for Registered Providers on determining affordable rent levels or to have a blanket expectation on larger affordable housing units to below 80% market rent. Both could potentially impact maximising the supply of new housing. (See 4.9.1)	Good quality buildings and sustainably built homes will save money in the long run and should be included. Also research into jobs in rural areas and whether there is adequate public transport to access employment and services for young people.	

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Warmer, Safer, Healthier Homes				
Does the content of this chapter cover all the main issues?	Yes	No comment	Yes	Yes
If you answered no, please suggest what additional issues should be covered				
Is our strategic response satisfactory?	Yes		Yes	Yes
If you answered no, what responses would you add or remove?				
The Management and Prevention of Homelessness				
Does the content of this chapter cover all the main issues?	Yes		No	Yes
If you answered no, please suggest what additional issues should be covered			see below	The duty is to serve the homelessness for local people and not to provide homes to people from other areas
Is our strategic response satisfactory?	Yes		No	Yes
If you answered no, what responses would you add or remove?		<p>Unlike all of the other statements, the statement 'ethnic minority households are disproportionately more likely to be homeless', has no background statistics provided - you may wish to add some data to support this here.</p> <p>At 6.5.3 you may wish to consider other issues which are likely to affect the levels of homelessness over the next few years such as:</p> <ul style="list-style-type: none"> • Preserved RTB taking social housing stock out of the available stock for reletting to those in housing need – I am not sure if this is an issue in your area as there are blanks against North Herts in the LA data to be found here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/200525/Table_685__version_2_.xls • Mortgage arrears caused by interest only mortgages and people not making arrangements to cover the full amount to pay off the capital. Article on this can be found at: http://www.bbc.co.uk/news/business-22366821 • Temporary short term awards of DHP coming to an end in individual cases and planned overall reduction in DHP funds from central government year on year (your Housing Benefit team will have more detail). 	<p>Add; To work with HCCs integrated sustainable transport team and policie to research whether there is adequate transport (public) access to get to training and employment. There is already evidence that access to towns is very poor in rural areas. The majority do not have cars because they can't afford to run them.</p>	
Further comments or suggestions		<p>You may wish to consider including some additional action points around:</p> <ul style="list-style-type: none"> • prompt planning decisions • supporting partners' efforts to access funding streams for homes and services that assist in the prevention of homelessness 	<p>Public transport is key to getting people out of homelessness and poverty and should feature a lot more in this strategy. Particularly relevant to North Herts rural areas where it is inadequate.</p>	<p>Provide information re Energy Saving Grants and assistance available for local people. Strategy shows NHDC trying to manage housing for the area which is very difficult to manage.</p>