

Consultation Statement – Housing and Homelessness Strategy.

The draft Housing and Homelessness Strategy (and supporting Action Plan) was published for consultation between 6th November and 18th December 2018. As part of the consultation process it was presented to Scrutiny Coordination Board for consideration on the 12th December. Feedback from that meeting have been utilised in reviewing and updating the Strategy ready for adoption.

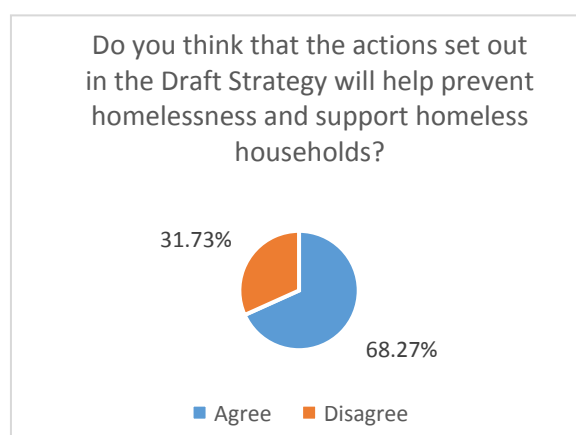
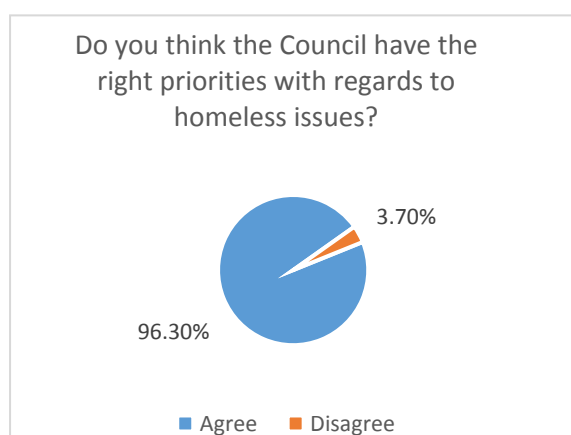
This briefing note provides a summary of the consultation responses received and how they have affected the review of the draft Strategy and Action Plan.

For ease of reference, consultation responses have been summarised by Theme.

THEME 1: Preventing Homelessness and Supporting Homeless Households

The most responded to area of the strategy was theme 1 which related directly to homelessness and homelessness prevention. This theme forms the Homelessness Strategy element of the report.

In total 108 responses were received to this theme through the survey monkey questionnaire. The majority of responses were received from members of the public. The majority of responses were supportive of the priorities and agreed that the actions set out in the Draft Strategy would help prevent homelessness and support homeless households. This is shown in the graphs below:



In addition a further 16 responses were received via email and letter, with the majority being from partner organisations and voluntary sector.

In summary the following principle issues were raised in response to Theme 1:

- Registered Providers should stop evicting households.
- Challenge national LHA rates.
- Make better use of Discretionary Housing Payment (DHP).
- Importance of successfully delivering the Housing First programme.
- Do more to combat rough sleeping.
- Prioritise homelessness prevention.
- Create more links between rough sleeping and drug/alcohol addiction, mental health, unemployment and access to jobs and services.
- Ensure wider accessibility to information and support and awareness of how to get it.
- Do more to support those with multiple complex needs.
- Highlight the importance of tenancy support training to ensure tenancy sustainment.
- There are insufficient resources to deliver the aims and objectives of the strategy.

- Need to make sure the duty to refer is functioning effectively.
- Need a single data collection point and a process for sharing information between partner organisations – prevent repeated cases of rough sleepers providing the same info multiple times.
- Target the root cause of homelessness.
- Ensure those with experience of rough sleeping and homelessness are involved in the commissioning of new services and how they are delivered.
- There is a need for a ‘wet facility’.
- Would be good for the strategy to be endorsed by more than just the council.
- Strategy overly focused on prevention – not enough on relief.

The tables below further summarise the responses received and officer comments made in response.

Summary of comment(s)	Officer response and proposed change (if relevant)
THEME 1 - Preventing Homelessness and Supporting Homeless Households	
consider changing references to Service User to "client"	Comment noted, change has been made in both strategy and action plan where appropriate.
Introduce methods to assess individuals for drug dependency and provide them with necessary tools such as mentoring and clinics if affected.	This already happens as part of understanding an individuals needs when they present as homeless. As part of PHPs specific opportunities and referrals can be agreed between the Council/Partner organisation and the individual to help combat dependency. This also links in with the Councils drug and alcohol services.
Yes speak to those with lived experience and/or those currently on our streets especially around town and get a real insight into life on the street and the issues faced with putting all the drug addicts alcoholics and those with mental health issues in one place to try and sort their lives out we constantly set them up to fail by doing this.	Comment noted. The Strategy has been developed and consulted on with an experts by experience group and other agencies including Crisis and the Coventry ARC - their views and opinions have fed into the strategy.
Personal housing plans need to be developed for those presenting as homeless and need to have effective referrals to partner organisations with long term support provided - assisting people to be ‘tenancy ready’, gaining access to crisis grants, funding and support in home set up and furniture packages to commence living independently	Agreed, this is already delivered through the Councils Homeless Reduction Act responsibilities and as part of how we manage support homelessness applications.

Need to promote greater education about homelessness	Agreed, this is expected to form part of the councils approach to the homelessness reduction act and sharing relevant information.
Prioritise accommodation for street homelessness including those with NRPF	Comment noted however there is already a range of hostel accommodation that is accessible to street homeless across the city that means no-one has to sleep rough. The council recognises however that more needs to be done to diversify this accommodation and increase the opportunities available to those sleeping rough. We are also exploring opportunities to bid for grant funding related to those with NRPF.
Use the proposed Pathway model to link homelessness support to employability support via the Job Shop and other employment support services.	Comment noted, this already forms a key part of how we work with and support those presenting as homeless. It's also a key part of homeless referral pathways and the work our partners do with homeless households e.g. The Salvation Army.
There needs to be a greater emphasis on Homelessness prevention	Agreed. The council have restructured its services to deliver a greater emphasis on prevention work in accordance with national legislation. This is reflected in the Strategy. We will also continue to review and reshape service processes as we learn what 'works' in prevention.
Increased democratic oversight of RPs and meaningful penalties when service failures	No action - HE has this role. Local Authorities have no direct control or sanctions that can be applied to Housing Associations as they are private organisations. Homes England does however have an oversight role through the management of grants etc.
Promote rapid rehousing for homeless households (Inc. those in unsuitable TA) to ensure they are found suitable housing.	Comment noted. This is already a priority through the assessment and management of homeless households through the councils housing options service and the work we do with the Salvation army. This is not always possible though due to the time it can take to find a suitable property, the need to ensure adequate support programmes are in place and the need to ensure the household is able to maintain the tenancy going forward. This is reflected in the homeless review and the strategy.
Need to embed the Housing First programme as part of the pathway for rough sleepers	Agreed. The council has access to funds as part of a national pilot scheme to roll out a housing first project during 2019. this is reflected in the strategy and action plan
Lobby and petition government for rent controls on PRS - long term tenancies	I'm afraid this is a political matter subject to central government policy and not one we can influence through the strategy.
Promote awareness of how to access support and information	Agreed, the strategy already includes priorities for maximising accessibility to information and support for those who are homeless or at risk of becoming homeless. This is being driven forward by the Councils Housing Options and Customer Service sections
More needs to be done to help house every homeless person irrespective of need or statutory duty.	Although accommodation is limited, opportunities do exist for those who are not owed a statutory duty, especially through the winter months.

<p>Need to do more to address the complex issues that lead to individuals becoming homeless. This includes drug/alcohol addiction, mental health and homelessness.</p>	<p>Agreed, the city council have linked service provisions around drug and alcohol abuse, domestic violence, mental health and homelessness to help link such issues together and ensure that households receive the most appropriate advice and support. This is also supported by the Salvation army as part of our contracted services. As such this is already reflected within the strategy and action plan.</p>
<p>more needs to be done to remove rough sleepers from the town centre permanently as this currently creates a health hazard and poor image for city</p>	<p>Comment noted. The city council continues to work with its partners to combat rough sleeping across the city and the region as a whole. The key to this will be the provision of suitable accommodation alongside the necessary support programmes. The housing first programme will help with this and is already covered by the strategy.</p>
<p>Need to ensure appropriate standards of temporary and emergency accommodation for families etc. At present, they are poor which requires proactive enforcement action as tenants are often too scared to complain for fear of eviction.</p>	<p>Comment noted, however options for temporary and emergency accommodation can often be limited, especially when faced with a growing demand. This can often limit opportunities and have a negative effect on the quality and suitability of accommodation. The city council does continue however to work with the Salvation Army and other partners to support all those who are homeless or risk becoming homeless to ensure they have access to accommodation that is both safe and secure. The city council also have responsibilities under the Children's Act where this involves families. The council are also working with partners to secure better quality accommodation, especially for families. This is already covered by the Strategy.</p>
<p>Need to do more to help people become tenancy ready.</p>	<p>Comment noted. Our work in response to the Homelessness Reduction act already includes a significant work stream on helping households become tenancy ready. This also forms a key part of the work we do with Housing Associations and the Salvation army. This is already captured within the Strategy and action Plan.</p>
<p>The Council should develop an area in the city Centre which homeless households can use. This would allow the issues to be monitored on a regular basis.</p>	<p>The City Council work with partners to deliver the steps for change project which provides hub type facility in the city centre. The Salvation Army also operate a hub facility on the edge of the city centre, whilst other partners such as the Jesus Centre, Coventry Cyrenians have central premises. Individuals do have a freedom of movement though and unless they are committing a legal offence it is difficult, and not necessarily appropriate, to force people to move away from city centre.</p>
<p>There needs to be more emergency accommodation for rough sleepers, especially during the Winter and freezing cold weather.</p>	<p>Comment noted, the city council already works with The Salvation army, Coventry Winter Night Shelter and the Coventry Emergency Shelter (amongst others) to provide accommodation options for rough sleepers, especially during winter periods. This is already reflected in the strategy and action plan.</p>
<p>Where does temporary accommodation fit in? Recovery and move-on support?</p>	<p>Temporary accommodation is provided for a short period of time to prevent households from sleeping rough whilst they apply for more permanent accommodation.</p>
<p>Look at why people become homeless, look at the paths people take and possibly</p>	<p>Comment noted, this research has been undertaken and will continue to be reviewed. It is covered by the homelessness review and the strategy/Action Plan already.</p>

introduce some philosophies at schools in Coventry to get youngsters to look differently at their world.	
Lots of monitoring of impacts and not a lot of action. Can the City work with other LAs in WMCA to ensure people don't get left isolated?	Yes, the city can and does work with other authorities to ensure a joined up approach is taken. This is already reflected in the strategy.
The council should not use the intentionality element of the legislation unless absolutely necessary. Instead use 56 days prevention duty to resolve issues.	This already happens through the council's response to the homelessness reduction act.
There are insufficient resources available to deliver the priorities and aims of this strategy.	Comment noted. The council does have committed funds to help deliver the strategies aims and objectives and is committed to working with partners to deliver projects in an efficient and cost effective way. There is also further funding options available through government, charities and the WMCA. This strategy is a 5 year plan though and will take time to be fully realised.
Needs a greater emphasis on partnership working, agreed commitments that are realistic and in the interest of those affected (i.e. at risk of/or homeless Housing options that are viable, sustainable and ongoing support provided beyond being housed).	Agree but partnership working is already a key element of the strategy. We will also be looking to update the strategy going forward with partners to create a Partnership Strategy in future.
It also needs to be accommodation for people who do have a drug and alcohol issues that should not be excluded from this	Agreed. The city council are looking at opportunities for expanding the offer of complex needs accommodation and working with partners around how best to deliver this. The Housing First programme will help deal with this for entrenched rough sleepers.
Single people with children/families afraid to approach the homelessness sector because they will be put in or allocated inappropriate accommodation where they are at personal risk of sexual and physical assault and robbery	Comment noted. The council works proactively with the Salvation Army when placing families to ensure they are placed in safe and secure accommodation. We also work closely with Children's services including joint case conferences where appropriate to help manage case specific issues. This is already reflected within the strategy and is a key consideration from a safeguarding perspective.
Empowering people to resolve conflicts through mediation to prevent homelessness and improve relationships in families and in neighbourhoods. (use organisations like	Comment noted. This is already happening as part of the councils work to respond to the Homelessness Prevention Act. This is also covered in the strategy and forms a key part of the work we already do with our partners (e.g. st basils).

Mediation and Community Support)	
Needs to be an improved referral process from Customer Services teams such as Council Tax or Housing Benefits	Comment noted. The duty to refer became fully operational in late 2018 and the city council are working with it partners to ensure appropriate referral pathways are in place and functioning properly.
Greater emphasis of system design/planning from those with lived experience needed	Agreed. This has already formed a key component of evidence gathering to inform the strategy and action plan. It also continues to be a key theme within the homelessness forum and will support the evolving housing first programme. This is already recognised within the strategy.
Increase emergency accommodation to avoid use of hotels and B&B - adapt existing empty council community buildings and then encourage community groups/charities to take this on-board and actively manage the accommodation.	Comment noted. This is already something that the council is actively pursuing to reduce the financial burden but also improve the quality of temporary accommodation offer available. This is reflected within the strategy and action plan already and was subject to cabinet approval in November 2018.
Acknowledge that welfare reform /UC implementation is having an impact on homelessness?	Comment noted but this is a national policy that we cannot really influence it in principle as a city council. We are working locally in partnership with DWP though to see if there are aspects we can influence in Coventry. We acknowledge that this is causing issues and is a key reasons for arrears and eviction etc. We are continuing to work with housing associations and private landlords thought to help mediate and maintain tenancies wherever possible. This is covered already in the strategy.
Assisting with 'tenancy readiness', crisis grants, furniture packages etc.	HP (HRA) officers will assist where necessary to source funding
Need to ensure references to domestic violence and abuse. Refugees and migrants	Such references are already included in the strategy and action plan. The Council also already has a separate strategy for domestic violence and abuse. Domestic violence and abuse are contained in the Pathways Model the Council is looking to adopt.
Coventry Homefinder should include property options outside of the city boundaries	Comment noted and this is something currently being discussed with neighbouring authorities as part of delivering the city's housing needs on a cross boundary basis. This will form part of the review of the Homefinder policy which is a key priority of the strategy and action plan.
Homeless numbers should be published, monitored and reported regularly, at the moment it seems to be a black hole without ownership or reporting.	Figures are already recorded and reported to central government on a quarterly basis. Central Government make this available through Open Data portal and press releases regularly. It is not possible to record any more frequently at this time due to capacity and the relevance of changes in data. The importance of data gathering and monitoring as part of good quality IT systems is already referenced in the strategy and action plan.

Vital that the different departments work together and communicate.	Comment noted, this already happens and is overseen by the council's strategic housing board.
RPs need to stop evicting households for spurious reasons and therefore contribute towards creating homelessness - in line with WMCA aspirations.	Comment noted. The council works very closely with its RP partners to minimise the need for evictions. Wherever possible the council will work to mediate between parties and support tenancy sustainment. Sometimes though this does not prove possible or acceptable.
Council should challenge LHA levels in the City - these are currently too low.	Comment noted, however this is national policy that Local authorities cannot control.
Council should use DHP more readily to prevent homelessness.	Comment noted. The council does have a safeguarded DHP pot which it utilises to its full potential every year. In addition we have a Homelessness Prevention fund which also supports combating homelessness.
Need better local drug and alcohol support services	Comment noted. The council has recently retendered its drug and alcohol support services (to CGL). These services will be monitored and assessed on an ongoing basis. They are reflected already within the strategy and action plan.
One of the actions in the Action Plan under theme 1 is 'review and improve housing pathways for prison leavers'. It would be beneficial if 'and those in the criminal justice system' were to be added on to this action.	Comment noted - change has been made as suggested.
What is asked of individuals claiming homelessness is a barrier – far too much information is required which leads to people rough sleeping. This information should also only have to be provided once, and not required to be repeated to various organisations. This could include the production of a central directory or database of support services would benefit this aim (agencies often unsure who or how to refer to other agencies) (iCAT suggested). Moreover, the qualification rules are far too sensitive so many are being turned away	The city Council has already made amendments to the way it processes application to help speed them up and make them more efficient. We are also working with partners to explore data sharing protocols and shared databases to combat the issues raised here. PHPs include referrals and signposting taken from a central database of support agencies and are included in discussion with the client. To aid clarity however an additional bullet point has been added to the 'how we will achieve this' section and the 'Preventing Homelessness will be a corporate priority' section of the Action Plan. This states: <ul style="list-style-type: none"> • Strategically review how we receive store and process information from homeless households and share that information with partner organisations in a safe and secure way to ensure data only has to be provided by the client once as part of the homeless presentation and engagement process.
Commitment to ensure that there is improved data collection in any case from statutory and voluntary organisations so that patterns	Comment noted, the improvements already being made and planned moving forward will continue to help improve data collection and modelling. Further improvements will be made in relation to the above process so will be supported by the above

<p>of homelessness can be identified at the earliest opportunity.</p>	<p>referenced change. The update of the Homelessness Review will also support this aspect of monitoring.</p>
<p>Support (and housing) needs to be consistent and provided for as long as it is required by the client and not worked to an artificial deadline for move-on. It should also be provided whenever people are ready to accept it, not two weeks down the line.</p>	<p>Comment noted, however the council do have to operate within the guidelines laid down through the homelessness reduction act. In general though the Council is keen to move households into permanent and settled accommodation as quickly as possible once their support needs are met and the chances of tenancy sustainment are maximised.</p>
<p>Support needs to target the root cause of individual issues and be more flexible (if people can evidence their previous behaviour has changed they should not be excluded again)</p>	<p>Comment noted. This forms a key part of the support packages provided to homeless households and is something the Council does actively look to influence through allocation policy and creation of tenancies where appropriate. It is not necessarily something we can achieve directly through the strategy though.</p>
<p>commission a single provider to manage all homelessness matters across the city</p>	<p>Comment noted. The city council will be tendering for services during the course of 2019. At this stage we cannot comment on whether this will result in one or a multiple number of service providers.</p>
<p>Commission multiple providers to manage different aspects of homelessness across Coventry - this will allow more bespoke approaches to issues and ensure specialist services can be delivered and supported.</p>	<p>Comment noted. The city council will be tendering for services during the course of 2019. At this stage we cannot comment on whether this will result in one or a multiple number of service providers.</p>
<p>Needs to be a long term strategy to support households to sustain tenancies (possibly tapered: pre-load support at commencement of tenancy – tenancy ready/transitional support- and reduce support as time goes-on ensuring that it is always available though) – beyond simply accessing to housing</p>	<p>Agreed. This will form part of the training and support packages that will be commissioned as part of the new homelessness contract(s). The Council agrees that helping promote and maintain tenancy sustainment is a key aspect of preventing homelessness.</p>

<p>When individuals are ready, an information pack should be provided upon move-in so that they can quickly start to feel a part of the local community</p>	<p>Comment noted. It is our understanding that this already happens in part when homeless households move into different accommodation. We appreciate though that this could be more ad-hoc rather than the norm and will explore opportunities through the review of service delivery to introduce this sort of approach. An additional point has been added within the action plan under the Positive Pathways - sustain housing section which will require us to "Develop access and availability of information and/or prepare information packs for households when moving into temporary and emergency accommodation and also at point of duty being discharged. This will help settle the household within a local community and provide information to help them establish and sustain the tenancy".</p>
<p>Lack of, or gaps in, services and options for people with; no recourse to public funds, mental health services, (young) women, individuals with multiple, complex needs, refugees/migrants (no connection to local area so can't establish community), ex-offenders, and those who have experienced trauma.</p>	<p>Comment noted. Some of these gaps have been identified through the homelessness review and are already referenced within the action plan and strategy. They will be addressed and mitigated through the commissioning of new services.</p>
<p>The strategy should place an emphasis on designing and delivering trauma informed services in partnership with other agencies as this is often the underlying reason for homelessness. By increasing the awareness of how to work with individuals who went through traumatic experience(s), and incorporating it at the centre of the strategy.</p>	<p>Comment noted. Such an approach is captured as part of our commitment to the pathways model, especially in mental health pathways (included PTSD and recurrent trauma) and working with ex-armed forces personnel.</p>
<p>Provision of a 'wet shelter' should be considered, or a 'homeless hub' that is independent from the contract and compulsorily works with all relevant external agencies.</p>	<p>This is highlighted in the strategy and action plan as something that needs to be explored and developed in partnership with other agencies and organisations.</p>

<p>Need to better define what is meant by a wet facility or wet shelter</p>	<p>Comment noted - the provision of a wet facility or shelter is not referenced explicitly by name as such a facility is only perceived as one option for helping support street homeless who may utilise such a facility. Instead the Action Plan highlights important process steps to be taken around support and accommodation that already reflects key priorities of the Strategy e.g. "Develop further measures to tackle rough sleeping and support vulnerable people who are (or are at risk of) rough sleeping, understanding the reasons for non-engagement and developing appropriate 'challenge and support' policies". As such the Action Plan remains fairly high level in this respect in order to support the recommissioning and tendering process that will follow for the city's new homelessness services. This allows partner organisations and voluntary sector to work jointly with the council to provide the most effective approach to combatting these issues.</p>
<p>The current homelessness contract doesn't offer alternatives for people who can't access Salvation Army (SA) services (e.g. due to previous eviction). Although SA have been noted to be a barrier to rough sleepers and other vulnerable people for their inflexibility.</p>	<p>As previously indicated the homelessness review has identified a need to deliver more flexible and varied services to fill identified gaps in current provisions. This will be considered further through the recommissioning of services during 2019 which is already identified as a key aspect of the new strategy.</p>
<p>More proactive at identifying people at risk because some individuals don't ask for help. Partner organisation such as the police, fire service and NHS (local GPs) could have a system to help identify these.</p>	<p>The Duty to Refer came into effect in late 2018. The city council are working with these partners (and others) to help provide information on homelessness and what to look for and who to refer to. This will be a learning curve for all concerned though and will take time to fully implement.</p>
<p>Must engage with the wider community to challenge myths and misconceptions surround homelessness.</p>	<p>Agreed. The city council is already working to develop an appropriate communications strategy for homelessness issues. This is reflected within the strategy and Action Plan already.</p>
<p>Families who leave after receiving Section 1 notice should not be found intentionally homeless.</p>	<p>Comment noted, however this does relate to national statutory duties. We will consider this further through the review of the Homefinder policy, which forms a key part of the Strategy and action plan already.</p>
<p>Need to establish a definition of what 'tenancy ready' means, as it holds a different perception for different people.</p>	<p>Comment noted and accepted, this will be considered further as part of the training programmes developed and the recommission/tendering of homelessness contracts.</p>

<p>An important consideration regarding the location of services and accommodation near the city centre is that it is close to other services but also easy access to drugs etc. and other poor environment/influences.</p>	<p>Comment noted. The key benefit of focusing services in or near to the city centre is that they are easily accessible to those that need them and accessible from all parts of the city by a range of transport options if necessary. Access to other negative services will, unfortunately, inevitably follow this however it is our view that access to the appropriate support, information and accommodation services outweighs this risk.</p>
<p>Critical to acknowledge that living on the street is a community in itself and sometimes people want to return to that 'lifestyle'.</p>	<p>Comment noted. The Council is committed to working with its partners to making support and accommodation available to all those who need it and ask for it. We appreciate that some people may choose to opt out of those services, but in partnership with voluntary organisations we will continue to work with those people to help them as best we can.</p>
<p>Commitment to design out homelessness should be made a city wide priority</p>	<p>This is already a priority under Theme 1 of the Strategy.</p>
<p>The strategy could be expanded to include the general public and other agencies in the strategy, making the reduction of Coventry homeless population everyone's priority.</p>	<p>Comment noted. The strategy is due to be reviewed in 12 months' time to take account of an updated homelessness review and the first years' work programme following the inaction of the Homelessness Reduction act. The Council also need to complete a rough sleeper strategy by winter 2019. It is envisaged that as part of this work the main strategy could be updated and be endorsed by a range of partners - not just the council. Notwithstanding this version of the strategy has been developed in partnership and the action plan includes a range of objectives that will be delivered by others - not just the council.</p>
<p>The strategy could be more radical by using a single site, such as a multi-storey car park, where those who sleep on the street could come at night (for example between 19:00 and 07:00) where homeless/rough sleepers could attend for food, portable shower, clothing, support workers, medical staff etc.</p>	<p>Such options will be explored as part of delivering the strategy. However to include such approaches within the strategy itself would serve to limit the strategy and result in it being overly prescriptive, hence limiting flexibility and opportunity for new and innovative opportunities for combatting rough sleeping and homelessness etc.</p>
<p>It should be acknowledged that a small number of groups are unintentionally facilitating rough sleeping by feeding people on the street but not offering more extensive professional services which is counterproductive</p>	<p>Comment noted. This reflects work undertaken by voluntary organisations though. It is not something the Council can necessarily influence or prevent and we would not want to comment on effectiveness of other agencies.</p>

<p>The Homelessness Reduction Act focuses on two themes - prevention and relief. Concerns that the strategy talks almost exclusively about homelessness prevention and says very little about relief. This gap is driven by evidence which overwhelmingly focuses on data gathered on why individuals and families find themselves homeless, with little or no data presented as to why they remain homeless and find difficulty exiting temporary accommodation quickly (beyond describing housing supply issues). There seems to be an implicit assumption that those in temporary accommodation face the same issues as those who are threatened with homelessness.</p>	<p>Comment noted. We have developed the strategy though very much with the HRA and the drive towards a preventative approach at the forefront of our minds. As such we often talk about 'prevention' as shorthand for prevention and relief. This does not mean that our responsibilities under the relief duty are ignored within the strategy or the action plan though. There are, in our view, a number of references to relief and how this aspect of the HRA will be administered, managed and monitored. We will look at ways to make this clearer within the strategy document though. It is also important to note that through the strategy we will be collecting data that clearly separates the two stages to understand what works for different households in the most effective way.</p>
<p>Action plan Theme 1 - "Improve the general advice..."- lead responsibility shown as Housing Options Team but should be Regulatory Services Team.</p>	<p>Comment noted. The action has been assigned to both teams to reflect the support and advisory role that will be retained and delivered by the Housing Options service.</p>

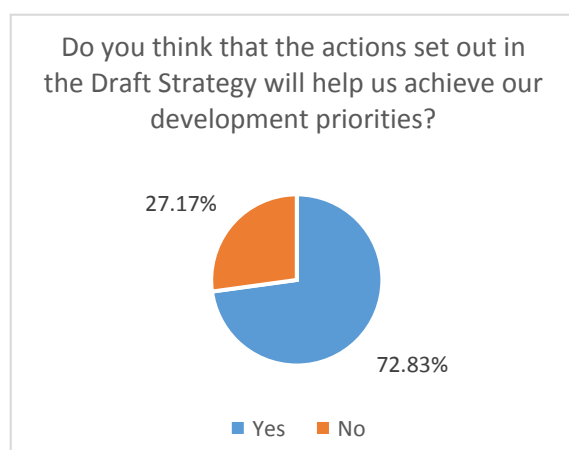
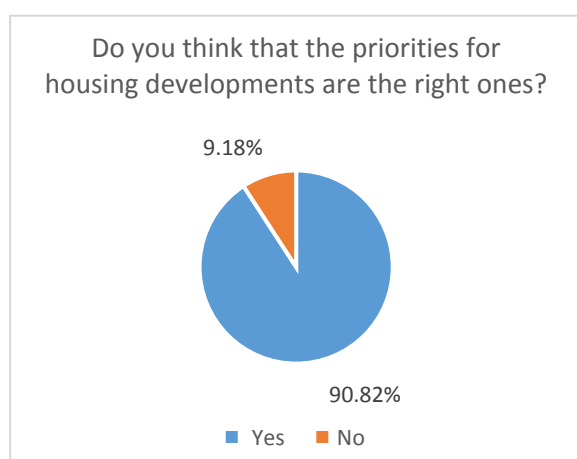
Key Changes made to the Strategy and Action Plan

Other than a number of technical and typographical changes, the most notable amendments to this part of the strategy include:

1. An additional bullet point has been added to the 'how we will achieve this' section of the Strategy and the 'Preventing Homelessness will be a corporate priority' section of the Action Plan. This states:
 - Strategically review how we receive store and process information from homeless households and share that information with partner organisations in a safe and secure way to ensure data only has to be provided by the client once as part of the homeless presentation and engagement process.
2. An additional point as been added within the Action Plan under the 'Positive Pathways - Sustain Housing' section, which will require us to "Develop access and availability of information and/or prepare information packs for households when moving into temporary and emergency accommodation and also at point of duty being discharged. This will help settle the household within a local community and provide information to help them establish and sustain the tenancy".

THEME 2: Housing Development

The second most responded to section of the survey related directly to Housing Developments in the city. In total 98 responses were received to this theme through the survey monkey questionnaire. The majority of these responses were again in favour of the priorities the council has set out with regards to housing development. They also generally agree that the actions set out in the Draft Strategy would help the council achieve its own goals. This is shown in the graphs below:



In addition a further 16 responses were received via email and letter, with the majority being from partner organisations and voluntary sector.

In summary the following principle issues were raised in response to Theme 2:

- Need for new genuinely affordable housing targeted at those with low incomes.
- Establish clear empty homes policy.
- Ensure new homes are supported by appropriate infrastructure.
- Prevent development of Green Belt land.
- Prioritise development on brownfield sites.
- Restrict the delivery and concentration of HMOs.
- Promote council investment in housing stock – build or buy.
- Plan/Strategy should go further and build more homes.
- Explore options for the council to invest/support mortgage lending.
- More promotion of self-build/custom build homes.

The tables below further summarise the responses received and officer comments made in response.

Summary of comment(s)	Officer response and proposed change (if relevant)
THEME 2 - Housing Development	
Need to have more genuinely affordable housing accessible to those on low incomes and available to large families and those with specific accessibility needs	Comment noted. The strategy reflects the policies of the local plan which seek to increase and accelerate the delivery of new affordable housing. The types and tenures of affordable homes are however governed by national policy. However the Council is looking at ways to get involved within the housing market to help deliver more genuinely affordable homes. This is again captured within the strategy and action plan.
Council needs a new Empty homes policy.	comment noted
Appropriate infrastructure needs to be in place in new developments.	Comment noted, the Local Plan promotes the delivery of appropriate infrastructure to support new development. This will be managed through the planning process.
Increasing house numbers is fine as long as the infrastructure can cope, - schools, transport, local shops, and doctor's surgeries.	Comment noted, please see response above.
New homes should be focused on brownfield sites. Land within the greenbelt should be protected. New homes should not be built where they will destroy the local wildlife.	Comment noted, the local plan was developed on the basis of protecting the city's most sensitive and highest value green spaces. It was also developed on the basis of national guidance which requires the Council to plan positively for the housing needs of the city. As explained within the Local Plan this produced a need to release eland from the green belt to support house building and meet local needs.
need to provide suitable accommodation for those with health conditions	Comment noted, the Action Plan and Strategy commits the council to working with its partners to help deliver specialist housing across the city.
HMOs to be limited in the outer areas of the city.	Comment noted. The local plan contains policies on HMO's and student accommodation. Small HMOs are covered by national permitted development right. The local plan can however consider large HMOs and ensure they are delivered in areas that are appropriate and suitable within specific areas. This has regard to issues of parking and amenity space amongst others.
Warden/staff assisted accommodation to help those coming from the street - some people have been on the streets a long time and find the concept of "normal day to day housing" challenging and overwhelming.	Comment noted, Housing First will provide a prime opportunity to support those households in this situation. This is outlined in the strategy and the action plan and will be rolled out wider afield during 2019.
There is a need for more disabled accessible housing and adapted houses.	Comment noted. This will be captured within our review of housing needs assessments. It is therefore already captured within the strategy and action plan for theme 4.

<p>There is a need for affordable housing for the students.</p>	<p>Comment noted. Unfortunately national guidance prevents the council from imposing an affordable housing policy on purpose built student accommodation. As such this is not a policy approach we are able to take.</p>
<p>Council should buy and manage empty properties</p>	<p>The council are looking at ways it can invest and support the local housing market. This includes looking at options to purchase, secure long term leases and develop its own housing stock again. This is outlined in the strategy and the action plan, but will require detailed assessment and proposals.</p>
<p>Plan not radical enough at 348 properties per annum.</p>	<p>Comment noted. The figure is based an initial assessment of need and is classed as a minimum figure that can be exceeded.</p>
<p>Investigate cheaper ways of building property</p>	<p>The council is already working with stakeholders and housing associations to look at promoting and supporting different ways of building homes. This is set out in the strategy and action plan already.</p>
<p>Council to explore opportunities to facilitate mortgages to renters/first time buyers. For example a partnership scheme with Coventry Building Society could be a positive approach.</p>	<p>The provision of mortgages for homeowners or prospective homeowners is the responsibility of banks and building societies, it is not something the Council can deliver. Notwithstanding the Council have previously worked with the Coventry Building Society (in non-financial terms) as part of the Wood End/Henley Green New Deal for Communities programme to support the offer of a dedicate lending and saving product. A new action point has been added to the Action Plan within the 'Diversifying the housing offer' section which states "explore options to work with local mortgage lenders to support and facilitate improved accessibility to the local housing market through savings and mortgage opportunities".</p>
<p>Hostels are a good solution to help providing affordable accommodation</p>	<p>Comment noted. The city does already have a number of hostel facilities across the city, which are well used. Such facilities are better suited to single or couple households as opposed to families. We will continue to work with housing association partners to explore the need and demand for further hostel provisions.</p>
<p>More needs to be done for individuals that have special educational needs.</p>	<p>Comment noted. This will be captured within our review of housing needs assessments. It is therefore already captured within the strategy and action plan for theme 4.</p>
<p>Provide something like converted containers for street sleepers then there is no need to sleep in shop doors etc.</p>	<p>Comment noted. This has been explored as an option and we are aware of other examples around the city where this has been operated. We retain concerns about the suitability of shipping containers as homes. We are working with partners to deliver alternative options for accommodation. At this moment in time however there is no reason why someone should be sleeping rough on the city's streets as there are accommodation options available to them.</p>

<p>the council should do more to support the delivery of more self-build projects</p>	<p>Comment noted. The Local Plan contains policy to promote this, but it is dependent upon market demand and availability of plots. The Strategy also supports the delivery self-build and custom build properties and the council will look to promote site options through its land supply database.</p>
<p>Support the development of large scale regeneration projects and initiatives in the city through influencing WMCA investment and leveraging in other potential long-term funding relating to the City of Culture and Commonwealth Games.</p>	<p>This is something the city council are already involved in. regeneration projects in areas such as Wood End and Canley are delivering a large number of new affordable homes and delivering improvements to the city's built and natural environment. We are also working closely with the WMCA and Homes England to lever in additional funds to help drive forward other regeneration programmes and opportunities across Coventry. This is already referenced within the Action Plan under themes 2 and 4.</p>

Key Changes made to the Strategy and Action Plan

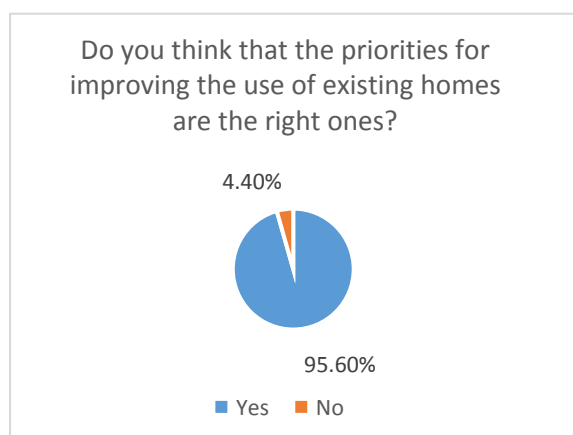
Other than a number of technical and typographical changes, the most notable amendments to this part of the strategy include:

1. A new action point has been added to the Action Plan within the 'Diversifying the housing offer' section which states: "explore options to work with local mortgage lenders to support and facilitate improved accessibility to the local housing market through savings and mortgage opportunities".

THEME 3: Improving the Use of Existing Homes

The third most responded to section of the survey related directly to the council’s plans regarding Existing Homes in the city.

In total 91 responses were received to this theme through the survey monkey questionnaire. The vast majority of these responses were in favour of the council’s plans regarding existing homes, alongside being largely in favour of the actions set out in this section of the Draft Strategy. This is shown in the graphs below:



In addition a further 16 responses were received via email and letter, with the majority being from partner organisations and voluntary sector.

In summary the following principle issues were raised in response to Theme 3:

- Reduce empty homes.
- Provide more support and advice for private landlords.
- Combat rogue landlords.
- Ensure first priority relates to all homes not just rented homes.
- Combat over/under occupancy.
- Review opportunities for fixed term tenancies.
- Expand landlord licencing.
- Plan more for health communities and combatting deprivation.

The tables below further summarise the responses received and officer comments made in response.

Summary of comment(s)	Officer response and proposed change (if relevant)
THEME 3 - Improving the use of existing homes	
Accommodation providers like private landlords, need to have a package of support in place to help ensure they are aware of their responsibilities to tenants etc. This should be supported by the council and regularly reviewed.	Comment noted. The council are actively reviewing how it works with private sector landlords to help improve joint working and how households can access the private rented sector in a more secure and efficient way.

<p>Stopping rogue landlords from operating in the city.</p>	<p>The Council continues to develop its relationship with landlords and is actively developing new licencing arrangements to help combat rogue landlords. It is not possible to stop all such landlords from operating though.</p>
<p>Make more efficient use of empty homes -including opportunities to renovate and use for Housing First?</p>	<p>The level of empty homes in the city remains relatively low, however data does suggest it is growing again after a sustained period of decline. The Council is continuing to work to reduce the level of empty homes across Coventry - working with landlords and agents etc. Notwithstanding empty properties are privately owned and there remains a degree of choice associated with such properties. Empty homes that are smaller in nature e.g. 1 bed flats and bedsits may be suitable for Housing First as the programme will support mainly single people.</p>
<p>Options for improving existing homes should apply to ALL housing stock, not just rented accommodation. There are many households in owner occupied houses, in poor quality housing that they cannot afford to improve or move into better accommodation which might be better suited to their needs.</p>	<p>Comment noted. The overarching theme is intended to apply to all types of property, not just rented accommodation. As such the principle is proposed to be edited to say "Support and advice landlords and private homeowners to improve the management and maintenance of all properties, with a focus on health and wellbeing impacts".</p>
<p>Unused factories/office building should be turned into apartments for homeless/difficult to place individuals.</p>	<p>Comment noted, this I supported by the planning system in principle where the loss of employment land is appropriate.</p>
<p>Make sure that occupancy is correct for the property size - i.e. combat over and under occupancy</p>	<p>We agree that combatting under and over occupancy could release additional property into the market and make more efficient use of stock, however we cannot force people to downsize or move house - this reflects people's right to choice.</p>
<p>Support the development of lifetime homes.</p>	<p>Comment noted. This approach has been removed from recent planning guidance and was removed from the local plan during examination. This will remain an area of design we will continue to review however and continue to promote high quality new homes.</p>
<p>Privately owned properties that have been standing empty for 6 months should be actioned. If within 3 months of contact, the owner still hasn't responded, it should be taken by the council to house local people.</p>	<p>Comment noted but this is not something the council can action in practice. We will continue to work proactively with owners of empty homes to help bring them back into beneficial use.</p>

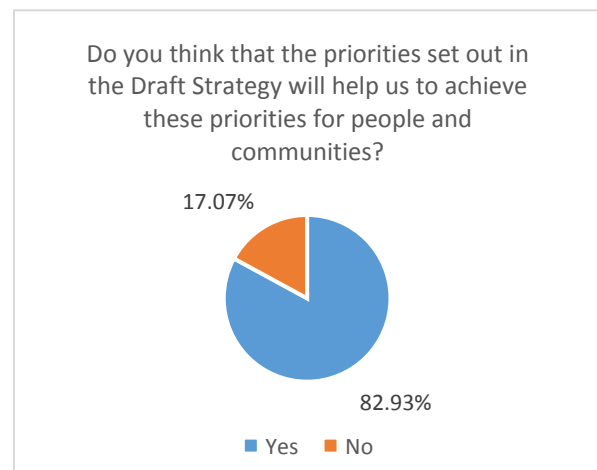
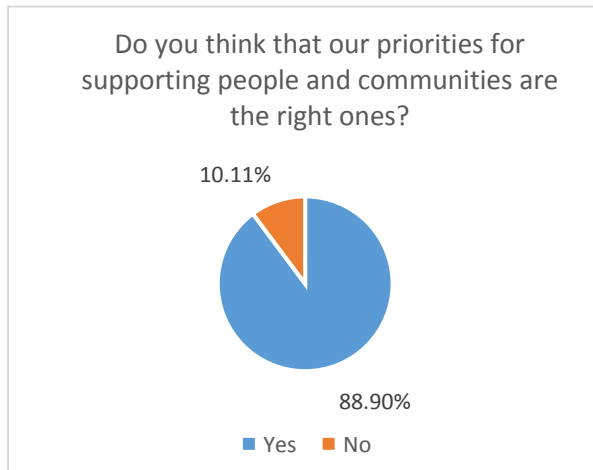
<p>Enable people to get a loan or grant to buy rundown / uninhabitable houses</p>	<p>The council are committed to helping combat empty homes and return them to functional use. We are exploring a range of options associated with this including matters of council tax, planning powers and compulsory purchase. The Strategy and action plan includes a commitment to a specific Empty Homes Strategy already which can explore this issue further.</p>
<p>Impose Landlord Licencing / Accreditation on all private landlords within the city as a means of achieving the above.</p>	<p>Comment noted - the council are currently moving forward with a new approach to property licencing linked to changes in national regulations. This is already captured within the strategy and action plan.</p>
<p>Social housing should be let on fixed term tenancy, for example 5 years. This means parents would work towards a clear goal and not become reliant on their social housing tenancy. This would help to take pressure off stock in the long term.</p>	<p>Housing Associations already have discretionary powers to operate fixed term or flexible tenancies. Nationally however there has been a very low uptake of this opportunity. Government have also acknowledged that it cannot force Housing Associations to operate in this way. This is therefore not something that the Council can influence or deliver.</p>
<p>The council should create partnerships with benefits agencies such as housing benefit and universal credit to: 1. Ensure benefits meet housing costs; and 2. Consider increases in benefit for private sector tenants where homelessness would incur expensive temporary accommodation.</p>	<p>LHA levels are intended to support benefit payments meet housing costs, but are set at centrally determined levels and often fall short of total housing costs. Unfortunately this is something the city council cannot influence, however we are able to use funds such DHP to support costs where appropriate.</p>
<p>Maybe a combined maintenance group managed by the Council and all housing associations would help improve existing housing stock and cut down on costs</p>	<p>Comment noted, however the city council does not own or hold any housing stock, so would not have need for a maintenance fund in this respect. Housing associations are also private organisations that manage and maintain their own respective housing stock.</p>
<p>There needs to be more support for people with Health Issues to stay in their own homes</p>	<p>Comment noted. This will in part, be captured within our review of housing needs assessment in so far as it will include the need for specialist housing options compared to more flexible use of existing housing stock. Where possible though the benefit of helping people stay in their own homes longer is recognised in so far as it can help maintain community cohesion and be positive for mental health. It is therefore already captured within the strategy and action plan for theme 4.</p>

Other than a number of technical and typographical changes no notable adjustments have been made to Theme 3.

THEME 4: Support for People and Communities

The least most responded to section of the survey related directly to the council's plans regarding People and Communities in the city.

In total 89 responses were received to this theme through the survey monkey questionnaire. The vast majority of these responses were in favour of the council's plans regarding people and communities, alongside being largely in favour of the actions set out in this section of the Draft Strategy. This is shown in the graphs below:



In addition a further 16 responses were received via email and letter, with the majority being from partner organisations and voluntary sector.

In summary the following principle issues were raised in response to Theme 4:

- Provide newly placed households with community info packs.
- Improve links to health and deprivation.
- Ensure access to amenity space as part of new developments and temporary accommodation.
- Need to support and facilitate downsizing where appropriate.
- Need to support people to improve their existing homes and future proof them to help people stay in their homes and local communities longer.
- Promote more variety of house types including bungalows and accessible homes.
- Stronger outreach policy to support Neighbourhood Planning.

The tables below further summarise the responses received and officer comments made in response.

Summary of comment(s)	Officer response and proposed change (if relevant)
THEME 4 - Support for people and communities	
Need to understand the linkages between the Health effects of deprivation and development proposals	Comment noted. The City Council have adopted policy and technical guidance around Health Impact Assessments, these help understand and plan positively for health impacts and benefits as part of new developments. The local plan also has a strategic focus on planning for healthy developments and designing in opportunities to create health benefits and combat deprivation. This is all achieved through joint working with public health officers and is reflected within the strategy.
Families need to have access to outside space where children can play safely. This applies to temporary, emergency and permanent housing.	Comment noted. The city council completely agrees with this view and do all it can to ensure temporary and emergency accommodation is appropriate in terms of amenity space either within the site or in close proximity to it. All new homes need to provide amenity space or good accessibility to suitable parks and open spaces. This is covered by the Local Plan as well as the strategy.
Placing a duty upon new housing developers to ensure inclusion of bungalow/single storey accessible accommodation to allow move on opportunities for older people with deteriorating health to downsize/future proof their homes.	Comment noted. The strategy does reflect local plan policy in so far as it promotes the delivery of a range of types and tenures of new homes. This includes opportunities for bungalows and accessible ground floor flats. This is especially reflective of the affordable housing policy and opportunity to negotiate this through the planning system. This will also be part of pre-planning advice where appropriate. We do however have to be mindful of development viability and the cost implications of bungalows, which sometimes mean they are resisted by developers.
The plan could benefit from a policy of outreach to communities to encourage neighbourhood planning in addition to supporting existing communities who are already developing their plans.	Comment noted. Both the Housing and Homelessness Strategy and the Local Plan support and promote Neighbourhood Planning. The council have already adopted a Neighbourhood Plan for Willenhall and have work on going for other such plans in other parts of the city. The delivery of neighbourhood plans is however primarily a planning function as opposed to a housing one.
remove points 7,8,10 and 12 from the How we will achieve this section as these duplicate other actions either already in theme 4 or elsewhere in the strategy	Comment noted - points deleted as suggested.
Supported Housing Needs Assessment across all services is a positive move, but consideration needs to be given to the cost for key providers who currently receive no local funding.	Comment noted. We are currently developing tender specifications and proposals for new services to be delivered later this year. The principle of retendering for homelessness services is already captured within the strategy and action plan. This detail will feed into that process.

undertake a housing market needs assessment to understand the true capacity of the PRS sector in the city	Comment noted. This will be captured within our review of housing needs assessments. It is therefore already captured within the strategy and action plan for theme 4.
Adult Services should read Adult Social Care - predominantly Theme 4 but also Theme 1?	comment noted - change has been made

Key Changes made to the Strategy and Action Plan

Other than a number of technical and typographical changes, the most notable amendments to this part of the strategy include:

1. Points 7, 8, 10 and 12 from the 'How we will achieve this' section of Theme 4 have been deleted as they are deemed to duplicate other actions either already in Theme 4 or elsewhere in the strategy. This has been reflected within the Action Plan also.

In addition to the comments above, a further recommendation was received to re-order the themes to ensure the strategy as a whole provides a closer relationship to the pathways model. In effect this has seen Themes 2 and 4 switched around for the purposes of the final strategy. For reference and clarity back to the original draft they have remained unchanged for this Consultation Statement.