

Appendix 2

Local Housing Strategy Consultation Responses – January to March 2016

Organisation	Section No.	Page No.	Representation	Reasoned Response	Decision and Action
BCBC - Wellbeing	2	4	<ul style="list-style-type: none"> Would it be beneficial to undertake a housing needs analysis to support the implementation of this act? – maybe this could be a priority action? This could then lead to an identification of the types of accommodation required and perhaps the development of a market position statement for those who wish to invest. 	<ul style="list-style-type: none"> Housing need is multi-faceted derived from 3 sources: <ul style="list-style-type: none"> Supported housing through the Supporting People Local Commissioning Plan and Regional Commissioning Plan. Market housing through the Local Housing Market Assessment. Social housing through the Common Housing Register. 	<ul style="list-style-type: none"> This information is intermittently updated.
V2C Housing Association	3	5	<ul style="list-style-type: none"> 'The highest house prices are in Porthcawl in the West', yet most expensive community is Coychurch (east of Bridgend). This is slightly confusing. With the large number of 1 bed need (870 persons or 67%) within the CHR, how many of these are under 35 years of age? What is BCBC proposing, beyond encouraging to develop more shared living options for this community? 	<ul style="list-style-type: none"> Acknowledge potential confusion. The information has been verified and updated for 2015/16. For clarification, the information is regarding actual sale values realised and not purely for sale price. Acknowledge point. For those in housing need and receiving housing benefit, shared living is likely to be the only financially sustainable solution and working in partnership with private and social landlords is imperative to achieve this. Other single person households, able to afford and access market housing, would seek to have their requirements met by the market. 	<ul style="list-style-type: none"> Updated for 2015/16. No action required. This is addressed under priority 2 and 3.
V2C Housing Association	4	11	<ul style="list-style-type: none"> Recent proposals by the UK Government to cap supported housing to the LHA is likely, if implemented, to result in sheltered, extra care and other supported projects becoming unaffordable for elderly and disabled persons from April 2017. This change should be included as a significant risk factor. 	<ul style="list-style-type: none"> Agreed. 	<ul style="list-style-type: none"> This is now included in section 4 "The Challenges Ahead".

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Online response	4	11	<ul style="list-style-type: none"> Since the council transferred all their properties to v2c the only choice left to older people who would like to downgrade to a smaller property from private accommodation is to go into sheltered accommodation whereas before they could apply for a council bungalow. It focuses on vulnerable people, deprived areas and town centres without considering the needs of the non-dependant majority. It doesn't mention the impact of the well-being of future generations act 2015. It doesn't include making housing & communities resilient to climate change and impact on an aging population etc. e.g. of flooding, heat stress in summer, extreme colds and storms in winter. It focusses specifically on houses and doesn't necessarily consider the needs of communities which would drive the type and need of housing required in different communities. 	<ul style="list-style-type: none"> Many people can and do downsize to smaller properties by purchasing on the open market. If this is not possible because of affordability reasons and a housing need can be demonstrated, they would be eligible to apply to the Common Housing Register for a property suitable to meet their housing needs. Agreed that there is need across many household groups however, the strategy sets out the Council's main priorities which allows limited resources and work streams to be directed towards these priorities. Noted. 	<ul style="list-style-type: none"> No action required. No action required. Reference to the challenge has been included in section 4 "the challenges ahead" and ensuring the objectives of the Act are being met has been included in section 7 "next steps".
V2C Housing Association	5	14	<ul style="list-style-type: none"> How do these achievements relate to the previous Housing Strategies aims and SMART targets? An outcome assessment would be useful to enable better understanding. 	<ul style="list-style-type: none"> Agreed. 	<ul style="list-style-type: none"> Section 5 "Our achievements" has been updated to show progress from the strategic objectives of the last strategy.
BCBC - Wellbeing	6	17	<ul style="list-style-type: none"> Should there be a separate priority for refugees? 	<ul style="list-style-type: none"> Noted, reference to refugees should be included. However, not as a separate standalone priority as it is incorporated into homelessness legislation. 	<ul style="list-style-type: none"> Reference to assisting refugees has been added under priority 1.
W&W Housing Association	7	34	<ul style="list-style-type: none"> We would welcome the opportunity to comment upon the actions and performance indicators developed from this Strategy. We would support the commitment to provide regular updates on these indicators to ensure that shorter term projects and 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> Updates will be provided to relevant stakeholders.

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			actions and their outcomes can be monitored.		
V2C Housing Association			<ul style="list-style-type: none"> We understand that this is an interim document until Local Government Re-organisation, however, as written; it is not a full Strategy, more of a position statement. 	<ul style="list-style-type: none"> Noted. However, whilst the document highlights current position, it also sets out the strategic priority and direction for housing in Bridgend in the short/medium term. 	<ul style="list-style-type: none"> No action required.
V2C Housing Association			<ul style="list-style-type: none"> It highlights the main issues but does not present the Councils solutions/responses to the issues identified apart from where they are already in the pipeline. To us this is more of recognition of the problems facing those seeking housing in Bridgend. It does not actually set out how these individuals will be helped in enough detail to answer the issues raised. Its commitment is clear, but its intended actions are missing in detail. 	<ul style="list-style-type: none"> Noted. However, this document highlights the strategic focus of the Council and all its partners and as it is a short term strategy it will not contain an individual action plan. Actions constantly evolve to respond to changing opportunities and funding etc. and incorporating the actions and indicators into the annual business plans allows for this flexibility. 	<ul style="list-style-type: none"> No action required.
V2C Housing Association			<ul style="list-style-type: none"> Welfare reform should be a priority area of its own as it is the greatest risk facing housing. The Strategy needs to have an Action Plan attached detailing specific intentions over the next couple of years, rather than referencing inclusion within other corporate plans. 	<ul style="list-style-type: none"> Noted. Welfare reform has been recognised as a key Challenge. As such it is inferred throughout the document, particularly when addressing housing priorities and therefore, has not been included as a specific priority area of its own. Noted. Actions constantly evolve to respond to changing opportunities and funding etc. and incorporating the actions and indicators into the annual business plans allows for this flexibility. 	<ul style="list-style-type: none"> No action required. No action required.
Online response			<ul style="list-style-type: none"> For a local government document it is remarkably easy to read and understand. Although the language is clear, it is very heavy on numbers in text. This could be difficult for some people to digest. The report could make more effective use of tables and graphs to represent this information. Would benefit from an "executive summary". 	<ul style="list-style-type: none"> Support is welcomed. Acknowledged. Noted. 	<ul style="list-style-type: none"> No action required. Some charts and graphs have been now been added and additional images will be incorporated into the final document if appropriate. We will publish an executive

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			<ul style="list-style-type: none"> • Not enough detail of how results are to be achieved (too much put on statistics). • There is no focus on retaining working couples, young families. 	<ul style="list-style-type: none"> • This document highlights the strategic focus of the Council and all its partners and as it is a short term strategy it will not contain an individual action plan. • Agreed that there is need across many household groups however, the strategy sets out the Council's main priorities which allows limited resources and work streams to be directed towards these priorities. 	<p>summary on the website on approval of the full strategy.</p> <ul style="list-style-type: none"> • No action required. • No action required.
Online response			<ul style="list-style-type: none"> • To support those who unable to maintain housing through debt or the Bedroom tax and to increase the number of homes which are one or two Bedroom homes. • There is no reference to retaining middle income families / couples in the area. • Does not consider what support could be given to purchasers willing to take on a run-down property and renovate it. • Pay due regard to the environment in which houses are located. Undeveloped land and open green spaces are an important element in housing. • The local housing strategy has a specific priority for 	<ul style="list-style-type: none"> • These issues are valid and therefore have already been included in the strategy and its priorities. • Agreed that there is need across many household groups however, the strategy sets out the Council's main priorities which allows limited resources and work streams to be directed towards these priorities. • The strategy makes reference to bringing empty properties back into use and the financial assistance available to do this. More detail is available on the Council's website. • Agreed that these are important, however they are planning considerations and are covered during the statutory planning application process. The strategy highlights the focus for promoting brownfield regeneration over Greenfield new build. • We seek to ensure that all communities are 	<ul style="list-style-type: none"> • No action required. • No action required. • No action required. • No action required.

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			<p>sustainable town centre regeneration. It should be a priority to make all communities sustainable.</p>	<p>sustainable; however the current redevelopment priority is for the town centres.</p>	
Online response			<ul style="list-style-type: none"> • Although the strategy does mention youth it does not go into a lot of detail. There is no mention of Looked After Children Care Leavers or any plans for the need of more supported housing for these young people. • Vigorous action needs to be taken with respect to empty properties. Available legal means to bring them back into productive use should be used to the full. There is a shortage of 1 bedroom properties. In our town centres, there are upstairs premises, above shops and offices that would be ideal for this purpose. Compulsory purchase should be used if necessary. This should be a top priority. 	<ul style="list-style-type: none"> • Agreed. • The strategy has a clear focus of bringing empty properties back into use and references the financial assistance available to do this. More detail of this assistance is available on the Council's website. Where appropriate, enforcement action is carried out by the Authority. 	<ul style="list-style-type: none"> • Reference has been made in priority 1 and 4. • No action required.
W&W Housing Association	Priority 1	18	<ul style="list-style-type: none"> • We fully support the assertion that single persons under 35 are likely to find their housing options constrained. • We are committed to working in partnership with Bridgend CBC to tackle homelessness in the county. • We recognise that the Welsh Government has emphasised that partnership working is key in addressing homelessness with the emphasis on a local approach. • The preventative approach to homelessness, particularly with younger people and their families is supported. • We fully support the commitment to developing a holistic approach to dealing with domestic abuse. 	<ul style="list-style-type: none"> • Support is welcomed. 	<ul style="list-style-type: none"> • No action required.

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V2C Housing Association	Priority 1	18	<ul style="list-style-type: none"> We think more consideration needs to be given to solutions to address welfare reform and UK Government led austerity measures, especially the council's response to Digital by Default. The risk to future Homelessness presentations will be significant from rent arrears led evictions. What is the council proposing to do to enable improved advice, help and assistance services to this sector? 	<ul style="list-style-type: none"> Noted. Welfare reform has been recognised as key challenges in the Challenges Ahead Section (Political, Economic, Social & Technological). As such it is intrinsic throughout the document, particularly when addressing housing priorities and therefore, has not been included as a specific priority area of its own The Housing (Wales) Act 2014 places a strengthened duty on local authorities' to prevent and relieve homelessness. 	<ul style="list-style-type: none"> No further action required at this stage.
BCBC – Adult Social Care	Priority 1	18	<ul style="list-style-type: none"> Greater emphasis should be placed on duties to prison leavers. 	<ul style="list-style-type: none"> The Housing (Wales) Act 2014 places a strengthened duty on local authorities' to prevent and relieve homelessness and vulnerable prison leavers are one of the categories of applicants that are given a priority. 	<ul style="list-style-type: none"> No action required.
Online response	Priority 1	18	<ul style="list-style-type: none"> If the priorities are ranked in order of importance then this should not be the first priority. On the priority of homelessness prevention, there is no mention of working with Early Help Support Services to provide support to reduce escalation of issues such as debt arrears, relationship breakdown, poor home conditions, which can result in homelessness. 	<ul style="list-style-type: none"> Noted, the priorities are not listed in order of importance. They are all equally important. Agreed. 	<ul style="list-style-type: none"> We have included an undated statement in the strategy that these priorities are not ranked in order and are of equal importance. We have highlighted community based services focusing on early support in priority 1.
W&W Housing Association	Priority 2	22	<ul style="list-style-type: none"> We support the local authority in the commitment to maximise the use of existing stock. We would note that the reconfiguration, or new development of any property can be a longer term project, and it will be important the RSL and the local authority work well in partnership to understand the implication, both practically and financially, of any project. 	<ul style="list-style-type: none"> Agreed. 	<ul style="list-style-type: none"> We recognise at present there are barriers both technical and financial to the reconfiguration of existing properties and we have reflected this in the strategy (Priority 2). A new approach is required in this area involving a range of stakeholders.

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			<ul style="list-style-type: none"> We would add examples such as supporting or incentivising older people to move from larger properties, and how we could match their needs. In addition, we should ensure that best use is made of the adapted homes element of the Common Housing Register to ensure that persons requiring adapted homes can be matched to suitable accommodation. We support the commitment by the council to improve housing standards in Bridgend. 	<ul style="list-style-type: none"> Agreed. Support is welcomed. 	<p>Effectively matching properties with applicants on the Common Housing Register has a part to play in this.</p> <ul style="list-style-type: none"> No action required.
W&W Housing Association	Priority 3	24	<ul style="list-style-type: none"> It is noted that the Council proposes to focus on maximising new intermediate rented housing based on affordability of a number of households however given the restrictions on the LHA currently this is not always a viable option for Associations. It is also noted the assessment of the affordability is based on the 2012 LHMA average market rent which has fluctuated since that date. We welcome the Councils' commitment to refreshing the LHMA. The Council's focus on providing opportunities for homeownership is supported and will help to create sustainable communities across the Borough. We see securing off site contributions (S106) as being a last resort. 	<ul style="list-style-type: none"> It is recognised that viability could be an issue for the RSLs. Updating the Local Housing Market Assessment will help to define what is needed. Support is welcomed. Noted and this is reflected in Supplementary Planning Guidance 13. 	<ul style="list-style-type: none"> The Local Housing Market Assessment will be updated. No action required. No action required.
V2C Housing Association	Priority 3	24	<ul style="list-style-type: none"> In regard to monetary payments in lieu of housing provision, this exclusion should not apply to disposals of council owned land. What is BCBC's Strategy for increasing the supply of land to RSL's development programmes and/or placing on site requirements to ensure early delivery of new social rented properties? 	<ul style="list-style-type: none"> Each site has to be considered on its own merits, because each comes with its own specific constraints. Therefore, a blanket approach is not appropriate. The delivery of affordable housing on site is determined in the s.106 with 'trigger points' for the construction of the affordable housing and which prevents the development of subsequent market housing on site until this requirement is met. 	<ul style="list-style-type: none"> No action required.

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			<ul style="list-style-type: none"> Off-site contributions are a useful tool but should be considered as a last resort. When off-site contributions are received what is the council's policy and timescales for allocating the money to ensure timely delivery of actual units? 	<ul style="list-style-type: none"> Noted, it is the Council's stated preference for a Registered Social Landlord to be involved in provision of affordable housing on site. (SPG13 on Affordable Housing). Off-site and commuted sum contributions are only taken in exceptional circumstances. Any commuted sum is for the provision of affordable housing within areas of demand and are committed within a reasonable time as determined in the s.106 process 	<ul style="list-style-type: none"> No action required.
Coastal Housing Group	Priority 3	24	<ul style="list-style-type: none"> We would welcome consideration of intermediate rents, but would need to ensure that housing developments are delivered in such a way so that service charge costs are eliminated or minimised. We would welcome the opportunity to consider Council owned sites off-market to ensure that we can offer proper mixed tenure schemes achieving mixed communities. We don't feel that best value in monetary terms alone achieves the wider strategic goals set out. 	<ul style="list-style-type: none"> Noted. Noted. The Council do undertake direct land sales in certain circumstances where additional community benefits are demonstrated. However, this is balanced by the requirement for the Council to fulfil its Capital Programme Disposal. 	<ul style="list-style-type: none"> No action required. No action required.
BCBC - Wellbeing	Priority 3	24	<ul style="list-style-type: none"> Making best use of Section 106 Agreements - Would it be useful to undertake an analysis of upcoming and likely situations for s106 and develop a market position statement for investors setting out key housing priorities? Again maybe this could be a priority action 	<ul style="list-style-type: none"> The Council's use of S106 is set out in its Local Development Plan together with its Supplementary Planning Guidance (13). Additionally, this strategy highlights the key themes for development. 	<ul style="list-style-type: none"> No action required
Online response	Priority 3	24	<ul style="list-style-type: none"> The priority should also say "in the right place". Ensuring there are appropriate services in place this should also include equality of transport such as active travel routes, sustainable transport links 	<ul style="list-style-type: none"> Agreed. Whilst these are important, they are planning considerations and are covered during the statutory planning application process. 	<ul style="list-style-type: none"> The priority has been altered to reflect this by adding, 'in the right place'. No action required

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			<p>(buses, trains) and access to quality open space for recreation e.g. NRW accessible green space standards. These are important for long term sustainability in light of peak oil, climate change to increase community resilience.</p> <ul style="list-style-type: none"> The focus of the plan does not appear to facilitate the access to these areas (access to green spaces, access to parks, local shops, and transport) despite them being held in such regard in the text. 	<ul style="list-style-type: none"> Putting any development in the right place and addressing the issues highlighted is a consideration undertaken during the statutory planning process. 	<ul style="list-style-type: none"> No action required
W&W Housing Association	Priority 4	27	<ul style="list-style-type: none"> We fully support the emphasis within the Register to match currently adapted properties, or properties that can be adapted, to applicants who require them. We fully support the commitment within the Strategy to address poverty. In addition to the future challenges to be faced through the rollout of Universal Credit and the extension of the LHA shared accommodation rate to under 35 year olds in the RSL sector. We would also note the potential effect of the reduction of the Benefit Cap which will likely be felt from August 2016. We recognise the importance of early advice and support in maximising income. We fully support the commitment within the Strategy to tackle the issue of fuel poverty in Bridgend. We support the view that digital inclusion is a major element in supporting residents to access financial services. 	<ul style="list-style-type: none"> Support is welcomed. Support is welcomed. Noted and agreed. Noted. Support is welcomed. Support is welcomed. 	<ul style="list-style-type: none"> No action required. No action required. The benefit cap is now included in section 4 "The Challenges Ahead". No action required. No action required. No action required.

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V2C Housing Association	Priority 4	27	<ul style="list-style-type: none"> • With increasing pressure on budgets the principle of encouraging people to stay in their own home must be challenged. Re-locating to more suitable properties in more accessible homes and areas to local services will reduce high cost adaptations and allow existing budgets to help more people. • How have the long-running programmes, such as Community 1st, Flying Start etc. performed in tackling poverty and housing inequalities and what is their role in this Strategy? 	<ul style="list-style-type: none"> • Whilst it is acknowledged that a person's current property may not be suitable and that relocation may be an option, the document refers to own home in the wider sense, i.e. promoting independence. Home does not necessarily refer to the particular property they are residing in currently but to a property suitable for the person's needs. • It is not appropriate in a housing strategy to go into detail however; the strategy recognises that these programmes have a useful role to play in dealing with these issues. 	<ul style="list-style-type: none"> • No action required. • No action required.
BCBC – Wellbeing	Priority 4	27	<ul style="list-style-type: none"> • Wish to include: <ul style="list-style-type: none"> ○ Transition from foster care where they choose not to remain in placement through 'When I am ready'. ○ Making all communities dementia friendly? As per the Council's commitment to the Dublin declaration and in the ageing well plan. ○ Physical and sensory impairment? • Although very relevant this chapter has a large focus on SP and it may be of use to include other housing funding and an analysis of future funding sources for housing for vulnerable people. • "Granny flat" is not a terminology that is used in ASC we recommend that this phrase is removed. • Transport is also critical for the engagement of older adults in the community where they can no longer drive or do not have access to transport. • Will there also be a coordinated approach to aids adaptations and housing renewal for disabled and 	<ul style="list-style-type: none"> • Agreed. • Noted. • This is already referenced in the Councils Private Sector Renewal Policy. • Noted. The strategy refers to the major sources of housing related support and assistance funding. • Noted. • Agreed. • This is already referenced in the Councils Private Sector Renewal Policy. 	<ul style="list-style-type: none"> • Reference has been made in priorities 1 and 4. • Reference to dementia has been added in regards to housing related support. • No action required. • No action required. • Have removed the term "granny flat". • Have deleted reference to employment. • No action required.

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			<p>older adults in our community?</p> <ul style="list-style-type: none"> Under “addressing poverty” and “reducing fuel poverty” include something here about financial inclusion - having warm homes efficient homes being able to pay bills – maximising income but also ensuring that properties are insulated and efficient. Information about access to grants for boiler renewal etc. Add as a focus “Flexibility of Environment” - Developing homes for life that can be adapted in line with changing needs and with appropriate space to enable practical support to be delivered effectively within a person’s home. Homes should be developed in a way that utilises modern technology solutions. Work should be undertaken with landlords so that they support adaptations within their properties so that people do not have to face moving home as their needs require adaptations to their surroundings. Add as a focus “Position Statement” - Develop a population assessment to understand housing needs for vulnerable people. 	<ul style="list-style-type: none"> Noted. The strategy already references financial inclusion. “Homes for Life” is already embedded within the development of new social housing. It would require a national policy to impose this on private developers. In addition, a pragmatic approach would be required as some properties are unsuitable for adaptation because of their location (e.g. no public transport and topography). This is addressed as part of the Local and Regional Supporting People Commissioning Plans. 	<ul style="list-style-type: none"> No action required. No action required. No action required.
W&W Housing Association	Priority 5	31	<ul style="list-style-type: none"> The opportunities to regenerate town centres are recognised and it is acknowledged require commitment from a range of partners in particular the private sector and investors. Attracting people to live in town centres is the challenge. 	<ul style="list-style-type: none"> Agreed. Therefore, the quality of the housing offer is paramount. 	<ul style="list-style-type: none"> No action required.
V2C Housing Association	Priority 5	31	<ul style="list-style-type: none"> The renewed focus on Bridgend is welcomed as an aid to improve the town centre. However, experience of other local authorities is that this investment maybe at the expense of investment in other key retail areas such as Maesteg and Porthcawl. 	<ul style="list-style-type: none"> Noted. However, there are existing regeneration programmes underway in all three key retail town centres 	<ul style="list-style-type: none"> No action required.

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Coastal Housing Group	Priority 5	31	<ul style="list-style-type: none"> Welcome focus on town centre regeneration; the principle of town centre living is one that Coastal welcomes, and we see it as a mechanism for revitalising the town centre by introducing footfall into the area. We welcome the focus on the other main town centres of Porthcawl and Maesteg and would be keen to work alongside the Council to explore options in these areas. 	<ul style="list-style-type: none"> Noted. However, there are existing regeneration programmes underway in all three key retail town centres 	<ul style="list-style-type: none"> No action required.
BCBC – Wellbeing	Priority 5	31	<ul style="list-style-type: none"> Transport absolutely essential for our valley communities as part of a package of regeneration measures. Could consideration be given to supported housing for older people in town centres? Shops would be accessible, transport would be accessible. Could we consider parking e.g. free parking for the first two hours? 	<ul style="list-style-type: none"> Noted, however it is not appropriate to include this level of detail in this strategy; however it is addressed in relevant transport strategies. Agreed. Noted, however it is not appropriate to include car parking within a Housing Strategy. 	<ul style="list-style-type: none"> No action required. Have added reference to older persons' accommodation in priority 5. No action required.
Online response	Priority 5	31	<ul style="list-style-type: none"> Town centre should be retail and services.....NOT HOUSING. 	<ul style="list-style-type: none"> An appropriate mix is required within town centres. Housing can help to sustain the vitality required for retail and services. 	<ul style="list-style-type: none"> No action required.

Factual Updates

Organisation	Section No.	Page No.	Summary of Representations	Reasoned response	Decision and Action
BCBC - Planning	3	5	<ul style="list-style-type: none"> There are an estimated 62,462 homes in the County Borough. Approximately 70% of these are owner occupied, 16% privately “rented” instead of “owned”. 		<ul style="list-style-type: none"> This has been altered from privately owned to privately rented.