

CABINET
26 OCTOBER 2021

HOUSING STRATEGY 2021-25

Cabinet Member(s): Councillor Bob Evans
Responsible Officer: Simon Newcombe, Corporate Manager for Public Health, Regulation and Housing

Reason for Report and Recommendation: To provide Members of the Cabinet with an opportunity to adopt the proposed revised corporate Housing Strategy (Annex 1) following the recent completion of external and public consultation. Details of the consultation are set out within the report. The consultation responses and outcomes are set out in Annex 2.

The reason for the recommendation is to ensure the updated strategy is formally adopted allowing for delivery against the strategic priorities and objectives over the strategy period 5-year period.

Recommendation: Members approve the final Housing Strategy 2021-25 attached in Annex 1

Financial Implications: None directly arising from this report.

Budget and Policy Framework: There are no direct budget implications of this report.

This strategy sets out those opportunities and challenges in respect of several key delivery functions; housing delivery, enabling and renewal/standards alongside housing needs and homelessness. As such it links with a much wider policy framework, adopted or in development.

The current strategy was adopted in 2015 and ran for the period 2015-20. It was therefore due for review and updating to reflect the current priorities, needs and aspirations of our community in respect of having access to affordable, safe and healthy housing.

Legal Implications: The strategy has no formal basis and is no legal requirement for have one. Nonetheless, it will provide links to a number of statutory requirements on the Council, for example in acting as the Strategic Housing Authority and as registered social housing provider alongside being the Local Planning Authority.

Risk Assessment: The new strategy provides a framework for the delivery of those key functions and priorities outlined above. In doing so, it will help in the development of a coherent and consistent approach to housing across the district.

Equality Impact Assessment: An EIA has been completed and is attached in Annex 3. No protected characteristics are negatively impacted by this strategy. Conversely, the strategy does propose several objectives aimed at improving access to suitable housing for vulnerable people, whether this is due to financial circumstances (affordable housing) or physical or mental-health disabilities

(supporting specific needs, Housing Assistance Policy and adapting for neuro-diversity in social housing).

Relationship to Corporate Plan: Our Corporate Plan for 2020-2024 has four key priority areas one of which is Homes. Within each priority strand the Council has committed to ensuring we are working towards sustainable and prosperous communities. This includes a recognition that our villages and towns need affordable housing for local people. There are number of specific actions that underpin this commitment includes targets for the delivery of affordable housing, working with community land trusts and private sector landlords and working to improve the supply of quality housing.

Impact on Climate Change: Decisions relating to the management and maintenance of the homes belonging to the Council and influence the carbon performance of market or community led housing will enable officers and Members of the Council to influence the direction of travel against appropriate targets. We can use new development as opportunities to help communities to become increasingly sustainable and self-sustaining at neighbourhood level.

1.0 Introduction

1.1 Homes are a basic necessity and a fundamental requirement for everybody. Local authorities have a broad role to play in supporting and regulating the housing sector, and in facilitating the delivery of new housing.

1.2 All agencies, including the NHS and social care are impacted by housing - in relation to its availability, quality and suitability where poor housing leads to significant health inequalities. In short, good quality housing is the foundation of upon which people can build happy and successful lives. The economy also relies on a sufficient supply of housing in order to attract and retain a skilled workforce.

1.3 Tackling our housing needs and requirements are not something that one service or organisation can achieve on its own. Local authorities, registered social landlords, developers, the NHS, social care and the voluntary/ community sectors all have important roles to play.

1.4 With budgets are under pressure, and economic reality of the Covid-19 pandemic just starting to be realised there is an increasing demand for our services and safe, affordable accommodation. Having a clear, coherent strategy in place that sets out our leadership and direction is more important than ever where effective internal and external partnerships are in place.

1.5 This report follows on from a previous update provided to members in January 2021 and sets out the proposed consultation draft of the updated Housing Strategy 2021-25.

1.6 As agreed by the Homes Policy Development Group in January, the development of the draft, consultation document has been led by a Strategy Working Group with a wide range of internal stakeholders and contributors as set out below on page 11 of the Strategy (Introduction).

2.0 Strategy overview

2.1 The Housing Strategy sets out our vision a Council for the provision and management of housing over the next five years. In particular, as set out in the document foreword, it puts forward the following vision.

Our vision is to meet the housing needs and aspirations of our residents through a greater choice of high-quality new and adapted homes. This will help us to support the social wellbeing needs of everyone who lives in Mid Devon and provide high quality growth in a high quality environment

Purpose

2.2 Building on this vision, the purpose of the Strategy is to provide a clear direction, for the next five years, to offer more housing with more choice by developing new homes and improving existing homes and communities. There is a particular focus on affordable and social rent properties alongside a strong commitment to having low-carbon, accessible and adaptable homes. This means we can support our most vulnerable residents to access and maintain good quality housing which meets their needs.

Strategic context

2.3 The Housing Strategy for Mid Devon does not stand alone and most of the priorities and actions within it operate alongside existing strategies, delivery plans and policies. In particular, it is guided by policies and priorities outlined in the Mid Devon Local Plan 2013-2033 and the Corporate Plan 2020-24.

2.4 This Strategy has also been developed in the context of the role of the Heart of the South West Local Enterprise Partnership which aims to boost the regional economy across the Devon, Plymouth, Somerset and Torbay region with high living standards and outstanding quality of life.

2.5 It is important that Mid Devon continues to contribute towards regional ambitions for growth by continuing to work with other Local Authorities and regional partners. From a national perspective, in recent years the Government has introduced a raft of new legislation to stimulate and speed up housing supply across all forms of tenure and to reform the welfare system. Most recently, in November 2020 we saw the publication of the Government's Social Housing White Paper which will place new responsibilities on us as a Social Landlord and direct provider of social housing.

2.6 We have taken these changes, opportunities and strategic direction of travel into account within the development of this draft document. It is also important that we are responsive to further legislative changes as they emerge and shape these policies to meet the needs of our local housing market. This Strategy sets out Mid Devon District Council's considered housing plans and actions for the period 2021-2025 taking into account the national, regional and local context as discussed in more detail in the introduction to the Strategy itself.

Priorities and objectives

- 2.7 In recognising the above context, the following 'HOME' priorities were developed, taking into account the supporting evidence and documents that underpin the Strategy.

Housing - increase delivery of quality designed, well-built homes across the housing market to meet identified needs

Optimise - fit for purpose healthy, sustainable, adaptable homes optimised for high energy efficiency and low carbon impact

Making the most - making the most of our existing homes across the private and public sector in all forms of tenure

Engage - engaging and working with others including partner organisations to deliver our aims

- 2.8 Consequently, the Strategy is divided into four chapters which expand upon each of our key housing priorities. All priorities have equal weighting; each impacts on the other and much of the work around these priorities will necessarily be overlapping and interdependent.

- 2.9 Within each chapter are specific objectives and targets to deliver the different elements that make up each priority.

- 2.10 Overall, some 40 objectives are described within the Strategy and ultimately this provides a detailed but strong framework; setting direction for each of our partners and stakeholders involved in housing; residents, ward members, housing associations, developers, government bodies, regulators, investors, private landlords, charities, voluntary groups and the Council – to provide the right type of homes that are needed.

- 2.11 Members will therefore need to consider the document and the objectives set out holistically within boundaries of where we have an influencing, commissioning or direct delivery role with regard to the provision of housing. Within the latter, members have previously expressed a direct interest in the delivery of new Council Houses. These are covered in Chapter One of the document and Objectives 5 and 6 specifically.

3.0 Proposed adoption timeline and consultation

- 3.1 The Mid Devon Scrutiny committee meeting in June 2021 considered the pending adoption of an updated Housing Strategy and noted that the document would be considered by this PDG and Cabinet in its first round for approval to go to consultation and then be considered by Scrutiny committee prior to it coming back to the PDG ahead of a final recommendation to Cabinet to adopt the final Strategy.

3.2 Accordingly, the following consultation roadmap and timeline was agreed at the 20 July Homes Policy Development Group (PDG):

- 20 July – Homes PDG with recommendation that Cabinet approve draft for consultation
- 16 August – Scrutiny Committee
- 31 August – Cabinet with recommendation to approve draft for consultation
- September external consultation
- 20 September – verbal update to Housing PDG on initial consultation feedback
- Late September – early October – final updates to Strategy document
- 26 October – Cabinet recommendation to adopt final strategy

3.3 In addition to general public consultation, it was agreed that a targeted consultation on the draft Strategy would be carried out with a wide range of interested regional and local organisations as set out in Page 11 of the Strategy.

3.4 On the 16 August Scrutiny Committee supported the draft, updated Housing Strategy and recommended to the Cabinet that: the strategy be approved subject to:

- Net Zero Carbon terminology be consistent throughout the strategy
- The Project Board to only reference job titles and not named individuals

3.5 At the 31 August Cabinet meeting, an updated draft Housing Strategy was considered with the above recommendations from Scrutiny addressed. Cabinet resolved that the consultation draft Housing Strategy 2021-25 be approved for external and public consultation and further noted the timeline and stages for adoption of the Strategy as set out above.

4.0 Consultation and outcomes

4.1 The external and public consultation on the proposed Strategy commenced on the 8 September 2021, immediately after 31 August Cabinet decision call-in period had elapsed.

4.2 Public consultation was completed via a dedicated web-site page which can currently still be viewed at <https://www.middevon.gov.uk/council-s-housing-plans-for-next-five-years-need-community-input/>

This page set out a summary of the strategy and invited comment and response via a web form on each of the four key priorities (Housing, Optimise, Make and Engage) and the specific Objectives set out within together with a general comments field. A link to the full strategy and more about how to respond in writing if preferred was included on the page. This page was accompanied by a media press release that was also circulated to all members internally and to all town and parish councils.

4.3 In addition to the above, a targeted email was sent to over thirty organisational contacts containing links to the above page. This included

Devon County Council, other Devon local authorities, local Housing charities including existing partners, Housing Partnerships, Devon Home Choice, local Housing Associations, the Gypsy and Traveller Forum and relevant local/partner Community Interest Companies.

4.4 Finally, targeted communications through existing channels including social media were sent to all of the Council's housing tenants (approaching 4,000 residents).

4.5 A follow-up, reminder email was sent to all organisational email contacts mid-point during the consultation and a verbal update on the consultation process was also provided to the Homes PDG on 14 September 2021 as agreed.

4.6 The consultation through all channels closed on the 30 September 2021.

4.7 Despite a three-week consultation period and a tailored, but extensive, consultation exercise only 15 responses were received. This may be indicative of a general, wide support for the Strategy and its proposals (comments are generally provided if people object rather than approve of change) but also the relative breadth of the document, containing several themes and some 40 specific Objectives.

4.8 In terms of respondent types, it has been possible to categorise these as follows, however no personal data was requested. Two Council tenant respondents did provide contact information which was used to arrange a direct response and follow-up on any points raised not directly relevant to the Strategy i.e. property specific concerns.

Residents/tenants – 5 response
Residents - 4 responses
Parish Council – 3 responses
Organisation – 2 responses
MDDC councillor – 1 response

4.9 The full response from each respondent is set out in Annex 2 of this report with all comments provided in full/verbatim as received but with any personal data removed. Annex 2 also sets out a specific response from the Strategy lead/responsible officer, supported by the wider project team.

4.10 In terms of general themes from the 15 responses, then there was clear overall support for the Strategy and the priority themes and specific objectives were broadly welcomed. There was one response from a parish council that did not support the Strategy format and style.

4.11 There was specific, common support for the following specific priorities and Objectives:

Priority/Chapter One: Homes – especially the delivery of new affordable and/or social housing. More Council housing specifically was frequently mentioned. There was some challenge around perceived quotas or % allocations of market development provided affordable homes (Local Plan policy) versus delivery.

Priority/Chapter Two: Optimise – there was wide support for the specific carbon Objectives regarding optimising standards in new build properties. There was specific support for new adaptability standards for mental-health needs and general approach to ‘living well at home’ and flexible properties able to meet varying, long-term needs of occupants.

Priority/Chapter Three: Make – there was wide support for the environmental/sustainability and specifically carbon Objectives within this chapter and the general improvement of existing housing stock across all ownerships and tenure. There was specific support of retro-fit initiatives to decarbonise the Council housing stock alongside specific work to improve access to and standard of adapted property (physical disabilities).

Priority Chapter Four: Engage – there was wide recognition of the benefits and need to engage widely and work with partners identified to deliver the Strategy aims in the widest sense. These was challenge around consistency of approach and ensuring set standards across agencies.

General responses – there were several questions from one respondent in respect of the relationship between the Strategy/Objectives and the Homes England Affordable Homes Programme. These were responded to directly in detail at the time, highlighting the positive detail set out within the strategy and further opportunities to accelerate social housing provision through the programme. This response is duplicated in full within the Annex 2 table.

A further general Parish council response provided overall support for the Strategy but challenged the overall housing target/provision for Mid Devon as set out in planning policy. In response, it has been highlighted that the Housing Strategy must be consistent and have due regard the adopted Local Plan. Furthermore, it cannot (and should not) be purpose of this Strategy to separately address principles of development and planning policy that have been legally and extensively addressed through the strategic planning process.

4.12 No respondents suggested alternative priorities for the Strategy and there were no comments on the proposal that these priorities have equal weighting where each will impacts on the other and much of the work around these priorities will necessarily be overlapping and interdependent.

5.0 Conclusions

5.1 The internal and external development of the proposed Strategy has been thorough with effective and strong joint-working across services, functions, officers and members. This has been welcomed and supported.

5.2 With the exception of one response, internal and external consultation has demonstrated support for the overall format and approach of the Strategy. The priority themes have been endorsed and the Objectives are considered appropriate and clear, albeit with some debate respectively around over or under-ambition with regard to targets set.

5.3 The level of response to targeted and general external consultation was disappointing. There will always be lessons that can be learnt from how consultation has been carried out and how to secure effective engagement, striking a difficult balance between informing, developing and delivering timely change.

5.4 In this instance, the external consultation was largely targeted to interest groups, residents and organisations and was tailored to help support and focus responses through different channels. The excellent support and input of the Council's Communications Team must be acknowledged here. Potential reasons for the low response are explored briefly in section 4.7 and despite this, many of those responses received were informative, considered and detailed.

5.5 Overall, support for the proposed Strategy, its format including the priority areas and specific Objectives were strongly welcomed.

5.6 In the context of the above, no further changes aside from those already incorporated in the Strategy prior to external/public consultation are proposed and the Strategy presented in Annex 1 is unchanged from the approved consultation draft, other than the consultation section on Page 11 has been updated to reflect the completed consultation exercise.

6.0 Recommendation

6.1 In accordance with the above, the following recommendation is therefore made:

Members approve the final Housing Strategy 2021-25 attached in Annex 1.

7.0 Next steps

7.1 Should members agree to the adoption of the updated Strategy then delivery of the Strategy will commence in full. Details of how it is proposed to monitor and achieve this are set out on Page 56 of the Strategy document.

7.2 This Strategy and any specific priorities or Objectives will be reviewed annually. This is a fast-paced area of work with frequent policy and legislative changes alongside new and emerging opportunities to expand or change how the overarching aims of Strategy are delivered. The annual review will also provide an opportunity to inform members and our residents/local organisations on progress with delivery against our targets.

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Circulation of the Report:

Members of the Housing PDG
Cllr Bob Evans, Cabinet Member for Housing and Property Services
Leadership Team
Corporate Management Team

Service/Operations Managers
Legal Services
Housing Strategy Officer Working Group

List of Background Papers:

Current MDDC Housing Strategy
<https://www.middevon.gov.uk/residents/housing/housing-strategy/>

Annex 1 – Proposed final Housing Strategy 2021-25 (attached separately)

Annex 2

Summary of Housing Strategy Consultation responses and outcomes

Web form responses (verbatim)

No.	Consultee type	Q1. Priority 1 – HOUSING - increase delivery of quality designed, well-built homes across the housing market to meet identified needs	Q2. Priority 2 – OPTIMISE - fit for purpose healthy, sustainable, adaptable homes optimised for high energy efficiency and low carbon impact	Q3. Priority 3 – MAKE - making the most of our existing homes across private and public sector in all forms of tenure	Q4. Priority 4 – ENGAGE - engaging and working with others including partner organisations to deliver our aims	Q5. Additional comments	Feedback and outcomes
1	Resident	The Priority should be on social housing. Families desperate for a home continue to languish in unsuitable housing. There should also be a firm commitment to making these homes 'homes for life' by considering the ageing process and any disabilities that might occur	Carbon zero homes; no nonsense, no questions. The earth cannot afford to be fobbed off.	Where possible, housing should be bought back by the council, particularly bungalows for the disabled, in order that it can be made safe and clean for future social rent tenants. Reliance on the private sector should be less of a priority. The private rental sector is unaffordable and shambolic, not to mention discriminatory and sometimes unhealthy.	Some fine housing charities exist that could be asked to assist; Habinteg for instance believe in homes for life. Corporate players should be avoided as they work merely for profit.	Respondent skipped this question	<p>Q1. The response is supportive of the priority and Objectives 5 and 6 in particular</p> <p>Q2. The response is supportive of the priority and Objectives 26 and 27 in particular</p> <p>Q3. The response is broadly supportive of the priority. Specific points raised are supported by Priority 1 and several Objectives</p> <p>Q4. The principle of working with Housing charities is well established within this priority so the response is support. MDDC have existing relationships with CHAT for example and not-for-profit Housing Associations. Habinteg is a specialist, accessible property Housing Association. It is not known if they operate with Mid Devon but a property search on their corporate website found the closest available property to be</p>

							in Sedgemoor area of Somerset
2	Parish Council	<p>I note that there seems to be a problem caused by older residents blocking the access of younger residents to large family homes. One solution is to provide specific housing for older residents however my experience of most existing schemes is that they are unattractive to older residents who often appreciate, for example, good sized living and kitchen areas and some garden. Older does not mean immobile and prepared to live in a solitary box somewhere out of the area.</p>	<p>We really don't take climate change seriously enough. There should be absolutely no building on flood plains. We need to look at the cost of using concrete in our building, a huge generator of carbon dioxide. New housing must be all electric and have a minimum of solar panels and use ground source heat pumps. But also they should be built to take advantage of natural light e.g. large windows to the south small to the north.</p>	<p>Here is the way to minimise the impact on our climate. It's far more efficient to update an old house than start from scratch</p>	<p>Parish councils can have a real role here please. We know what's needed and where it will fit.</p>	<p>Thanks for letting me comment</p>	<p>Q1. The response notes the tension between ownership or secure tenure in all forms (private sector, social rent, tenanted and owner occupied) where older residents may be living in family homes too large for their needs. This is not straightforward and there are many rights. Priority 2 is more applicable here and Objectives 20 – 23 recognise and address different needs</p> <p>Q2. The response is supportive of the priority and Objectives 26 and 27 in particular</p> <p>Q3. The response is supportive of priority 2 and Objectives 26 and 27 in particular. The strategy recognises the benefits of improving existing stock through Objectives 26-27</p> <p>Q4. This is noted, agreed and consistent with the priority overall</p>
3	Resident	<p>If these are affordable or social rent then good. If not then no expansion of the area should benefit local</p>	<p>Good</p>	<p>Again this should be affordable, ring fenced for locals, Single, couples and families. There should be a decrease in 2nd homes these effects both the community, and services with reduced income</p>	<p>Linked up planning us good, there needs to be a system that ensures no one in need is missed</p>	<p>I would say that the culm garden village will not in my opinion create many issues. This includes lack of infrastructure, the new road planned still leaves vehicles accessing the m5 at the same slip roads. Having had, on many</p>	<p>Q1. The response is supportive of the priority and Objectives 5 and 6 in particular</p> <p>Q2. The response is supportive of the priority and Objectives 26 and 27 in particular</p> <p>Q3. The response is supportive of priority 1 and Objectives 5 and 6 in particular. It also supportive of Objectives 4, 7 and 8</p>

				from council tax and local economy spending		occasions to "park" in the near side lane to exist m5 to cullompton i csn voucher its unsave. The railway line opening is good but too far off to assist with traffic from the new houses. Also there us little or limited facilities in cullompton so traveling out of the town is normal. Cullompton could i feel easily become a commuter town losing it heart	Q4. Is supportive of the priority Q5. The response lacks clarity in respect of objection or support for the Culm Garden Village. Whilst village can help deliver several objectives within the strategy and notably Objective 3, infrastructure and transport issues are addressed directly through the Local Plan and masterplanning
4	Resident/tenant	Respondent skipped this question	Whilst I really like and enjoy living in our little bungalow, I feel that an update would vastly improve me and my wife's living conditions. Thing like removal of the bank at the rear of the property would give you feeling of a much larger property and the same at the front of the property which could be adapted for the electric vehicles of the future. Solar Panels fitted to the rooves would help with carbon footprint as would	Respondent skipped this question	Respondent skipped this question	Whilst I've enjoyed living in Mid Devon with all the local conveniences, I think the local council have done a marvellous job on the whole and it seems to really look after it's tenants. As items 1,3 and 4 don't really concern me I think it would be unfair of me to comment	Q2. The response is largely property specific as a tenant, however is supportive of the priority and Objectives 26 and 27 in particular Q5. This is supportive of the work of the Council as a landlord

			light tubes fitted through the back roof into the kitchen. I think it would be beneficial if all the outside walls were insulated and re-plastered to reduce the feeling of dampness. I think that's it for now.				
5	Organisation	MDDC are missing a source of housing that is very similar to putting abandoned homes back into use. This is the conversion of buildings standing on the curtilage of existing properties. Class Q allows barns standing alone in fields to be converted into full market value residences, which does, in fact, create new isolated homes in the countryside. Yet currently, outbuildings standing on the residential curtilage of existing properties outside of settlement boundaries can only be made into new homes if they are to be sold a	<p>I would like to see all new buildings (industrial, retail and residential) having solar panels on the roof - it's a no-brainer. As is rain water storage tanks underground.</p> <p>It's also important that estate developers stop putting up these rabbit hutches where garages and stairs up to first floor kitchens are the only things on the ground floor. These do not cater for disabled people and they cram too many people in together on uncomfortably packed estates.</p>	Respondent skipped this question	Respondent skipped this question	<p>As already stated, policy S3 part (c) needs a rethink. It rather smugly implies that self builders should be happy that their all hard work and financial commitment can go into an affordable home - almost like they ought to be happy they've been allowed to self build at all.</p> <p>There are no self build options within settlement boundaries as, by the nature of the beast, the everything within the boundary has already been built. Therefore, self builders have no self build options available. As this is the only way many will ever be able to afford their own homes, and that the</p>	<p>Q1. The response is supportive of several objectives including Objective 8 and 18-19 in particular. The planning system and the Local Plan are supportive of the appropriate development of redundant agricultural buildings within existing residential curtilages and are consistent with permitted development changes nationally/national planning policy. The response highlights the challenges around land availability, price and development costs which are often difficult for small/self-builders. Objective 18 and 19 seek to address these points specifically</p> <p>Q2. The response is supportive of the priority and Objectives 26 and 27 in particular. Objectives 9 and 10 within priority 1 also seek to address specific points around accessibility and design standards</p> <p>Q5. Refer to response to Q1. In addition, there is a need to strike a careful balance between supporting self-builders and</p>

		<p>reduced market value in perpetuity. This seems very unbalanced, and certainly does not encourage self builders to invest their own money into building/converting their own homes. After all, why should a self builder have to accept that their financial outlay will never reap the returns seen by the estate builders snapping up land set aside for development around the towns and villages in Mid Devon's Local Plan 2017-33? If you want to encourage self building, then you have to provide fair opportunities for the self builder to create their own home and invest in their families' financial future by doing so. Forcing a self builder to never make money on the home they've build is wrong, especially when there are no</p>				<p>government's white paper wants to see the gentle densification of villages where suitable plots in and around them are identified, MDDC should reconsider their stance on insisting on affordable homes if a new build/conversion is outside of a settlement boundary (which, by the way, are often lamentably out of date)</p>	<p>ensuring sustainable patterns of development across district, recognising the cumulative impact of such developments. The existing Local Plan seeks to achieve this through Policy S3 which helps make land available for open market custom and self-build developments on allocated sites and Policy DM6 'Rural Exception Sites' which make exceptions to the normal restrictions on housing development outside defined settlements, to support opportunities for low cost housing including self-build in rural areas where there is a need. The new Local Plan (Plan Mid Devon) will consider how to further support custom and self-builders across the district and the Council will be inviting views on this through an 'Issues' consultation in due course.</p>
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		<p>serviced plots available in the villages where they live/want to build their homes as the plots that are earmarked for development go to the estate builders. At least allowing outbuildings on existing residential curtilages, even though they be outside of settlement boundaries, to be made into homes (full market value homes) gives self-builders a chance at obtaining their own homes and benefitting by their financial investment and hard work.</p>					
6	Resident/tenant	<p>Offer new well built houses to people who have been good tenants and who live in houses that need to be rebuilt because of how old they are because of the problems they have.</p>	<p>Respondent skipped this question</p>	<p>Respondent skipped this question</p>	<p>Respondent skipped this question</p>	<p>Respondent skipped this question</p>	<p>Q1. The response is broadly supportive and many of the objectives within this priority, and Objectives 5 and 6 in particular</p>
7	Resident/tenant	<p>Upgrade - existing properties - no showers / baths</p>	<p>Agree - existing homes do not have showers</p>	<p>Long term tenure remove 5 year tenure</p>	<p>As long as the quotes are not the cheapest items</p>	<p>5000 houses along the culm valley is a place of outstanding</p>	<p>Q1 and Q2 both relate to priority 2 and are addressed through the MDDC stock planned</p>

		<p>are not environmentally friendly and old . Heating - no ground source heating - using electricity is not efficient .</p> <p>- asbestos on sheds and not removing it -</p> <p>- sockets - not in the right places</p> <p>In efficient toilets</p>	<p>- heaters from 1970</p> <p>- storage heaters not big enough for size of the property</p> <p>- no ground source heating being used</p> <p>- no showers - environmental concerns need to be addressed other housing associations across Devon provide all of this already</p>		<p>which it seems to be. This is not cost effective and does not improve the well being of tenants .</p> <p>Eg - kitchens not finished off</p> <p>Bathrooms not finished off</p> <p>Exposed pipes work - depressing or not boxed in .</p> <p>Humiliating</p> <p>Poor building work</p> <p>They need major upgrades not up to standard some were built in 1927.</p> <p>This is a definite need</p>	<p>beauty and all villages in this area will fight against it . It is already overhoused in this area .</p>	<p>maintenance programme rather than the strategy directly. The exception is carbon and environment concerns addressed by Objectives 24 and 26-27</p> <p>Q3. The response is supporting long-term tenure of social housing which is already provided for under legislation. The overall tenancy strategy for Council housing and short-term, flexible tenancies v longer-term will be addressed by Objective 31</p> <p>Q4. See response to Q1 – Q2.</p> <p>Q5. The response is an objection to the Council's proposals for the Culm Garden Village. The planning of the Garden Village will be taken forward through the preparation of a new Local Plan for Mid Devon. It will also be subject to masterplanning work. This will include opportunities for public comment on proposals at key stages over the next several years.</p>
8	Resident	<p>Council housing should be the priority.</p> <p>Ensure developers cannot backtrack on quotas of "affordable" homes.</p>	Agreed!	Again, please prioritise traditional council houses.	Insist on unchangeable quota of affordable homes.	<p>Council houses desperately needed. Put a stop to second home ownership.</p>	<p>Q1. This is supportive of several Objectives within the priority. The response also highlights the impression of 'quota' or fixed % of market deliverable affordable houses versus the Local Plan policy and a site-by-site viability assessment</p> <p>Q2. Non-specific but supportive response to this priority</p> <p>Q3-Q5. See response to Q1</p>

9	Organisation	<p>The identified needs have to be very specific and when new homes are submitted for planning approval, whether multiple homes on brownfield sites through to single isolated houses in the open countryside if they do not strictly meet the previously identified need then they should be refused.</p> <p>An identified need for all new builds should be environmentally friendly heating and roof mounted solar panels. No house should be approved without meeting these requirements.</p> <p>Climate greenhouse gas minimisation should be a red line test for any new build approval.</p>	<p>Fully agree. However it's your Planning Department and the Planning Committee, that need to take on board this message. Planning approval is frequently given with no mention whatsoever about energy efficiency.</p>	<p>Should this not have been a priority for decades. With the cost of house purchase and rent being so high both in real terms and in inflationary terms I cannot believe that we still have empty homes available. Severe penalties need to be available to levy against empty house owners. Second homes not used for rental should have council tax levied at a very high rate x5 or x10 of the normal rate.</p>	<p>Respondent skipped this question</p>	<p>The local plan is a well-constructed document with some very good policies. However I am frequently frustrated at planning permission being granted with a case officer comment that is complies with policy when it plainly does not. These policies have to be applied rigorously by the officials and audits should be frequent to ensure this happens to prevent houses being constructed against the declared policies and aims of the council.</p>	<p>Q1. The response aligns need to build for new housing, In this sense the evidence base for the Local Plan and the Housing Strategy provide assurance here but they are by their nature strategic documents not intended to be (and should not be) a process map for individual planning decisions. The response also highlights environmental concerns and therefore is support of Objectives 26 and 27 specifically</p> <p>Q3. It is uncertain whether the respondent intended to say whether the priority and making the most of existing housing stock should (rather than should not) have been priority for decades. The remainder of the response lends itself to being supportive of the priority overall and in particular Objectives 28 and 29 and empty homes initiatives</p> <p>Q5. See response to Q1.</p>
10	Resident/tenant	<p>Improving current properties should be the first priority</p>	<p>General repairs to bring houses to a proper standard should be added to this</p>	<p>Okay</p>	<p>Only if set standards can be met</p>	<p>The older properties already owned by MDDC need to be bought up to standards.</p>	

Other responses (verbatim)

No.	Consultee type	Open field	Comments and outcomes
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11	MDDC member	<p>As part of the consultation on the new Housing Strategy I'm asking what will the MDDC approach be to the latest iteration of the Government's Affordable Homes programme (see link above)? In particular:-</p> <ol style="list-style-type: none"> 1. How might the Government's programme support increased numbers of affordable and social rented homes over and above those contained in the Strategy? 2. What bids for these funds are being considered both now and for the future and to what ends? 3. What evidence of local housing need can be provided to support bids for these funds? 	<p>These questions have, in other wording, been asked separately of officers during the consultation timeframe. In a direct response to the MDDC member, the following information was provided:</p> <p>The 5-year 1-4-1 programme set out in the draft housing strategy (Objective 5), as also set out in detail at the recent HPDG and Scrutiny meetings contains details of a further 14-pods in 2024/25. We are also looking at options for several other 1-4-1 sites due earlier in the programme (for example Beech Road) to see if they are viable for alternative modular build rather than traditional and any cost/carbon benefits etc.</p> <p>Beyond the above, we are currently working on a much more expansive plans to consider many other redundant or development HRA sites not currently listed in the 1-4-1 plan or the non-1-4-1 plan which currently includes Post Hill. These formative plans are considering an even more ambitious social rent build programme beyond the target set out in the current draft housing strategy. Given we have fully allocated our 1-4-1 receipts already and we have the major Post Hill coming forward, then these additional sites will be reliant on closing the budget/viability gap via bids into the Homes England (HE) Affordable Homes Programme. We have already held discussions with HE to agree principles and will be informally submitting 3-4 feasibility studies on a mix of different sites in the next couple of months with a view to obtaining firm figures from them on potential HE % funding – this will enable us to develop an overall business case within the HRA. Once we have this key information then we can start specifying numbers and sites over an additional HE-modular build 5-year programme that will move beyond the existing HRA growth targets in Objective 6 of the housing strategy. Once formalised, this will come to LT and members in due course – I therefore can't provide any more detail on this work in progress at this stage, nonetheless we are moving as quickly as possible and aiming to provide details during Q4 21/22, subject to HE response times.</p> <p>I have further responded to a request from Andrew Jarrett (MDDC s151 officer) reflect the above and provide some very outline figures on potential MDDC budget requirements that can appear in the emerging, updated MTFP for 22/23 onwards, which of course will also be subject to member approval in entirety later in the year. There will be some caveats on this, for example due to the fact that the HE work will overlap and may not be complete.</p> <p>The location of future schemes will be determined by available land</p>
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			with priority given to sites where housing need (as evidenced by the different mechanisms set out in the strategy – for example Devon Home Choice data). This will inform the mix and make-up of each site, for example no. of 1,2,3 and 4 bed properties and level of adaption etc.
12	Parish Council	<p>Having studied the Draft Housing Strategy for Mid-Devon, we find it necessary to communicate concern that the document falls seriously short in terms of content and structure.</p> <p>The problem with the document starts with the curious attempt to fit the chapters within the acronym H.O.M.E. It becomes quickly clear that each of these four categories causes considerable duplication and restricts easy comprehension by the reader since each subject of importance is ruthlessly divided into four parts.</p> <p>Clarity emerges when this proposed draft is compared to a study of the predecessor document (2015-2020). At first glance the previous version shows a clarity of organisation which is missing in the new draft; the detailed discussion contained under “Housing Priorities” in the 2015-2020 document was helpfully supported by Appendixes containing data on Strategic context, Local Context, Planning Policies in Mid Devon, Action Plan, & Registered Providers.</p> <p>This comparison immediately highlighted the obvious error whereby the new draft has no Action Plan, as in Appendix 4 of the 2015-2020 version. Further inspection showed that the new draft also fails to match this expiring version which had excellent data for population, GTAA, spare bedroom deduction, housing benefit claimants, requests for Local Welfare assistance, population change, no of dwellings, tenure profile, meeting decent standard, average monthly rents, households in need (A-D), bedroom need of needy applicants. And perhaps the crucial table which is now missing is the SHMA assessment for social and Affordable Rented needs. This showed 45% of the need in 2015 was for single bed accommodation, which should now be combined in 2021 with data of increased aging population as a need for built bungalow accommodation</p> <p>Among surprising changes in the 2021 draft is the downward adjustment of the Affordable Home annual target (section 1.13) which has been reduced to 94 from the 124 shown in the Local Plan; obviously a well-written strategy would have found ways to propose increase, rather than target a decrease in this fundamental target.</p> <p>Among other targets which would merit investigation is that set for</p>	<p>The name of the Parish Council was provided.</p> <p>This is an interesting response as it largely draws comparison with the format of the preceding Strategy. The main concern appears to be that the proposed Strategy is less of a data-centric, academic paper with an Action Plan and more of a delineated, strategic document with prescribed priorities and objectives but no delivery plan.</p> <p>In reply, the strategy is designed to be exactly that i.e. strategic and set out the key priorities alongside specific, target based objectives upon which a subsequent delivery plan can be measured against whilst providing a coherent purpose and direction of travel.</p> <p>The overall feedback from the MDDC Homes Policy Development Group, Scrutiny and Cabinet committee reviews of the draft Strategy welcomed the change in format and approach in the consultation document, recognising it’s integrated but focussed, outcome based approach.</p> <p>No other respondents to the public, external consultation have commented in the same way or raised any concerns in respect of comprehending the Strategy approach and what it is intended to deliver (and why).</p> <p>Overall, whilst the feedback is welcome, this element of the feedback is largely subjective and the overall internal and external consultation process firmly supports the format proposed.</p> <p>MDDC is working partners ECC, TDC and EDDC towards a new Gypsy and Traveller Accommodation Needs Assessment (GTAA) which we anticipate will be completed in 2022, as noted in the Strategy.</p> <p>MDDC is also working partners ECC, TDC and EDDC towards a new Local Housing Needs Assessment (LHMA) which we anticipate will be completed later this year, as noted in the Strategy.</p> <p>There is no error that the Strategy has no Action Plan and it is not agreed that the targets have been applied too loosely to be of use.</p>

		<p>Objective 26 (Climate change & existing Council Housing stock) which has been “redefined” to refurbish only 15% of the current Council housing stock to a zero-carbon standard by 2030.</p> <p>Overall the targets have been applied too loosely to be of use to management. This is especially relevant since there is no Action Plan in which the targets can be summarised.</p> <p>In summary the proposed draft is greatly inferior to the published version 2015-2020 and should be re-written in a similar style, together with updated sets of Data and a workable Action Plan.</p>	<p>Conversely, the Strategy contains 40 specific Objectives which are can be directly monitored and measured with numerical and/or defined outputs for the most part. Furthermore, the Strategy addresses the issue of deliverability in its Conclusion setting out a specific framework to deliver and review strategy. This includes bringing together working groups focussed one of each of the four priorities within the Strategy tasking the development and implementation of specific Action Plans around each suite of Objectives and targets.</p> <p>In respect of housing need, the Strategy reflects the updated information available since the preceding 2015 document was developed and identifies new information that will become available in the lifetime of the proposed Strategy and how that information will be used to refine housing need and delivery.</p> <p>On the matter of the different between the Housing Strategy target for market delivered affordable homes and that set out in the Local Plan is specifically addressed within the Strategy itself and the challenges around viability and deliverability versus aspiration. The Housing Strategy target takes into account that the ability to secure affordable housing through the planning process will be subject to the viability of development proposals More detail is provided in Section 1.13 of the Strategy.</p> <p>The response around Objective 26 is noted and the specific carbon target contained therein is based around affordability and budget (alongside technical constraints) in respect of retrospective improvements to existing Council Housing Stock and with a zero-carbon target for new build going forward.</p>
13	Resident	<p>I’m very happy that you are providing more affordable housing, a better record than many councils! Also that your bringing empty properties back into use.</p>	<p>This supports Priority 1 (Homes) and Objectives 3-6 in particular</p>
14	Resident/tenant	<p>I fell you should concentrate on the homes you already have.</p> <p>Our house is moldy, been waiting 2 years for you to fix the problem. In fact most houses in crediton are damp and moldy.</p> <p>Our stairs are falling down also.</p> <p>I really think you should upgrade the houses you have got so that they are suitable for the tenants you already have. Not try get more tenets.</p> <p>We have had nothing but trouble due to lack of funding your end now your putting your funding into new homes not existing ones. Sounds like</p>	<p>The response is largely property specific as a tenant, however is supportive of the priority of making the most of our existing stock. Information provided around the property has been fed back to our Building Services team but is not a matter for this Strategy to address directly</p>

		we are going to continue having problems in our home we already rent from you	
15	Parish Council	<p>The Parish Council agrees with most of the principles underlying the Housing Strategy.</p> <p>In respect of Objectives 1 and 2, it continues to believe that the housing target is higher than is justified by statistical analysis and that the decision to concentrate half of Mid Devon's new housing on Cullompton is unfortunate.</p>	<p>The name of the Parish Council was provided.</p> <p>The response provide overall support for the Strategy, though it comments upon matters correctly addressed by the adopted Local Plan around overall housing need and location/sustainability of development. It cannot and should not be the purpose of this Strategy to separately address principles of development and planning policy that have been legally and extensively addressed through the strategic planning process.</p>

Annex 3

Equality Impact Assessment

Title of review	Housing Strategy 2021-25
Service	Corporate Management Team. Delivery of the strategy is organisational and sits across several services including Public Health, Mid Devon Housing, Development Management, Forward Planning, Assets Management and Property Services
Date of review	06/10/2021
Date of next review	Annually as required if the Strategy is amended
Lead officer, Job Title and Service	Simon Newcombe, Corporate Manager for Public Health, Regulation and Housing
Review team	Housing Strategy project officer group – see Strategy
Scope of the analysis	The purpose of this review is to consider the equality implications of the Housing Strategy 2021-25
Beneficiaries	The residents of, and those that visit and work in, Mid Devon. All protected characteristics are represented within the beneficiaries.
Stakeholders	Stakeholders include: <ul style="list-style-type: none"> • Residents; • Partner Agencies; • Council Members; • Council staff; • Community and voluntary organisations.
Relevant data and research	N/A
Access complaints	None recorded
Consultation	See report and public/external consultation on the Strategy during September 2021. A specific, draft EIA consultation was held remotely with the Officer working group in October 2021 following the public consultation exercise.
Results of consultation	The attached Housing Strategy 2021-25

Relevance to the duty - Do your proposals contribute towards or impact on any of the aims of the duty?

There is impact as some of the activities are directed at vulnerable groups within our communities in order to offer support and improve access to appropriate housing.

1. Eliminate unlawful discrimination – harassment, victimisation and any other conduct prohibited by the Act;

Some of the activities within the plan specifically target members of the community, such as vulnerable people, whether this is through financial poverty or physical disabilities or mental health concerns. The Strategy priorities and specific Objectives are designed to provide guidance, advice and support and improve access to appropriate, safe and secure accommodation relevant to these vulnerable groups

2. Advance equality of opportunity – between people who share a protected characteristic and people who do not share it by;

- removing or minimising disadvantages suffered by people due to their protected characteristics;
- meeting the needs of people with protected characteristics; and
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is low.

Some residents groups and localities have been identified by Devon Home Choice data, internal and external consultation and will further emerge through planned analysis of census data alongside the Local Housing Needs Assessment.

3. Foster good relations – between people who share a protected characteristic and people who do not share it, by; tackling prejudice and promoting understanding between people with a protected characteristic and others.

Engage is one of four key priorities within the Strategy. This will involve both informal and more formal joint-working across partner agencies including neighbouring LAs, Devon County Council, local registered Social Housing Providers, other Housing Providers and Housing charities.

Equality impacts raised or identified:

The proposed Housing Strategy 2021-25 will target groups that have been identified in respect of some of the protected characteristics.

Protected Characteristic	Commentary	
Age	Impact	Yes. Through links to the Local Housing Needs Assessment and the following Objectives:

		<p>14 - Increasing accommodation options 15 - Improving health and wellbeing by supporting those with complex needs 20 - Identifying needs and trends 21 - Supporting specific needs 22 - Housing Assistance Policy</p> <p>Note: Age is just one characteristic alongside several others that are relevant to these elements of the Strategy.</p>
	Mitigation	None required. These are positive actions to support individuals and groups within the protected characteristics that do not discriminate against those with no protected characteristics.
Gender	Impact	<p>No.</p> <p>The Housing Strategy 2021-25 does not discriminate against gender.</p>
	Mitigation	Not required as no impact has been identified, negative or positive.
Race	Impact	<p>No.</p> <p>The Housing Strategy 2021-25 not discriminate against race.</p>
	Mitigation	Not required as no impact has been identified, negative or positive.
Disability	Impact	<p>Yes.</p> <p>Through links to adapted accommodations – new build and optimisation and existing stock. A key aim is to provide sustainable, lifetime accommodation that flexible meets the changing needs of those with physical and mental-health disabilities. Specific Objectives are:</p> <p>14 - Increasing accommodation options 15 - Improving health and wellbeing by supporting those with complex needs 20 - Identifying needs and trends 21 - Supporting specific needs 22 - Housing Assistance Policy 23 - Adapting for neuro-diversity in social housing 38 - Better Care Fund</p>
	Mitigation	None required. These are positive actions to support

		individuals and groups within the protected characteristics that do not discriminate against those with no protected characteristics.
Religion or belief	Impact	No. The Housing Strategy 2021-25 does not discriminate against religion or belief.
	Mitigation	Not required as no impact has been identified, negative or positive.
Gender reassignment	Impact	Generally no, however Objective 15 does address those with specific and/or complex needs. This is a positive discrimination that does not impact on others without this protected characteristic. The Housing Strategy 2021-25 does not negatively discriminate against gender reassignment.
	Mitigation	Not required.
Sexual orientation	Impact	No. The Housing Strategy does not discriminate against sexual orientation.
	Mitigation	Not required.
Marriage and civil partnership	Impact	No. The Housing Strategy 2021-25 does not discriminate against Marriage or Civil Partnerships.
	Mitigation	Not required.
Pregnancy and maternity	Impact	No. The Housing Strategy 2021-25 not discriminate against pregnancy and maternity.
	Mitigation	Not required.
<p>Overall conclusions and options to be put before decision maker or to take forward to develop your service:</p> <p>Some of the protected characteristics are likely to be impacted by the delivery of the priorities and specific Objectives of the Housing Strategy 2021-25. The Strategy is positively targeting specific vulnerabilities in respect of access to appropriate housing.</p>		

Actions arising from analysis:		
Action	Officer Responsible	Deadline
None		

Acceptance

Name and signature of assessing officer and date of assessment

Name: Jill May

Position: Director of Business Improvement and Operations

Signed:

Date: xx/10/2021