

# Draft Sefton Housing Strategy: Consultation Response Report August 2022



## **Sefton Draft Housing Strategy 2022 - 2027 – Consultation Response Report**

A draft of Sefton's Housing Strategy (2022-2027) was published for a wider 12-week public consultation in early May 2022 and concluded on 31<sup>st</sup> July 2022. This draft housing strategy was developed over a number of months in partnership with a range of internal and external stakeholders. The development of a robust housing strategy has followed good practice guidance, which indicated the importance of developing a 'shared' strategy, in collaboration with key Local Authority partners, and also through consultation with a wider group of stakeholders and the local community.

The stakeholder collaboration to produce the draft Housing Strategy was achieved through working with a diverse range of groups. Additionally, members of the public and Housing Association partners have been briefed on the development of the housing strategy. Importantly they also had a key input in 'shaping' the draft strategy through the initial strategy drafting phases and also throughout the public consultation process.

The development of the draft strategy was communicated through wide-ranging presentations and discussion sessions to numerous stakeholder groups, throughout the borough, from the outset of the strategy development. This process started in April 2021 and concluded in July 2022. It is estimated that Officers presented the draft strategy to over forty different groups or forums over its development cycle.

Finally, to ensure that published version of Sefton's Housing Strategy is robust, fit for purpose and inclusive, a consultation plan was developed and agreed by Sefton's Public Engagement and Consultation Panel. See:

<https://modgov.sefton.gov.uk/ieListDocuments.aspx?Cid=498&Mid=10330>

The main purpose of the wider consultation was to allow all relevant stakeholders and members of the public to assess and have their say on any aspect of the draft Housing Strategy.

In total we received 22 formal responses to the consultation from a wide range of diverse respondents.

The report sets out (in Appendix 1) a summary of the comments reported back through the 12-week consultation process, and the Council's proposed response to each comment.

[Please note: Some comments have been repeated through similar wording and language and will be addressed as a single comment in this report. Suggested changes have been assessed for appropriateness and consistency with local and national housing policies].

**Thank you to all participants in the consultation for taking the time to consider and respond to our questions.**

**Appendix 1 [Overleaf]**

## Appendix 1- Consultation comments

Consultation Comments	Council Response	Changes required to the draft Housing Strategy
<p>Typographical error - Page 4, Paragraph 4, Line 1 - should read “housing for the most vulnerable” not “housingforthemostvulnerable”</p>	<p>Comment noted - thank you</p>	<p>Text altered to reflect comment</p>
<p>Typographical error Page 7, no spacing in the sentence “barriers to obtaining suitable housing for the most vulnerable”</p>	<p>Comment noted - thank you</p>	<p>Text altered to reflect comment</p>
<p>I agree with the overall vision of the strategy, however it does not provide any specific details on how the Council will achieve the stated priorities.</p>	<p>Comment noted - thank you</p> <p>Sefton’s Housing Strategy will be supported by further documents including an ‘Action Plan’ and ‘Monitoring Report’ to ensure that the strategy is effective, deliverable and intelligence driven using robust evidence sources. These documents are currently being drafted and will be published and consulted upon later this year.</p> <p>The Action Plan will outline the different methods to address the issues outlined in the final Housing Strategy. This plan will contain specific action points and targets and timescales to meet the housing priority topics, but will remain flexible and responsive to changes in market conditions, new opportunities and also introduce new issues/topics as they arise, for example changing legislation and new governmental policy.</p>	<p>None required</p>
<p>Where a housing priority is</p>	<p>Comment noted - thank you</p>	<p>None</p>

<p>identified there should be an attempt to quantify it – not just say what the Council are going to do, but also have achievable ‘stretch’ targets so that the Council can be judged on how successful they are in achieving them.</p>	<p>This will be considered through the development of the Housing Strategy Action Plan and also the Monitoring Report as described in the previous consultation response (above).</p>	<p>required</p>
<p>With specific regard to Sefton’s Care Leavers - Short term accommodation is needed – Uni vacation for example / prior to moving to Uni accommodation / joining Armed Forces – we have had young people put in the impossible position of having to take on a tenancy when they turn 18yrs knowing that they will be moving on in a matter of months. They then have to use their £2000 ‘Setting Up Home’ grant to furnish the accommodation and then get rid of it when they move.</p> <p>Supported accommodation option post 18yrs to allow for slower transition into independent living. Example given – small block of one-bedroom apartments with staff on site. This would allow our more vulnerable young people space to get used to living independently with someone ‘on hand’ should they need.</p> <p>The group also feel very strongly about care leavers having to use hostels.</p> <p>Using hostels for young care leavers should not be an option. “The thought of a vulnerable young person leaving care and having to live in a hostel – this would be extremely scary for them and make them feel unsafe”.</p>	<p>All comments noted - thank you The comments as outlined are important issues to Sefton. Therefore, they will be considered further as part of the development of the Housing Strategy Action Plan (as set out in the previous responses). This Action Plan development will involve the relevant Council Housing Team, Children’s Social Care Teams and also include the Making a Difference Group (MAD)</p>	<p>None required</p>

Will the council be looking to implement any enhanced standards on new builds i.e. 100% NDSS? In light of Sefton declaring a climate emergency are the council intending to introduce measures to ensure new builds are more energy efficient?	<p>Comment noted - thank you</p> <p>The justification with regards to implementing any enhanced standards on new build homes including - Nationally Described Space Standards (NDSS) will rest on evidence included in the Strategic Housing Market Assessment (amongst other evidential sources). The Housing Strategy recognises that any future local policy changes need to be reflected in the available evidence, alongside existing local and national legislation. Any proposals regarding changes to new build standards will be addressed in the Housing Strategy Action Plan.</p>	None required at this point.
Jigsaw (Housing Association) have previously expressed an interest in a number council owned sites for delivery of affordable housing. Whilst we acknowledge the council priority is for Sandway Homes to deliver private and council housing, we welcome further discussions to maximise development opportunities in the borough.	<p>Comment noted - thank you</p> <p>Continued liaison between Sefton Council and potential housing or social investors is welcomed. The Council has a published <a href="#">Asset Disposal Policy</a> that:</p> <ul style="list-style-type: none"> <li>• sets out our broad objectives in relation to how we use our property assets;</li> <li>• summarises the Council's property asset base;</li> <li>• sets out the principles we use when making disposal decisions; and</li> <li>• identifies a list of sites and other property assets that are available for disposal.</li> </ul> <p>Further to this, regular meetings between Social Housing providers and Sefton Council will provide the platform to help maximise</p>	None required

	housing development opportunities within the borough.	
A five-year strategy is not long enough. The strategy should be over a longer period to ensure that all housing priorities are achieved.	Comment noted - thank you The Housing Department recognise that a 5-year strategy is considered the most suitable to ensure that the Local Authority's housing priorities are current and can also be reactive to changes in local policies, national legislation, and economic cycles. The priorities identified within the current Housing Strategy will be reviewed at the end of the five-year period and may be carried on to the next Housing Strategy where appropriate.	None required
I feel that Sefton in terms of development and new housing are selling the tax payers of Sefton short in recent years. You are striving to get the new homes bonus without any thought of the long term development of Sefton. If you look at the internal population growth of Sefton there isn't a need for houses, the people are coming from elsewhere and they are mainly from London, with the government pushing out the lower classes from London and moving them up North. Should we be overcrowding our boroughs for this ? Sefton are allowing poor developments and giving too much power to developers. Developers are being allowed to build in areas where the infrastructure is already overburdened, and these already ridiculously rich developers should be made to invest in roads, doctors, schools and shops. New Developments should contain green areas, parks and sport amenities for	Comments noted - thank you  With regards to the New Homes Bonus - Sefton does receive this grant paid by central government to incentivise housing growth within the borough. However, Sefton has received a much lower grant than any other comparably sized local authority, over the past 12 years. This is due to a lower rate of new-build housing development, conversion or bringing long-term empty homes back into use over this time.  The long-term housing development areas for Sefton are primarily set out in Sefton's Local Plan, rather than this Housing Strategy. To this end, and as referenced within in the draft Housing Strategy document, it fully aligns to support the Council's existing high-level strategies including: Sefton's Vision 2030, Local Plan, Health	None required

<p>the community, to enhance well being and health. There should also be pavements and drives to park cars. The estate off Kenilworth road(Ainsdale)is a good example of how estates should be built, developers will obviously cram as much as possible in for financial gain but councils need to step in with more restrictions. Also housing and apartments should be built with thicker walls and floors, again developers will get away with what they can, but this helps people have a more enjoyable existence with neighbours.</p>	<p>and Wellbeing Strategy and Climate Emergency Strategy.</p> <p>The Local Plan for Sefton addresses the overall objectively assessed housing requirements, development infrastructure and contributions. Alongside this, further Planning Policies on housing developments set out the minimum requirements for Green Space provision in conjunction with other health and community amenity standards. Additionally, the design, construction and parking standards for new developments are set out in Sefton’s Supplementary Planning Documents (SPDs) alongside the Local Plan. See:  <a href="https://www.sefton.gov.uk/planning-building-control/planning-policy-including-local-plan-and-neighbourhood-planning/adopted-supplementary-planning-documentsguidance/">https://www.sefton.gov.uk/planning-building-control/planning-policy-including-local-plan-and-neighbourhood-planning/adopted-supplementary-planning-documentsguidance/</a></p>	
<p>Driving Housing Quality in Communities and Neighbourhoods - Would in not be better to include that the housing quality should be first assessed/re-assessed and then Driven forward. This may give the public the confidence to know that the quality of the current housing stock is good quality.</p>	<p>Comment noted - thank you</p> <p>The quality of Sefton’s existing housing stock is continually monitored through regular stock modelling and analysis. The Council utilises this information to ensure that any future housing interventions or policies are appropriately targeted, to ensure that the best neighbourhood outcomes are achieved.</p>	<p>None required.</p>
<p>I saw the proposal to build social housing, become a landlord etc. I think this is a wonderful idea and will support it wholeheartedly.</p>	<p>Comment noted - thank you.</p> <p>Sefton is once again Registered as a Provider of Social Housing. Work to deliver these new social homes is currently underway.</p>	<p>None required</p>

<p>The strategy focuses too much on older people. What is being done to help younger people onto the housing ladder?</p>	<p>Comment noted - thank you</p> <p>The demographic nature of Sefton both currently and in the future means that there is a significant focus on older persons within this strategy. However, the Housing Strategy will help enable all people including younger people to meet their housing needs. This will not only focus on market housing for sale, but it will assess how to increase the supply, mix and quality of new homes &amp; low-cost homes as well as Affordable Housing. The increase in overall housing supply will encourage a greater choice of homes that meet the needs of existing and future residents. The Council will also be consulting on (starting in September 2022) updating its Affordable and Supported Housing Supplementary Planning Document (2022). This will include specific policy requirement called First Homes. This will ensure that a proportion of new homes will be sold as discounted market homes to first-time buyers.</p>	<p>None required</p>
<p>Driving Housing Quality in Communities and Neighbourhoods - In the event that Government enforces a revised decent homes standard on private landlords alongside the removal of no fault evictions, inflation and an increase in BOE base rates, there is potential for private landlord disinvestment in areas where rents are low and buildings are in poor condition. The strategy should consider how it would respond to that scenario – probably not in detail but certainly with a view to working with Agents</p>	<p>Comment noted - thank you</p> <p>Agree with the recommended strategy wording change.</p> <p>Additionally, we will be reflecting any/all legislative changes brought about by the Private Rented Sector White Paper through the Housing Strategy Action Plan.</p>	<p>Change priority to: “Working closely with private sector landlords to support and encourage them to invest in Sefton &amp; provide high quality homes and management</p>

<p>regarding how such a scenario could be dealt with. This could be reflected in wording changes (for instance saying 'Working closely with private landlords to support and encourage them to invest in Sefton....').</p> <p>Some consideration should also be given to referencing Sefton's planning powers and how these could be utilised to help drive up housing quality.</p>		<p>services”</p>
<p>Meeting People's Housing Needs - We would partially disagree with the first of the suggested Action points. The bullet, as worded, suggests that there is a need to attract high quality developers into Sefton. We would suggest that Sefton already has high quality developers (or developers who could become high quality) who are located in the borough and that the Council's first priority should be to work with local developers given this would have demonstrable benefits in terms of the local economy, reduced impact on the environment and broader social value. We would suggest a specific reference is made to supporting local developers.</p>	<p>Comment noted - thank you</p> <p>Agree with these comments and will alter wording to reflect these.</p>	<p>Change priority to: “Working with and supporting housing developers to deliver exceptional homes and neighbourhoods”</p>
<p>Enabling People to Live Independently - We would suggest that the priority around Reducing health inequalities should be relocated to the first priority theme as it is not specifically about independent living but refers more to overall quality of housing. We would also suggest that some consideration needs to be given to referencing the use of planning powers to increase the number of</p>	<p>Comment noted - thank you</p> <p>Agree with regard to independent living comment. Altering strategy wording to be more specific.</p> <p>With regards to using Planning powers to increase number of lifetime homes. This will be considered and addressed through the development of the Housing Strategy Action Plan.</p>	<p>Change priority to: “Reducing health inequalities through improved specialist housing”</p>

<p>Lifetime Homes produced. It may be that, in some cases, changes to the overall balance of planning requirements on a site could be used to drive up Lifetime Homes (for instance allowing developers to slightly reduce their affordable housing requirement in order to invest more in delivering Lifetime Homes outcomes – we would note that delivering increased Lifetime Homes will, longer term, reduce the pressure on extra care provision).</p>		
<p>Tackling Barriers to Obtaining Suitable Housing for the Most Vulnerable and Ensuring Equal access to Housing Services - The Actions section here (We will achieve this by ...) is worded in a way which suggests the next five years are largely around planning rather than action. For instance it suggests 'assessing' the needs of vulnerable groups but there is no suggestion of implementing the outcomes of that assessment. Similarly there is a commitment for developing a business plan around Council housing but not a commitment to implement that plan. The document would be improved by adding commitments to action on these points.</p> <p>We would also note that many vulnerable people are housed in the private rented sector and it is unlikely that this will change during the life of the housing strategy. We would suggest making reference to actions to improve the knowledge and understanding of private landlords who may be housing vulnerable groups as well as actions to tackle those private landlords who do not properly support</p>	<p>Comments noted - thank you</p> <p>Any specific actions and/or commitments will be addressed within the Housing Strategy Action Plan.</p>	<p>None required at this point.</p>

vulnerable tenants.		
<p>Effectively using Council Assets to Support Housing - We would suggest that specific reference should be made to giving priority to local developers when considering asset disposal given that this would have a range of additional benefits to Sefton (social value, growing the Sefton pound etc).</p>	<p>Comments noted - thank you</p> <p>The Housing Strategy priority theme Effectively using Council Assets to Support Housing has been developed in accordance with Sefton's existing Asset Disposal Policy. In disposing of assets, the Council will be guided by its obligation to secure value for money. Disposals are expected to be at market value predicated on the nature of the asset and any agreed mix of uses, however disposal at less than best consideration may be considered in exceptional circumstances. This would be fully assessed on a case-by-case basis.</p>	<p>None required at this point.</p>