

Appendix C- Written Responses to Draft Housing Strategy consultation

Increasing housing supply		
No	Comments	Response
1	Questions about how the Housing Needs Assessment and requirements for new homes take account of households already living in Emergency or Temporary Accommodation and future pressures on homelessness.	The Housing Needs Assessment (HNA) is intended to provide the council with an estimate of the total number of homes that need to be built over the next 10 years. The HNA included households who are living in non-secure tenancies and the households who were accepted onto the housing allocations scheme (at April 2014) as well as an estimation of backlog of need (e.g.: concealed households and overcrowded households) extrapolated from the 2014 London SHMA produced by the Greater London Authority. It is difficult to project future homelessness pressures within this but clearly housing requirements will need to be reviewed in light of any changes in the housing market.
2	Question about how the council intends to assist non-secure tenants when they are decanted from the regeneration estates and what impact will it have on the supply of affordable accommodation for all housing applicants given the extent of decanting due to take place?	The council has considered how to support long-standing non-secure tenants on the regeneration estates to enable them to maintain links with the community. When non-secure tenants are decanted from the regeneration estates they will be assessed for their housing need at that point. If the non-secure tenant meets the necessary criteria, they will be placed onto Barnet Council's Allocations Scheme. When assessed each non-secure tenant will also receive a recommendation on the area that they can suitably be rehoused into. These will be based on the individual circumstances of each non-secure tenant, having full consideration of issues such as schooling, work commitments and support networks. Following their placement onto the Scheme, the non-secure tenant will be made an offer of accommodation. The type of tenure they are nominated for and location of the property will be dependent on the availability of accommodation and the recommendations mentioned above.
3	Suggestion that council could increase affordable housing supply by buying out Right to Buy leaseholders in non-regeneration areas using the right of first refusal to buy back within the first 10 years of sale. Homes could then be let out to housing applicants.	The business case for this will need to be considered under the Housing Revenue Account business planning.

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4	<p>Comments agreeing that it is important to ensure that new developments are of a high quality design, for example:</p> <ul style="list-style-type: none"> • Good space and environmental standards. • Complimenting and enhancing the area's local character and identity. 	<p>This is noted and the council reaffirms its commitment that new homes are delivered to the highest design and environmental standards as embodied by the council's Local Plan policies.</p>
5	<p>Concerns about the risks of over-development, particularly high density flatted developments and lack of communal green space and concerns about the lack of other infrastructure to support the new communities (e.g.: schools, transport and health services).</p>	<p>This is noted and as in response 4 above, the council's Local Plan policies and the planning process are designed to ensure that developments are well designed and through Section 106 agreements new infrastructure is delivered to support the new developments.</p>

Delivering homes that people can afford		
No	Comments	Response
1	<p>The majority of comments on this priority were relating to the proposal to increase council rents to 80% market or LHA rate. They were mainly against the proposal. The key concerns raised included:</p> <ul style="list-style-type: none"> • PRS rents in Barnet have become unaffordable for many working families. • Increasing council rents will substantially increase the housing benefits bill and mean more households are affected by the overall benefits cap. • Council tenants, given local allocation policies, are already those most in need of assistance. Pegging council rents to the private sector may increase welfare dependency. • This proposal may push families who may just be managing without claiming housing benefit onto reliance on housing benefit. • It is likely to drive Right To Buy sales as the individual business case for those who can afford to buy will buy rather than pay higher rents thus reducing affordable housing supply 	<p>The Council has considered the responses and proposes to consult further on a draft rents policy on the following basis:</p> <ul style="list-style-type: none"> • Existing tenants will see rent increased to the formula rent • New homes will have rents set at 65% of average market rents • New five year flexible tenants will be charged rent at 50% of average market rents for the first 5 years and if they are offered a further tenancy on review they will be charged 65% market

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	<ul style="list-style-type: none"> The strategy is silent on whether tenants will see any specific improvements in service, or a revised service offer as a result of the rents increase. <p>There was some recognition from one respondent that there is room to increase council rents above their current level and that increased rental income can assist the council in developing more affordable homes.</p>	
2	<p>Suggestions to ensure that affordable housing is maximised through the planning system , for example:</p> <ul style="list-style-type: none"> Set out specific targets for social rented housing. Develop a Supplementary Planning Document that sets out clear expectations on value in viability reports, including that viability calculations should be transparent and public. Establish a policy on the local marketing of properties to minimise off-plan sales. 	<p>The council is currently producing a new Affordable Housing Supplementary Planning Document (SPD) that will be consulted on during Summer 2015. The SPD will explain how the council will maximise the delivery of affordable housing.</p>
3	<p>Suggestion that where the council must transfer land to secure delivery of affordable housing it should have a long-term interest in the land through retaining the freehold, keeping a long term equity stake in the value uplift of the land by adding covenants on disposal, and look at long term payback arrangements on private sector-led development.</p>	<p>The suggestion has been noted. The council's approach to delivery of affordable housing will be contained in the forthcoming Affordable Housing Supplementary Planning Document. There will be a further consultation on this in Summer 2015.</p>
4	<p>Suggestion that Barnet Council should halt the West Hendon development, seek legal advice and review the current scheme.</p>	<p>There will be many benefits for local people in the regeneration of West Hendon, including new high quality housing and improved infrastructure. Halting West Hendon would be a breach of contract and would leave the Council liable for costs running into £millions.</p>
5	<p>Suggestion that on the regeneration schemes the same number of council homes should be provided as a minimum.</p>	<p>This is noted but overall the regeneration schemes will provide high quality housing across the range of tenures and existing secure tenants will be re-housed on the estate. The new private market homes on the regeneration estates are required to subsidise the building of new affordable homes, Each stage of the regeneration scheme enables the council to review the</p>

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		actual amount of affordable homes to be provided by the developer.
6	Suggestion that all longstanding non-secure temporary tenants on Barnet's regeneration estates should be granted secure tenancies	The Council does not support this. There are many potential implications, including the viability of the regeneration schemes themselves, in deciding to grant all non-secure tenants secure tenancies and this is something that the council is not considering. However, the council has considered how to support long-standing non-secure tenants on the regeneration estates to maintain links with the community. The support that will be given to non-secure tenants when they need to move is explained in the section on increasing housing supply above.
7	<p>Suggestions on the development of new intermediate rent and low cost home-ownership products, for example:</p> <ul style="list-style-type: none"> • Intermediate rent based on a percentage of income. • Key worker housing for particular target groups of people including those who need to live close to where they work. • Mutual home ownership. 	The council is investigating a range of models to help more people on middle incomes to access home ownership. One model being considered is Pocket Homes. They are generally 20% cheaper than comparable properties in the area, providing an opportunity for people on middle income who have lived or worked in the area for at least one year to access home ownership. Also now referenced in the strategy is the fact that the council will work with the government on the new Housing Bill when it comes forward to build more starter homes in Barnet.
8	Concern about how any low cost home ownership product created does not very quickly become recycled back into the buy to let market.	The council understands this concern. One of the home ownership products being considered, Pocket Homes, ensures that the properties remain below market value, and therefore affordable, in perpetuity. The leases also limit the ability of the owner to let the property out.

Sustaining quality of private rented sector		
No	Comments	Response
1	<p>Suggestion that the council should promote and plan for the delivery of purpose built PRS for a number of reasons, including:</p> <ul style="list-style-type: none"> • Demand for PRS housing continues to increase due to a range 	The suggestions have been noted. The council supports the delivery of new purpose built PRS as part of a diverse mix of tenures to support a growing population.

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	<p>of factors including, mortgage constraints on access to owner-occupation, movement towards smaller household, more people opting to rent as a flexible life-style choice.</p> <ul style="list-style-type: none"> • To provide flexibility and choice to new entrants to the labour market. • Encourage mobile middle income earners to move to the borough. • Reduce pressure and improve quality of existing local PRS market by increasing the supply of purpose built high quality PRS 	
2	<p>Suggestions to improve standards in private rented sector, including:</p> <ul style="list-style-type: none"> • License all private sector landlords in order to tackle rogue landlords, improving standards in the private rented sector and reducing anti-social behaviour. • Introducing a Decent Homes Standard based Kite mark for the private rented sector, including current minimum legal requirements. • Increase tenants awareness of their rights. 	<p>The suggestions have been noted. The council is introducing an Article 4 Direction on homes in multiple occupation (HMOs). This will require landlords to obtain planning permission when converting homes into HMOs and will take effect in June 2016. The council is also consulting later in the year on plans to extend licencing of HMOs across the borough. The council also continues to support existing schemes in place for improving property and tenancy management such as the London Landlord Accreditation Scheme run by Camden Council and the London Mayor's London Rental Standard. Barnet Homes provides training for tenants in accessing the private rented sector and tenants' rights and responsibilities.</p>
3	<p>Suggestion to set up a social lettings agency to offer a quality management service to private landlords for letting their properties at either market rent or affordable rent but the service is free of charge for tenants.</p>	<p>Let2Barnet has been set up as a letting service by Barnet Homes and is free of charge for tenants and provides management services at a cost for landlords including council leaseholders. Despite a challenging housing market in terms of persuading landlords to work with benefit claimants, Let2Barent has successfully increased the supply of accommodation available for housing applicants.</p>

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Tackling homelessness		
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1	Suggestion that the draft strategy does not go into enough detail about homelessness prevention which is a big challenge for Barnet Council and Barnet Homes. The detail could be provided in a separate homelessness strategy.	The council has revised the section on tackling homelessness to include more detail on preventing homelessness.

Other issues raised		
No	Comments	Response
1	Suggestion that public health outcomes should be included in the Housing Strategy.	The Barnet Joint Social Care Needs Assessment will set out public health outcomes as they relate to housing. This is currently being produced and will be published in September 2015.
2	Suggestion that overseas buyers should not be able to buy up properties and leave them empty for investment purposes.	The council cannot prevent overseas buyers from purchasing properties. Buyers will have to pay council tax on their property. Where possible the council will establish a policy on the local marketing of properties to ensure people living and working in the borough have the opportunity of purchasing homes built on council land before marketing more widely.