


16 January 2017

Committee	Council
Date	Tuesday, 24 January 2017
Time of Meeting	6:00 pm
Venue	Council Chamber

ALL MEMBERS OF THE COUNCIL ARE REQUESTED TO ATTEND



**for Sara J Freckleton
Borough Solicitor**

Agenda

- 1. APOLOGIES FOR ABSENCE**
- 2. DECLARATIONS OF INTEREST**

Pursuant to the adoption by the Council on 26 June 2012 of the Tewkesbury Borough Council Code of Conduct, effective from 1 July 2012, as set out in Minute No. CL.34, Members are invited to declare any interest they may have in the business set out on the Agenda to which the approved Code applies.



	Item	Page(s)
3.	MINUTES	1 - 12
	To approve the Minutes of the meeting held on 6 December 2016.	
4.	ANNOUNCEMENTS	
	1. When the continuous alarm sounds you must evacuate the building by the nearest available fire exit. Members and visitors should proceed to the visitors' car park at the front of the building and await further instructions (staff should proceed to their usual assembly point). Please do not re-enter the building unless instructed to do so.	
	In the event of a fire any person with a disability should be assisted in leaving the building.	
	2. To receive any announcements from the Chairman of the Meeting and/or the Chief Executive.	
5.	ITEMS FROM MEMBERS OF THE PUBLIC	
	a) To receive any questions, deputations or petitions submitted under Council Rule of Procedure.12.	
	<i>(The deadline for public participation submissions for this meeting is 18 January 2017).</i>	
	b) To receive any petitions submitted under the Council's Petitions Scheme.	
6.	MEMBER QUESTIONS PROPERLY SUBMITTED IN ACCORDANCE WITH COUNCIL PROCEDURE RULES	
	To receive any questions submitted under Rule of Procedure 13. Any items received will be circulated on 24 January 2017.	
	<i>(Any questions must be submitted in writing to Democratic Services by, not later than, 10.00am on the working day immediately preceding the date of the meeting).</i>	
7.	PETITION - SALE OF GASTONS TO TEWKESBURY BATTLEFIELD SOCIETY	13 - 25
	To consider whether Officers should raise the issues within the Petition through the Borough Plan process and explore with Tewkesbury Battlefield Society, the Tewkesbury School Trust and landowners the potential for improving the Battlefield as a cultural and heritage asset.	
8.	MEMBER ALLOWANCE SCHEME 2017/18	26 - 34
	To determine the Scheme of Allowances to take effect on 1 April 2017 until 31 March 2018 having regard to the recommendations of the Independent Remuneration Panel.	

9. APPOINTMENT OF CIVIC HEADS FOR THE MUNICIPAL YEAR

To recommend the appointment of Civic Heads for the Municipal Year 2017/18.

1. Mayor

It is usual practice that the current Deputy Mayor be appointed Mayor for the ensuing Municipal Year.

2. Deputy Mayor

To receive nominations for the appointment of Deputy Mayor for the ensuing Municipal Year.

(Potted biographies for the nominations received will be placed in the pigeon-holes prior to the start of the meeting)

10. LEAD MEMBER PRESENTATION - FINANCE AND ASSET MANAGEMENT

To receive a presentation from Councillor Dave Waters – Lead Member for Finance and Asset Management.

11. NEIGHBOURHOOD PLANS - WINCHCOMBE AND SUDELEY (COMBINED) AND HIGHNAM

35 - 78

To agree that the 'Winchcombe and Sudeley Combined Neighbourhood Plan' and the 'Highnam Neighbourhood Plan' are made part of the Development Plan for Tewkesbury Borough; and to delegate authority to the Head of Development Services, in agreement with the relevant Qualifying Body, to correct any minor errors, such as spelling, grammar, typographical or formatting errors, that do not affect the substantive content of the plans.

12. HOUSING STRATEGY 2017-2021

79 - 250

To adopt the Housing Strategy 2017-2021.

13. APPOINTMENT OF EXTERNAL AUDITOR

251 - 256

At its meeting on 14 December 2016 the Audit Committee considered a report on the appointment of External Auditors for 2018/19 and **RECOMMENDED TO COUNCIL** that it opt-in to the Public Sector Audit Appointments Ltd (PSAA) as the Sector Led Body (SLB) for the appointment of the Council's External Auditors from 2018/19.

14. COUNTER FRAUD UNIT BUSINESS CASE

257 - 296

At its meeting on 14 December 2016 the Audit Committee considered a report on the business case for the Counter Fraud Unit and **RECOMMENDED TO COUNCIL** that it approve option 3 of the business case to establish a permanent Counter Fraud Unit, subject to similar approval being made at all partner authorities and that, should all necessary approvals not be forthcoming, option 2 be the Council's default position.

Item	Page(s)
15. SCHEDULE OF MEETINGS 2017/18	297 - 300
To adopt a Schedule of Meetings for the 2016/17 Municipal Year.	
16. ROYAL GARDEN PARTY	
To agree the nominations for the Council's representation at the Royal Garden Party in May/June 2017.	
The dates provided are Tuesday 16 May, Tuesday 23 May and Thursday 1 June 2017.	
17. SEPARATE BUSINESS	
The Chairman will move the adoption of the following resolution:	
That under Section 100(A)(4) Local Government Act 1972, the public be excluded for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Act.	
18. SEPARATE MINUTES	301 - 304
To approve the separate Minutes of the meeting held on 6 December 2016.	

Recording of Meetings

Please be aware that the proceedings of this meeting may be recorded and this may include recording of persons seated in the public gallery or speaking at the meeting. Please notify the Democratic Services Officer if you have any objections to this practice and the Mayor will take reasonable steps to ensure that any request not to be recorded is complied with.

Any recording must take place in such a way as to ensure that the view of Councillors, Officers, the public and press is not obstructed. The use of flash photography and/or additional lighting will not be allowed unless this has been discussed and agreed in advance of the meeting.

TEWKESBURY BOROUGH COUNCIL

Minutes of a Meeting of the Council held at the Council Offices, Gloucester Road, Tewkesbury on Tuesday, 6 December 2016 commencing at 6:00 pm

Present:

The Worshipful the Mayor
Deputy Mayor

Councillor Mrs G F Blackwell
Councillor H A E Turbyfield

and Councillors:

R E Allen, P W Awford, Mrs K J Berry, R A Bird, R Bishop, G J Bocking, K J Cromwell, D M M Davies, Mrs J E Day, M Dean, R D East, A J Evans, D T Foyle, R Furolo, Mrs P A Godwin, Mrs M A Gore, Mrs J Greening, Mrs R M Hatton, B C J Hesketh, Mrs S E Hillier-Richardson, Mrs A Hollaway, Mrs E J MacTiernan, J R Mason, Mrs H C McLain, A S Reece, V D Smith, T A Spencer, Mrs P E Stokes, P D Surman, M G Sztymiak, R J E Vines, D J Waters, M J Williams and P N Workman

CL.59 HONORARY ALDERMAN MARGARET OGDEN

- 59.1 The Mayor advised that this was the first Council meeting since the sad loss of Honorary Alderman Margaret Ogden who had passed away on 30 October. She explained that Margaret had been a Borough Councillor for 20 years and an Honorary Alderman since 2015. She would be sadly missed by all that had known her. The Mayor invited any other Members who wished to speak to do so and the Leader of Council, Councillor Vines, indicated that Margaret had been a formidable, kind, sympathetic and sensitive figure at the Council for many years. She would be sadly missed by all that had met her and been 'looked after' and guided by her over her time as a Councillor. Councillor Stokes advised that she and Margaret had been friends for many years and had been members of the same heart support group whilst they had been on the Council together; she had been extremely sad to hear the news of her death. Councillor Davies advised that he had known Margaret for many years; she had been extremely loyal to the Council and the Borough as a whole and he had been saddened to hear of her death.
- 59.2 The Mayor thanked those Members for their comments and asked all in attendance to join in her a minute's silence to show their respect.

CL.60 APOLOGIES FOR ABSENCE

- 60.1 An apology for absence had been received from Councillor J H Evetts.

CL.61 DECLARATIONS OF INTEREST

- 61.1 The Committee's attention was drawn to the Tewkesbury Borough Council Code of Conduct which was adopted by the Council on 26 June 2012 and took effect from 1 July 2012.
- 61.2 There were no declarations of interest made on this occasion.

CL.62 MINUTES

62.1 The Minutes of the meeting held on 20 September 2016, and those of the Extraordinary meetings held on 19 and 25 October 2016, copies of which had been circulated, were approved as correct records and signed by the Mayor, subject to the following amendments:

- 20 September 2016 – Minute No. 41.3 – Insert before final sentence ‘However, the absence of a five year housing supply would be given added weight which might be capable of outweighing the planning (Neighbourhood Plan) objections to a development’.
- 25 October 2016 – Minute No. 56.3 – Amend sentence to read ‘At this stage the Council had no further information but this matter would be considered in detail when further information was received. ~~and it was anticipated at this stage that any shortfall would be dealt with through the Plan review’.~~

CL.63 ANNOUNCEMENTS

63.1 The evacuation procedure, as set out on the Agenda, was advised to those present.

63.2 The Mayor reminded Members that they had received a report, circulated separately, which detailed the boundary review – Council size submission.

CL.64 ITEMS FROM MEMBERS OF THE PUBLIC

64.1 There were no items from members of the public on this occasion.

CL.65 MEMBER QUESTIONS PROPERLY SUBMITTED IN ACCORDANCE WITH COUNCIL PROCEDURE RULES

65.1 There were no Member questions on this occasion.

CL.66 LEAD MEMBER PRESENTATION

66.1 The Mayor invited the Lead Member for Clean and Green Environment, Councillor J R Mason, to make his presentation to the Council.

66.2 The presentation covered the following main points:

- Waste, Recycling and Street Cleansing Services – Partnership Working – The Council was a member of the Gloucestershire Joint Waste Committee which was the strategic coordinator for waste collection (Districts) and disposal (County). The Joint Waste Committee was served by the Joint Waste Team whose principal role was to specify, plan, procure, monitor, co-ordinate and improve the delivery of waste, recycling and street cleansing services. The Joint Waste Team was delivering a number of large projects for the Council including: procurement of a new waste, recycling and street cleaning vehicle fleet; retendering the contract for the Materials Recovery Facility (MRF) for recycling; calendars, campaigns and other waste communications; and monitoring of contracts with service providers including Ubico, Grundon, WEEE (electricals) and textile recyclers. Next year the team would be prioritising communications and service reviews of trade waste, garden waste and bulky waste.

- Direct Services Provided by Ubico – Ubico had commenced trading in April 2015 and provided direct services including waste (garden, bulky, clinical and fly-tip clearance), recycling, food and clinical waste as well as street cleansing and grounds maintenance services. Currently 99.95% of refuse, recycling, garden, food and trade waste collections were on schedule.
- Performance To Date up to Quarter 2 of 2016/17 – 54.94% of waste was recycled, reused or composted which was an increase of 3.15% between July and September 2016. In terms of performance against the previous year, refuse was down by 223.75 tonnes which meant a decrease in waste going to landfill; recycling was up by 282.28 tonnes; garden waste had increased by 411.95 tonnes; and the collection of food waste had increased by 266.54 tonnes.
- Environmental Health – 1,041 service requests had been dealt with by the Environmental Health and Licensing Teams since 1 April 2016. Highlights included: three filthy and verminous premises being cleared; two Notices being issued to deal with poor drainage; and two premises causing a statutory nuisance had been dealt with.
- Housing Conditions – 25 housing condition complaints had been investigated since April with three formal actions being taken: one Prohibition Order; one Improvement Notice; and one Hazard Awareness Notice. In terms of Disabled Facilities Grants, 60 applications had been received since April and around 40 were still being delivered; these included adaptations such as showers, stair lifts and door threshold ramps.
- Warm and Well Scheme – This aimed to improve energy efficiency in the home and reduce the risk of fuel poverty and associated health problems. Since 2001, the scheme had provided energy advice to thousands of households in Gloucestershire and had improved more than 41,500 properties. Since April, there had been 186 enquiries to the scheme with 23 applications being processed for new (free government) boilers and seven properties had been insulated.
- Other Pollution Control – The Council was duty bound to monitor air quality and Officers visited 17 monitoring sites in the Borough on a monthly basis to place diffusion tubes to monitor that data. There was one air quality management area in Tewkesbury, centred at the lower end of Tewkesbury High Street, and the information gained from the monitoring sites was used to inform control measures and developments. Officers also inspected 25 industrial premises that emitted to the atmosphere and checked the quality of private water supplies of which there were 15 in the Borough.
- Planning Applications – 176 applications had been considered for environmental health matters; this could also include ‘screening’ applications for contaminated land matters e.g. making sure that areas which may have suffered historic contamination, but were now to be developed, were treated appropriately.
- Food Inspections – There were over 800 registered food premises/operators in the Borough and, since April, Officers had inspected 115 premises, served 23 Hygiene Improvement Notices and undertaken two prosecutions. However, the majority of premises in the Borough were at a good standard with most rated at the maximum five stars in the national food hygiene rating system. Since April there had been 62 food complaints received and investigated; 131 infectious diseases investigated; and Officers had been helping an exporter to China by providing certificates for shellfish exports.

- Regulation of Health and Safety at Work – Officers had attended an Inquest and gave evidence regarding a fatality at the Morrison's supermarket in Tewkesbury; the evidence given was based on a comprehensive investigation that had been carried out. Since April, 30 serious accidents / incidents / near misses were reported from businesses in the Borough and investigated by Officers along with 14 complaints regarding health and safety at work issues. The environmental health, housing and property teams worked together to carry out weekly safety inspections of a dozen children's playgrounds throughout the Borough. In addition, the environmental health team was working with other teams throughout the County, the Trading Standards service and the Growth Hub on a 'Better Business for All' project which aimed to demystify business regulation, increase the good working relations between business and regulators and show how good awareness of standards could increase and improve productivity and profits.
- Environmental Crimes – Although flytipping enforcement was carried out over the whole District, a focus was being placed on 'hotspots' in Sandhurst Lane, Longford and Coriander Drive, Churchdown with some initial success being seen. 492 fly tips had been reported, investigated and cleared in the six months since April 2016. In addition, 144 abandoned vehicles had been dealt with in the same period. The Council, in partnership with Parish and Town Councils, was looking to employ an Environmental Warden in the new financial year and, to date, 11 Parish Councils had expressed an interest in the proposed joint venture which would help combat environmental crimes especially dog fouling.
- Environmental Crimes – Education – Three times a year, Officers and local Police worked with a different Parish to carry out dog fouling patrols in the early morning and evening to promote responsible dog ownership. This was also a good opportunity to promote the Council's Paws on Patrol Scheme for dog walkers to pass community safety and environmental crimes over to the appropriate authorities. There were also over 200 volunteer litter pickers that the Council supported; this included the provision of insurance.
- Grounds Maintenance and Street Cleaning – Ubico serviced between 300 and 320 acres throughout the Borough and carried out environmental support services such as mowing; strimming; hedge cutting; shrub maintenance; tree planting and maintenance; sports field marking and maintenance; cemetery maintenance; and street cleansing. On average, grass cutting was carried out on each area of land 12 times a year with sports pitches being maintained and marked out annually. In addition, supervisors carried out regular, unannounced, quality checks.
- Land Drainage – The Council was contracted by Gloucestershire County Council to ensure riparian owners kept their watercourses clear and able to convey water. 42 complaints about watercourses had been considered since April. 15 planning applications had been considered for potential adverse land drainage implications and major watercourse improvements were soon to be delivered in Bishop's Cleeve and Chaceley using funding from a variety of external sources. There were other projects in the pipeline and additional projects were always being considered. 9,000 kilometres of Tewkesbury Borough Council owned watercourses was annually maintained with programmes of de-silting and flail cutting of vegetation.

- Licensing – The Council was the licensing authority for a number of different licenses, the principal ones being taxis, alcohol and gambling licences. The Council did not only process and issue licences but also carried out regulatory activities to make sure licence conditions were kept to.

66.3 The Mayor thanked the Lead Member for his informative presentation and invited questions from Members. In response, a Member queried what the actual recycling percentages were currently. She was advised that they were currently at 54%. In terms of riparian ownership, a Member questioned how the Council could ensure people accepted their responsibilities and what sanctions it had if they did not. In response, Members were advised that, fortunately, when owners were asked to carry out works they usually did which meant the Council did not need to take sanctions. However, it did have the power, should it wish to use it, to serve Notices under the Land Drainage Act. This power had been delegated to it by the Lead Local Flood Authority, Gloucestershire County Council; there were approximately 100 served in a year.

66.4 Referring to the Environmental Warden, a Member questioned who would pay for the post. In response, she was advised that the scheme would be cost neutral for Tewkesbury Borough Council or it would not go ahead. The Borough Council would put in resources in kind i.e. management, payroll, HR etc. and Parishes would contribute on a pro-rata basis depending on what they wanted from the service. The next stage of the process was to hold a meeting with Parishes to put together a joint agreement; once that agreement was signed the scheme could go ahead. With regard to grass cutting, a Member understood from a recent place planning meeting that this was carried out on a 2/3 week cycle and he questioned whether Members could have the schedule for different areas of the Borough. He was advised that this could be provided. In terms of flytipping, and the prosecution thereof, the Lead Member indicated that this was a nationwide issue but the Council was taking steps which he hoped would start to see some results, including prosecutions, soon.

66.5 A Member made a complaint that the waste collections in her road on Cleeve Hill were regularly missed and she felt this needed to be addressed; she had previously been told that this was due to the road being on a steep hill but she did not feel that was an acceptable reason for so many collections being missed. The Lead Member undertook to look into this issue. Another Member mentioned particular instances of broken glass being a problem in his area and the Lead Member suggested that the local Parish Council may wish to recruit litter pickers to tackle that issue.

66.6 The Lead Member indicated that the Council's Environmental Health Manager, David Steels, would be leaving the Council shortly and he took the opportunity to wish him luck for his future endeavours. Members joined him in those sentiments.

66.7 Accordingly, it was

RESOLVED That the presentation provided by the Lead Member for Clean and Green Environment be **NOTED**.

CL.67 BOUNDARY REVIEW - COUNCIL SIZE SUBMISSION

67.1 The report, circulated separately at Pages No. 1-53, set out a draft submission on the future size of the Council which it was proposed would be sent to the Local Government Boundary Commission for England in response to its review of the Borough Ward boundaries. Members were asked to approve that submission.

- 67.2 The Head of Democratic Services explained that the Local Government Boundary Commission for England had decided to review the Borough's Electoral Wards as, in 2015, eight of the Council's 22 Wards had an electoral imbalance in excess of +/- 10. The first stage of that process was for the Council to submit its submission on its future size which included information such as governance; scrutiny; outside bodies and representational roles; and comparisons to the Council's nearest neighbours. The Boundary Review Working Group had considered the information and recommended that the Council size should remain at 38 Councillors as it was currently.
- 67.3 The draft submission document had been sent to all Members, the Council's Corporate Leadership Team, Heads of Service and the Local Government Boundary Commission for England for comment. A couple of minor comments had been made and the Commission had confirmed that the submission met its criteria. It now remained for the Council to agree whether or not it was happy with it. If the submission document was agreed by the Council it would be considered by the Commission on 20 December and the Council was likely to hear early in January what its view was. Once the submission was accepted, the Council would need to undertake a review of Wards which would be the more difficult part of the process.
- 67.4 Referring to housing numbers, some Members found it hard to see why they were so low. In response, the Head of Democratic Services explained that the building forecast being referred to had been put together by the Forward Planning team so she could not answer questions on specific sites herself; however, in order for a site to meet the Local Government Boundary Commission for England criteria it would have to be complete and have registered electors living in the properties by 2022. This meant that only sites that had planning consent and were being built had been included. She also indicated that the 2022 forecast may vary slightly when the final submission was made to the Commission dependant on a final check of the development sites, and the Wards they fell within, by the Forward Planning Team. In terms of the Joint Core Strategy, the Commission had been advised that this was ongoing and could result in a vastly different development outlook but it had advised that it was going to undertake the review now and if another review needed to be undertaken within ten years then so be it. In response to a query regarding transient residents, foreign nationals and those who were disinterested in registering to vote, the Head of Democratic Services reiterated that the Commission was only interested in the electorate; it was understood that this would change and that the information provided now was only a snapshot in time but this was what the Commission required.
- 67.5 Upon being proposed and seconded, it was
- RESOLVED** That the Council's submission to the Local Government Boundary Commission for England on the future size of the Council be **APPROVED**.

CL.68 RECOMMENDATIONS FROM EXECUTIVE COMMITTEE**Medium Term Financial Strategy**

- 68.1 At its meeting on 23 November 2016 the Executive Committee had considered a report on the Medium Term Financial Strategy 2017/18-2021/22. The Executive Committee had recommended to Council that the Strategy be adopted subject to amendments which would add flexibility to it:
- Paragraph 1.1 – amend sentence to read ‘...the level of savings and increased income that are likely to be needed. ~~to keep Council Tax affordable...~~’
 - Paragraph 10.3 – amend sentence to read ‘...given the size of the deficit faced by the Council it is recommended that this strategy is continued **for 2017/18 recognising the likely need for further increases in future years**’.
 - Table 8 – amend heading to read ‘Impact of ~~proposed~~ charges per Council tax band’.
 - Paragraph 10.5 – delete last sentence ‘~~Projections of future increases to council tax will ensure the council remains within the bottom quartile for council tax charges and meet its priority to maintain a low council tax.~~’
- 68.2 The report that had been considered by the Executive Committee had been circulated with the Agenda for the current meeting at Pages No. 23-48.
- 68.3 The recommendation from the Executive Committee was proposed and seconded by the Chair and Vice-Chair of that Committee and accordingly it was

RESOLVED

That the Medium Term Financial Strategy 2017/18-2021/22 be **ADOPTED** subject to the following amendments which would add flexibility to it:

- Paragraph 1.1 – amend sentence to read ‘...the level of savings and increased income that are likely to be needed. ~~to keep Council Tax affordable...~~’;
- Paragraph 10.3 – amend sentence to read ‘...given the size of the deficit faced by the Council it is recommended that this strategy is continued **for 2017/18 recognising the likely need for further increases in future years**’;
- Table 8 – amend heading to read ‘Impact of ~~proposed~~ charges per Council tax band’; and
- Paragraph 10.5 – delete last sentence ‘~~Projections of future increases to council tax will ensure the council remains within the bottom quartile for council tax charges and meet its priority to maintain a low council tax.~~’

CL.69 REVIEW OF HACKNEY CARRIAGE AND PRIVATE HIRE POLICY

69.1 At its meeting on 16 June 2016 the Licensing Committee had considered the Hackney Carriage and Private Hire Driver's Policy. The Licensing Committee had recommended to Council that it be adopted subject to the following amendments:

- **Paragraph 2.8 Security and CCTV**

There is no mandatory requirement for CCTV system in the licensed vehicles. Operators and drivers may install such equipment with prior written notification being supplied to the Council. Use of CCTV must be clearly indicated by signs in the vehicle including contact details for the system manager/operator. All such equipment and images must be operated in accordance with the Data Protection Act 1998. It is the responsibility of the driver/operator to ensure compliance. **No audio, video or recording systems shall be installed or operated in the vehicle without prior written notification being supplied to the Council.**

- **Appendix E, Paragraph 9**

Major traffic offences

~~Isolated convictions, without disqualification, for a major traffic offence should not prevent an applicant from gaining a licence or an existing licence holder from keeping their licence but will normally merit a warning as to future driving and advice on the standard expected of hackney carriage and private hire drivers. More than one.~~ Any conviction for a major traffic offence within the last two years would require the application, or an existing licence holder, to be referred to the Licensing Sub-Committee for a decision. No further application would normally be considered until a period of three years free from convictions has elapsed.

Where an application has been refused, or an existing licence holder suspended because of this provision, they may be required to pass the DVSA Taxi and Private Hire Assessment before the licence is granted or the suspended licence reinstated.

69.2 The report that had been considered by the Licensing Committee had been circulated with the Agenda for the current meeting at Pages No. 49-92.

69.3 In proposing the recommendation from the Committee, the Chair of the Committee advised that, following the February meeting of the Licensing Committee, a six month consultation period had been undertaken. The five responses to the consultation had been dealt with by the Committee at its meeting in June, as per the amendments which had been outlined within the Committee's decision on the matter, and the Council was now asked to agree in line with that recommendation. The Licensing Committee Chair also felt that, once the Policy was in place, any minor amendments needed to ensure it remained in line with legislation should be delegated to the Deputy Chief Executive, the appropriate Lead Member and the Chair of the Licensing Committee to ensure it remained up to date and he so proposed. Members generally felt that this seemed a sensible approach.

69.4 During the brief discussion which ensued, a Member questioned why the vehicles could not have audio systems installed; he was of the view that this needed to be reworded so that it did not cause confusion. In response, the Environmental Health Manager confirmed that audio referred to recording in vehicles rather than radios and he undertook to look at the policy to see if this could be clarified. In terms of the tightening of the criteria which established if someone was a fit and proper person to hold a licence, the Licensing Committee Chair indicated that when applications for licences were considered, the Sub-Committee was provided with a lot of information to help it decide whether the person in question was or was not a fit and proper person and it was felt to be absolutely necessary that this process was as stringent as possible given the driver would ultimately be responsible for members of the

public.

69.5 Upon being proposed and seconded, it was

RESOLVED

1. That the Hackney Carriage and Private Hire Driver's Policy be **ADOPTED** subject to the following amendments:

- **Paragraph 2.8 Security and CCTV**

There is no mandatory requirement for CCTV system in the licensed vehicles. Operators and drivers may install such equipment with prior written notification being supplied to the Council. Use of CCTV must be clearly indicated by signs in the vehicle including contact details for the system manager/operator. All such equipment and images must be operated in accordance with the Data Protection Act 1998. It is the responsibility of the driver/operator to ensure compliance. **No audio, video or recording systems (this does not include a car radio) shall be installed or operated in the vehicle without prior written notification being supplied to the Council.**

- **Appendix E, Paragraph 9**

Major traffic offences

~~Isolated convictions, without disqualification, for a major traffic offence should not prevent an applicant from gaining a licence or an existing licence holder from keeping their licence but will normally merit a warning as to future driving and advice on the standard expected of hackney carriage and private hire drivers. More than one.~~ Any conviction for a major traffic offence within the last two years would require the application, or an existing licence holder, to be referred to the Licensing Sub-Committee for a decision. No further application would normally be considered until a period of three years free from convictions has elapsed. Where an application has been refused, or an existing licence holder suspended because of this provision, they may be required to pass the DVSA Taxi and Private Hire Assessment before the licence is granted or the suspended licence reinstated.

2. That authority be delegated to the Deputy Chief Executive, in consultation with the Lead Member and Chair of the Licensing Committee, to make any minor amendments in line with legislation.

CL.70 REVIEW OF PROTOCOL FOR COUNCILLORS AND OFFICERS INVOLVED IN THE PLANNING PROCESS

70.1 At its meeting on 22 November 2016 the Standards Committee considered amendments to the Protocol for Councillors and Officers Involved in the Planning Process and recommended to Council that the revised Protocol be adopted, subject to the following amendments:

- Appendix A – Planning Obligations Officer Working Group – Terms of Reference – point 4 - amend to read '...on the draft **Heads of Terms** for major applications...';

- Appendix B – Summary Guide of Do’s and Don’ts – First point under ‘Do’ – amend to read ‘Do always ~~involve Officers and structure~~ **ensure that any** discussions with developers **are structured and involve Officers**’;
- Appendix B - Summary Guide of Do’s and Don’ts – Point 12 under ‘Do’ – remove wording ‘~~Do use Meetings to show leadership and vision~~’;
- Procedure for Planning Committee Site Visits – Paragraph 1.3 - amend to read ‘...visits subject to ~~the~~ this protocol...’; and
- Procedure for Planning Committee Site Visits – Paragraph 3.2 – fifth bullet point – amend to read ‘Local Ward Members (**see 2.1**) will be asked to highlight any local issues relevant to the site visit’.

70.2 The report that had been considered by the Executive Committee had been circulated with the Agenda for the current meeting at Pages No. 93-176.

70.3 In proposing the recommendation, the Standards Committee Chair advised that, in May 2016, the Council had approved, with some slight amendments, the continuation of the Scheme of Public Participation at Planning Committee following its successful trial period. The Protocol for Members and Officers Involved in the Planning Process had been comprehensively reviewed in 2015 and had now been given further consideration in light of the continuation of the Public Participation Scheme. He therefore proposed that the Protocol, which was attached at Appendix 1 to the report, together with the additional amendments which were listed on the Agenda, be approved. He confirmed that the recommended Protocol took into account the views expressed by individual Members and by the Planning Committee which he felt was important.

70.4 During the discussion which ensued, a Member questioned whether it had always been the case that the Development Manager had the discretion to refuse a Member’s request for a site visit. In response, he was advised that this approach had been in operation since the new Protocol had been implemented in April 2015. In practice this had not happened to date; if it did happen, and the Member did not agree with the decision of the Development Manager, there was no formal appeals process in place but the Member could bring the issue to the attention of the Corporate Leadership Team and they would investigate. Referring to Paragraph 3.4.4 of the Protocol, a Member indicated that he was not aware of written records of formal meetings undertaken between Officers and developers. In response, the Borough Solicitor confirmed that this was designed to protect Councillors against claims of pre-determination. It did not apply in the same way to Officers as it was their job to process applications.

70.5 Referring to his own situation, a Member expressed the view that the Council needed to ensure there was a way of connecting to, and listening to, its customers for example the use of an Agents Forum. He felt this worked well in other areas and it was something that could be useful in Tewkesbury Borough.

70.6 Having considered the report and, upon being proposed and seconded, it was

RESOLVED

That the revised Protocol for Councillors and Officers Involved in the Planning Process be **ADOPTED**, subject to the following amendments:

- Appendix A – Planning Obligations Officer Working Group – Terms of Reference – point 4 - amend to read ‘...on the draft **Heads of Terms** for major applications...’;
- Appendix B – Summary Guide of Do’s and Don’ts – First point under ‘Do’ – amend to read ‘Do always ~~involve Officers and structure~~ **ensure that any** discussions with developers **are structured and involve Officers**’;

- Appendix B - Summary Guide of Do's and Don'ts – Point 12 under 'Do' – remove wording '~~Do use Meetings to show leadership and vision~~';
- Procedure for Planning Committee Site Visits – Paragraph 1.3 - amend to read '~~...visits subject to the~~ this protocol...'; and
- Procedure for Planning Committee Site Visits – Paragraph 3.2 – fifth bullet point – amend to read 'Local Ward Members (**see 2.1**) will be asked to highlight any local issues relevant to the site visit'.

CL.71 SEPARATE BUSINESS

71.1 The Mayor proposed, and it was

RESOLVED That, under Section 100(A)(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely discussion of exempt information as defined in Part 1 of Schedule 12A of the Act.

CL.72 SEPARATE MINUTES

72.1 The Separate Minutes of the meeting held on 20 September 2016, and those of the Extraordinary Meetings held on 19 and 25 October 2016, copies of which had been circulated, were approved as correct records and signed by the Mayor.

CL.73 SEPARATE RECOMMENDATIONS FROM EXECUTIVE COMMITTEE

Commercial Property Investment Strategy

(Exempt –Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972 –Information relating to the financial or business affairs of any particular person (including the authority holding that information))

73.1 The Council considered a recommendation from the Executive Committee on the Commercial Property Investment Strategy. Members resolved, in line with the recommendation from the Executive Committee, that the Strategy be approved and that a number of delegations be agreed to allow the acquisition of assets etc.

Review of Development Management Team Staffing Structure

(Exempt –Paragraph 1 of Part 1 of Schedule 12A of the Local Government Act 1972 – Information relating to any individual)

73.2 The Council considered a recommendation from the Executive Committee on a review of the Development Management structure. Members resolved, in line with the recommendation from the Executive Committee, that the proposals be agreed as set out within the report.

Proposed Expansion to the Council's Vehicle Fleet

*(Exempt –Paragraph 5 of Part 1 of Schedule 12A of the Local Government Act 1972
–Information in respect of which a claim to legal professional privilege could be
maintained in legal proceedings)*

- 73.3 The Council considered a recommendation from the Executive Committee on a proposal to expand the Council's vehicle fleet. Members resolved, in line with the recommendation from the Executive Committee, that the proposals be agreed as set out within the report.

The meeting closed at 7:45 pm

TEWKESBURY BOROUGH COUNCIL

Report to:	Council
Date of Meeting:	24 January 2017
Subject:	Petition - Sale of Gastons to Tewkesbury Battlefield Society
Report of:	Julie Wood, Head of Development Services
Corporate Lead:	Robert Weaver, Deputy Chief Executive
Lead Member:	Councillor R A Bird
Number of Appendices:	One

Executive Summary:

A petition was received by the Council from Tewkesbury Battlefield Society on 11 December 2016. The petition requests that the Council:

- communicate to the Governors of Tewkesbury School our disagreement with their decision not to sell the Gastons to the Tewkesbury Battlefield Society;
- make clear any aspiration to sell the Gastons for development purposes is wholly inappropriate given its historical significance and will be vigorously opposed if attempted by the Trustees; and
- consider formally designating the Gastons, in the Local Plan, as the intended site for the future creation of a Heritage Park for Tewkesbury and work with the Society and residents to deliver this objective.

The Council has an agreed process for dealing with petitions, the detail of which is set out in Paragraph 1.3 of the Petition Scheme, which is attached as Appendix 1.

This report has been produced to enable Members to consider the request of the petitioners and outlines recommendations for responding to each of these requests.

Recommendation:

That the Council requests Officers to consider the issues raised within the Petition through;

- 1. the Borough Plan process; and**
- 2. exploring with Tewkesbury Battlefield Society, the Tewkesbury School Trust and landowners the potential for improving the Battlefield as a cultural and heritage asset.**

Reasons for Recommendation:

To determine an appropriate course of action as required by the Petition Scheme.

<p>Resource Implications:</p> <p>Officer time in considering the issues raised within the petition.</p>
<p>Legal Implications:</p> <p>The petition must be considered in accordance with the Council's Petition Scheme. The Scheme sets out a number of options for the Council following consideration of the Petitioner's request.</p>
<p>Risk Management Implications:</p> <p>None at this stage.</p>
<p>Performance Management Follow-up:</p> <p>Monitoring reports will be provided through the quarterly Performance Tracker.</p>
<p>Environmental Implications:</p> <p>None directly related to the report other than the potential future impact on the Battlefield.</p>

1.0 INTRODUCTION/BACKGROUND

- 1.1 The Council's Petition Scheme; approved 28 September 2010 (based on the national model scheme) is designed to allow the public to have easy access to information about how to petition their local authority and they will know what to expect from their local authority in response. Included within the Scheme is the requirement to have a Council debate should a certain number of signatures be achieved. Tewkesbury Borough Council has set that threshold at 100 signatures. The current petition qualifies for a Council debate.
- 1.2 The legislation also recommends a 15 minute maximum period for the debate and recognises that the issue may be referred to another Committee where the matter is not one reserved for Council. The purpose of the requirement for Council debate therefore, is not to ensure that the final decision relating to the petition is made at that Council meeting but to increase the transparency of the decision making process, ensuring that debates on significant petitions are publicised with sufficient notice to enable the Petition organiser and public to attend. It also ensures that local people know their views have been listened to and they have an opportunity to hear their local representative debate their concerns. The outcome of debates will depend on the subject of the petition.

2.0 THE PETITION

- 2.1 The petition was received on 11 December 2016 from Mrs Christine Laird. It has 2,741 signatures, which is in excess of the 100 signatures required to trigger a Council debate. In addition, the Battlefield Society has undertaken its own online petition which contains 386 signatures.

2.2 The Council is therefore required to debate the petition in accordance with the Petitions Scheme. The process for dealing with petitions, agreed by Tewkesbury Borough Council is attached at Appendix 1. Paragraph 5.1 of the Petitions Scheme states that the petition organiser will be given five minutes to present the petition at the meeting and the petition will then be discussed by Councillors for a maximum of 15 minutes. The Council's response to a petition will depend on what a petition asks for and how many people have signed it, but may include one or more of the following:-

- taking the action requested in the petition;
- considering the petition at a Council meeting;
- holding an enquiry into the matter;
- undertaking research into the matter;
- holding a public meeting;
- holding a consultation;
- holding a meeting with petitioners;
- referring the petition for consideration by the Council's Overview and Scrutiny Committee;
- calling a referendum; or
- writing to the petition organiser setting out the Council's views about the request in the petition.

3.0 BACKGROUND INFORMATION TO THE SUBJECT OF THE PETITION

3.1 The petition has been submitted in response to the Battlefield Society's concerns regarding the sale of the Gastons field in Tewkesbury. The land forms part of the registered battlefield (as registered by English Heritage). The land is currently owned by the Tewkesbury School Trust and the Battlefield Society had been under the impression there was agreement the land would be sold to the Society. However, that sale has now been withdrawn.

3.2 Previously, in 2014 the land was nominated and listed as an asset of community value. This listing enables the community to raise funds to bid for the land once it is put up for sale. This listing remains in place for a five year period.

3.3 The justification for the petition sets out:

'We appreciate the Council has no power to instruct the Governors to proceed with the sale as originally promised, but sincerely believe recent events justify our request for some form of intervention. The Gastons has not been well managed by its current owners, the Tewkesbury School Trust for many years and residents remain convinced the Governors of Tewkesbury School, who are also the Trustees of the Charity, only withdrew from the sale of the Gastons to the Battlefield Society because they hope to sell this historic site for more money to a property developer.

It is our view this ambition is inappropriate given its importance in English History. We support the Tewkesbury Battlefield Society's aspiration to transform the Gastons Field into England's first medieval battlefield heritage park. For our part residents are willing to do all we can to help them and the Council realise this ambition – we want to make it happen.

We therefore ask our Council to:

- *communicate to the Governors of Tewkesbury School our disagreement with their decision not to sell the Gastons to the Tewkesbury Battlefield Society;*

- *make clear any aspiration to sell the Gastons for development purposes is wholly inappropriate given its historical significance and will be vigorously opposed if attempted by the Trustees; and*
- *consider formally designating the Gastons, in the Local Plan, as the intended site for the future creation of a Heritage Park for Tewkesbury and work with the Society and residents to deliver this objective.*

4.0 CONSIDERATION OF THE PETITION

- 4.1** In reference to communicating disagreement regarding the decision not to sell the Gastons, it is not appropriate for the Council to communicate between the two parties in this manner.
- 4.2** With regard to planning policy, the Gastons fields area is currently subject to saved policy HEN24: Historic Battlefields of the Adopted Tewkesbury Borough Local Plan to 2011. The policy covers the wider Battle of Tewkesbury (1471) area, including the Gastons, and requires that any proposals for development pay regard to the conservation of the historic landscape. The supporting justification to the policy states that proposals should be able to demonstrate that they respect the character of the registered site and generally retain its openness.
- 4.3** Any proposal for development within the battlefield would be judged against this policy as well as the other saved policies contained within the adopted Borough Plan as well as guidance in the National Planning Policy Framework. Any additional policy approaches to development on the Battlefield would have been determined through the statutory plan making process as set out by Town and Country Planning (Local Planning) (England) Regulations 2012.
- 4.4** The Council, however, is currently preparing a new Tewkesbury Borough Plan to cover the Plan period 2011 to 2031. Through this the Council has the ability to review and update existing policies, such as HEN24, and include new policies to designate land and guide future development. Therefore, the identification of the Gastons as a Heritage Park would be most appropriately considered through this process.

5.0 THE BATTLEFIELD

- 5.1** In respect of the other elements of the petition, the Gastons is one site within the Battlefield. Currently the Council promotes the Battlefield in a number of ways. There is a Battle Trail that is marketed and exhibited through various promotional methods and also at the Tewkesbury Heritage and Visitor Centre. Shortly new signage and interpretation will be installed along the Battlefield. However, there is further potential for the Battlefield to be enhanced as an asset for the community and visitors. It would be beneficial for officers to explore with the Battlefield Society, the Tewkesbury School Trust and other landowners the potential for the other opportunities, through taking a whole Battlefield approach, with the aim of improving the Battlefield as a cultural, tourism and heritage asset.
- 5.2** Therefore, it is recommended that the Council explores the potential for improving the Battlefield as a cultural and heritage asset with the Battlefield Society, Tewkesbury School Trust and other landowners.

6.0 OTHER OPTIONS CONSIDERED

- 6.1** None.

7.0 CONSULTATION

7.1 None.

8.0 RELEVANT COUNCIL POLICIES/STRATEGIES

8.1 As set out in section 4 above.

9.0 RELEVANT GOVERNMENT POLICIES

9.1 As set out in section 4 above.

10.0 RESOURCE IMPLICATIONS (Human/Property)

10.1 Officer time in considering the issues raised as part of the Borough Plan process and improving the Battlefield.

11.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)

11.1 Any proposal for a policy as suggested in the Petition will need to be considered in light of the NPPF and other relevant policies/guidance/legislation through the Borough Plan process.

12.0 IMPACT UPON (Value For Money/Equalities/E-Government/Human Rights/Health And Safety)

12.1 None.

13.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS

13.1 As set out in Section 4 above.

Background Papers: None.

Contact Officer: Andy Sanders, Community and Economic Development Manager
Tel: 01684 272094 Email: andy.sanders@teWKesbury.gov.uk

Appendices: One – Petitions Scheme.



TEWKESBURY BOROUGH COUNCIL PETITIONS SCHEME

1. PETITIONS

1. Tewkesbury Borough Council welcomes petitions and recognises that petitions are one way in which people can let the Council know their concerns. All petitions sent, or presented, to the Council will receive an acknowledgement from the Council within 10 working days of receipt. This acknowledgement will set out what the Council plans to do with the petition. The Council will treat something as a petition if it is identified as being a petition, or if it seems to the Council that it is intended to be a petition.
1. Paper petitions can be sent to Democratic Services, The Council Offices, Gloucester Road, Tewkesbury, Glos, GL20 5TT.
1. Petitions can also be presented to a meeting of the Council or Executive Committee. Scheduled meetings of the Council take place 8 times a year and the Executive Committee meets on a regular basis, the dates and times can be found at http://minutes.tewkesbury.gov.uk/mgCalendarMonthView.aspx?GL=1&bc_r=1 . If you would like to present a petition to the Council, or would like your Councillor, or someone else, to present it on your behalf, please contact Democratic Services on 01684 272021, at least 10 working days before the meeting, for an explanation of the process. If the petition has received 100 signatures or more it will also be scheduled for a Council debate [http://www.tewkesbury.gov.uk/media/word/k/0/Part_4 - Section 1 \(Part 1\) - Meetings and Proceedings of Council \(2\).doc](http://www.tewkesbury.gov.uk/media/word/k/0/Part_4_-_Section_1_(Part_1)_-Meetings_and_Proceedings_of_Council_(2).doc). Should this be the case, the petition organiser will be advised as to whether this will happen at the same meeting, or a later meeting, of the Council.

2.0 WHAT ARE THE GUIDELINES FOR SUBMITTING A PETITION?

2.1 Petitions submitted to the Council must include:

- A clear and concise statement covering the subject of the petition. It should state what action the petitioners wish the Council to take.
- The name and address and signature of any person supporting the petition.

2.2 Petitions should be accompanied by contact details, including an address, for the petition organiser. This is the person that Democratic Services will contact to explain how the Council will respond to the petition. The contact details of the petition organiser will not be placed on the website. If the petition does not identify a petition organiser, Democratic Services will contact signatories to the petition to agree who should act as the petition organiser.

2.3 Petitions which are considered to be vexatious, abusive or otherwise inappropriate will not be accepted. In the period immediately before an election or referendum it may be necessary to deal with petitions differently – if this is the case Democratic Services will explain the reasons and discuss the revised timescale which will apply. If a petition does not follow the guidelines set out above, the Council may decide not to do anything further with it. In this case, Democratic Services will write to the petition organiser to explain the reasons.

3.0 WHAT WILL THE COUNCIL DO WHEN IT RECEIVES MY PETITION?

3.1 An acknowledgement will be sent to the petition organiser within 10 working days of receiving the petition. It will let the organiser know what the Council plans to do with the petition and when the organiser can expect to hear from the Council again. It will also be published on Tewkesbury Borough Council's website.

3.2 If the Council can do what the petition asks for, the acknowledgement may confirm that the action requested has been taken and the petition will be closed. If the petition has enough signatures to trigger a Council debate, or a Senior Officer giving evidence, then the acknowledgement will confirm this and tell the organiser when and where the meeting will take place. If the petition needs more investigation, the organiser will be advised of the planned steps.

3.3 If the petition applies to a planning or licensing application, is a statutory petition (for example requesting a referendum on having an Elected Mayor), or is on a matter where there is already an existing right of appeal, such as Council Tax banding and non-domestic rates, other procedures apply and this scheme will not be relevant.

3.4 The Council will not take action on any petition which it considers to be vexatious, abusive or otherwise inappropriate and will explain the reasons for this in the acknowledgement of the petition.

3.5 To ensure that people know what the Council is doing in response to the petitions received, the details of all petitions submitted to the Council will be published on Tewkesbury Borough Council's website, except in cases where this would be inappropriate. Whenever possible the Council will also publish all correspondence relating to the petition (all personal details will be removed)

4.0 HOW WILL THE COUNCIL RESPOND TO PETITIONS?

4.1 The Council's response to a petition will depend on what a petition asks for and how many people have signed it, but may include one or more of the following:

- taking the action requested in the petition
- considering the petition at a Council Meeting
- holding an inquiry into the matter
- undertaking research into the matter
- holding a public meeting
- holding a consultation
- holding a meeting with petitioners
- referring the petition for consideration by the Council's Overview & Scrutiny Committee *
- calling a referendum
- writing to the petition organiser setting out the Council's views about the request in the petition

* Overview & Scrutiny Committees are Committees of Councillors who are responsible for scrutinising the work of the Council – in other words the Overview & Scrutiny Committee has the power to hold the Council's decision-makers to account. Tewkesbury Borough Council's Overview & Scrutiny Committee consists of 15 Members of the Council who are tasked with scrutinising the work of the Executive Committee and holding the Members of that Committee to account.

4.2 In addition to these steps, the Council will consider all the specific actions it can potentially take on the issues highlighted in a petition. The table below gives some examples:

Petition Subject	Appropriate Steps
Alcohol related crime & disorder	If your petition is about crime or disorder linked to alcohol consumption, the Council may, among other measures, consider the case for placing restrictions on public drinking in the area by establishing a Designated Public Place Order or, as a last resort, imposing an Alcohol Disorder Zone. When an Alcohol Disorder Zone is established the licensed premises in the area where alcohol related trouble is being caused is required to contribute to the costs of extra policing in that area. The Council's response to your petition will set out the steps it intends to take and the reasons for taking this approach.
Anti-Social Behaviour (ASB)	As the elected representatives of the local area, and the Licensing Authority, the Council has a significant role to play in tackling anti-social behaviour. The Council, in conjunction with its partners in the local Community Safety Partnership, has set out minimum service standards for responding to issues of anti-social behaviour. When responding to petitions on ASB, the Council may consider, in consultation with its local partners, all the options available including the powers and mechanisms to intervene as part of its role as Licensing Authority. For example, the Council will work with the Neighbourhood Policing Team in the affected area to identify what action might be taken, including what role CCTV might play, consider identifying a dedicated contact within the Council to liaise with the community and neighbourhood partners on issues of ASB in the area in question and, where appropriate, the Council will alert the Community Safety Partnership and Overview & Scrutiny Committee to the issues highlighted in the petition.

Under Performing Health Services	The Council may work with local health partners to consider the matter raised in the petition including, where appropriate, exploring what role the Local Involvement Network (LINK) might have in reviewing and feeding back on the issue (the LINK is run by local individuals and community groups and independently supported – their role is to find out what people want in terms of local health services, monitor those services and to use their powers to hold them to account). The County Council Health Community & Care Overview & Scrutiny Committee will also be alerted to the petition and, where the matter is sufficiently or potentially serious, the issue will be referred to that Committee for consideration.
----------------------------------	--

4.3 If the petition is about something over which the Council has no direct control (for example, the local railway or hospital) the Council will consider making representations on behalf of the community to the relevant body. The Council works with a large number of local partners and, where possible, will work with these partners to respond to the petition. If the Council is not able to do this for any reason (for example, if what the petition calls for conflicts with Council Policy), then the petition organiser will be advised accordingly. More information on the services for which the Council is responsible can be found on the Council’s website at www.tewkesbury.gov.uk.

4.4 If the petition is about something that a different Council is responsible for, consideration will be given to what the best method is for responding to it. This might consist of simply forwarding the petition to the other Council, but could involve other steps. In any event the petition organiser will be notified of what action has been taken.

5.0 FULL COUNCIL DEBATES

5.1 If a petition contains more than 100 signatures it will be debated by the Council unless it is a petition asking for a Senior Council Officer to give evidence at a public meeting. This means that the issue raised in the petition will be discussed at a meeting which all Councillors can attend. The Council will endeavour to consider the petition at its next meeting, although on some occasions this may not be possible and consideration will then take place at the following meeting. The petition organiser will be given five minutes to present the petition at the meeting and the petition will then be discussed by Councillors for a maximum of fifteen minutes. The Council will decide how to respond to the petition at this meeting. The Council may decide to take the

action that the petition requests, not to take the action requested for reasons put forward in the debate, or to commission further investigation into the matter, for example by a relevant Committee. Where the issue is one on which the Council's Executive Committee is required to make the final decision, the Council will decide whether to make recommendations to inform that decision. The petition organiser will receive written confirmation of this decision. This confirmation will also be published on the Council's website.

6. OFFICER EVIDENCE

6.1 A petition may ask for a Senior Council Officer to give evidence at a public meeting about something for which the Officer is responsible as part of their job. For example, the petition may ask a Senior Council Officer to explain progress on an issue, or to explain the advice given to Members to enable them to make a particular decision.

6.2 If your petition contains at least 100 signatures, the relevant Senior Officer will give evidence at a public meeting of the Council's Overview & Scrutiny Committee. Members of the Council's Corporate Management Team may be called to give evidence in this respect. The organiser should be aware that the Overview & Scrutiny Committee may decide that it would be more appropriate for another Officer to give evidence instead of any Officer named in the petition – for instance if the named Officer has changed jobs. The Committee may also decide to call the relevant Lead Member to attend the meeting. Members of the Overview & Scrutiny Committee will ask the questions at this meeting, but the petition organiser will be able to suggest questions to the Chairman of the Committee by contacting Democratic Services no later than three working days before the meeting.

7. WHAT CAN I DO IF I FEEL MY PETITION HAS NOT BEEN DEALT WITH PROPERLY?

7.1 Should the petition organiser feel that the Council has not dealt with the petition properly, the petition organiser has the right to request that the Council's Overview & Scrutiny Committee reviews the steps that the Council has taken in response to the petition. It is helpful to everyone, and can improve the prospects for a review, if the petition organiser gives a short explanation of the reasons why the Council's response is not considered to be adequate.

7.2 The Overview & Scrutiny Committee will endeavour to consider the request at its next meeting, although, on some occasions, this may not be possible and consideration will take place at the following meeting. Should the Committee determine that the Council has not dealt with the petition adequately, it may use any of its powers to deal with the matter. These powers include instigating an investigation, making recommendations to the Executive Committee and arranging for the matter to be considered at a meeting of the Council.

7.3 Once the appeal has been considered, the petition organiser will be informed of the results within five working days. The results of the review will also be published on the Council's website.

8.0 E-PETITIONS

8.1 The Council welcomes e-petitions which are created and submitted through the website www.tewkesbury.gov.uk . E-petitions must follow the same guidelines as paper petitions. The petition organiser will need to provide the Council with their name, postal address and email address.

8.2 Once registered, the organiser will be asked for the title of the petition. The system will automatically search to see if there is already a petition in operation that deals with the same issues. If there is, the organiser will be asked to review that petition or to decide if their petition covers a new area. After this has been ascertained, the organiser of the petition will be asked to provide further details, including the options for signatories i.e. agree, agree/disagree or agree/disagree/don't know. The organiser will also need to decide how long the petition should be open for signatures. The system will default to allow for a period of 2 months but this can be overridden and extended for up to 12 months in line with the requirements of the organiser.

8.3 When an e-petition is created, it will take up to five working days before it is published online as the suitability of the content must be checked before it is made available for signature.

8.4 If for some reason the Council is unable to publish the petition, the organiser will be contacted within the 5 day period.

8.5 When an e-petition has closed for signature, it will automatically be submitted to Democratic Services. In the same way as a paper petition, an acknowledgement will be sent within 10 working days.

HOW DO I 'SIGN' AN E-PETITION?

- 8.6**
- Go to the Council's website at www.tewkesbury.gov.uk.
 - Click on Council and Democracy
 - Click on Committee Agenda, Minutes and Reports and then e-petitions
 - A list of the e-petitions that are currently active will be displayed
 - Click on the appropriate petition and then "sign a petition".
 - Contact details will need to be provided (name, address and email address) but only the name will be displayed on the website.
- 8.7** A petition may gather names and addresses both in electronic and paper form, although repeat names will be removed. Both petitions must run for the same period of time and must be submitted together.
- 8.8** The Council accepts no liability for the petitions published on the website and the views expressed in the petitions do not necessarily reflect those of the Council.
- 8.9** For further information, help and advice on how to submit an e-petition, contact Democratic Services on 01684 272021 or email democraticservices@tewkesbury.gov.uk.

TEWKESBURY BOROUGH COUNCIL

Report to:	Council
Date of Meeting:	24 January 2017
Subject:	Scheme of Members Allowances
Report of:	Lin O'Brien, Head of Democratic Services
Corporate Lead:	Sara Freckleton, Borough Solicitor
Lead Member:	Councillor R J E Vines
Number of Appendices:	One

Executive Summary:

The Council's current Scheme of Allowances expires on 31 March 2017. In determining a new Scheme of Allowances the Council must have regard to the recommendations of its Independent Remuneration Panel. The Council can determine a Scheme effective from one to four years but, having determined its Scheme, it cannot make any changes to it without considering the recommendations of its Independent Remuneration Panel.

Recommendation:

The Council is asked to determine the Scheme of Allowances to take effect on 1 April 2017 until 31 March 2018 having regard to the recommendations of the Independent Remuneration Panel as set out at Appendix 1.

Reasons for Recommendation:

To enable the Council to put into place a Scheme of Allowances prior to the expiry of the current Scheme.

Resource Implications:

The current budget for Basic Allowances and Special Responsibility Allowances is £331,644. The total cost of the recommendations of the Panel is £4,325 representing a 1.3% increase on this budget.

Legal Implications:

The Local Authorities (Members' Allowances) (England) Regulations 2003, require Authorities to establish and maintain an Independent Remuneration Panel. The purpose of the Panel is to make recommendations to the Authority about the Allowances to be paid to Councillors.

Independent Remuneration Panels will make recommendations which must include the level of Basic Allowance for all Councillors, the level of Special Responsibility Allowances, and to whom they should be paid, and on whether Dependants' Carers' Allowance, Travelling & Subsistence Allowances and Co-Optees' Allowance should be paid and the levels of these Allowances. Schemes must be made by 31 March for implementation in the forthcoming financial year. A Scheme may be amended at any time, following consideration of the Independent Remuneration Panel's recommendations, but may only be revoked with effect from the beginning of a year, except in the case where a Council has begun to operate:

- (a) executive arrangements, where they are being operated in place of existing alternative arrangements;
- (b) alternative arrangements, where they are being operated in place of existing executive arrangements; or
- (c) different executive arrangements which involve an executive which takes a different form.

The 2003 Regulations place certain duties on Local Authorities in connection with publicising the recommendations made by their Independent Remuneration Panel, their Scheme of Allowances and the actual allowances paid to Councillors in any given year.

The Regulations require that, as soon as reasonably practicable after receiving a report from its Panel which sets out the Panel's recommendations, a Local Authority must ensure that copies of the report are available for inspection at its Principal Office at all reasonable hours. A Local Authority must also, as soon as reasonably practicable after it receives the report, publish a Notice in at least one newspaper circulating in its area which:

- States that the Authority has received recommendations from an Independent Remuneration Panel about its Scheme of Allowances.
- States that copies of the report detailing the Panel's recommendations are available for inspection at the Principal Office of the Authority at all reasonable hours.
- States the address of the Principal Office.
- Describes the main features of the Panel's recommendations, including the amounts of allowances the Panel has recommended should be payable to Councillors.

The 2003 Regulations also require that members of the public may take copies of the Panel's report on payment of such reasonable fee as the Local Authority may determine.

In respect of the Local Authority's Scheme of Allowances, the Regulations require that, as soon as reasonably practicable after determining a Scheme of Allowances, a Local Authority must ensure that copies of the Scheme are available for inspection at its Principal Office at all reasonable hours. A Local Authority must also, as soon as reasonably practicable after determining the Scheme, publish a Notice in at least one newspaper circulating in its area which:

- States that the Authority has adopted a Scheme of Allowances and the period for which the Scheme has effect.
- States that copies of the Scheme are available for inspection at its Principal Office at all reasonable hours.
- States the address of the Principal Office.
- Describes the main features of the Scheme, including the amounts of Allowances payable to Councillors under the Scheme.
- States that, in determining the Scheme, the Authority had regard to the recommendations of an Independent Remuneration Panel.
- Describes the main features of the Panel's recommendations, including the amounts of allowances the Panel had recommended should be payable to its Councillors.
- Describes any responsibilities or duties in the Scheme which would merit the payment of a Special Responsibility Allowance and Travelling and Subsistence Allowance.

The final publicity requirement in the Regulations is that, as soon as reasonably practicable after the end of a year to which a Scheme relates, a Local Authority must make arrangements for the publication in its area of the total sum paid by it to each Member in respect of Basic, Special Responsibility, Travelling and Subsistence, Co-Optees' and Dependants' Carers' Allowances.

All these publicity requirements are statutory minimum requirements. However, the guidance on the Regulations from the then Office of the Deputy Prime Minister also states that a Local Authority should publicise more widely the report from its Panel, its Scheme of Allowances and the sums paid to each Member. This should include, where possible, publishing this information on the Authority's website and in the Council's own newspaper (where they have one).

Risk Management Implications:

If the Council does not adopt a Scheme of Allowances prior to the expiry of the current arrangements it will be unable to pay any allowances.

Performance Management Follow-up:

Once a new Scheme is agreed the appropriate amendments will be made and actioned and the statutory requirements in respect of publicity will be undertaken.

Environmental Implications:

None.

1.0 INTRODUCTION/BACKGROUND

1.1 The current Independent Remuneration Panel was formed in 2015 and undertook a fundamental review of allowances culminating in a report to Council in January 2016. Accordingly, at that meeting the Council **RESOLVED**:

That the recommendations of the Independent Remuneration Panel for the 2016/17 Scheme of Allowances be **AGREED** as follows:

- That the Basic Allowance payable to all Councillors remain at £7,200.
- That the following Special Responsibility Allowances be payable:

Leader of the Council	£8,400
Deputy Leader	£6,300
Lead Members (7)	£4,200
Committee Chairmen (5)	£2,100
Planning Committee	
Licensing Committee	
Overview and Scrutiny Committee	
Audit Committee	
Standards Committee	
Mayor	£2,100
Deputy Mayor	£1,300
- That the provision which states that Councillors who carry out more than one role which would attract a Special Responsibility Allowance are only entitled to claim the highest applicable Special Responsibility be deleted from the Scheme and that any Member carrying out a role subject to a Special Responsibility Allowance should receive payment for each role undertaken.

(In respect of the current Mayor particularly, who was also a Lead Member; this provision should be back-dated so that he receives both Special Responsibility Allowances during his Mayoral Year. Accordingly, it is recommended that the provision in the 2015/16 Scheme restricting claims to one Special Responsibility Allowance be removed).

- That no reference to IT be included in the Council's Scheme of Allowances.
- That the arrangements for travel allowances remain unchanged except that the reference to 'journeys exceeding 50 miles in total will be payable at a mileage rate of 1p per mile after the first 50 miles' be deleted as the Panel cannot see any rationale for this to remain in the Scheme.
- That the arrangements for subsistence allowances remain unchanged except that the Democratic Services Group Manager be given delegated authority to approve increased amounts in special circumstances, such as visits to London, subject to them being reasonable and upon the production of receipts.
- That the Dependent Carers' Allowance remains in place but that the maximum amount payable be increased from £6 per hour to £7.20 in line with the living wage.
- That it be noted that, from 1 April 2014, the entitlement of local Councillors to join the Local Government Pension Scheme was abolished.
- That the repayment provision within the Scheme remain unchanged.
- That the Scheme be introduced for one year from 1 April 2016 to 31 March 2017, during which period the Panel will meet to review the Scheme and recommend any amendments if necessary.
- That no other changes be made to the Scheme of Allowances, including the Schedule of Approved Duties.

2.0 SCHEME OF MEMBERS ALLOWANCES 2017/18

2.1 The Council's existing Scheme expires on 31 March 2017 and, before making a new Scheme, the Council must have regard to the recommendations of its Independent Remuneration Panel. Once a Scheme has been determined, the Council can only make any changes to it after having considered the recommendations of its Independent Remuneration Panel.

2.2 The report of the Council's Independent Remuneration Panel, setting out its recommendations for a Scheme of Members Allowances 2017/18, is attached at Appendix 1.

2.3 Members are asked to consider the Panel's report having regard to its recommendations before determining a Scheme of Allowances for 2017/18.

3.0 OTHER OPTIONS CONSIDERED

3.1 Not applicable.

4.0 CONSULTATION

4.1 As set out in the Independent Remuneration Panel's report.

5.0 RELEVANT COUNCIL POLICIES/STRATEGIES

5.1 Not applicable.

6.0 RELEVANT GOVERNMENT POLICIES

6.1 Not applicable.

7.0 RESOURCE IMPLICATIONS (Human/Property)

7.1 Not applicable.

8.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)

8.1 Not applicable.

9.0 IMPACT UPON (Value For Money/Equalities/E-Government/Human Rights/Health And Safety)

9.1 Not applicable.

10.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS

10.1 Council Report considered on 26 January 2016.

Background Papers: None.

Contact Officer: Lin O'Brien, Head of Democratic Services Tel: 01684 272020
Email: lin.obrien@teWKesbury.gov.uk

Appendices: One – Report of the Independent Remuneration Panel.

TEWKESBURY BOROUGH COUNCIL

REPORT AND RECOMMENDATIONS OF THE INDEPENDENT REMUNERATION PANEL ON MEMBERS' ALLOWANCES

1. BACKGROUND

1.1 The Tewkesbury Borough Council Independent Remuneration Panel was established pursuant to the provisions of the Local Authorities (Members Allowances) (England) Regulations 2003.

1.2 The current Panel, which was established in 2015, comprises:

Mr Richard Blamey (Chair)

Mr Hugh Laird

Mrs Sue Lambert

Mr Andrew Turner

1.3 In January 2016, the Panel recommended an Allowances Scheme to the Council for the financial year 2016/17 which, in essence, kept the Basic Allowance the same but increased the amount payable for Special Responsibility Allowances to give greater recognition to those Members who undertook roles with added responsibilities and to bring the Council's Scheme more in line with other Schemes across the country.

2. WORK OF THE PANEL

2.1 To assist with the preparation of the Scheme of Allowances for 2017/18 the Panel considered a variety of information which included:

- Allowances received by Tewkesbury Borough Councillors in 2015/16.
- Comparison of Allowances for Gloucestershire and South West Councils.
- Comparison of Allowances for Councils in England operating a Committee structure.
- Tewkesbury Borough Council Special Responsibility Allowances paid for 2016/17.
- Comparison of Basic Allowances and Special Responsibility Allowances to be paid for 2016 – Gloucestershire and sample of South West Councils.

2.2 The Panel also met with the following Councillors over three sessions:

- Councillor Kay Berry – Lead Member for Community.
- Councillor Derek Davies – Lead Member for Built Environment.
- Councillor David Foyle – Elected to Tewkesbury Borough Council in May 2015.
- Councillor Mike Dean – Lead Member for Customer Focus.
- Councillor Harry Turbyfield – Deputy Mayor.
- Councillor Ruth Hatton - Elected to Tewkesbury Borough Council in May 2015.

- Councillor Jim Mason – Lead Member for Clean and Green Environment.
- Councillor Elaine MacTiernan – Lead Member for Organisational Development.
- Councillor Rob Garnham – Chair of Licensing Committee.
- Councillor Robert Vines - Leader of the Council.
- Councillor Dave Waters – Deputy Leader of the Council.
- Councillor Gill Blackwell – Mayor / Support Member for the Corporate Portfolio.
- Councillor Alex Evans – Elected to Tewkesbury Borough Council in May 2015.

A summary of some of the points arising from those discussions is set out below:

- Workload and responsibilities were increasing resulting in all roles requiring a large time commitment which had come as quite a surprise to new Members on the Council. The role required seven days' a week commitment as the public expected to be able to contact their Councillor at any time.
- There was a concern that one or two Members only attended meetings of the Council but received the same allowance as all Members.
- Support Members attended briefings and other meetings but there was no financial recognition for this role.
- It was becoming increasingly difficult to attract people to stand as Councillors, particularly young people, which was due to a number of factors including financial but also the time commitment and impact on family life as well as work and career prospects.
- The proposals put forward by the Independent Remuneration Panel for the 2016/17 Scheme of Allowances were generally felt to be fair and appropriate and the philosophy to reward people who did the work was the right one.
- The majority of Members felt that the Basic Allowance was reasonable but a minority felt that, bearing in mind the Basic Allowance had been cut and then frozen for several years, it was now time for it to be increased.
- Remuneration was not the motivating factor in standing for the Council with many Members expressing the view that it was a privilege and honour to serve the community and, although financial recognition was appreciated, nothing beat getting a 'win' for the community or helping someone in need.

2.3 The Panel met with the Council's Chief Executive, Mike Dawson, and a summary of some of the points covered is set out below:

- The Council's budgetary position had deteriorated further with a deficit of £2.9 million over the next five years against a net spend of £8.6 million.
- The Council's Medium Term Financial Strategy did not include Members' Allowances as a growth item. Growth in this area was not planned and would need to be considered along with all the other growth items.
- Remuneration for Members was not recompense for the work that they undertook. It was the role of the Panel to strike a balance between adequate recompense and the perception of what was reasonable to the public.

- The proposal for the current year had seemed to find favour with Members and had increased the budget by about 1% which would not be insurmountable for the future. Staff had received a pay rise of 1% for the current financial year.
- Getting younger people on the Council and achieving a broader spectrum of age range would be beneficial. However, finance was only a small part of the problem with time and commitment playing a big part. Political parties needed to engage with younger people.
- The majority of Members did a really good job because they cared about their communities. They made themselves available at any time of the day or night and financially it was not feasible to pay them for everything they did it was more about recognition and the level that should be set at was for the Panel to determine.

2.4 The Panel had attended an Extraordinary meeting of the Council on 25 October 2016 and observed the role of Members at meetings.

3. SUMMARY OF THE PANEL'S FINDINGS / CONCLUSIONS

3.1 The main points that the Panel concluded from its work are as set out below:

- Money was not the motivator for standing as a Councillor, it was the enabler.
- The majority of Members were hard working and committed to the role which was very impressive.
- A broader age range and encouraging more young people to join the Council could not be achieved with financial recompense alone. The willingness to commit the time with the resultant impact on personal time and career, as well as a desire to give back and contribute to the community, were the overriding factors.
- The cost of the Council's Scheme per resident was the highest in Gloucestershire and third highest across the Country of comparable authorities.
- Although there had been some catch-up on the Basic Allowance, Tewkesbury's remained the highest and the Panel did not feel that an increase in the Basic Allowance could be recommended.
- Special Responsibility Allowances were still marginally lower than other authorities and the Panel remained very much in favour of the principle that there should be a strong link between responsibility and payment.
- Staff had received a pay rise of 1% in the current year which, when applied to the total budget for the Basic and Special Responsibility Allowances of £331,644, provided a figure of £3,316.44 which could be used to increase Special Responsibility Allowances.
- Support Members did not receive any recognition for the role that they undertook but as this would be a new category of Special Responsibility Allowance the funding should not be included in the 1%.

4. RECOMMENDATIONS OF THE PANEL

4.1 That the Scheme of Allowances for 2017/18 be as follows:

- A Basic Allowance of £7,200.
- Special Responsibility Allowances be increased as set out below:

	Current 2016/17	Proposed 2017/18
Leader of the Council	£8,400	£8,800
Deputy Leader	£6,300	£6,600
Lead Members (7)	£4,200 each	£4,400 each
Committee Chairmen (5)	£2,100 each	£2,200 each
Planning Committee		
Licensing Committee		
Overview and Scrutiny Committee		
Audit Committee		
Standards Committee		
Mayor	£2,100	£2,200
Deputy Mayor	£1,300	£1,350

- A new Special Responsibility Allowance be added for the nine Support Members each receiving a sum of £175 to provide some recognition of the additional work undertaken.
- All other aspects of the current Scheme of Allowances remain unchanged.

4.2 The Panel also recommend that the Council consider including an inflationary increase on the Members Allowance budget within the Medium Term Financial Strategy to allow greater scope for amending the Scheme in future. The Panel felt constrained by the fact that there was no long term plan in place to increase the base budget for Allowances.

5. FINANCIAL IMPLICATIONS

5.1 The total cost of the recommendations of the Panel is £4,325 representing a 1.3% increase on the budget for Basic and Special Responsibility Allowances which accommodated a growth item with the introduction of a new Special Responsibility Allowance for Support Members.

TEWKESBURY BOROUGH COUNCIL

Report to:	Council
Date of Meeting:	24 January 2017
Subject:	Neighbourhood Plans - Winchcombe and Sudeley (Combined) and Highnam
Report of:	Paul Hardiman, Planning Policy Officer
Corporate Lead:	Julie Wood, Head of Development Services
Lead Member:	Councillor D M M Davies
Number of Appendices:	Four

Executive Summary:

Following the resolution of Council on 20 September 2016 referendums relating to the adoption of both the 'Winchcombe and Sudeley' and the 'Highnam' Neighbourhood Plans were held on Thursday 24 November 2016. The question which was asked in the Referendums was:

"Do you want Tewkesbury Borough Council to use the neighbourhood plan for [Name of Town or Parish Neighbourhood Planning Area] to help it decide planning applications in the neighbourhood area?"

The results were as follows:

Neighbourhood Plan Referendum for Winchcombe and Sudeley

Yes = 818 (87.02%)

No = 122 (12.98%)

Turnout = 22.49%

Neighbourhood Plan Referendum for Highnam

Yes = 631 (96.19%)

No = 25 (3.81%)

Turnout = 41.89%

All Neighbourhood Development Plans are required to gain a simple majority of those voting in favour at referendum in order to be 'made' (adopted) by the Local Planning Authority. If the plan receives a positive result then the Local Planning Authority has a legal duty to bring the plan into force.

Recommendation:

- 1. That the Council resolves that the 'Winchcombe and Sudeley Combined Neighbourhood Plan' and the 'Highnam Neighbourhood Plan' are made part of the Development Plan for Tewkesbury Borough; and**
- 2. That authority be delegated to the Head of Development Services, in agreement with the relevant Qualifying Body, to correct any minor errors, such as spelling, grammar, typographical or formatting errors, that do not affect the substantive content of the plans.**

Reasons for Recommendation:

1. Both Neighbourhood Development Plans exceeded the required majority of 50% plus one vote cast in the referendums held on 24 November 2016.
2. Both Neighbourhood Development Plans are considered compatible with European Union obligations and Human Rights conventions as required by Section 38A (6) of the Planning and Compulsory Purchase Act 2004 (as amended).
3. Under Section 38A (4) of the Planning and Compulsory Purchase Act 2004 (as amended) we therefore have a legal duty to 'make' the two Neighbourhood Development Plans.
4. The proposed delegation to the Head of Development Services, in agreement with the Qualifying Body, to undertake the correction of minor errors that do not affect the substantive content of the plans will allow any final corrections in production to be made to the policy document.

Resource Implications:

There are no additional resource implications arising from the adoption of the two Neighbourhood Development Plans.

Legal Implications:

Whilst Neighbourhood Planning is not a legal requirement for Towns, Parishes and other communities, it is a right which they can choose to exercise. Once exercised Local Planning Authorities have a duty to support them and undertake elements of the work under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012 as amended (2015).

In this case, following a positive referendum result, there is a legal duty, under Section 38A(4) of the Planning and Compulsory Purchase Act 2004 (as amended), to 'make' a Neighbourhood Development Plan, providing it does not consider it incompatible with any European Union obligations or Human Rights conventions (within the meaning of the Human Rights Act 1998). In this regard the resolution to send the two plans to referendum on the 20 September 2016 determined that this was not the case and therefore there is a duty, under The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016, to 'make' the plans within 8 weeks from the date of the referendum.

Risk Management Implications:

As a legal requirement to bring the plan into force, within the 8 week timescale required by The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016, failure to adopt it would lead to costs associated with any legal challenge.

Performance Management Follow-up:

The Neighbourhood Development Plans, once adopted, will form part of the Development Plan for the Borough and will be used when determining planning applications within the respective designated Neighbourhood Planning Areas. The implementation of the plans will be monitored by the Qualifying Bodies, in this case Winchcombe Town Council and Sudeley Parish Meeting and Highnam Parish Council. It is the intention that by monitoring the plans the Qualifying Bodies will be able to identify where changes may need to be made in future plans.

Environmental Implications:

The implications for biodiversity, habitats, energy usage, waste and recycling or protected species have been considered by the Qualifying Body as required by the Environmental Assessment of Plans and Programmes Regulations 2004 and the Conservation of Habitats and Species Regulations 2010.

1.0 INTRODUCTION/BACKGROUND

- 1.1 The Winchcombe and Sudeley Combined Neighbourhood Area was formally designated in June 2013, whilst Highnam Neighbourhood Area was designated in January 2014.
- 1.2 A Submission Version of the Winchcombe and Sudeley Neighbourhood Development Plan was accepted by the Council on 5 November 2015, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the regulations'). As prescribed by 'the regulations', the Council consulted on the plan for six weeks and arranged for the Plan to be examined.
- 1.3 A Submission Version of the Highnam Neighbourhood Development Plan was accepted by the Council on 11 November 2015 under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the regulations'). As prescribed by 'the regulations', the Council consulted on the plan for six weeks and arranged for the Plan to be examined.
- 1.4 The Council, with the agreement of the Qualifying Body, appointed Mr Nigel McGurk BSc(Hons), MCD, MBA, MRTPI as the Independent Examiner for both the 'Winchcombe and Sudeley' and 'Highnam' Neighbourhood Development Plans.
- 1.5 The Examination for Winchcombe and Sudeley concluded on 20 May 2016 with the receipt of the Examiners Report, which recommended that the Plan, once modified, met all of the basic conditions and should proceed to referendum.
- 1.6 The Examination for Highnam concluded on 3 June 2016 with the receipt of the Examiners Report, which recommended that the Plan, once modified, met all of the basic conditions and should proceed to referendum.
- 1.7 The Examiner also recommended that the area for the referendum for each of the Neighbourhood Development Plans should not extend beyond the designated Neighbourhood Area to which the Plan relates.
- 1.8 On 20 September 2016 the Council resolved to approve the submission of the 'Winchcombe and Sudeley Combined Neighbourhood Plan' and the 'Highnam Neighbourhood Plan', both incorporating modifications proposed through independent examination, to a community referendum.
- 1.9 Both Neighbourhood Development Plans exceeded the required majority of 50% plus one vote cast in the referendums held on 24 November 2016.

2.0 NEXT STEPS

- 2.1 The Council is required to publish a statement setting out its decision and the reason for making it.

- 2.2** Once made the Neighbourhood Development Plans will form part of the statutory Development Plan for the Borough and will be used to assist in determining planning applications within the relevant designated Neighbourhood Area. Paragraph 198 of the National Planning Policy Framework (NPPF) states that: "Where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted."
- 2.3** As soon as possible after the Council has resolved to make the Plans the Council must: publish the Plan, details of when and where it can be inspected and notify any person who has asked to be notified that it has been made and where and when it can be inspected.

3.0 OTHER OPTIONS CONSIDERED

- 3.1** No other options have been considered as the development of Neighbourhood Plans is a statutory process.

4.0 CONSULTATION

- 4.1** Consultation has been undertaken in order to legally comply with the requirements of the Neighbourhood Planning (General) Regulations 2012 (as amended). In addition to public engagement throughout the process of preparing a Neighbourhood Plan the Regulations require two statutory six week periods of consultation:

Under Regulation 14 the Qualifying Body is required to consult on the proposed Plan prior to submission to the LPA.

Under Regulation 16 the LPA is required to consult on Plan proposals submitted.

5.0 RELEVANT COUNCIL POLICIES/STRATEGIES

5.1 Tewkesbury Borough Council Plan 2012 – 16

Priority: Provide customer focused community support.

Objective 3 – Work with Town and Parish Councils to deliver the localism agenda.

Action b) Provide appropriate support for Neighbourhood Planning.

6.0 RELEVANT GOVERNMENT POLICIES

- 6.1** The National Planning Policy Framework (2012) Paragraphs 183 – 185.

7.0 RESOURCE IMPLICATIONS (Human/Property)

- 7.1** See above.

8.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)

- 8.1** Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to set planning policies to ensure that communities get the right types of development for their area within the overarching framework set by the local plan.

9.0 IMPACT UPON (Value For Money/Equalities/E-Government/Human Rights/Health And Safety)

9.1 The neighbourhood planning process requires evidence of involvement by hard to reach groups. This is a matter that the relevant, qualifying body preparing the Plan has addressed and reported on to the Examiner in their 'Consultation Statement', which is a requirement for examination alongside a 'Basic Conditions Statement' and 'Plan Proposal'.

10.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS

10.1 Decision to delegate to the Executive Committee the defining of a Neighbourhood Area – 29 January 2013.

10.2 Decision to delegate to the Executive Committee the authorisation for Neighbourhood Plans to go to Community Referendum – 20 September 2016.

Background Papers: None.

Contact Officer: Paul Hardiman, Planning Policy Officer. Tel: 01684 272261.

Email: paul.hardiman@tewkesbury.gov.uk

Appendices:

A. Winchcombe and Sudeley Neighbourhood Plan.

B. Winchcombe and Sudeley Neighbourhood Plan Referendum – Declaration of Result of Poll.

C. Highnam Neighbourhood Plan.

D. Highnam Neighbourhood Plan Referendum – Declaration of Result of Poll.



Winchcombe and Sudeley

Neighbourhood Plan

... shaping the future of our town and its setting

2011 – 2031

DRAFT

Winchcombe Town Council, Abbeyfields Community Centre,
Back Lane, Winchcombe, GL54 5BQ

Phone
01242
604087

Web Mail
info@winchcombetowncouncil.co.uk

Winchcombe and Sudeley
Neighbourhood Plan 2011 - 2031

A message from the Chairs of Winchcombe Town Council and Sudeley Parish Meeting

Winchcombe Town Council and Sudeley Parish Meeting have jointly completed a number of consultations with their communities in order to develop a Neighbourhood Plan. They have now formally agreed the plan below and submitted it to Tewkesbury Borough Council.

Reaching this stage of our Plan is a significant achievement. There has been lively debate at various stages and a great deal of interest at our open sessions in the Library. When it came to the formal consultation, every household and business received a draft plan, with an invitation to comment and contribute ideas. All the comments made by residents, businesses and interest groups were properly recorded and analysed by an independent consultant. The Town Council re-examined every aspect of the plan in the light of these comments. This public response is not an official secret; all the individual responses from the formal consultation may be viewed at the Winchcombe Town Council Office during normal office hours. The full analysis, along with the Town Council's decisions on how to respond, is published as a separate document – again available from the Town Council office or on the Winchcombe Town Council website.

We are grateful for all the input from our communities in Winchcombe and Sudeley. But we could not satisfy every resident on every aspect of our Plan. For example, we know that many people are concerned about the impact of new development on community services – a particularly sensitive issue as we absorb the pressure of three major housing developments over just a few years. But a neighbourhood plan cannot dictate health, education, transport and other service policies or investments even though these are - of course - all affected by new development.

Many of the comments focused on these aspects and, although the Town Council will note many of them for future reference, and raise them with the responsible bodies concerned, they could not be incorporated into the plan itself. Another concern was that Winchcombe simply could not take any more development. But we could not produce a plan that completely opposed or prohibited any new building here at all. The national media continue to report the evidence that housebuilding is simply not keeping up with need. National government planning policy insists that new housing should be planned for. Both the strategic plans of Tewkesbury Borough Council and our Neighbourhood Plan must, by law, be generally consistent with government planning policies. And Tewkesbury Borough Council have made clear that, as a “rural service centre”, Winchcombe must take a share of new housing over the coming years. This does not leave us powerless over housing development. If Tewkesbury Borough requires Winchcombe to provide a certain amount of additional housing during the plan period (up to 2031), with a Neighbourhood Plan in place we can:

- Say where we want the new development to go
- Indicate what style the homes are built in
- Make provision for particular needs (e.g. accommodation for the elderly, or affordable homes)

- Add other reasonable conditions we feel may be necessary.

On some issues residents were divided. This is not surprising: although we all want Winchcombe to flourish, we are quite entitled as individuals to hold different views on how this might be achieved. Where there has been disagreement, the Town Council (as elected representatives of the local community) has needed to decide what - in the light of all the comments, other evidence and the legalities of planning law - would be in the best interests of the town and surrounding areas.

For all of these reasons, not all of the comments made could be reflected in the Neighbourhood Plan. It was simply not achievable to please everyone on every aspect. We nevertheless hope that our communities will appreciate the difficulties of the task we faced, and will respect the conclusions we reached. We believe that we have produced a Plan which broadly reflects the wishes of the Winchcombe and Sudeley communities and which, if adopted, can be used to encourage sensitive development that contributes to our needs. If adopted, our Plan will be more likely to protect Winchcombe and Sudeley from future speculative developments that are not in the best interest of the town, or would lead to significant damage of the nationally designated (AONB) landscape that surrounds it.

Many people commented that the Plan is long, difficult to understand and uses technical terms. And we sympathise with this – having grappled with it for over four years! We have tried wherever possible to keep things short and understandable. But sometimes it is essential that technical terms are used so there is no ambiguity when the Plan is used by planners and lawyers. Our overall message is: whilst you may not agree with everything, we hope that on balance you feel that the future of Winchcombe and Sudeley will be secured and improved, that this plan has the best interests of Winchcombe at heart and that, when the time comes, you will vote in favour of it.

JIM MASON, Chair, Winchcombe Town Council

TRISTAN BAILEY, Chair, Sudeley Parish Meeting

Contents

<u>Introduction</u>	Page 5
<u>General Policies for Sustainable Development</u>	Page 6
<u>Development for a Thriving Economy</u>	Page 8
<u>Development of Places to Live</u>	Page 12
<u>Services that Support a Good Quality of Life and Wellbeing</u>	Page 15
<u>Design Standards for Development</u>	Page 17
<u>Monitoring the Neighbourhood Plan</u>	Page 18
<u>Proposals Map</u>	Page 19
<u>Area Covered by the Plan</u>	Page 20

Introduction

This is the Winchcombe and Sudeley Neighbourhood Plan for the period 2011- 2031, approved by both the Winchcombe Town Council and by the Sudeley Parish Meeting Chair on 4th November 2015.

The Plan period is designed to align with that of the relevant Joint Core Strategy and forthcoming Tewkesbury Borough Plan.

In preparing this Plan, the Town Council and Parish Meeting Chair have reflected the strongly expressed views of local people that Winchcombe and Sudeley should be a living, working community, with the town at its heart providing a range of services.

People have said that they want good services to meet their needs, and these can also benefit residents of smaller neighbouring communities and visitors to the town.

To address economic, social and environmental needs - the Plan provides for modest, incremental development and investment in the town and surrounding area over the next fifteen years or so. The words “modest” and “incremental” are important, given that the whole area of the Plan is either adjacent to or within the nationally important Area of Outstanding Natural Beauty landscape setting, in which there is a presumption against “major” development.

Like many neighbourhood plans, this one focuses mainly on where new houses, businesses and shops should be located and how they should be designed. The policies are designed to be in conformity with the strategic policies of the saved Tewkesbury Borough Council development plan. It is relevant to note that, during the plan-making process, a wide range of information was taken into account, including that relating to the first draft Tewkesbury Borough Plan and the emerging Joint Core Strategy.

The Plan is in six sections, each with an introductory text explaining the overall approach. That introductory text is followed by the policies themselves (in bold typeface) and explanatory text justifying the need, policy by policy.

Given the scale of recent residential development in the town, the Town Council intends to monitor the delivery of policies in this plan, evaluate their effectiveness and review the Plan in 2020 to ensure that it continues to meet the full needs of the communities of Winchcombe and Sudeley.

The Neighbourhood Plan itself covers the whole of the two parishes of Winchcombe and Sudeley. A map of part of that area is included at the end, following Section 6, showing the specific areas covered by particular policies.

There is an accompanying **Environmental Report**, prepared to demonstrate the full evidence underpinning the Plan and to satisfy the statutory requirement for Strategic Environmental Assessment. This Plan is also accompanied by a **Community Engagement Statement** and a statement showing how the Plan meets the requirements of the national legislation on Neighbourhood Plans.

1. General Policies for Sustainable Development

The parishes of Winchcombe and Sudeley are special. To maintain their special qualities and guide development compatible with the principles of sustainable development, our Neighbourhood Plan needs to: respect the distinctive character of the town and its surroundings; protect land in agricultural use for future generations; encourage development in locations that encourage cycling and walking and thus reduce dependence on car journeys to reach local services; ensure that flood risk is managed, when climate change means we can expect heavier storms; and put in place protected green space close to the community. This section of the Neighbourhood Plan sets out general policies to apply to all development to help deliver a place we can still be proud of in the 2030s.

Policy 1.1 Protecting the Distinctive Character of the Area

Development should respect local character and where relevant, must protect and enhance the Cotswolds AONB. Development should protect areas of ecological importance and proposals to enhance biodiversity are encouraged.

REASON FOR THE POLICY

Winchcombe and the surrounding area share a distinctive character, which makes it an attractive place to live and helps to underpin the visitor economy. The Town Council and Sudeley Parish Meeting therefore want to maintain and enhance the physical character of our town and surroundings for future generations.

In particular in all our public consultation events, people have told us how important it is to protect both the appearance of the town as seen from the Cotswolds Area of Outstanding Natural Beauty (AONB), and the attractiveness of the AONB viewed from the town and elsewhere. Almost all the area covered by this Plan is designated as AONB. In AONBs the Government's National Planning Policy Framework makes clear that there is a presumption against granting permission for major development except in exceptional circumstances and where it can be demonstrated as being in the public interest (National Planning Policy Framework, paragraph 116).

For any development, major or otherwise, "protecting and enhancing" the AONB is to be judged with particular reference to the relevant elements of the Cotswolds AONB Landscape Character Assessment – areas 1B, 2D, 2E, 7C, 19D.

Maintaining local biodiversity and wildlife habitats, flora and fauna, are also important elements of the sustainable development goals we aspire to.

Policy 1.2 Local Green Spaces

The "Dell" and land between the River Isbourne and the B4632 are designated as Local Green Space (see Map below), where new development is ruled out other than in very special circumstances.

[INSERT NEW MAP 'Local Green Space Boundaries'](#)

REASON FOR THE POLICY

Winchcombe benefits from open land reasonably close to the community, which is demonstrably special to people and holds a particular local significance because of the tranquillity and richness of wildlife, beauty, history and recreational value. Much is effectively protected and conserved as a result of being a part of the designated Area of Outstanding Natural Beauty, but other demonstrably special areas are of such local importance to warrant designation as Local Green Space (as defined in paragraphs 76-78 of the National Planning Policy Framework) to reinforce protection from development that would run counter to the purposes for which this Plan has designated it.

2. Development for a Thriving Economy

Winchcombe is a "rural service centre". This means that it is a living, working community, where there is a wide range of services available to local people and visitors. These services provide local employment, but there are fewer employees in farming and land based activity than in the past, and more in tourism. The Town Council's vision for the future of our town is a strong and diverse economy to ensure prosperity in and around Winchcombe, capitalising on our natural and cultural resources. We believe that there are employment opportunities in tourism, retail, hi-tech and other small business development, as well as home based businesses and care services for elderly and vulnerable people. The Sudeley Parish Meeting looks to retain the essential character of the local economy, based on land-based businesses but also including the major attraction of Sudeley Castle. The general and site specific policies proposed below are designed to achieve the vision of the Town Council and Parish Meeting.

Policy 2.1 New Commercial and Light Industrial Development

New or expanded business uses will be encouraged within the Town Centre¹, and at Isbourne Business Park, the Winchcombe Station yard, the telephone exchange in Greet Road, former farm buildings at Almsbury Farm², Sudeley Old Dairy and Withytrees Farm. In these and other locations, re-use, conversion, extension and adaptation of rural buildings for small business, training, recreation or tourism uses will be encouraged, provided that:

- a. the relevant building is structurally sound and capable of conversion without substantial reconstruction;
- b. its proposed use is appropriate to its setting;
- c. the conversion or restoration work respects the character of the immediate area and/or buildings;
- d. the local road system is capable of accommodating the traffic generated by the proposed use; and
- e. parking is provided on-site to the extent needed to avoid any increase in on-street parking.

REASON FOR THE POLICY

To support sustainable economic growth and competitiveness, and provide opportunities for private sector investment, our main goal is to increase local employment by encouraging new business investment and making it easier for customers and employees to engage with businesses. We want to attract a variety of businesses to invest in the town and its surroundings. We can help this by protecting employment land and safeguarding buildings in business use. There is also a need to support ways of giving local people the skills that existing and new businesses require. In order to encourage local farming and forestry, businesses and homes should be encouraged to provide heat sources that draw on locally sourced crops and wood (as biofuel).

Policy 2.2 Postlip Paper Mill

New buildings or further alterations or extensions to the range of buildings at Postlip Paper Mill will be supported, where needed to enable the business to continue to thrive, while meeting

environmental and pollution control standards. Such development must be of sensitive design given the Area of Outstanding Natural Beauty setting.

REASON FOR THE POLICY

One long established business in Winchcombe is the Postlip Paper Mill. Although located in the Area of Outstanding Natural Beauty, its importance to the community justifies a reasonable positive approach to the new buildings and equipment such a business will need to invest in so as to remain competitive.

Policy 2.3 Retail development.

Within the Town Centre (as shown on the plan accompanying this document), and subject to its impact on nearby residents:

- a. **new retail development will be encouraged;**
- b. **conversion of former town centre shops from residential or office use back into to retail use will be encouraged.**

Outside that area, new retail development will be discouraged unless:

- a. **there is a proven local need AND no suitable premises are available elsewhere in town; or**
- b. **it is proposed as an element within a tourist attraction.**

REASON FOR THE POLICY

To improve the vitality and viability of Winchcombe town centre, our goal is to encourage the improvement or redevelopment of shops to meet the needs of local people and visitors. The Joint Core Strategy suggests that Winchcombe should encourage 445 sq m of extra "comparison goods" retail space, and 248 sq m of extra space for convenience goods shops. These figures predate the conversion of the former Sun Inn into a shop, and the permission given for a significant convenience goods shop in Greet Road near the town centre.

Policy 2.4 Protection of business premises.

Development that would result in the loss of any retail or business premises in the designated Town Centre area must demonstrate that the existing use is no longer commercially viable, further to an active marketing period of at least 12 months.

REASON FOR THE POLICY

The high price of residential property may lead to pressure to convert retail and other commercial premises to residential use. The Town Council is keen to protect retail businesses from such pressure, in order to guard against trends that could undermine the town's economic vitality and sustainability.

Policy 2.5 Tourist accommodation.

Strong support will be given to proposals to provide hotel or other new accommodation to meet the needs of visitors to Winchcombe and Sudeley.

REASON FOR THE POLICY

To develop tourism specifically, our goal is to improve the image and attractiveness of the town through:

- I. improving existing buildings, streets and spaces
- II. creating new high quality buildings, streets and spaces
- III. encouraging new and improved tourist facilities and attractions
- IV. encouraging the development of a new hotel and smaller scale visitor accommodation to fill the gap created by the loss of bed and breakfast establishments.

New tourism accommodation is an important part of this goal.

Policy 2.6 Home based working.

Home working proposals will be encouraged where it can be shown that there will be no unreasonable adverse impact affecting nearby residents, or the character and appearance of the locality.

REASON FOR THE POLICY

Information technology and the growth in the number of self-employed businesses are enabling many more people to work from home. Such enterprise is to be welcomed, given its contribution to other employment and expenditure in the town.

Community Action: Farmers Market.

The Town Council will encourage the creation of a regularly available space for local producers' market stalls for food, drink or other products.

A farmers' market operated in Winchcombe previously, but at some distance from the town centre. The Town Council wants to encourage local entrepreneurs and small business start-ups operating at a scale that falls short of supporting a full time retail outlet. This would also encourage footfall to benefit other businesses in town.

Policy 2.7 Sudeley Castle.

Development that supports Sudeley Castle as a tourist attraction whilst preserving the significance of the heritage asset will be supported.

REASON FOR THE POLICY

Sudeley Castle is a significant attraction, bringing in about 70,000 visitors a year and guests at weddings, and thereby contributing to the wider economy of the town.

Policy 2.8 Winchcombe Pottery.

The expansion of Winchcombe Pottery, including other businesses or attractions related to pottery and crafts, will be supported.

REASON FOR THE POLICY

In promoting rural development, it is important to consider how local assets might make a stronger contribution to our economy. Winchcombe Pottery may be one such asset capable of diversifying into a wide range of craft based uses. The land opposite could be used as car parking to facilitate development in and around the pottery site, or developed as a complementary attraction.

Policy 2.9 The Gloucestershire Warwickshire Railway.

Development of new enterprises or attractions of interest to visitors close to the railway station will be encouraged.

REASON FOR THE POLICY

This preserved railway is an important local tourist attraction, but with its extension north to Broadway, there may be less reason for visitors to get off the train and contribute to Winchcombe's economy. There is a need for better pedestrian routes to link the station with Winchcombe Pottery and with the town centre attractions of Winchcombe.

3. Development of Places to Live

Neighbourhood plans can specify where new houses should be located, what sectors of the community they should be designed for and what they should look like. But the overall scale of new housing development in the Borough is a strategic decision to be taken through the Joint Core Strategy and Local Development Plan processes, which identify Winchcombe as a place for more housing. What's more important for the Winchcombe and Sudeley Neighbourhood Plan is not the precise number, but the needs to be met, the best locations for further development and the design and style of development.

The neighbourhood plan has been prepared taking into account the latest figures³ for the objectively assessed housing need for the wider local area (Tewkesbury borough), which sits within the context of the Gloucestershire housing market area. The objectively assessed need for the Tewkesbury borough area, as set out in the evidence base for the emerging Joint Core Strategy, indicates 10,100 homes need to be provided during the Joint Core Strategy plan period 2011-2031. It is against this figure that the 5 year housing land supply is calculated. At the strategic level Tewkesbury borough has agreed to contribute to fulfilling unmet need from Cheltenham and Gloucester under the duty to cooperate as set out in Policy SP2. Consequently it is on that basis that the neighbourhood plan's housing needs have been considered.

For the purposes of providing sufficient homes the Joint Core Strategy Policy SP2 sets out a spatial strategy for delivering housing that primarily seeks to concentrate new development in and around the existing urban areas of Cheltenham and Gloucester and elsewhere in Tewkesbury borough following a hierarchical approach to allocating housing by identifying Tewkesbury town, Rural Service Centres and Service Villages as locations for lower levels of housing development.

Winchcombe town, along with Bishop's Cleeve, have been identified as Rural Service Centres. Together these settlements are expected to accommodate 1,860 homes over the 20 year plan period. This figure has been derived through a consideration of historic housing delivery across the rural parts of the borough along with an uplift to provide flexibility and a boost to housing supply. As a 'rural service centre', Winchcombe needs to provide for a share of the new homes that the draft Joint Core Strategy and Tewkesbury Borough Plan are likely to identify as needed.

These lower levels of development for Tewkesbury borough are to be determined through the Tewkesbury Borough Plan and neighbourhood plans. An indicative housing disaggregation process was undertaken for the Tewkesbury Borough Plan Draft Site Allocations and Policies document (February 2015). The methodology followed the requirements in the emerging Joint Core Strategy and identified a 67:33 proportional housing split between Bishop's Cleeve and Winchcombe for the 1,860 homes. However, as of September 2015 there has already been 1,746 units committed between the two Rural Service Centres (Bishop's Cleeve 1,494 and Winchcombe 252) leaving a balance of 114 to be found up to 2031 (shared between the two settlements of Winchcombe and Bishops Cleeve), which equates to just over one year's housing requirement remaining. Consequently, on the basis of the most up to date figures, it was noted that housing requirements for the majority of the plan period have already been permitted across the two Rural Service Centres.

Notwithstanding this, earlier local consultation has suggested that many people regard staying in Winchcombe as a high priority. Dedicated housing for older people also emerged as important, not only to meet a need, but also because it may release homes locally for younger families. But in the view of most people responding to our earlier consultation, and taking account of a recent

Landscape Assessment, further developments on the scale of recent major estates in Winchcombe would not fit well with landscape and environmental constraints.

Drawing on the Sustainability Appraisal 2014 and earlier community contributions, the Town Council has agreed the following goals and identified sites on the accompanying map (following Section 6) that are most suitable within the tight landscape, built heritage and traffic management constraints we face.

Policy 3.1 Infill development.

Residential development on infill and redevelopment sites will be supported, provided that they are within the built up areas (as shown on the map in this Plan after Section 6), well designed and meet all relevant requirements set out in this plan. Replacement dwellings must respect the size and scale of the surrounding buildings.

REASON FOR THE POLICY

As a small market town that has evolved over the centuries, Winchcombe has seen a great deal of infilling. In terms of sustainability, urban density is to be welcomed as it makes it easier to walk or cycle to shops and services. In terms of design, density differentiates historic Winchcombe from more recent suburban settlements.

Policy 3.2 Meeting local needs for new homes for those with modest incomes.

Where six or more homes are proposed (or 11 or more outside the designated AONB area) the development must include provision for affordable housing. The applicant will be required to submit a "Winchcombe and Sudeley Affordable Housing and Dwellings Provision" statement. This should clearly set out the affordable housing needs that the proposed development is intended to address, how those needs will be met and how they will be maintained after completion of the development.

REASON FOR THE POLICY

Our goal is to maintain a strong community spirit through housing developments to meet the recognised needs of our community confirmed in the initial consultations, in particular affordable housing (for sale and/or rent) for those on lower incomes. With a population close to 6,000, Winchcombe is properly regarded as a market town. Affordable housing provision should be made within the town; and developments on AONB sites at the edge of the town should be assessed against the policies in this plan rather than through any "rural exceptions" policy. The rural exceptions policy is, however, relevant to the rural area of Sudeley Parish.

Policy 3.3 Bungalow development.

Infill developments of almshouses or small bungalows suitable for older people will be encouraged where appropriate to the urban context, and must be built to wheelchair accessible standards.

Proposals to extend such new or existing dwellings into their roof space will be resisted.

REASON FOR THE POLICY

There is a demand for single storey bungalows, and yet many homes originally built as bungalows have been effectively enlarged and extended into significantly sized houses, which no longer meet the needs of those looking to buy or rent a single storey bungalow. The goal of this policy is to discourage extensions into the roof space that effectively convert bungalows into houses, while also encouraging more bungalow development to meet the needs of older people wanting to live independently.

4. Services that Support a Good Quality of Life and Wellbeing

In preparing this Neighbourhood Plan, residents have emphasised the importance of a good quality of life for those living in the town and surrounding area. This requires more than just wise development and good design. One particular need identified by younger people and supported by many respondents to the public consultations in 2014 was an informal activity area where safe skateboarding and BMX cycling can be encouraged. Another need expressed was for a bowling green, as a focus for older people and others to gather and be active.

Winchcombe Town Council and Sudeley Parish Meeting has set out its goals below, and draft Neighbourhood Plan policies that will help deliver them. Some of these goals will require action outside the scope of a Neighbourhood Plan, which the law requires to focus on development and use of land and buildings. Winchcombe Town Council and Sudeley Parish Meeting will take these forward and champion them as part of their day-to-day business. Goals such as ensuring an excellent medical centre are a matter for other agencies and cannot feature in Neighbourhood Plan policies beyond ensuring that expansion is feasible and appropriate as the local population increases, and seeking Section 106 contributions or making a contribution from Community Infrastructure Levy when implemented so that necessary services can keep pace with the demands of an increased population.

Policy 4.1 Protection and improvement of Community Facilities.

Developments that would lead to the loss of existing well-used community facilities will not be supported unless, by relocation or other means, alternative facilities providing an equal or improved level of service and access for users has first been made available.

REASON FOR THE POLICY

Winchcombe already hosts a good range of facilities that help deliver good health and social inclusion. These must be maintained. Beyond that there may be options to improve those facilities, in consultation with those who will use them, and those who will fund and manage the improvements. These include allotments to meet demand, social and community activities through facilities such as the Winchcombe Day Centre and community transport, leisure facilities for all, especially those that support integration of young and old in community leisure facilities, more opportunities for elderly people to meet and relax with the wider community, facilities that local schools can offer to share with the community, and facilities needed for festivals and events.

Policy 4.2 Facilities for older residents.

Development at Winchcombe Day Care Centre to generate a wider range or better quality facilities for older people will be supported

REASON FOR THE POLICY

Winchcombe hosts an increasing population of retired people - partly because settled households appreciate the strong community, and partly because the area is attractive to older people recently retired or approaching retirement age. Policies are needed to encourage community facilities for this sector of the community, so that Winchcombe remains a lively place.

Policy 4.3 Facilities for younger residents.

Development of a Youth Activity Park will be supported on the Greet Road playing fields on the site identified on the map after Section 6 of this Plan.

REASON FOR THE POLICY

Over the past few years and during the Neighbourhood Plan consultation process, younger people have pressed for investment in a skateboard park or BMX bike facility where energy can be expended without damage or community disturbance. The majority of those responding to the Neighbourhood Plan consultation were happy to see a site provided on the new playing fields site, close to the Medical Centre where minor injuries can be handled.

Policy 4.4 Walking and cycling routes.

The existing network of public rights of way will be supported and extended with developer contributions where possible, including dedicated foot and cycle paths:

- a. **alongside Greet Road linking Winchcombe School to Littleworth, with suitable traffic management at the GWR railway bridge**
- b. **linking Riverside, Wyndham Way and Pennylands with Winchcombe Garage and Isbourne Business Park**
- c. **alongside the B4632, under the Broadway Rd rail bridge to provide a safe, segregated, route between Isbourne Business Park and, Winchcombe Pottery**
- d. **from Corndean Lane to Vineyard Street, and on to Castle Street and Footbridge linking to the routes through Riverside to Winchcombe School and the Isbourne Business Park.**

REASON FOR THE POLICY

Health and wellbeing are important goals for our populations and visitors alike. One particular need is to encourage sustainable transport decisions by creating and signposting new pedestrian and cycle routes to encourage more walking and safe cycling for health (as well as encouraging tourism, as championed by the Winchcombe Walkers are Welcome group). Public consultation revealed some demand for off road cycle routes, provided that these were not bridleways also accessible to horses in view of the damage they can create.

Policy 4.5 Provision of new allotments.

The development of allotments alongside the proposed cemetery above Mount View Drive will provide for those who want to grow food or other produce for their own use.

REASON FOR THE POLICY

There are existing allotments, but the main site off Broadway Road suffers from a lack of water for irrigation and is a long walk from most homes. The Town Council owns a site (shown on the proposals map) and plans to develop it for allotments if there is sufficient public demand.

5. Design Standards for Development

In the design of new buildings and alterations to existing ones, the Town Council and the Sudeley Parish Meeting are looking to reflect the character of the area while also being open to contemporary designs, while creating places that will meet the needs of future generations. This points to a need for policies that address a wide range of issues including the need to reduce water and energy consumption in buildings, to increase the use of energy from renewable resources, to protect and manage the character of the town and its designated Conservation Area, and to address the risk of crime and improve waste management.

Policy 5.1 Design of new development.

New development should reflect the character of its surroundings. Where appropriate, planning applications will need to demonstrate an understanding of those qualities and features that make up this character, and show how their proposals will respect and complement what is already there.

The design of new development will be expected to:

- a. **Complement and enhance, where appropriate, the prevailing size, height, scale, materials, layout, density and access of any surrounding development;**
- b. **Demonstrate that the amenities of neighbouring residential occupiers are not unduly affected through overlooking, loss of light, over-dominance or disturbance**
- c. **Provide landscaping, where necessary to complement and enhance the characteristics of the surrounding area.**

REASON FOR THE POLICY

The Town Council wants to maintain and strengthen local distinctiveness and sense of place which means development should:

- i. enhance the built quality of the area generally, as well as including individual buildings or structures that contribute to local distinctiveness
- ii. prioritise and enabling modest incremental developments rather than extensive housing estates in a single style
- iii. encourage innovative design that complements its surroundings and promotes sustainability

Policy 5.2 Off street parking.

The provision of off-street parking areas as part of development proposals, to minimise additional on-street parking, is supported. Off-street parking areas should be constructed so as to minimise run off during heavy rain.

REASON FOR THE POLICY

In all communities, parking can be a challenge. Inadequate off-street provision can have an adverse effect on urban design and create tensions between neighbours. Where off-street provision takes the shape of garages, householders can easily remove that provision under permitted development rights to provide extra rooms - and add their vehicles to those on the public highway in a way that creates obstruction and unnecessary congestion.

On the other hand, keeping additional car parking spaces to a minimum can also encourage more efficient use of land through increased density and encourage residents to use sustainable transport options such as buses, walking and cycling.

New development proposals must demonstrate a high quality of design, therefore, which provides a good standard of amenity for current and future occupants, and also demonstrate that the amenities of adjoining properties are not adversely affected.

Policy 5.3 Winchcombe Conservation Area.

Development within the designated Conservation Area will be expected to conserve the Winchcombe Conservation Area.

Development proposals should:

- a. clearly identify any heritage assets potentially affected,**
- b. provide an assessment of their significance and of the impact of any proposal on those assets, and**
- c. justify the design approach intended.**

REASON FOR THE POLICY

The designated Conservation Area is important to the sense of place in central Winchcombe, which is in turn an important driver of its tourism economy. The Town Council would like development proposals to enhance the character of the Conservation Area.

Policy 5.4 Illuminated signs and shop front design.

Within Winchcombe's historic town centre, new shop fronts will be expected to preserve an appropriate traditional appearance by:

- a. keeping fascias and projecting signs to a minimum;**
- b. avoiding internally illuminated signs;**
- c. limiting external lighting to appropriately located spotlights constructed of traditional or composite materials.**

All signs and advertisements must be designed to a high standard and located on, and related well to, the business and premises they serve. They must also be in keeping with the general street scene or, where located in the wider rural area, be in character with the locality and landscape. Illuminated signs will be confined to areas that have street lighting.

REASON FOR THE POLICY

Policies are needed to guide retailers and others towards illumination that is effective in signposting customers, but respectful of the environment of a small country town.

Policy 5.5 Extensions and alterations to existing buildings.

Proposed extensions and alterations should normally be:

- a. subservient in size and scale to the existing "host" building**

- b. constructed of complementary materials and,
- c. while possibly innovative or modern, nevertheless reasonably accord with the character and appearance of nearby existing buildings.

New roofs are to be pitched unless this is out of character with the existing roofscape of the immediate area, or where a flat roof would complement or enhance the character of the original or nearby building.

REASON FOR THE POLICY

It is impossible for a development plan to define and deliver best design practice. Even so, clumsy and unprofessional design can result in buildings that undermine the special character of the town or the rural areas around it. Policies are needed to concentrate the minds of property owners and developers at the start of designing proposals to improve and extend property.

Policy 5.6 Gardens.

Residential development should normally provide private garden space where possible - in addition to appropriate landscaping and children's play space.

REASON FOR THE POLICY

In Winchcombe and the surrounding area, the prevailing character is of homes with gardens. There is a need to continue this, partly to respect overall town design objectives and also to ensure that residents have access to private open space - whether for young children's play or vegetable growing.

Community Action: Safety.

The Town Council is keen for development proposals to accord with "Secured by Design"⁴ principles.

Winchcombe is a safe place to live in and visit. The Town Council wants to keep it that way and reduce the fear of crime.

Monitoring the Neighbourhood Plan.

The Winchcombe Town Council Planning Committee will monitor the implementation of this Neighbourhood Plan and make an annual report to the public Parish Meeting in April of each year.

The annual report should include an assessment of any change in the relevant elements of the Cotswolds AONB Landscape Character Assessment – areas 1B, 2D, 2E, 7C, 19D – as a result of development.

By the end of 2020, the Town Council will have reviewed the need and availability of housing at a reasonable price for younger families - whether for rent or for purchase - and will if necessary consult the community and bring forward amendments to this Plan to make provision for the period 2021/2031.

That review will also take account of the need for any expanded off-street vehicle parking which may be necessary as a result of increased tourism.

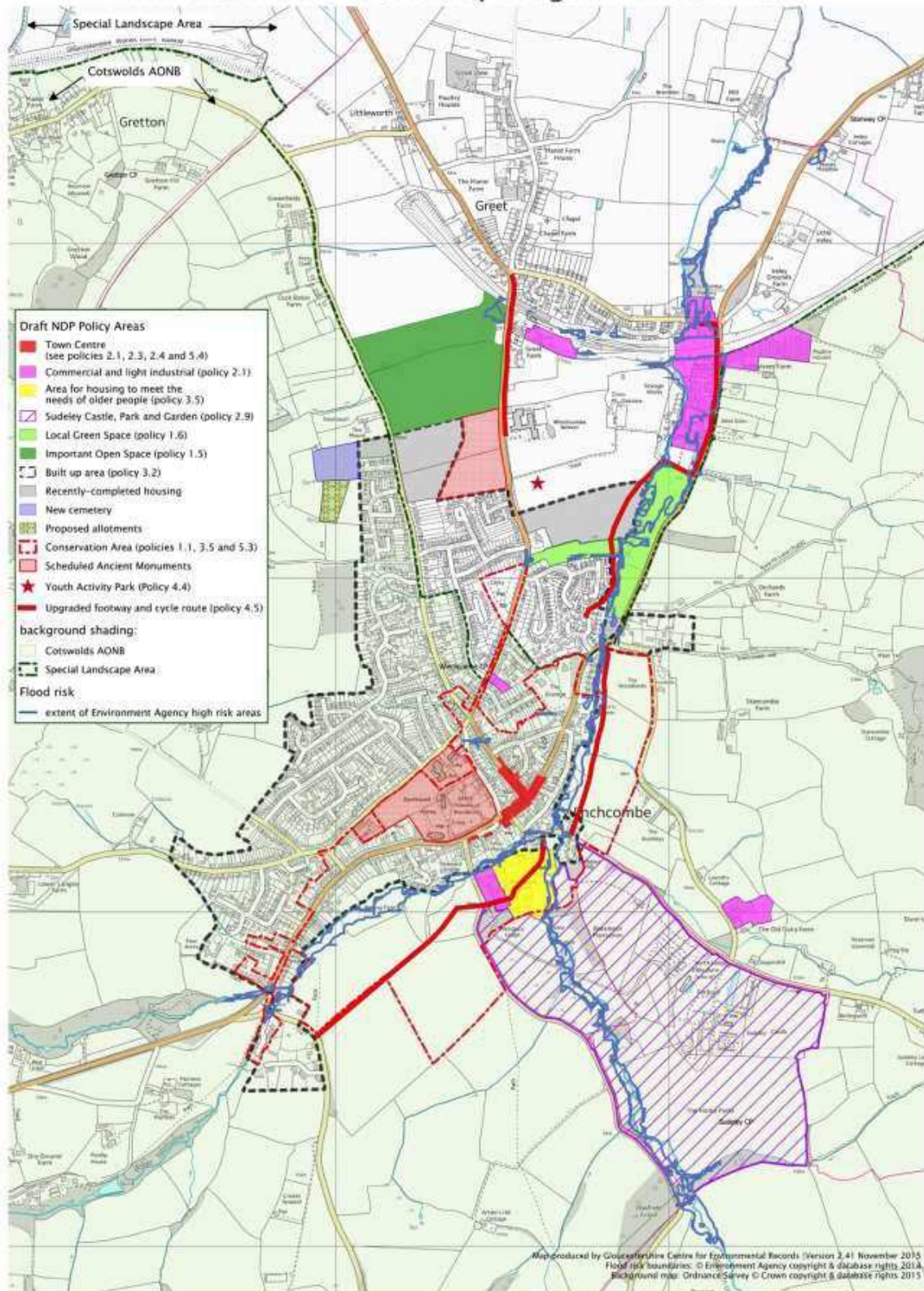
¹ *Delineated on the map showing policy areas (after Section 6 of this Plan)*

² *If not developed as part of a wider housing and care home development provided for under policy 3.5*

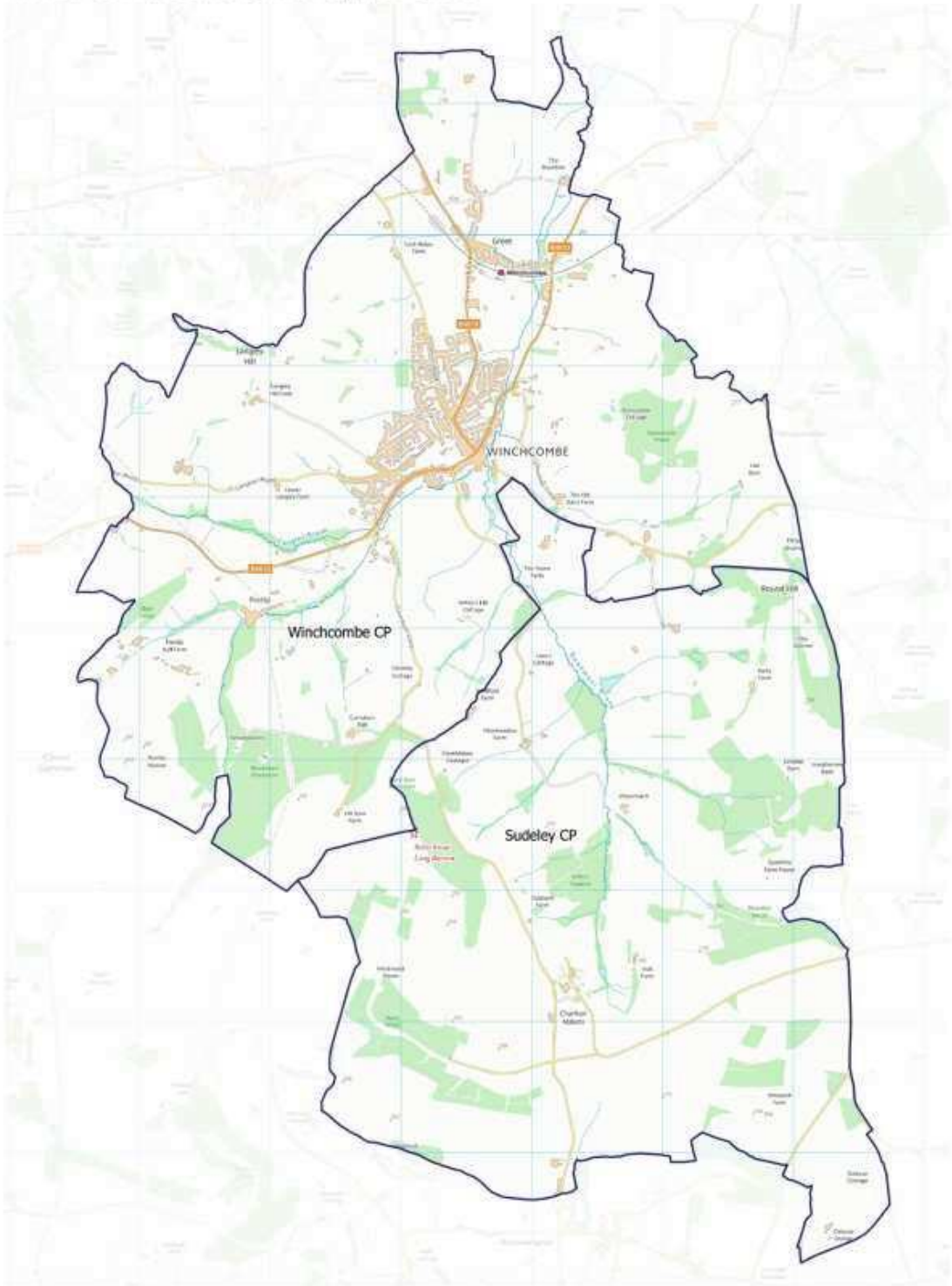
³ *The Joint Core Strategy housing evidence is provided primarily in the Housing Background Paper Update November 2014. At the time of preparing the neighbourhood plan the Joint Core Strategy was being examined and therefore not adopted, however the planning appeal inspector's report for Moat Farm, Gotherington, Cheltenham (23 September 2015, reference: APP/G1630/W/15/3002522) states that 'the current housing land supply is between 2.7 and 3.9 years, depending on which requirement figure the supply is measured against. The lower figure relates to the now revoked South West Regional Strategy (RS), and the higher is based on the emerging JCS... The RS figure is clearly no longer up to date, and there is no evidence that it was ever intended to be based on the district's own objectively-assessed needs. The JCS-based requirement is preferable in both of these respects.'*

⁴ <http://www.securedbydesign.com/>

Winchcombe and Sudeley Neighbourhood Plan



Winchcombe and Sudeley parishes



Map produced by Gloucestershire Centre for Environmental Records
v1.0 December 2014

Background map: Ordnance Survey OpenData VectorMap District © Crown copyright and database right 2014

DECLARATION OF RESULT OF POLL

Tewkesbury Borough Council

Neighbourhood Planning Referendum for the Winchcombe and Sudeley Neighbourhood Area

on Thursday 24 November 2016

I, Mrs Linda O'Brien, being the Deputy Counting Officer at the above Referendum, do hereby give notice that the number of votes recorded at the said Referendum is as follows:

Question		
Do you want Tewkesbury Borough Council to use the Neighbourhood Plan for Winchcombe and Sudeley to help it decide planning applications in the Neighbourhood Area?		
	Votes Recorded	Percentage
Number cast in favour of a Yes	818	87.02%
Number cast in favour of a No	122	12.98%

The number of ballot papers rejected was as follows:		Number of ballot papers
A	want of an official mark	0
B	voting for more than one answer	0
C	writing or mark by which the voter/proxy could be identified	0
D	unmarked or wholly void for uncertainty	0
Total		0

The total number of votes recorded represented 22.49% of the registered electors.

And I do hereby declare that the result of the Referendum for Winchcombe and Sudeley Neighbourhood Area is as follows:

More than half of those voting have voted in favour of Tewkesbury Borough Council using the Neighbourhood Plan for Winchcombe and Sudeley to help it decide planning applications in the Neighbourhood Area.

Dated Friday 25 November 2016

Mrs Linda O'Brien
Deputy Counting Officer

Highnam Neighbourhood Development Plan

2011-2031

Introduction

Government initiatives, under the Localism Agenda, now enable communities to produce their own vision of how they would like their area to develop.

The Neighbourhood Plan must have regard to national policy and guidance, including the National Planning Policy Framework, which provides the Government's overarching approach to planning. It must also be in general conformity with the strategic policies of the development plan – in Highnam's case, this means the saved policies of the Tewkesbury Borough Local Plan to 2011. It is also relevant to note that various relevant information was taken account of during the plan-making process, including that relating to the first draft Tewkesbury Borough Plan and the emerging Joint Core Strategy. The Neighbourhood Development Plan is the final part of this planning structure. Once it has gone through all its stages, including a referendum of the Parish, it will become a Statutory Document, reflecting the views and aspirations of the Parish and it must be taken into account in determining Planning Decisions in the Neighbourhood Area during the plan period, 2011-2031.

Place Setting

The Parish of Highnam is situated in the County of Gloucestershire, 3 miles to the West of the city of Gloucester and separated from it by the River Severn. The Parish is bounded on the South by the Severn, on the North by the smaller River Leadon and to the west by Highnam Woods (See map 1 Location Plan). The Parish is crossed by the A40 trunk road with the B4215 branching off and continuing towards Newent. The Gloucester to South Wales railway passes through the southern part of the Parish but there is no station.

Originally, the location of the Roman river crossing of the Severn was near Over, and much later the higher ground was occupied by the residence of the Bishops of Gloucester, and a vineyard, bounded by the Severn and the Leadon. To the northwest, the principal settlement was at Lassington which had Parish status, and further south there was the estate associated with Highnam Court. Post-Reformation, the status of Lassington and Over diminished in importance. Highnam Court became the principle landholding, and in the 1840's and 1850's the estate was remodelled with the addition of Holy Innocents Church, the Old Vicarage, the village school (now part of the Community Centre) and a scattering of estate housing, principally around Highnam Green.

The core housing estate in the village of Highnam itself, known as Maidenhall was first started in the late 1930's, but was primarily built in the late 1940's to early 1960's. In the early 1970's the village started to expand with a sequence of housing estates within the enclosing ring and discipline of Oakridge. This gave the village the structure it has today with the bulk of the village northeast of the B4215, the church and the Community Centre separated to the south, Highnam Farm and its Business Centre and a commercially run Golf Course to the West. Lassington now consists of the church tower of St Oswald's, its nave having been demolished in 1975, two farms and a scattering of dwellings. Over largely consists of a housing estate built on the site of the now demolished Over Hospital ; the canal basin of the Gloucester-Hereford Canal which currently houses the offices of the Canal Trust and an up market restaurant/hotel; traveller sites, a pub/restaurant and some industrial

development along the A40(T). The village of Highnam is host to a Primary School, a Doctors' Surgery, a Day Nursery and a Post Office and Stores¹.

The Parish landscape as a whole is characterised by good quality agricultural land particularly towards the Severn, with a Listed park and garden associated with Highnam Court. Public access woodland on the East flank of Lassington Hill which slopes down to the River Leadon is an important landscape feature, as is the broad sweep of Highnam Woods which are managed as an RSPB Reserve and which enclose views to the west of the Village, with Rodway Hill Golf Club in the foreground.

Demography

Of the 1935 people registered as resident in the Parish, 1250 are of working age, the remainder being made up of 335 people over retirement age and 350 children under the age of 16. With the exception of the retired populations, which is greater than the national average (17.4% compared to 16.3% nationally)², the demographic groups are almost exactly the national average for England.

Of the 1935, 1013 (70.3% cf 69.9%) are regarded as being "economically active" (either working or seeking employment) and 427 as "economically inactive" (29.7% cf 30.1%)(Students, home makers or retired). Of the economically active 38.2% are employed full time (cf 38.6% nationally) 18.1% are employed part time (cf 13.1%) 9.6% are self-employed (cf 9.8%)

Highnam is a relatively prosperous Parish. Gross and net weekly household income is above both the national and county averages at £720/£490 respectively (cf £673/420).

Of the 1250 people of working age only 85 are recorded as DWP benefit claimants (6.8% cf 13.9%) and only two households are registered as experiencing multiple deprivation. (0.3% cf 0.5%) In addition to this 51 people are in receipt of housing benefit (6.7% cf 20.7%), 30 people are in receipt of income support (2.4% cf 3.2%) and 51 people are in receipt of pension credits (15.1% cf 24.4%)³

Skill levels are above average with 40.6% having Degree level qualifications (cf 29.9% nationally) and only 10.9% with no qualifications at all (cf 22.5% nationally) The generally high level of skill is reflected in the type of employment where Highnam has 51% of its people working in managerial or professional occupations (cf 41.1% nationally) and only 4.1% working in elementary occupations (cf 11.1% nationally).

Types of Employment

Highnam has a higher proportion of Public Sector Employees at 35% of those employed, than the national average of 28%.⁴ This is probably accounted for by the proximity of Gloucester and Cheltenham where large Public Sector employers such as GCHQ, the NHS and Gloucestershire County Council are located.

The largest employment category is Health and Social Work at 14% followed by Retail 12% and Public Sector/Defence at 11%. Few of these people are employed within the boundaries of the Parish, the figures reflect Highnam's status as a dormitory for commuters, mainly to the nearby large centres of population, Gloucester and Cheltenham, and some further afield. These major population centres offer a wide range of employment opportunities of all types. This conclusion is supported by the finding that only 4.4% of people travel less than 2km to work (cf. 20% nationally) and 6.7% travel more than 40km, exactly the national average.⁵

The proportion of people working from home is relatively high at 5.6% (cf, 3.5% nationally).⁶

Plan Content and Status

The Neighbourhood Development Plan for Highnam covers the whole of the civil parish. Its boundaries are clear and well established. The Plan provides a vision for the future of the parish, drawn up following extensive consultation. It sets out the Parish's objectives, together with the policies required for their realisation. Objectives and policies were formulated following analysis of the natural environment of the Parish, of the social and economic needs and characteristics of its settled population and of the responses of residents and other interested parties to consultation. Care was taken to include all residents, including minorities and the disabled.

[Map of Neighbourhood Area](#)

[Insert Map from Appendix C of Basic Conditions Statement](#)

Plan Development

Highnam Parish Council decided in September 2013 that it would be in the interest of the Community to formulate our own Neighbourhood Development Plan and a sub-committee of the Parish Council was established to take it forward. The committee was formed of two Parish Councillors plus volunteers from within the community, with people joining, and a couple leaving, during the period that the work was carried out. Assistance was also given at all stages by the Parish Clerk.

Assistance and guidance was purchased from the Gloucester Rural Community Council (GRCC) and a grant obtained from LOCALITY to fund the project. Assistance and some additional funding was also provided by Tewkesbury Borough Council and one of their officers attended many of the committee's meetings.

To start the process the GRCC gave a public presentation on Neighbourhood Planning which was well attended, and led to volunteers joining the committee

It was agreed by the Committee that the area of the Plan should be the whole Parish of Highnam and this was proposed to Tewkesbury Borough Council. Following the correct statutory procedures, including a consultation period, this was approved.

There were three main public consultation events: to launch the project, to report back on the results of the survey, and to offer the draft plan to the Community. Feedback from these Community Consultations was considered by the Committee and reflected in the plan. In addition a detailed survey was conducted throughout the Parish with forms being delivered to every home and volunteers calling to collect them, some 1360 forms were distributed and 752 returned, a 55% response. Regular updates on progress were given to the Parish Council, posted on the Parish Council Website and published in the Parish magazine. A full timeline of all events, meetings and other activity is available on the Parish Council Website.

The members of the team also carried out considerable local research, interviewing local business and land owners, visiting the School and Surgery, collecting transport data and much more. Details are listed in the Evidence Base.

The Neighbourhood Plan is in general conformity with the strategic policies of the saved Tewkesbury Borough Local Plan.

The Vision

Highnam wishes to maintain its character as a self-contained community where people of all ages enjoy good quality of life.

To achieve this Highnam will:

- Remain a separate and distinct community from Gloucester and not become a suburb.
- Maintain and develop its own range of local facilities, services and employment opportunities
- Develop in ways appropriate to the needs of the local community
- Ensure that development reflects the nature, character, scale and density of the community.
- Maintain its relationship with its landscape setting.

In order to achieve this vision the following Objectives, and Policies for their achievement, have been identified.

Housing

Objective To ensure that future residential development includes a wide range of housing types and tenures, with provision for a mixed community including the increasing older segment of the population.

Policy H1a. Within residential developments, the inclusion of sites for-self-build and/or live/work units is encouraged.

Objective To ensure that the design quality and environmental performance of new development reflects current and future best practice standards.

Policy H2a. The design and visual character of any new development in Highnam should make a positive contribution to forming a sense of place: demonstrating both design quality and sensitivity to the existing environment. Density of any new development should reflect that of the existing settlement⁷ though exceptions can be considered for specialized homes for the elderly, including care provision.

Policy H2b. New housing development is encouraged to have regard to building performance, space standards and green energy systems.

Transport

Objective To ensure that development does not exacerbate current problems with the flow of traffic and pedestrian safety within and through the Parish, especially at peak times, and if possible, contributes to their alleviation.

Community Action. The Parish Council will support Park and Ride proposals at the junction of the A40 and A48 inasmuch as they would help to alleviate congestion on the A40.

Objective To maintain and improve public footpaths and cycle paths both within the Parish and to the surrounding areas in order to provide alternative means of movement within and through the area.

Policy T1a. New public paths constructed as a result of work relating to canal restoration should be linked to the existing network of paths used by the public.

Policy T1b. The protection and maintenance of existing footpaths and rights of way will be supported.

Policy T1c. The completion of an all-weather, wheelchair friendly, footpath around Oakridge in the interest of road safety and equality of access will be supported.

Business and Enterprise

The Community supports existing small scale local business and enterprise but would not wish to see the character of the Parish changed by large scale industrial development.⁸

Objective To support appropriate business start-up, expansion and home working.

Policy B1a. Proposals to extend Highnam Business Park up to around twice its current size (see Plan below) will be supported.

[Insert New Plan](#)

Policy B1b. The provision of offices and workshops in Over, at the site identified on the plan below, will be supported. The continued restoration of the Herefordshire and Gloucestershire Canal in the Neighbourhood Area will also be supported.

[Insert New Plan.](#)

Policy B1c. The expansion of existing business units in Over, within the site identified on the plan below, will be supported.

[Insert New Plan.](#)

Policy B1d. The expansion of the farm shop and visitor centre at Over Farm, within the site identified on the plan below, will be supported.

[Insert New Plan.](#)

Policy B1e. The building of work/live units is encouraged.

Community Facilities

Highnam has a good range of Community Facilities, these should be supported, maintained and, where possible, enhanced.⁹

Objective To support appropriate expansion of facilities such as the Surgery and School to meet the needs of a growing population.

Policy C1a. The extension of Highnam Surgery and/or its car park will be supported.

[Insert New Plan.](#)

Policy C1b. The necessary expansion and alteration of Highnam Academy will be supported.

[Insert New Plan.](#)

Objective To support and enhance local facilities such as shops, the post office, the community centre and businesses as well as any sports clubs and other leisure facilities that provide a service to the Parish.

Policy C2a. The expansion of the village post office and shop will be supported.¹⁰

[Insert New Plan.](#)

Policy C2b. The Community Centre, as shown on the plan below, is a valued local resource and it will be protected from a change of use. Any change of use of a community facility will be resisted unless it can be demonstrated that it is no longer required, or that it can be replaced with an equivalent or improved facility elsewhere in the Neighbourhood Area. Prospective developers are encouraged to engage with community groups as part of any change of use proposals.

[Insert New Plan.](#)

Environment and Conservation

The community values the rural nature of the Parish with its extensive wildlife habitat and wishes to see this maintained and enhanced where possible. ¹¹

Objective To maintain and expand public green spaces in the Parish and develop their nature conservation potential.

Policy E1a. Land or buildings currently in use as recreational grounds will be protected from a change of use unless it can be demonstrated that they are no longer required; or that they can be replaced by equivalent or better provision; or that the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Policy E1b. The change of use of existing allotments will be resisted and the provision of new allotments will be supported.

Policy E1c. Highnam and Lassington Woods, shown on the accompanying plan, will be protected from adverse development¹².

[Insert New Plan.](#)

Community Action. Highnam Parish Council supports and where possible, will work with other parties, including the Herefordshire and Gloucestershire Canal Trust, towards the proposed establishment of a Country Park through the Leadon Valley.

Map of the Parish showing views to be retained as in Policy E2b

Sustainability

The sustainability of the Plan has been considered at all times by the Committee, using a matrix to compare policies against objectives.

Monitoring

The Parish Council will monitor developments during the plan period.

Evidence Base and Supporting Documents

The supporting documents and evidence base referred to in footnotes can be viewed on line at [www.highnamparish.org.uk/NDP/Neighbourhood Development Plan](http://www.highnamparish.org.uk/NDP/Neighbourhood%20Development%20Plan).

Acknowledgments:

Thanks to the following people who took part in the production of the plan.

Councillor Mike Heenan	Chairman, Highnam Parish Council
Councillor David Nelson	Highnam Parish Council
David Ball	Volunteer
Tracy Amor	Volunteer
Steve Doyle	Volunteer
Mark McGillion	Volunteer
Maurice Atkinson	Volunteer
Terry Talbot	Volunteer
Darren Isbell	Volunteer
Adrian Goode	Tewkesbury Borough Council - Advisor and Mentor
Richard Hicks	Clerk to Highnam Parish Council

Photography for final version of the Plan was provided by Bob Train LRPS.

Layout and design services, plus printing of interim display materials and the final plan, were provided by Perpetua Press of Newent.

Grant assistance was provided by LOCALITY and Tewkesbury Borough Council.

Support and guidance throughout was obtained from the Gloucester Rural Community Council

Thanks too to the local businessmen and landowners, the staff of the Surgery and the Academy, the proprietors of the Village Stores and Post Office, the Gloucestershire and Herefordshire Canal Trust and everyone else who gave their time and assistance to the preparation of this Plan.

¹ Full details of the School, Surgery, Post Office, Business Centre etc. are available in the supporting documents.

² Source: IMD 2010 (CLG), Working age Benefits (DWP Aug-12), Multiple deprivation (Census 2011)

³ Source: Income Support/Pension Credit (DWP Aug-12), Economic Deprivation Index 2009, Fuel Poverty (Department for Energy and Climate Change 2009), Housing/Council Tax Benefit (DWP 2005), Households below median income (ONS 2008)

⁴ Source: Census 2011 (tables KS601EW, KS604EW and KS605EW)

⁵ Source: Travel to employment centres (DfT 2011)

⁶ Source: Working from home (Census 2011 QS701EW)

⁷ The average density of housing in the settlements in the Parish is currently in the order of 14 dwellings per hectare.

⁸ Source: Answers to Questionnaire section G

⁹ Source: Answers to Questionnaire sections B and D

¹⁰ Source: Answers to Questionnaire section D

¹¹ Source: Answers to Questionnaire section F and feedback from school and public functions.

¹² Further support for this policy is provided in the Basic Conditions Statement.

DECLARATION OF RESULT OF POLL

Tewkesbury Borough Council

Neighbourhood Planning Referendum

for the Highnam Neighbourhood Area

on Thursday 24 November 2016

I, Mrs Linda O'Brien, being the Deputy Counting Officer at the above Referendum, do hereby give notice that the number of votes recorded at the said Referendum is as follows:

Question		
Do you want Tewkesbury Borough Council to use the Neighbourhood Plan for Highnam to help it decide planning applications in the Neighbourhood Area?		
	Votes Recorded	Percentage
Number cast in favour of a Yes	631	96.19%
Number cast in favour of a No	25	3.81%

The number of ballot papers rejected was as follows:		Number of ballot papers
A	want of an official mark	0
B	voting for more than one answer	0
C	writing or mark by which the voter/proxy could be identified	0
D	unmarked or wholly void for uncertainty	0
Total		0

The total number of votes recorded represented 41.89% of the registered electors.

And I do hereby declare that the result of the Referendum for Highnam Neighbourhood Area is as follows:

More than half of those voting have voted in favour of Tewkesbury Borough Council using the Neighbourhood Plan for Highnam to help it decide planning applications in the Neighbourhood Area .

Dated Friday 25 November 2016

Mrs Linda O'Brien
Deputy Counting Officer

TEWKESBURY BOROUGH COUNCIL

Report to:	Council
Date of Meeting:	24 January 2017
Subject:	Housing Strategy 2017-2021
Report of:	Housing Strategy Review Working Group
Corporate Lead:	Robert Weaver, Deputy Chief Executive
Lead Member:	Cllr D M M Davies, Lead Member for Built Environment Cllr R E Allen, Lead Member for Health and Wellbeing
Number of Appendices:	Two

Executive Summary:

The Housing Strategy 2017-2021, which includes the Homelessness and Homelessness Prevention Strategy and Tenancy Strategy, has been developed by Officers with a Member Working Group made up of eight representatives from Overview and Scrutiny Committee.

Four key priorities have been concluded from the challenges facing Tewkesbury Borough Council in the foreseeable future. A number of objectives under each priority will be the areas of focus for annual action plans. The first year action plan for the calendar year 2017 has been set by the Member Working Group and endorsed by Overview and Scrutiny Committee. For each year of the Strategy an annual action plan will be produced and taken to the Executive Committee for approval. The Strategy and action plans will be monitored by the Lead Members together with bi-annual reports for monitoring to Overview and Scrutiny Committee.

The Housing Strategy 2017-2021 can be found in Appendix 1 along with an Equalities Impact Assessment in Appendix 2.

Recommendation:

To ADOPT the Housing Strategy 2017-2021 as set out in Appendix 1 to the report.

Reasons for Recommendation:

The Homelessness Act 2002 and Local Government Act 2003 require all District Councils to develop a strategy that sets out the Council's policies, commitments and programme for a wide range of housing matters.

The Council is required to have an up-to-date five year Homelessness Strategy and therefore has developed, through an Overview and Scrutiny Working Group, an overarching Housing Strategy that includes the Homelessness Strategy and Tenancy Strategy.

Once adopted by Council, the new Housing Strategy 2017-2021 will be regularly monitored in accordance with the arrangements set out at Paragraph 2 of this report.

Resource Implications:

Staff and Member time. Resource implications will be met from existing budget allocations and, where they cannot, will be subject to a growth bid within the Council's Medium Term Financial Strategy and a separate report to Members.

Legal Implications:

The Council is required to have a Housing and Homelessness Strategy in place so that its duties under the Housing Act 1996 (as amended) and Homelessness Act 2002 and Local Government Act 2003 can be met.

Risk Management Implications:

The review of activities against the Strategy action plan has identified that the aims and objectives of the Strategy are being delivered in a timely way. This significantly reduces the risk of not meeting statutory housing and homelessness duties. The Strategy should be reviewed in approximately 12 months to ensure that it, and the associated action plan, continues to be relevant in the future.

Performance Management Follow-up:

The Strategy will include the Homelessness and Homelessness Prevention Strategy and will be monitored in accordance with the arrangements set out at Paragraph 2 of this report.

Environmental Implications:

There are positive environmental implications in the delivery of the Strategy objectives e.g. the Strategy supports the delivery of new energy efficient homes and energy efficiency improvements in the existing housing stock across the Borough. The development of more affordable homes, especially those to be developed in rural areas, may have a negative impact upon the environment, however, the level of environmental impact and measures to mitigate them will be assessed as part of a formal planning application.

1.0 INTRODUCTION/BACKGROUND

1.1 The Homelessness Act 2002 (as amended) and Local Government Act 2003 require all District Councils to develop a strategy that sets out the Council's policies, commitments and programme for a wide range of housing matters. The Council is required to have an up-to-date five year Homelessness Strategy and therefore has developed, through an Overview and Scrutiny Working Group, an overarching Housing Strategy that includes the Homelessness Strategy and Tenancy Strategy.

2.0 HOUSING STRATEGY 2017-2021

2.1 The Member Working Group met monthly with the first meeting on 18 August 2016 and the final meeting on 12 December 2016. Officers presented the housing and homelessness evidence base to Members to inform them of the whole picture of needs and challenges in Tewkesbury Borough. Members agreed priorities and objectives for public and stakeholder consultation.

2.2 The Housing Strategy 2017-2021 is an overarching strategic document that takes into account the principle national and local issues that are likely to affect Tewkesbury Borough in the foreseeable future.

2.3 Key Challenges

- 2.3.1** The evidence base found there were an extensive number of challenges for Tewkesbury Borough Council; these can be found in Section 4 of the Housing Strategy. Some of these challenges have been summarised below:
- 2.3.2** Affordability of housing varies across our Borough with average house prices at £225,000 and average incomes at £23,524. This means the income to house price ratio as of 2015 was 9.56. The east of the Borough is the most expensive with the highest values fetching £600,000.
- 2.3.3** The number of households registered for affordable housing to rent and buy in the Borough is steadily increasing as the disparity between incomes and house prices continues to rise.
- 2.3.4** Ensuring adequate supply of affordable housing will be an increasing challenge for Tewkesbury Borough unless we can implement robust local planning policies through the Borough Plan.
- 2.3.5** We will need to work even more closely with our residents and partners including housing associations to mitigate the effects of Welfare Reform on tenancy affordability.
- 2.3.6** Ensuring that adequate accommodation is available for people in crisis i.e. emergency situations, and who are homeless or who may become homeless continues to put pressure on the Council. However we will continue to tackle this with a preventative approach; this will also aid Tewkesbury Borough Council in implementing the forthcoming Homelessness Reduction Bill.
- 2.3.7** Achieving the GOLD Standard - based on the Government report 'Making Every Contact Count', the challenge is a local authority, sector-led peer review scheme designed to help local authorities deliver more efficient and cost effective homelessness prevention services. The challenge follows a 10 step continuous improvement approach local authorities in front line housing services.
- 2.3.8** Limited access to specialist accommodation within the Borough that is accommodation-based supported housing, temporary and emergency accommodation such as bed and breakfast, and so on that makes it difficult for our residents to access the support they need.
- 2.3.9** We will need to ensure we address the needs of specific groups such as older people, people with disabilities, travellers and the needs of our most rural communities in accordance with our strategic accommodation assessments.
- 2.3.10** Working with private landlords will be essential and developing a close working relationship with our private rented sector has become more prevalent as we will seek opportunities to discharge our homelessness duty into private rented accommodation, seek increased housing standards in our Borough to ensure the homes are safe and ensure landlords and tenants have adequate support.

2.4 Four key priorities

2.4.1 The Strategy sets out the housing and homelessness challenges and explains how the Council intends to address these issues through four key priorities:

- Priority 1 - Increase the supply of housing.
- Priority 2 - Homelessness and homelessness prevention.
- Priority 3 - Meeting the housing needs of those who need it most.
- Priority 4 - Improving the health and wellbeing of local people.

2.4.2 Key objectives are detailed within each of the priority areas where targets and outcomes for delivery will be detailed in the annual action plan. Our targets and outcomes for delivering the objectives will be shaped annually in order to be proactive as well as re-active to the changing needs of our community and the challenges facing us when new government policies are implemented. The action plan is to be as flexible as possible so that the Council can continue to take action where necessary and start new actions when appropriate to do so over the five year Strategy period.

2.4.3 Included in the Strategy documents are the evidence base, the Homelessness and Homelessness Prevention Strategy 2017-2021 and the Tenancy Strategy 2017-2021. The Strategy and associated documents can be found at Appendix 1.

2.5 Monitoring and future action plans

2.5.1 Action plans for each year of the Strategy will be produced annually and taken to the Executive Committee for approval.

2.5.2 The Strategy and action plans will be monitored by the Lead Members together with bi-annual reports to the Overview and Scrutiny Committee.

2.6 Equalities Impact Assessment

2.6.1 An Equalities Impact Assessment has been completed and it is felt that there is a range of customers already accessing the housing services provided across the Borough. It is acknowledged that there are some residents who could potentially benefit from our services who do not apply for housing. Through the consultation process, we have also endeavoured to consult with particular groups in addition to the general consultation activities for all other stakeholders. This has provided an opportunity to identify specific housing issues for Tewkesbury Borough.

2.6.2 It is believed that no groups are directly or indirectly discriminated against as all customers have been considered in the Strategy in accordance with wider policies such as the HomeseekerPlus Allocations Policy and legislative requirements.

3.0 OTHER OPTIONS CONSIDERED

3.1 None.

4.0 CONSULTATION

4.1 A six week public consultation on the evidence base for the Housing Strategy commenced on 6 September 2016 and ran for a period of 6 weeks. It asked all stakeholders to identify gaps, to give support to the four priorities and input on the objectives under each priority.

4.2 The Housing Services Team held a stakeholder event for partners and an open public session on 12 October 2016.

4.3 The results from the consultation were publicised and responses considered as part of the development of the Housing Strategy.

5.0 RELEVANT COUNCIL POLICIES/STRATEGIES

5.1 The main documents are:

- Council Plan 2016-20.
- Emerging Joint Core Strategy and Tewkesbury Borough Plan.
- Housing Strategy 2017-2021.
- Strategic Housing Market Assessment 2014.
- Gypsy Traveller and Traveller Showpeople Assessment 2016.
- Enforcement Policy.

6.0 RELEVANT GOVERNMENT POLICIES

6.1 The main documents driving government housing policy and legislation are:

- Homelessness Act 2002 and Housing Act 1996 (as amended) (Housing Standards).
- Housing Grants, Construction and Regeneration Act 1996 (housing grants, loans and home improvement assistance).
- Local Government Act 2003.
- Housing and Regeneration Act 2008.
- The Future Home Improvement Agency (CLG 2009).
- Equality Act 2010.
- Laying the Foundations: A Housing Strategy for England 2011.
- Localism Act 2011.
- The Growth and Infrastructure Act 2013.
- The Welfare Reform Act 2012.
- National Planning Policy Framework 2012 and Planning Policy Guidance.
- The Welfare Reform and Work Act 2016.
- The Housing and Planning Act 2016.

6.2 Forthcoming relevant legislation:

- Homelessness Reduction Bill.

7.0 RESOURCE IMPLICATIONS (Human/Property)

7.1 None directly associated with this report other than staff and Member time. Any resources associated with the actions in the Strategy will form part of the Council's Medium Term Financial Strategy and Asset Management Plan. Resources implications will be met from existing budget allocations and, where they cannot, will be subject to a growth bid within the Council's Medium Term Financial Strategy and a separate report to Members.

8.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)

8.1 The Strategy includes consideration of sustainability and energy efficiency in addition to the social and economic implications.

9.0 IMPACT UPON (Value For Money/Equalities/E-Government/Human Rights/Health And Safety)

9.1 Housing is a basic human need and, through consultation and the Member Working Group, all relevant groups have been considered.

10.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS

10.1 The Housing Strategy 2017-2021 has been endorsed by Overview and Scrutiny Committee on 10 January 2017.

Background Papers: None.

Contact Officer: Paula Baker, Housing Services Manager
01684 272173 Paula.Baker@tewkesbury.gov.uk

Erin Davies, Strategic Housing and Enabling Officer
01684 272162 Erin.Davies@tewkesbury.gov.uk

Appendices: Appendix 1 – Housing Strategy 2017-2021.
Appendix 2 – Equalities Impact Assessment.

At home in Tewkesbury Borough

A housing strategy for our borough



This page is intentionally left blank

Foreword



Welcome to the Tewkesbury Borough Council Housing Strategy 2017-2021. As Portfolio Holder for the Built Environment, I recognise how important it is for residents to be able to access good quality housing and housing related services that make a real difference to their lives. Not only is housing important for the health and wellbeing of individuals and families, but it is an important part of building and maintaining strong communities and supporting the overall economic prosperity of the borough.

Under the Housing Act 2002 and the Local Government Act 2003, the Council is required to have a strategy in place to set out its vision for housing and how it will address homelessness across its administrative area. National and local policies guide the principles within this strategy.

This overarching strategy combines the housing, homelessness (Appendix 2) and tenancy (Appendix 3) strategies. This document provides a clear direction and commitment for the delivery of a customer focused, efficient housing service. By having a single overarching strategy should make it easier for our stakeholders to understand what we intend to do to address housing issues and tackle homelessness, and when we hope to do it.

This strategy will enable the council to work effectively and with a range of partner organisations to actively support private sector landlords and tenants and maintain and improve all dwelling stock across the borough. We will need to work with our stakeholders to achieve our annual action plans and in doing so I am confident that the delivery of this strategy, through innovative approaches, will help the council to deliver the right mix of accommodation in the borough and to provide high quality housing advice and support to people when they need it.

Providing our communities with a choice of affordable and private market housing, in an area where they want to live and work now and in the future, will contribute towards making Tewkesbury Borough a place where a good quality of life is open to all.



Councillor Derek Davies
Portfolio Holder for the Built Environment
Tewkesbury Borough Council

Contents Page

1	Introduction and background	Page 5
2	The local context	Page 6
3	Policy context and key challenges	Page 9
3.1	Increasing housing supply	Page 9
3.2	Homelessness and Homelessness Prevention	Page 14
3.3	Meeting the needs of specific groups	Page 15
3.4	Improving the health and well-being of local people	Page 20
4	The Challenges	Page 23
5	Addressing the challenges	Page 24
6	Key Priorities	Page 25
7	Monitoring our Strategy	Page 26
8	Action Plan: Year One 2017	Page 27
9	Glossary of Terms	Page 33
10	Appendices	
	Appendix 1a: Our Local Evidence – Increasing Housing Supply	
	Appendix 1b: Our Local Evidence – Homelessness Prevention	
	Appendix 1c: Our Local Evidence – Specific Housing Needs	
	Appendix 1d: Our Local Evidence – Improving the Health and Well-being of Local People	
	Appendix 2: Homelessness and Homelessness Prevention Strategy	
	Appendix 3: Tenancy Strategy	

1 Introduction and background

The Housing Strategy 2017-2021 has a key part to play in delivering the council's overarching vision¹ for the residents and communities of Tewkesbury Borough:

“Tewkesbury Borough, a place where a good quality of life is open for all”

Quality housing is fundamental to the health and well-being of our communities and ensures the borough remains a thriving one where people want to live, work and visit. Tewkesbury Borough Council recognises that access to quality affordable housing underpins the success of our area and all of the overarching corporate priorities.

The Council Plan 2016-2020 identifies housing as a priority because:

“We recognise how important it is for residents to be able to access good quality housing and housing related services that make a real difference to their lives.

“Not only is housing important for the health and well-being of residents it is also an important part of building and maintaining strong communities and supporting the economic prosperity of the borough.”

Only with the right supply of homes to meet the housing needs of local people can we achieve our vision of sustainable communities supported by economic growth.

In order to meet this vision, the Tewkesbury Borough Council housing priorities for the next five years are to:

- Increase the supply of sustainable housing across the borough to support growth and meet the needs of our communities
- Achieve a five year supply of land;
- Deliver the homes and necessary infrastructure to create new sustainable communities in key locations;
- Deliver affordable homes to meet local need.

The housing strategy is an overarching strategic document. It takes account of the principle national and local issues that are likely to affect Tewkesbury Borough in the foreseeable future. It sets out our housing challenges and explains how we intend to address these issues through four key priorities. Key objectives are detailed within each of the priority areas with targets and outcomes for delivering these objectives will be detailed annually in the action plan.

The Homelessness and Homelessness Prevention Strategy 2017-2021 can be found in Appendix 2 and the Tenancy Strategy 2017-2021 can be found in Appendix 3.

¹ Tewkesbury Borough Council Plan 2016-2020 <https://www.tewkesbury.gov.uk/tewkesbury-borough-council-plan>

2 The local context

2.1 Our profile

Tewkesbury borough is spread across 160 square miles and despite its predominately rural nature it also includes growing communities on the fringes of Gloucester City and the town of Cheltenham. The eastern part of the borough lies within the Cotswold Area of Outstanding Natural Beauty (AONB) which accounts for 8.5% of our district².

Flooding is a natural feature of the borough particularly in relation to the River Severn which runs down the western edge of the area and constraints regarding flood plain³. These constraints and the AONB can make development of new homes and other buildings and infrastructure difficult in the borough. However, the borough is at the heart of the economic engine of Gloucestershire, including four junctions of the M5 motorway and has excellent national transport links making it an area of significant growth.

The borough's population is roughly 85,800 with just under 40,000 households. There are 50 parish and town councils (includes parish meetings) covering the borough ranging in size from 3,062 households to as small as 574 households. Information from What Homes Where 2013⁴, a toolkit to help local authorities assess their housing needs shows us some of these key population issues⁵.

Assuming current population trends continue, the ONS projections⁶ for the next 25 years suggest that the population in Tewkesbury Borough will reach 93,400 by 2025 and 100,400 by 2037. The district's growth rates are higher than those predicted for Gloucestershire and England in the short, medium and long term⁷.

The dominating feature of the projected trend for Tewkesbury Borough is a sharp increase in the number of older people (aged 60 and over) to 2033. Projections for children and young people indicate slower growth, while the working-age population is expected to show little change in the long term. There continues to be an increase in one person households with this household type projected to overtake all others by 2033. Couples on their own and small families increases at a relatively steady rate but larger family growth remains small. Other households include couples with adult children living at home, friends living in a property and so on, are predicted to decline⁸.

In 2015, 11.8% of the housing stock in Tewkesbury Borough was affordable housing (owned by housing associations). The percentage increase in the actual number of all dwellings in Tewkesbury Borough from 2009 to 2015 is 7%; the market stock as increased by 7% and the housing association stock has increased by 9.5%. The extent of housing growth across Tewkesbury Borough has been beneficial for our households in need. However the

² Cotswold AONB <http://www.cotswoldsaonb.org.uk/userfiles/factsheet-1.pdf>

³ Environment Agency; Tewkesbury Borough flood map for planning <https://goo.gl/PwsxmY>

⁴ What Homes Where, 2013 <http://www.cotswoldsaonb.org.uk/userfiles/factsheet-1.pdf>

⁵ Housing Strategy 2017-2021 Appendix 1a, Section 2, Chart 1, Page 6

⁶ 2012-Based Sub-national Population Projections, Office for National Statistics

⁷ Housing Strategy 2017-2021 Appendix 1a, Section 2, Chart 3, Page 7

⁸ Housing Strategy 2017-2021 Appendix 1a, Section 2, Chart 2, Page 7

affordable housing dwelling stock in Tewkesbury Borough has only increased by 0.1% since 2010.

The majority of the borough's housing stock is owner-occupied and is generally in good condition. However the stock is skewed towards larger more expensive properties. Tewkesbury Borough as a whole is generally an affluent area; however this can mask pockets of significant inequality. As an example, housing in Tewkesbury borough is relatively expensive against national and regional averages with the East of the borough having the highest values given its proximity to the AONB. Isbourne ward has the highest average house price of £490,996, with detached properties fetching over £600,000⁹. Compared against data from the Indices of Multiple Deprivation (IMD)¹⁰ where the borough has 2 lower super output areas - Tewkesbury Priors Park 2 and Tewkesbury Priors Park 3. Both perform poorly on employment, education, skills and training, and income deprivation affecting children. Tewkesbury Priors Park 3 also performs poorly on income deprivation affecting older people.

The growth in income levels has not kept pace with the increases in property values meaning that many people are priced out of owner occupation the borough. While income growth in Tewkesbury Borough is in line with the rest of England, the average house price increase has been more significant at 2.96 times the values 15 years ago. The income to house price ratio for Tewkesbury Borough in 2013/14 was higher than Gloucestershire overall, the South West and England.

Both private and social housing rents are becoming more unaffordable to our residents. From 2008/09 to 2014/15 private sector rents have increased by 15% and social sector rents have also increased by a substantial 35%¹¹.

2.2 Statutory requirements

Under the Homelessness Act 2002¹², the Council is required to publish a strategy setting out how it will address homelessness in its administrative area. Our Homelessness and Homelessness Prevention Strategy 2017-2021 can found in Appendix 2.

The Localism Act 2011¹³ places a duty on all local authorities to produce a tenancy strategy, setting out what housing associations should take into consideration when making decisions about their individual tenancy policies. Our Tenancy Strategy can be found in Appendix 3.

⁹ Average house price for all properties over the period June 2015-May 2016; Source Land Registry via Local Insight, OCSI

¹⁰ IMD data and maps can be found here

https://inform.gloucestershire.gov.uk/viewpage.aspx?c=page&page=Deprivation_Maps2015

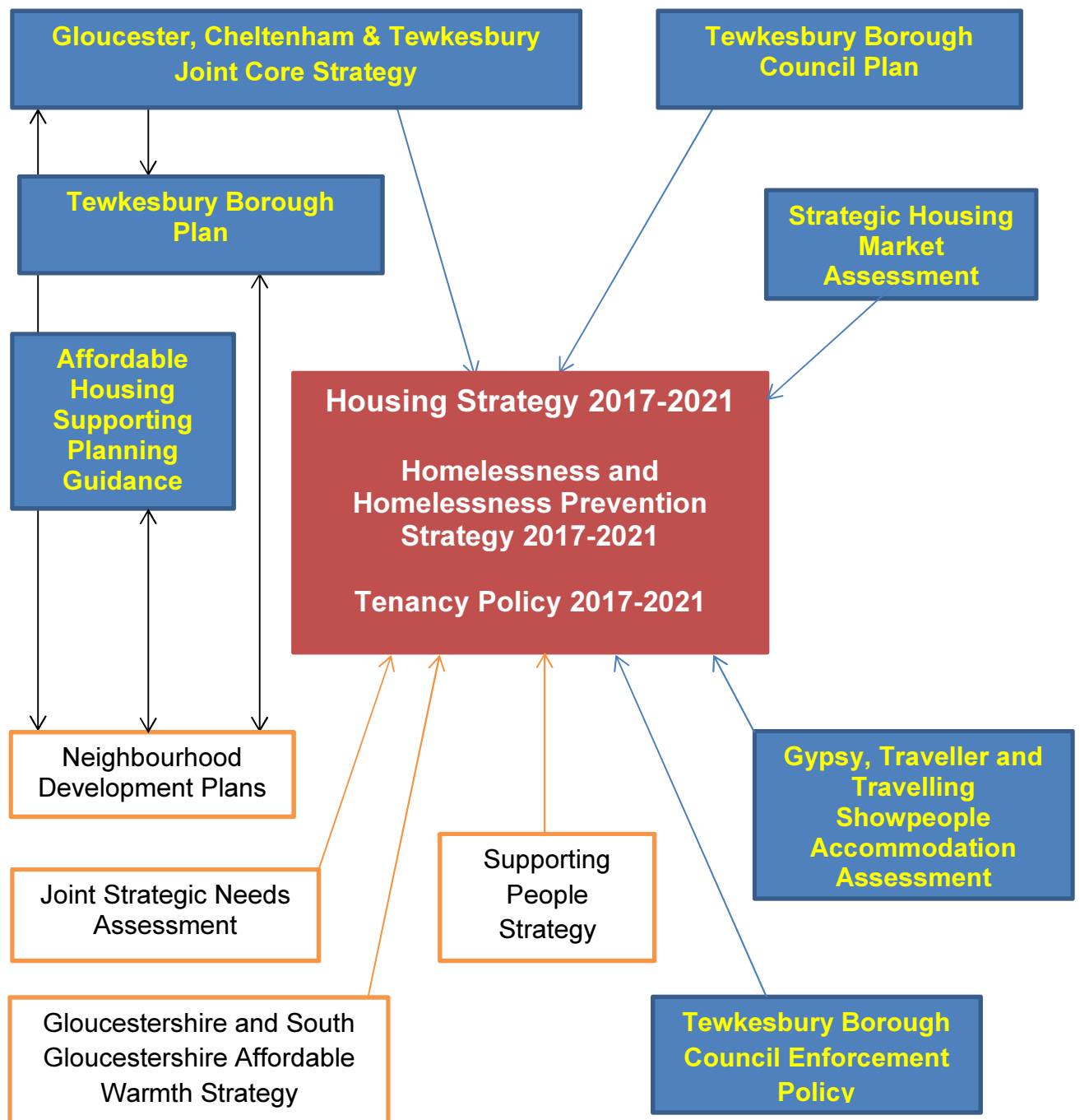
¹¹ Rents are covered in full in Housing Strategy 2017-2021 Appendix 1b Section 8.

¹² Homelessness Act 2002 <http://www.legislation.gov.uk/ukpga/2002/7/section/1>

¹³ Localism Act 2011 <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

2.3 Where the Housing Strategy fits

The following diagram shows where the Housing Strategy fits with other key Tewkesbury Borough Council and Gloucestershire county-wide strategic-level documents:



Blue boxes represent Tewkesbury Borough Council documents

Orange outlined boxes represent external documents impacting on Tewkesbury Borough Council

3 Policy context and key challenges

We continue to be guided by the National Strategy¹⁴ along with new legislation, such as the Housing & Planning Act 2016 and other government policies and initiatives. Since 2011, there have been several key government initiatives impacting on our housing services in Tewkesbury Borough.

3.1 Increasing housing supply

3.1.1 Universal housing provision

The Joint Core Strategy (JCS)¹⁵ partners will, through the Strategy and emerging Local Plans¹⁶, deliver sufficient housing supply to meet the universal housing provision and economic growth needs of the borough.

Section 4.2 of Appendix 1a evidences our resident's ability to access the housing market and how important it is for the council to consider and provide for the whole market to meet their needs. It is clear that government supported schemes and affordable housing home ownership are extremely popular and needed by our residents, but with these options being less than 12% of all sales in the borough the opportunities for younger people to get on the housing ladder are limited.

3.1.2 Government manifesto to increase home ownership

Whilst there is still some focus on rented housing, home ownership is the government's driver for housing at present believing more homes will be built, particularly Starter Homes, in the near future.

The government manifesto to provide more homes and more homes for sale for young people has meant their Starter Homes initiative being brought in via the Housing and Planning Act 2016. A vision of 'discounting' new homes by up to 20% has been out for consultation and at the time writing the sector is waiting for the decision as to how this product will work in reality. If Starter Homes are to be considered affordable housing in the future, this will affect the council's current position of what we can provide on-site on new developments particularly impacting the rented element. The affects will need to be fully assessed as part of a new Strategic Housing Market Assessment¹⁷ (SHMA) alongside other affordable housing products and the impact of benefit changes (to be discussed later) to ensure the needs of our borough are met.

¹⁴ Laying the foundations: a housing strategy for England 2011

<https://www.gov.uk/government/publications/laying-the-foundations-a-housing-strategy-for-england--2>

¹⁵ The Joint Core Strategy is a partnership between Gloucester City Council, Cheltenham Borough Council, and Tewkesbury Borough Council, formed to produce a coordinated strategic development plan to show how this area will develop during the period up to 2031 <http://www.gct-ics.org/>

¹⁶ The Tewkesbury Borough Plan is the development plan solely for Tewkesbury Borough <https://www.tewkesbury.gov.uk/tewkesbury-borough-plan/?rq=Tewkesbury%20Plan>

¹⁷ A Strategic Housing Market Assessment or SHMA is a technical study intended to help local planning authorities understand how many homes will be needed in a given period.

Recent development in key locations has significantly increased the supply of affordable homes including shared ownership and shared equity products ensuring that there are opportunities for lower incomes households to buy a home of their own.

In the June 2014 Financial Stability Report¹⁸, the Bank of England announced measures to cut the risk of a damaging house price bubble emerging by limiting the number of high-risk mortgages. Mortgage lenders must limit the proportion of mortgages at loan to income multiples of 4.5 and above to no more than 15% of their new mortgages. Given this restriction on mortgages, Tewkesbury Borough's income to house price ratio, may make it difficult for first time buyers to get on the property market. This is likely to result in the out-migration of young people in the lower income brackets of our borough and encourage people to commute into Tewkesbury Borough for work, while living in areas where housing is cheaper outside of the borough and in more urban areas.

3.1.3 *Right to Buy extension*

Further to the government home ownership ambition, a pilot commenced in November 2015 of 5 housing associations was undertaken to extend the Right to Buy to their tenants. The outcome to date has shown that just with 48,000 potential sales found that only "a shade under 16,000 of the 48,000 households were allowed to buy under the pilot once the exemptions were applied" and 1.6% (790) households made formal applications to buy their home¹⁹. Applications for the pilot from tenants of the housing associations closed in October 2016; in September 2016, almost a year after the pilot was launched, were sales going through. According to Inside Housing²⁰ this was an unconfirmed figure of 8 sales. In essence the government intends for 1.3million housing association tenants in England to receive Right to Buy and 3 years for the housing associations or local authority (where applicable) to start building a new home for each one sold under the new policy²¹.

3.1.4 *Effects on affordable housing of the economic downturn*

The economic downturn of 2008 saw a reduction in affordable housing delivery as schemes became unviable to deliver. Negotiations with developers meant that very low or zero affordable housing was provided and the loss was felt until delivery gained momentum again in 2012.

Appendix 1a section 2 shows the delivery of new affordable homes in the borough from 2010 when planning permissions previously granted during and post-2008 economic downturn were coming to fruition. It is not until 2013 that we see increases in delivery. In the six year period 2010-2016 there has been 26% affordable housing of all new-build delivery. However just 11.8% of the homes in Tewkesbury Borough is owned by a housing

¹⁸ Bank of England, Financial Stability Report 2014

<http://www.bankofengland.co.uk/publications/Documents/fsr/2014/fsrfull1406.pdf>

¹⁹ Shorthand Social Case Study on the pilot housing association Right to Buy Extension

<https://social.shorthand.com/insidehousing/jydttxO6P/the-right-to-buy-extension>

²⁰ Inside Housing article "First tenants purchase homes under Right to Buy pilots"

<http://www.insidehousing.co.uk/first-tenants-purchase-homes-under-right-to-buy-pilots/7016750.article>

²¹ Memorandum for the House of Commons, Committee of Public Accounts, Department for Communities and Local Government, Extending the Right to Buy <https://www.nao.org.uk/wp-content/uploads/2016/03/Memorandum-extending-the-right-to-buy.pdf>

association as affordable housing. According to the Strategic Housing Market Assessment Final 2014²² (SHMA) this figure should be nearer 20%.

3.1.5 *Delivering affordable housing*

Tewkesbury Borough Council has a target to deliver 40% affordable housing in accordance with the emerging JCS plan on all market-led development within the Borough. However, the government continues to reduce planning obligations on developers to incentivise development of new homes through a policy of zero affordable housing contributions on small sites of 10 or less dwellings or sites of less than 1000sqm unless in a designated area (for Tewkesbury Borough this is AONB only)²³.

The council seeks to work with developers and housing associations to provide housing for sale within affordable levels, giving considering local incomes and house prices. At present a new-build first sale shared ownership²⁴ share for an applicant cannot exceed 75% of the property's full market value. Typically on first sale the share sold is more likely to be between 35% and 50% of the property's full value depending on the area of the borough.

Evidence from the SHMA informs us of the most suitable mix of tenures across a development. However, like all policies regarding planning obligations we negotiate the percentage of affordable housing that can be delivered considering viability as well as suitable tenure mixes and house types. The council will continue a flexible approach to new development in the borough to ensure that new homes can be delivered within suitable timescales to meet our corporate objectives as well as delivering our housing planning policies of the JCS and Local Plan.

3.1.6 *Challenges for the affordable housing sector*

The rent cap affects housing associations where the rents on their rented properties are to be at local housing allowance (LHA) and will need to be considered in terms of rented housing products. A realistic percentage of rented housing on new developments will need to be established, possibly on a site-by-site basis, so that the affordable housing provision on-site is indeed affordable to local people. This may mean specific house sizes are required to be set at particular rents levels i.e. within the LHA.

The Welfare Reform Act 2012²⁵ is the borough's most significant legislative change impacting on our approaches for meeting housing need. For example, those on low incomes are struggling to find suitable low cost housing as the Localism Act brought in affordable rents. Housing associations are unable to draw down government grant for social rented housing (rented at around 55% of open market rent) and are to seek affordable rent (up to 80% of open market rent, inclusive of service charge). While this generates more income for

²² The Strategic Housing Market Assessment Final 2014 can be found in the housing section of the council's webpage Strategies and Policies <https://www.tewkesbury.gov.uk/strategies-and-policies>

²³ National Planning Policy Guidance; Planning Obligations Para 31 <http://planningguidance.communities.gov.uk/blog/guidance/planning-obligations/planning-obligations-guidance/>

²⁴ Section 1 and Section 4 of the Capital Funding Guide for Shared Ownership details the main features of the scheme and the rent and service charge element <https://www.gov.uk/guidance/capital-funding-guide/11-shared-ownership>

²⁵ Welfare Reform Act 2012 <http://www.legislation.gov.uk/ukpga/2012/5/contents>

housing associations, our residents in housing need now require more money towards their housing costs, often not fully met by the current housing benefit levels. The council seeks to negotiate rent levels at planning stage but this must be agreed based on the development viability.

Tewkesbury Borough Council's housing services team are working with the revenues and benefits team to identify and contact all residents who are currently claiming discretionary housing payments (DHP) to cover the financial shortfall in their rent through under occupation. This work will be ongoing to support residents to find alternative ways of 'topping up' their rent or to support them to move to a more affordable property and/or suitably sized home.

We continue to monitor the effects of the under-occupation charge, commonly known as the 'bedroom tax', brought in by the Welfare Reform Act where social housing tenants who are under-occupying a property are charged a rate to pay for the extra room. This is 14% of net rent for one spare bedroom or 25% for two or more spare bedrooms. In reality the charge saw a smaller number of households than anticipated move to more suitably sized accommodation with the majority of those affected by the charge able to afford to remain in their home and pay the charge.

Increasing income for housing associations and initiating more housing building by them has been contradicted by the requirement to reduce their rents by 1% per annum in each of the next four years with effect from 1 April 2016. The Welfare Reform and Work Act 2016²⁶ requires housing associations to comply with maximum rent requirements for new tenancies. This has placed pressure on housing associations to reduce their costs and has for some limited their capacity. Many Housing associations are committed to their new-build programmes whilst others are reducing theirs. Smaller housing associations whose income is significantly affected by the 1% rent reduction are likely to seek opportunities such as partnering with other housing associations to deliver new homes and small rural and in-fill development.

3.1.7 Environmental impacts of new homes

During our consultation period it was brought to our attention that Tewkesbury Borough Council needs to have an awareness of the potential improvements in construction by incorporating flood resilience measures where appropriate, for example reflecting the Environment Agency flood zones. It is therefore necessary to fully understand the requirements for new homes as well as providing support for communities when they are flooded. It will be for the Council's Flood Risk Management Group to determine measures in new housing development and the planning process; however it is the vision of this document that all possible support will be given to such wider priorities of Tewkesbury Borough Council and its communities.

²⁶ Welfare Reform and Work Act 2016 <http://www.legislation.gov.uk/ukpga/2016/7/contents/enacted>

3.1.8 *Private rented sector and empty homes*

The council recognises that the private rented sector is growing and will continue to do so in a growing area like Tewkesbury Borough; it will also support the borough to meet its housing needs. The council takes its statutory enforcement role seriously and where landlords are not meeting the standards required will deliver a robust service as described above. This is particularly important that the Council can now discharge its homelessness duty into the private rent sector (see Appendix 2: Homelessness and Homelessness Prevention Strategy). Ensuring such homes are available and appropriate and that the tenancy can be sustained is, therefore, increasingly important.

However, whilst a large proportion of the environmental health team's time is spent on enforcement this is only to deal with a small proportion of the worst private rented housing. Enforcement should only need to be a last resort. We wish to place a larger emphasis on the proactive role the council will play in helping landlords in the early stages. This is in particular for owners where being a landlord is not their core business, or reluctant landlords such as those who inherit a property but do not wish to sell it. The council will promote sources of advice that are available to landlords, existing private tenants and residents considering private renting.

The council will work with the other Gloucestershire district councils to promote the 'Fit to Rent' common accreditation scheme for landlords and letting agents across Gloucestershire. Sign-up to the scheme has been low and so the environmental health team shall promote the scheme and the benefits of accreditation.

Crucially, prospective tenants need to be made aware of the advantages of selecting a property owned by an accredited landlord or managed by an accredited letting agent. The environmental health team aims to maximise the number of inspections of properties owned by accredited landlords so that they can be given advice on the improvements that could be made.

Further to new-build housing, the council's environmental health team works closely with partners on initiatives handling operational (enforcement) actions to bring empty homes back into use. Most empty homes brought back into use will become private sector homes. The team will aim to ensure that each property achieves the highest standard. Enforcement options will include the Housing Health and Safety Rating System (HHSRS) under the Housing Act 2004²⁷, Empty Dwelling Management Orders, enforced sale and compulsory purchase orders (CPO).

²⁷ Housing Act 2004 <http://www.legislation.gov.uk/ukpga/2004/34/contents>

3.2 Homelessness and Homelessness Prevention

Local housing authorities have a statutory duty to provide advice and assistance to anyone who is homeless or threatened with homelessness (as outlined in the Housing Act 1996²⁸ as amended).

The Council's housing services team undertakes enquiries to assess what duties and assistance can be offered to those seeking help. Our focus is to work with our clients to prevent their homelessness wherever possible. If we are unable to prevent homelessness, the council has further statutory duties to secure accommodation for eligible vulnerable homeless households.

Our focus will be on preventing homelessness wherever possible and our joint interventions with our Council colleagues and partners are likely to include:

- Establishing if households are entitled to exemptions from welfare reform changes
- Advising residents of changes and the personal impact on their household
- How they can avoid financial hardship
- Offer financial advice and advice on the benefits of securing employment, and
- Working with the financial inclusion partnership to offer temporary assistance through discretionary housing payments, advice and assistance on arrears, working with housing providers to avoid possession proceedings.

Changes associated with welfare reform are likely to continue throughout the lifetime of this strategy and we will continue to take a proactive approach to identifying cohorts and clients. We will work with our partners and affected groups to offer early resolution to affordability issues. Those most likely to be affected will be:

- Those under-occupying affordable rented housing
- Those under 35 in unaffordable private rented, affordable rented housing, in supported accommodation, or at risk of homelessness.
- Those likely to be affected by the reduction of the benefit cap
- Those in affordable rents (rents set at 80% of the market rent) who may be affected by unaffordability following the implementation of the welfare reform changes.

The challenges facing Tewkesbury Borough Council, the implications of the above changes and further analysis of homelessness and homelessness prevention can be found in Appendix 2: Homelessness and Homelessness Prevention Strategy 2017-2021. It outlines our commitment, priorities and objectives to meet the needs of those threatened with homelessness within Tewkesbury Borough. Actions to be taken are detailed as part of this overarching document and can be found in Section 8.

²⁸ Housing Act 1996 <http://www.legislation.gov.uk/ukpga/1996/52/contents>

3.3 Meeting the needs of specific groups

3.3.1 Requirements for accommodation assessments

Many information sources have been used to assess housing needs and supply including the Strategic Housing Market Assessment (SHMA), the housing register for rented affordable housing, the housing register for affordable home ownership schemes, MAIDeN (Gloucestershire Information Observer) and nationally available databases such as the census, Office of National Statistics and Land Registry.

The Borough Council is required to undertake several assessments; a Strategic Housing Market Assessment (SHMA) and a Gypsy, Traveller and Travelling Show People Accommodation Assessment (GTTSA) as per the National Planning Policy Framework²⁹ (NPPF) and associated Planning Practice Guidance³⁰ (PPG).

The planning policy for traveller sites³¹ is one that supports provision such as rural exception sites to meet the housing and accommodation needs of gypsies, travellers and travelling showpeople. However the updated 2015 policy changes the definition of these groups for planning purposes. Under the JCS the council's requirement for additional pitches and plots to the year 2031 has now reduced owing to households in Tewkesbury Borough not meeting the new definition. We will continue to have an accommodation need for households who do not meet the definition and be required to provide suitable sites. These households will who do not meet the definition will have their needs assessed through the SHMA. Those who do meet the definition will continue to have their accommodation needs assessed through the GTTSA. The accommodation needs of gypsies, travellers and travelling showpeople are evidenced in Appendix 1c section 7, page 12.

The SHMA assesses our Borough-wide housing and accommodation needs and we work with our neighbouring authorities as our housing market areas cross administrative boundaries. The most recent assessment was published in 2014³² and identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period. The SHMA has guided us in our requirements for rented and shared ownership affordable housing, however it does not consider more detailed aspects of the sector that are emerging. Further to changes from central government we now require a new assessment in order to meet housing needs against the initiatives. As a county we will continue to work together to appoint consultants in 2017 to address additional areas in the SHMA such as:

- The future impact of welfare reform
- Affordability of the tenures
- Specialist housing and care for older people and people with disabilities
- Self-Build
- Starter Homes

²⁹ National Planning Policy Framework <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³⁰ Planning Practice Guidance <http://planningguidance.communities.gov.uk/blog/guidance/>

³¹ Planning Policy for Traveller Sites 2015 <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

³² Gloucestershire SHMA <http://tewkesbury.gov.uk/index.aspx?articleid=1907#SHMA>

- Accommodation needs of non-travelling gypsies and travellers

3.3.2 *Larger families*

The benefit cap for larger families will impact on the willingness of housing associations to develop larger family properties. This has already been noted in ongoing new developments where at the planning stage a 6-bed home was negotiated but at the build stage, the council and the housing association involved agreed to change the property to a smaller home. The members of staff involved from both organisations were unable to find a large family with a suitable level of income to move into the property. Many large households opted to remain in their current home and over-occupy so they can continue to afford their rent.

Welfare reform is likely to cause financial hardship for many residents on low incomes in our borough throughout the lifetime of this strategy. Homeless charities such as Crisis and Homeless Link are reporting that reductions in benefit levels associated with welfare reform, and changes in the way that benefits are paid through Universal Credit are increasing the risk of homelessness³³. We are committed to mitigating the impact of welfare reform on financially vulnerable households in the borough to reduce the risk of homelessness.

3.3.3 *Financial inclusion*

The rationale behind welfare reform is to incentivise work and reduce the cost of welfare³⁴. Households will be exempt from many of the most impactful reforms if they are in employment. Resolving financial hardship and preventing homelessness will inevitably involve supporting affected households to understand how the reforms will impact on them. Tewkesbury Borough Council is a key partner in the borough-wide Financial Inclusion Partnership to encourage households into employment wherever possible.

We are committed to identifying cohorts of clients likely to be affected by forthcoming reforms with a view to early intervention with partners in the Financial Inclusion Partnership. The partnership has recently commissioned research by Policy in Practice³⁵ on the projected cumulative impact of Welfare Reform within the borough with a view to identifying individuals and cohorts of residents likely to be significantly affected.

Evidence from the Policy in Practice research can be found in Appendix 1b where the impact of welfare reform has been analysed for Tewkesbury Borough and includes:

- The under occupation charge
- Local housing allowance
- The benefit cap at £26,000 and the new lower cap of £20,000 as at November 2016
- The profile of households capped
- Changes to benefit for young people
- The removal of the WRAG premium (work related activity group)

³³ Fair welfare campaign <http://www.homeless.org.uk/our-work/campaigns/policy-and-lobbying-priorities/fair-welfare-campaign>

³⁴ Welfare Reform 2.0 - Long-term solutions, not short-term savings
<https://www.policyexchange.org.uk/images/publications/welfare%20reform%20%20point%20.pdf>

³⁵ The cumulative impact of welfare reform in Tewkesbury Borough

- Housing benefit capped at local housing allowance (LHA) rates for social rents
- The LHA freeze
- Removal of the Housing Benefit Family Premium
- The impact of universal credit
- The cumulative impact of welfare reform.

The housing services team are committed to working with our council colleagues in revenues and benefits and partners namely the Department for Work and Pensions (DWP), housing associations, support providers, and Citizens Advice Bureau to identify the vulnerable cohorts and work with the affected households to resolve these difficulties. Our strong working relationships within the Tewkesbury Borough Financial Inclusion Partnership will be invaluable in managing the effects of welfare reform.

Revenues and benefits teams can offer temporary support to those affected by welfare reform changes with Discretionary Housing Payments (DHP) to prevent financial hardship whilst alternative, more permanent solutions are sought. However, this must only be an intervening measure as the DHP funding is not long-term and is likely to diminish over time. Tenants must seek to find employment or increase working hours to enhance their income to afford rents.

We will work with our colleagues in the revenues and benefits team, the DWP and housing associations to identify affected households and offer sustainable solutions. We will also work with housing associations operating within Tewkesbury Borough to establish how they can continue to meet the housing needs of those households unable to meet their housing needs through affordable housing products.

3.3.4 *Older People*

Population changes will present an increasing challenge for the borough in relation to additional pressure on health and social care and the need for more specialist accommodation. There is also evidence that a number of homes in both the social/affordable rented sector and market sector are currently under-occupied, particularly in rural areas.

The Care Act 2014³⁶ includes housing as a fundamental component. The Act looks at the suitability of accommodation for those at home receiving care and support. The Act and the accompanying regulations and guidance outline how housing can support a more integrated approach of particular note:

- A duty to promote well-being.
- Housing not just the 'bricks and mortar' but also includes housing related support.
- Housing must be considered as part of the household's assessment process
- Information and advice should reflect housing options, as part of a universal service offer

³⁶ The Care Act 2014 <http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted/data.htm>

- Care and support is to be delivered in an integrated way with cooperation with partner bodies, including housing services.

Tewkesbury Borough offers 40 retirement homes, sheltered housing and extra care housing accommodating 1,004 dwellings along with 25 care homes of 798 units of accommodation. Of the care homes, 12 are specific for older people (aged 55 and over), with the remaining accommodating any person with care needs and for people with specific disabilities.

Tewkesbury Borough will see significant growth in its older population and accommodation needs for this group are likely to change. For example, as we live healthier for longer our accommodation needs become different where we stay more active and mobile for longer and seek a more suitable home for our lifestyle. 36.47% of the Homeseeker Plus waiting list state that their vulnerability is worsened by their housing situation. Of this, a quarter (around 180 households) is over 60 years old.

Care homes are typically single bed units; there are few that are for couples or sharing. For many people having a disability and/or care need means living away from their family and friends in specialist housing; for some this is a necessity to receive around the clock care and support. For others their care needs can be and are being met in the family home but this often results in the home being unsuitable. More and more adaptations are required to existing homes across all tenures to ensure homes are suitable.

The countywide home improvement agency, Safe at Home, is funded by the six Gloucestershire district authorities, Gloucestershire County Council and the Gloucestershire NHS Trust, to assist clients with major works to their properties, focussing on providing services and assistance to elderly and vulnerable clients. Whilst this is the contracted countywide home improvement agency, the Council provides information on other agencies and surveyors in the local area that can help. The current contract has been extended until 2017 and at the time of writing, partners are considering priorities for future delivery. Providing adaptations is seen as particularly important given the possible health implications, care and support costs of residents not obtaining essential disabled adaptations in a timely fashion. However, it is essential that delivery of this aspect of the private sector housing service is integrated with all other aspects. We therefore work across services to assess housing need and whether a move to more appropriate accommodation is required.

3.3.5 *People with a disability*

Government statistics³⁷ show that people with disabilities have a poorer quality of life with a “*substantially higher proportion of individuals who live in families with disabled members live in poverty, compared to individuals who live in families where no one is disabled.*”

Barriers to employment and education are improving but remain significant as there is “*a 30.1 percentage point gap between disabled and non-disabled people, representing over 2 million people*” and that disabled people “*are around 3 times as likely not to hold any qualifications compared to non-disabled people, and around half as likely to hold a degree-level qualification*”.

³⁷ Figures published in 2014 by the Office for Disability Issues Department for Work and Pensions <https://www.gov.uk/government/statistics/disability-facts-and-figures>

In terms of housing these statistics say that “*Although the gap in non-decent accommodation has closed over recent years, 1 in 3 households with a disabled person still live in non-decent accommodation. 1 in 5 disabled people requiring adaptations to their home believe that their accommodation is not suitable*”.

With 2.5% of the housing waiting list requiring a ground floor, wheelchair property with specific adaptations, we must work with partners across the housing, health and social care sectors to consider how these homes will be built.

We must also consider the challenges faced when working with the house-building sector, particularly larger house-builders, when affordable housing that is outside of the norm is requested as part of Section 106 agreements. The Council often has to negotiate reduced overall affordable housing contributions in order to build specialist housing due to the costs associated.

3.3.6 Rural affordable housing

The Gloucestershire Rural Community Council (GRCC) state that:

“The lack of suitable affordable housing in Gloucestershire is a serious problem for many people who are forced to move home out of the countryside and into our larger towns and cities. The movement of people away from their roots has a major impact on rural communities in Gloucestershire, both socially and economically.”³⁸

The council’s work with GRCC is to facilitate rural exceptional housing whereby under exceptional circumstances development can be brought about to meet a specific need i.e. affordable housing need, in a village, parish or a specific area.

For a rural local authority where housing in villages and small communities (fewer than 3,000 population) comes through on small sites, the government’s small sites policy may come into effect and the Council cannot negotiate on-site affordable housing. This results in less affordable homes for local communities

Whilst planning policies will aim to maximise affordable housing delivery, the council must continue to facilitate rural exceptional housing development to meet local needs. There are numerous struggles that face the council in bringing about rural affordable housing including, sourcing suitable developable land with a willing land owner, building relationships with local representatives such as parish councils, and funding such a project.

Seventeen of our 50 parishes in Tewkesbury Borough have zero affordable housing at this time; this is over a third. In 19 parishes there are less than 1% of dwellings that are affordable. The council is aspiring to deliver more homes in rural areas so that these communities continue to thrive. See Appendix 1c, section 6, page 11 for a full table of the 40 most rural parishes in Tewkesbury Borough and the percentage of affordable housing stock.

³⁸ Gloucestershire Rural Community Council <http://www.grcc.org.uk/affordable-rural-housing/affordable-rural-housing>

There are numerous benefits to rural development including retaining young families in the area to support the local economy, schools and keeping families closer together as well as enabling those wishing to downsize to remain in the village in more suitably sized accommodation.

Housing associations are essential in delivering small-scale rural development and have shown continued commitment to Tewkesbury Borough in recent years and engagement through the Gloucestershire Rural Housing Partnership³⁹.

3.3.7 Asylum seekers and refugees

Tewkesbury Borough is a partner within the Gloucestershire Syrian Resettlement Programme and has worked with our partners Severn Vale Housing and GARAS (Gloucestershire Action for Refugees and Asylum Seekers) to provide accommodation for vulnerable families in our borough. We will continue to meet our commitment to this group during the lifetime of this strategy.

3.4 Improving the health and well-being of local people

3.4.1 More than bricks and mortar

The Housing Strategy must address more than bricks and mortar; more than simply the number of homes. Tewkesbury Borough Council understands the importance of building communities as well as homes. The Joint Core Strategy not only deals with the housing development but also the infrastructure and economic development of the 3 districts of Tewkesbury, Cheltenham and Gloucester.

Here in Tewkesbury Borough the Council's community development team works from a 'place' perspective; a way of engaging with our communities as well as supporting them to achieve their potential and reduce dependency on the council and other public services. What want our communities to thrive and feel empowered to do for themselves. We truly want Tewkesbury Borough to be a place where a good quality of life is open for all.

We will ensure our residents are well supported to enable them to live life to the fullest and it starts with good quality housing.

3.4.2 Stock condition and fuel poverty

The condition of the existing housing stock is important to ensure that residents are living in decent, safe accommodation which is suited to their needs. The condition of the housing stock is important to ensure that the increase in net housing stock through growth is not offset by a reduction in the number of existing homes which are habitable. Equally it is necessary to mitigate against the potential unintended consequence of growth that poor quality private sector housing leads to migration from existing communities into more attractive new housing developments leading to low demand neighbourhoods.

³⁹ Gloucestershire Rural Housing Partnership <http://www.grcc.org.uk/affordable-rural-housing/gloucestershire-rural-housing-partnership->

Living in poor condition, cold, damp homes that are not suitable for a household's needs have a detrimental effect on the health and wellbeing of the occupiers. When accidents and illness occur because homes are not fit, it has an impact on a person's ability to participate in work, education, social and other activities and consequently impacts on social care services and the NHS.

The significant shift in emphasis on home owners being responsible for repairs to their properties has to be reflected in this Strategy. The majority of home owners will, therefore, be offered no more than self-help to secure home improvements. Nevertheless, the Council recognises that there will be situations where support is necessary and appropriate for vulnerable home owners.

The council's environmental health service offers advice that aims to demonstrating to a private landlord the works that are needed to avoid enforcement action being taken against them, for landlord accreditation and or for the property to be accepted onto a Local Letting Agency; they also provide an owner of an empty home with details of the works necessary to put the property in a state suitable for letting or that are likely to affect the sale price of the property.

The Council will take appropriate action against landlords and home owners as appropriate in accordance with the Council's Corporate Enforcement Policy⁴⁰. This includes a period of informal action to encourage a landlord to take action voluntarily.

In the main the council will refer enquirers to the Gloucestershire Warm and Well energy advice helpline for general advice on how to save energy in the home. This service is currently provided by Severn Wye Energy Agency.

The Environmental Health team will establish the suitability or otherwise of the property in regards to condition, affordable warmth and space. If the householder raises a potential need for disabled adaptations details shall be referred to Gloucestershire County Council's Adult and Children Social Care, Customer Contact Centre for assessment.

3.4.3 Houses in multiple occupation

There are thought to be exceptionally few houses in multiple occupation (HMO) requiring mandatory licensing in Tewkesbury Borough. Progressing licenses has, therefore, not been a priority to date. Nevertheless, the Council now recognises it should pursue owners operating a licensable HMO illegally.

Where a HMO requiring a license comes to the attention of the Council, the Environmental Health team shall send a standard application pack to the owner.

There also needs to be some preparation for any possible future changes in HMO licensing and therefore the Council will be aiming to identify all HMOs in the borough.

⁴⁰ The Tewkesbury Borough Council Corporate Enforcement Policy can be found in the housing section of the council's webpage Strategies and Policies <https://www.tewkesbury.gov.uk/strategies-and-policies>

3.4.4 *Going the extra mile*

The Gloucestershire Going the Extra Mile (GEM) Project⁴¹ will engage with 1,100 people over three years until December 2019 to support the county's most vulnerable adults into work, training or education. The project will identify potential work related opportunities for its Gloucestershire participants.

Target participants are women, individuals with addictions, over 50's, rural residents, people with physical disabilities, learning disabilities, carers, black and minority ethnic residents, homeless applicants, people with mental health issues, and unemployed residents.

The Council will ensure that all possible participants in the borough are signposted to GEM to receive the support they require.

3.4.5 *Supporting residents affected by welfare reform and helping people into work*

Housing associations will be impacted by the 1% rent reduction and have been reviewing business plans. Non-essential services and some community work for example could be affected as housing associations cut back. This is not the case for all and may not affect Tewkesbury Borough social housing tenants greatly, however we must be prepared for possible impacts on housing association tenancy support services.

The Council is increasingly reliant on working in partnership with housing associations with stock in our borough to respond to welfare reform changes. The impact is fully discussed in Housing Strategy Appendix 2 and associated evidence in Appendix 1b.

The Council will be working proactively with housing associations and other partners to support residents not only into work and seek employment opportunities gain qualifications and so on, but to help them gain the skills and confidence they need to active and productive members of their communities.

⁴¹ More information can be found in the Autumn 2016 newsletter
<http://www.gloucestershiregatewaytrust.org.uk/images/pdfs/GGC%20Community%20Partners%20News%20Autumn%202016.pdf>

4 Key Challenges

4.1 Increasing Housing Supply

- Robustness of affordable housing policies in the Tewkesbury Borough Plan that manage home ownership products as well as rented.
- Rent levels and sales values that ensure viability for developers and affordability for our residents.
- Meeting the number of new affordable homes needed.
- The possible reduction in affordable housing stock through the Voluntary Right to Buy (the extension to the Right to Buy for housing associations)
- Empty homes across the borough that should be brought into productive use/
- Quality private sector rented accommodation
- Support for both landlords and tenants in the private sector.

4.2 Homelessness and Homelessness Prevention

- Intervention at the earliest possible stage for households in crisis and ensuring they access our services
- Achieving the GOLD Standard in homeless prevention to give a cost effective and excellent service to those facing housing difficulties
- Working with residents and partners to mitigate the effects of Welfare Reform on tenancy affordability
- Improving choice for residents facing homelessness by improving access to the private rented sector
- Addressing the needs of home owners following the removal of the Mortgage Rescue Scheme.
- Lack of local alternatives to Bed & Breakfast (B&B)
- Limited number of accommodation spaces available for households
- Expense of emergency accommodation/ short term accommodation
- Supporting specific groups to access suitable emergency accommodation
- Supporting households with poor tenancy history to find a sustainable solution
- Lack of temporary accommodation within the borough
- Solutions for single households with dual diagnosis/multiple needs
- Continued use of the social housing sector for discharging homelessness duty
- Sourcing sustainable housing solutions for care leavers and young people under 35.
- Discharging Homeless duties to those affected by welfare reform
- Implement changes associated with the forthcoming Homelessness Reduction Bill

4.3 Meeting the needs of specific groups

- Affordability of housing for low-income households and households affected by Welfare Reform
- Housing large families in affordable accommodation.
- Seeking appropriate accommodation for gypsies and travellers.
- Housing those with very specific housing needs.
- Housing older people as the population ages.

- Meeting the housing needs of our rural communities.
- Understanding, supporting and meeting the demand and need for self/custom-build and Starter Homes.
- Meeting the housing needs of refugees and asylum seekers

4.4 Improving the health and well-being of local people

- How tenants and leaseholders of affordable housing can deal with issues themselves as non-essential services lessen.
- Working with private landlords to provide suitable housing that meet basic standards.
- Ensuring homes are suitably kept warm.
- Meeting the needs of those in houses of multiple occupation and licensing such properties where appropriate.
- Energy saving, particularly for those on low incomes ensuring they are not paying too much in energy costs for their home.
- Providing appropriate support for non-working households to mitigate welfare reform.

5 Addressing the challenges

- 5.1 These challenges will be addressed during the lifetime of the Strategy. Key priorities and objectives have been drawn from these challenges, see Section 6 overleaf.
- 5.2 Following consultation on these priorities and objectives, we believe that Tewkesbury Borough Council is in a good position to address the challenges its housing and related services face over the next 5 years.

6 Tewkesbury Borough Council Housing Strategy 2017-2021 Key Priorities

From this work we have concluded that there are 4 key priorities for Tewkesbury Borough Council; under each priority there are objectives to focus on for the next 5 years.

109

Priority 1: Increasing the supply of housing

- 1.1 Encouraging new developments to meet the aims of the Joint Core Strategy.
- 1.2 Develop housing policies in the Tewkesbury Borough Plan that facilitates and enables affordable housing delivery.
- 1.3 Using financial sums from development to fund the building of more specialist and affordable homes.
- 1.4 Bring empty homes back into use across the Borough.
- 1.5 Maximise the opportunities of the private rented sector.

Priority 2: Prevent homelessness

- 2.1 Continue to improve the proactive homelessness prevention programme.
- 2.2 Implement and follow the GOLD Standard.
- 2.3 Evaluate implications of Welfare Reform changes and establish options to minimise the risk of homelessness.
- 2.4 Review the provision of temporary accommodation.
- 2.5 Stop the use of B&B accommodation for homeless households except in emergencies.

Priority 3: Meet the housing needs of specific groups

- 3.1 Consider and act on the outcomes of our accommodation assessments to assess our communities' needs.
- 3.2 Promote and facilitate rural affordable housing development.
- 3.3 Work with the health and social care sectors to provide effective housing-related support for vulnerable people.
- 3.4 Evaluate the provision of accommodation-based support for specific groups.
- 3.5 Work with partners to facilitate appropriate accommodation for refugees and asylum seekers as legislation and policy requires.

Priority 4: Improving the health and well-being of local people

- 4.1 Work with private landlords to ensure their properties meet basic standards and support them to improve the condition of their properties.
- 4.2 Continue working with and supporting schemes that provide advice and assistance to vulnerable households to help them reduce fuel costs and promotes safety through the installation of minor adaptations in the home.
- 4.3 Work with our partners to actively encourage individuals to take up educational, employment or other activities to support independence and create a sense of worth.

7 Monitoring our Strategy

This Strategy will be regularly monitored and reviewed by the Portfolio Holder. Annual action plans will be agreed by Executive Committee with annual reporting to Overview and Scrutiny Committee for review of achievements and future challenges.

Our annual action plan will be updated regularly and will be made publically available on the council's [housing webpages](#)⁴². This will ensure that all our stakeholders can see the progress we are making and when new actions are being taken to achieve our objectives.

Our action is to be shaped annually (calendar year) to be pro-active as well as re-active to the changing needs of our community and challenges facing us when new government policies are implemented.

We want our Housing Strategy to be as flexible as possible so that we can continue to take action where necessary and start new actions when appropriate to do so over the 5 year strategy period.

Each of the 4 priorities are referenced with the letter P and the priority number i.e. Priority 1 is P1. Each action to be achieved is then numbered (in no particular order) with a number to get the ID reference i.e. P1.1; P1.2 and so on. All actions have a deadline date to be achieved.

Section 8 overleaf details the action plan for the first year of the Strategy during the 2017 calendar year; there is at least one action for each objective.

⁴² The council's housing webpages: <https://www.tewkesbury.gov.uk/housing-strategy>

8 Housing Strategy Action Plan Year One: 2017

This Housing Strategy Action Plan for 2017 has been created by Tewkesbury Borough Councillors with officer support and with guidance from the consultation responses to prioritise areas of work for the next 12 months. This action plan identifies specific steps Tewkesbury Borough Council needs to take in order to achieve the priorities and objectives of the Housing Strategy during year one of the Strategy.

Priority 1 Increase the supply of housing

ID ref	Action	Objective to which the action contributes	Responsible Person	Required resources	Deadline
P1. 1.	Investigate how alternative construction methods can deliver new affordable housing on council-owned land	Objective 1.1	Strategic Housing & Enabling Officer	Input from: Property Services Development Management Severn Vale Housing Society	July 2017
P1. 2.	Establish detailed affordable housing policies for the Tewkesbury Borough local plan	Objective 1.2	Strategic Housing & Enabling Officer	Input from: Planning Policy Development Management	July 2017
P1. 3.	Produce a guidance note that determines the use of commuted sums (financial contributions in lieu of on-site affordable housing) and seek Executive Committee approval	Objective 1.3	Strategic Housing & Enabling Officer	Input from: Democratic Services Housing Services Manager	March 2017
P1. 4.	Identify long-term empty homes and evaluate their potential benefit to the council's housing service.	Objective 1.4	Environmental Health Manager	Input from: Revenues and Benefits Housing Services	December 2017
P1. 5.	Use a range of enforcement actions to bring vacant properties back into use	Objective 1.4	Environmental Health Manager	Input from: Revenues and Benefits Housing Services	December 2017
P1. 6.	Evaluate potential for additional promotional activities with private sector landlords to boost availability of homes in the borough.	Objective 1.5	Environmental Health Manager	Input from: Revenues and Benefits Housing Services	December 2017

Priority 2 Homelessness and Homelessness Prevention

112

ID ref	Action	Objective to which the action contributes	Responsible Person	Required resources	Deadline
P2. 1.	Improve advice process in prevention paperwork to incorporate action plans that include customer actions.	Objective 2.1	Housing Services Manager	None	June 2017
P2. 2.	Contact all housing associations and private landlords who have worked with us to prevent homelessness to develop an eviction/ prevention protocol	Objective 2.1	Housing Services Manager	None	June 2017
P2. 3.	Develop solutions for homeowners with special housing needs in mortgage difficulty	Objective 2.1	Housing Services Manager	Input from: - Housing association partners - Financial resources need to be identified	April 2018
P2. 4.	Improve housing services website and include a landlord advice section	Objective 2.1	Housing Services Manager	None	June 2017
P2. 5.	Update the housing services housing options/homelessness form	Objective 2.1	Housing Services Manager	None	June 2017
P2. 6.	Work with local authority partners on Gold Standard Programme and achieve 60% in peer review	Objective 2.2	Housing Services Manager	None	September 2017
P2. 7.	Introduce an early intervention protocol for tenants affected by welfare reform including transitional support and assistance to find work	Objective 2.3	Housing Services Manager	Input from: - Financial Inclusion Partnership - Council's revenues and benefits - Department for Work and Pensions - Housing associations - Citizen's Advice Bureau - Going the Extra Mile Project - Greensquare Support	July 2017

Priority 2 Homelessness and Homelessness Prevention continued

ID ref	Action	Objective to which the action contributes	Responsible Person	Required resources	Deadline
P2. 8	Stop the use of private bed and breakfast accommodation except in emergencies.	Objective 2.4 Objective 2.5	Housing Services Manager	Input from: Housing association partners	April 2018
P2. 9	Procure cost effective temporary accommodation within Tewkesbury Borough for accepted households with poor tenancy histories who are difficult to rehouse including properties suitable for households with mobility needs	Objective 2.4 Objective 2.5	Housing Services Manager	Input from: Housing association partners	April 2018
P2. 10	Work with county local authority partners to find solutions for high risk/high support/multiple needs homeless households	Objective 2.4 Objective 2.5	Housing Services Manager	Input from: Partner local authorities for multi-authority solution	Find funding solutions by April 2018
P2. 11	Implement changes associated with the forthcoming Homelessness Reduction Bill	Objective 2.1 Objective 2.2 Objective 2.3 Objective 2.4 Objective 2.5	Housing services Manager	To be identified	To be determined by the progress of the Bill.

113

Priority 3 Meeting the housing needs of those who need it most

ID ref	Action	Objective to which the action contributes	Responsible Person	Required resources	Deadline
P3. 1.	Commissioning, along with the district councils in Gloucestershire and other partners as appropriate, Strategy Housing Market Assessment	Objective 3.1	Planning Policy Manager	Strategic Housing & Enabling Officer	December 2017
P3. 2.	Evaluate the accommodation needs of Travellers and Non-Travellers (as determined by the 2016 updated Gypsy Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA))	Objective 3.1	Planning Policy Manager	Strategic Housing & Enabling Officer	December 2017
P3. 3.	Establish a local connection policy that ensures rural affordable housing development, via rural exception, is prioritised for the needs of the local community.	Objective 3.2	Strategic Housing & Enabling Officer	Input from: Rural Housing Enabler	In line with the Borough Plan affordable housing policy development timetable
P3. 4.	Establish a strategic managers group consisting of housing, health and social care to build relationships and create a joined-up way of working to better support vulnerable residents.	Objective 3.3	Housing Services Manager	Strategic Housing & Enabling Officer	December 2017
P3. 5.	Profile accommodation-based support that the council has access to in the county.	Objective 3.4	Housing Services Manager	Input from: Supporting People (Gloucestershire County Council)	December 2017

114

Priority 4 Improving the health and well-being of local people

ID ref	Action	Objective to which the action contributes	Responsible Person	Required resources	Deadline
P4. 1.	Maintain and promote the “Fit to Rent” Landlord Accreditation Scheme for landlords wanting to work with the council and be better trained to provide quality accommodation and management.	Objective 4.1	Environmental Health Manager	Input from all Gloucestershire districts (partners in the scheme)	December 2017
P4. 2.	Work with RP’s and partners to offer advice and assistance with grants, loans and support services (e.g. handyman services) to vulnerable and older people to help insulate, adapt and maintain homes.	Objective 4.2	Environmental Health Manager	Warm and Well contract and partnership agreement, agency services agreement / contract	December 2017
P4. 3.	Respond within 3 working days to customer complaints about housing conditions.	Objective 4.2	Environmental Health Manager	Environmental Health team	December 2017
P4. 4.	Reduce poor quality housing by taking appropriate action to deal with identified Housing Health and Safety Rating System Category 1 hazards.	Objective 4.2	Environmental Health Manager	Environmental Health team	December 2017
P4. 5.	Carry out the actions within the Strategy for Gloucestershire and South Gloucestershire Action for Affordable Warmth 2013 -2018	Objective 4.2	Environmental Health Manager	Gloucestershire Affordable Warmth Partnership	As per Strategy action plan

115

Priority 4 Improving the health and well-being of local people continued

ID ref	Action	Objective to which the action contributes	Responsible Person	Required resources	Deadline
P4. 6.	Regulate the standards of larger houses in multiple occupation and caravan sites by enforcing mandatory license conditions	Objective 4.2	Environmental Health Manager	Environmental Health team Housing Benefit team	December 2017
P4. 7.	To work with the council's community development team to ensure all council services are signposting residents to the 'Going the Extra Mile' Project	Objective 4.3	Tewkesbury Navigator	Funded through GEM Funding	Ongoing to September 2019

9 Glossary of key terms

This glossary is intended to cover all terms within the Housing Strategy 2017-2021 documentation. The Homelessness and Homelessness Prevention Strategy Appendix 3 provides its own Glossary of Terms to complement.

Affordable Homes Programme	DCLG funding that is available for Housing associations and house builders via the Homes and Communities Agency to increase the supply of Affordable Housing and specialist housing in England. Programmes are normally over a 3 year period with set target dates for drawing down grant and new-build completion. https://www.gov.uk/government/collections/affordable-homes-programme-2015-to-2018-guidance-and-allocations
Affordable Housing	Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Full definition as per National Planning Policy Framework 2012 or any successor document https://www.gov.uk/government/publications/national-planning-policy-framework--2
Affordable rent levels	Rented housing provided by a housing association subject to a rent of up to 80% of local market rents (inclusive of any Service Charge where applicable)
Building Regulations 2010 Approved Document M: Access to and use of buildings (and associated volumes and corrections) or any successor document	Building regulation in England to ensure that people are able to access and use buildings and their facilities https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approveddocument-m
Category 2 Housing	Optional requirement M4(2) – Category 2: Accessible and Adaptable dwellings https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m
Category 3 Housing a) Adaptable and b) Accessible	Optional requirement M4(3) – Category 3: Wheelchair user dwellings https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m
Code for Sustainable Homes	The Code is the national standard for the sustainable design and construction of new homes. The Code aims to reduce our carbon emissions and create homes that are more sustainable. This policy was withdrawn on 27 th March 2015.
Compulsory purchase order (CPO)	A legal function in the United Kingdom and Ireland that allows certain bodies which need to obtain land or property to do so without the consent of the owner.
Department for Communities and Local Government (DCLG)	A UK Government department established to create great places to live and work, and to give more power to local people to shape what happens in their area. Responsibilities include driving up housing supply, increasing home ownership, devolving powers and budgets to boost local growth in England, supporting strong communities with excellent public services.
Empty Dwelling Management Order	Empty Dwelling Management Orders: guidance https://www.gov.uk/government/publications/empty-dwelling-

	management-orders-guidance
Gloucestershire Going the Extra Mile (GEM) Project	The project will be managed by Gloucestershire Gateway Trust (GGT) on behalf of Gloucestershire County Council (GCC). The Gloucestershire GEM Project will engage with 1,100 people over three years from October 2016 and will focus on people who face challenges in getting into work, and support them to move closer towards education, training, volunteering or employment.
Gypsy, Traveller and Travelling Show People Accommodation Assessment (GTTSAA)	A document to provide an evidence base to enable authorities to comply with their requirements to gypsies, travellers and show people under the Housing Act 2004, the National Planning Policy Framework 2012, Planning Policy for Traveller Sites 2012 and 2015.
Homeseecker Plus	Homeseecker Plus is our choice based lettings system for letting social housing. It is a partnership formed between all six local Councils in Gloucestershire and West Oxfordshire District Council and many of the Housing Associations and social landlords operating in the area. Note: formerly known as Gloucestershire Homeseecker
Homes & Communities Agency (HCA)	The national housing and regeneration agency for England, with a capital investment budget https://www.gov.uk/government/organisations/homes-and-communities-agency
Houses of multiple occupation (HMOs)	As per government definition https://www.gov.uk/private-renting/houses-in-multiple-occupation
Housing associations	As defined in section 80 of the Housing and Regeneration Act 2008; also known as Registered Providers or Registered Social Landlords
Housing Benefit	Financial support to pay a tenant's rent if they are on a low income.
Housing & Planning Act 2016	Legislation that makes changes to housing policy and the planning system that includes Starter Homes; Extension of the Right to Buy; Sale of high value social housing; Improvements to the private rented housing sector; Self-build duty on local authorities; Planning policy for traveller sites. http://www.legislation.gov.uk/ukpga/2016/22/contents/enacted
Lifetime Homes Standard	The Lifetime Homes standard is a set of 16 design criteria that provide a model for building accessible and adaptable homes http://www.lifetimehomes.org.uk/ .
Local Housing Allowance (LHA)	LHA is used to calculate the amount of Housing Benefit for tenants who rent privately.
Low cost home ownership	The collective term for home ownership products under the Affordable Housing definition.
National Planning Policy Framework	"The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied" https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

National Planning Practice Guidance	Guidance to assist practitioners in the use of the NPPF http://planningguidance.communities.gov.uk/blog/guidance/
Planning Policy for Traveller Sites 2012 and updated 2015.	Sets out the Government's planning policy for traveller sites https://www.gov.uk/government/publications/planning-policy-for-traveller-sites
Rural exceptional housing development	Where, particularly in rural areas, a local need for affordable housing can be clearly demonstrated, and cannot be met in other way; exceptionally the council may permit residential development in accordance with the appropriate housing policies.
Social rent levels	Rents that are set by the housing association in accordance with the formula set by the Homes and Communities Agency (or its successor body)
Strategic Housing Market Assessment	A document that assesses the district's full housing needs and is the first step in the process of developing local plans as set out in the Planning Policy Guidance http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-landavailability-assessment/stage-5-final-evidence-base/#paragraph_045)
Warm and Well Scheme	Warm & Well can ensure older people stay safe and warm, whether they live in their own home or a rented property, by improving the energy efficiency of their homes. This will keep fuel costs down and reduce the risk of health problems linked to the cold http://www.gloucestershire.gov.uk/article/106393/Gloucestershire-Warm--Well---Energy-savinggrants-keep-older-people-safe-in-winter

At home in Tewkesbury Borough

A housing strategy for our borough 2017-2021

Appendix 1a: Our Local Evidence – Increasing Housing Supply



This page is intentionally left blank

Contents

List of charts and tables	Page 4
1 Introduction	Page 5
2 Population and households	Page 6
3 Planning for Development	Page 10
3.1 Affordable Housing Objectively Assessed Need	Page 10
3.2 Planning Policy	Page 10
3.3 Delivery against Local Plan Policy	Page 11
3.4 Construction	Page 11
3.4.1 Self-Build and Custom-Build	Page 11
3.4.2 Flood resilience	Page 12
3.4.3 Alternative construction methods	Page 13
4 Incomes, house prices and home ownership	Page 14
4.1 Ability to purchase a home in Tewkesbury Borough	Page 15
4.2 Accessing the housing market	Page 15
4.3 Starter Homes	Page 16
4.4 Planning obligations: changes to government policy	Page 16
5 Right to Buy	Page 17
5.1 Voluntary Right to Buy	Page 17
6 Housing Register (choice based lettings scheme)	Page 18
7 Profile of new accommodation	Page 22

List of Charts and Tables

Chart 1: Tewkesbury Borough age profile: how the age profile has changed and may change 1991 - 2010 - 2033	Page 6
Chart 2: How the mix of households has changed and is projected to change	Page 9
Chart 3: Households by housing tenure and house size, 2011	Page 7
Chart 4: Main reason for applying to Homeseeker	Page 18
Chart 5: Main reason for applying, top issues, by age group	Page 19
Chart 6: Number of households registered by bedroom need and banding	Page 20
Chart 7: Lets in Tewkesbury, by band, October 2009 to August 2016	Page 21
Chart 8: Profile of new accommodation required in Tewkesbury (lower scenario)	Page 22
Table 1: Mix of household sizes required to 2033	Page 8
Table 2: July 2016 housing register data as percentage of need	Page 8
Table 3: Number of completions and number of households registered for social housing	Page 9
Table 4: Size of additional units required to meet housing need (general needs) in Tewkesbury Borough-excluding households suitable for shared housing	Page 9
Table 5: Median income and house prices 2005 and 2015, along with the ratios for 2015	Page 14
Table 6: Home ownership sales under the help to buy agent, by Parish, Tewkesbury Borough April 2012-March 2016	Page 16
Table 7: Sales of Severn Vale Housing Society residential dwellings under Right to Buy from 1998/99 to July 2016	Page 17
Table 8: Households registered by bedroom need and banding as a percentage of all applicants	Page 20
Table 9: Bedroom need and current house type	Page 21

1 Introduction

This document outlines the evidence gathered by Tewkesbury Borough Council showing the housing and homelessness context in which the council is working.

We have used this evidence to identify 4 priorities for housing and homelessness along with key objectives for the next 5 years.

The strategy will link with the priorities outlined in the Council Plan 2016-2020, set out the council's priorities and objectives for housing, and appropriate activities that will help us to meet our statutory housing duty under the Housing Act 1996.

Housing is a priority in the Tewkesbury Borough Council Corporate Plan because:

"We recognise how important it is for residents to be able to access good quality housing and housing related services that make a real difference to their lives.

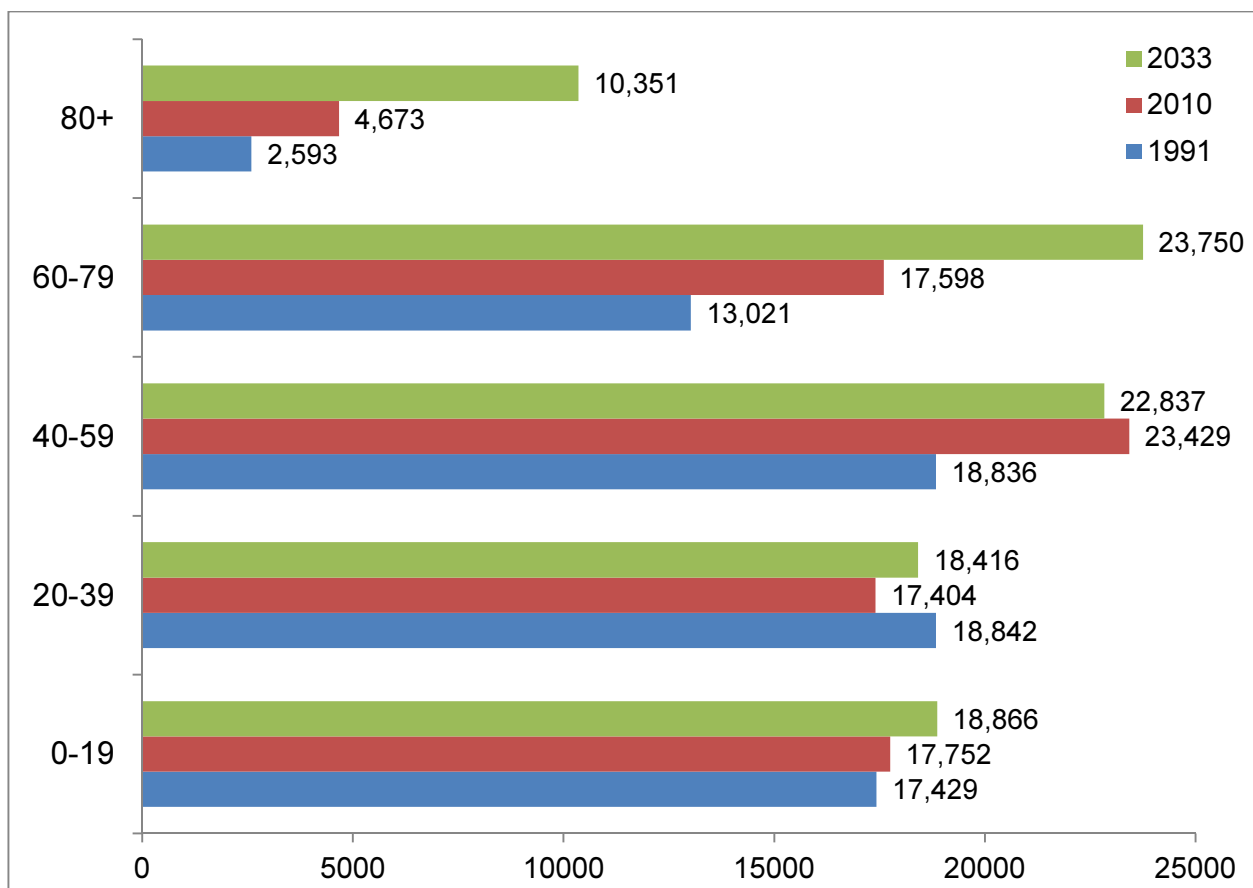
"Not only is housing important for the health and well-being of residents it is also an important part of building and maintaining strong communities and supporting the economic prosperity of the borough."

Tewkesbury Borough Council recognises that access to quality affordable housing underpins the success of our area and all of the overarching council priorities.

2 Population and households

Information from “What Homes Where 2013”, a toolkit¹ to help local authorities assess their housing needs shows us some of the key population issues. Our borough population is roughly 85,800; assuming current population trends continue, the ONS projections² for the next 25 years suggest that the population in Tewkesbury Borough will reach 93,400 by 2025 and 100,400 by 2037. The district’s growth rates are higher than those predicted for Gloucestershire and England in the short, medium and long term.

Chart 1: Tewkesbury Borough age profile: how the age profile has changed and may change 1991 - 2010 - 2033



Source: What Homes Where 2013

As shown above the dominating feature of the projected trend is a sharp increase in the number of older people aged 60 and over, particularly those aged 80+. Projections for children and young people indicate slower growth, while the working-age population is expected to show little change in the long term.

Population changes will present an increasing challenge for the borough in relation to additional pressure on health and social care and the need for more specialist accommodation. There is also evidence that a number of homes in both the social/affordable rented sector and market sector are currently under-occupied, particularly in rural areas.

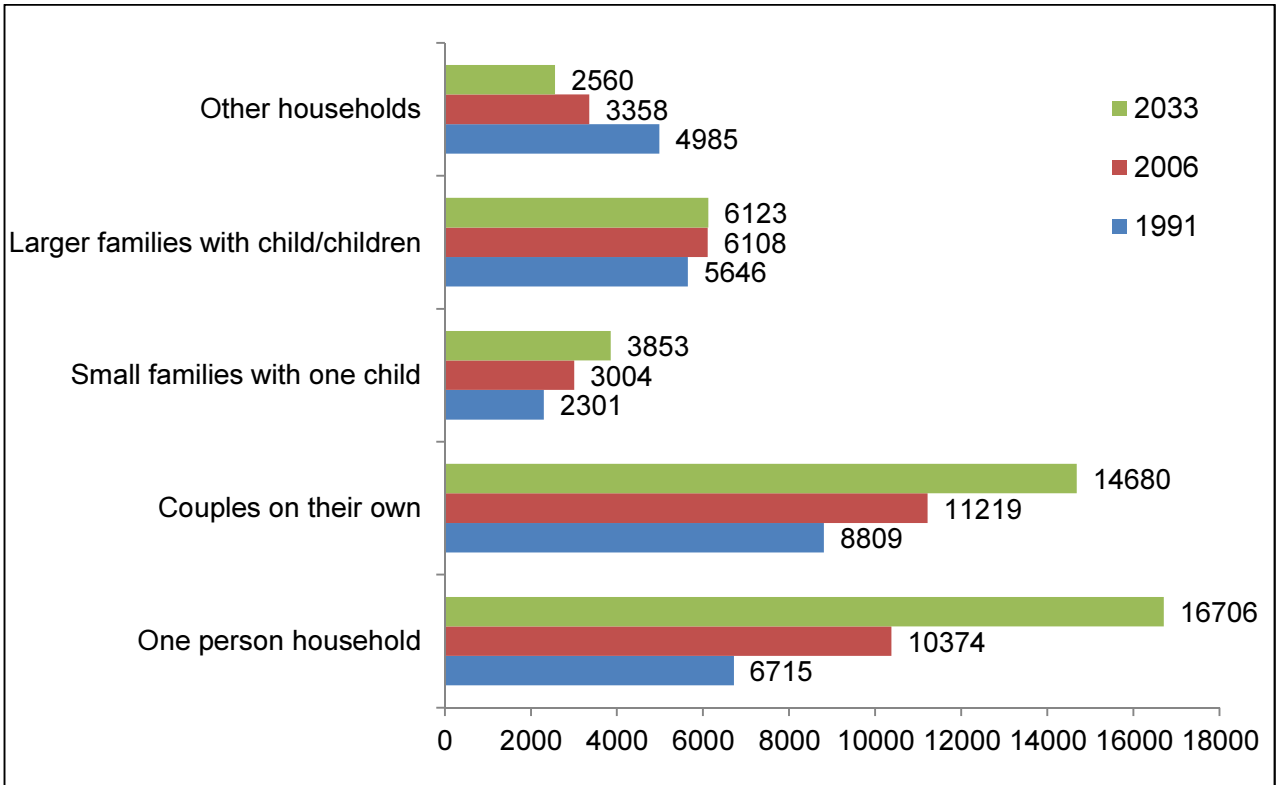
There continues to be an increase in one person households with this household type projected to overtake all others by 2033. Couples on their own and small families increases at a relatively

¹ What Homes Where, 2013 <http://www.howmanyhomes.org/>

² 2012-Based Sub-national Population Projections, Office for National Statistics

steady rate but larger family growth remains small. Other households include couples with adult children living at home, friends living in a property and so on, are predicted to decline:

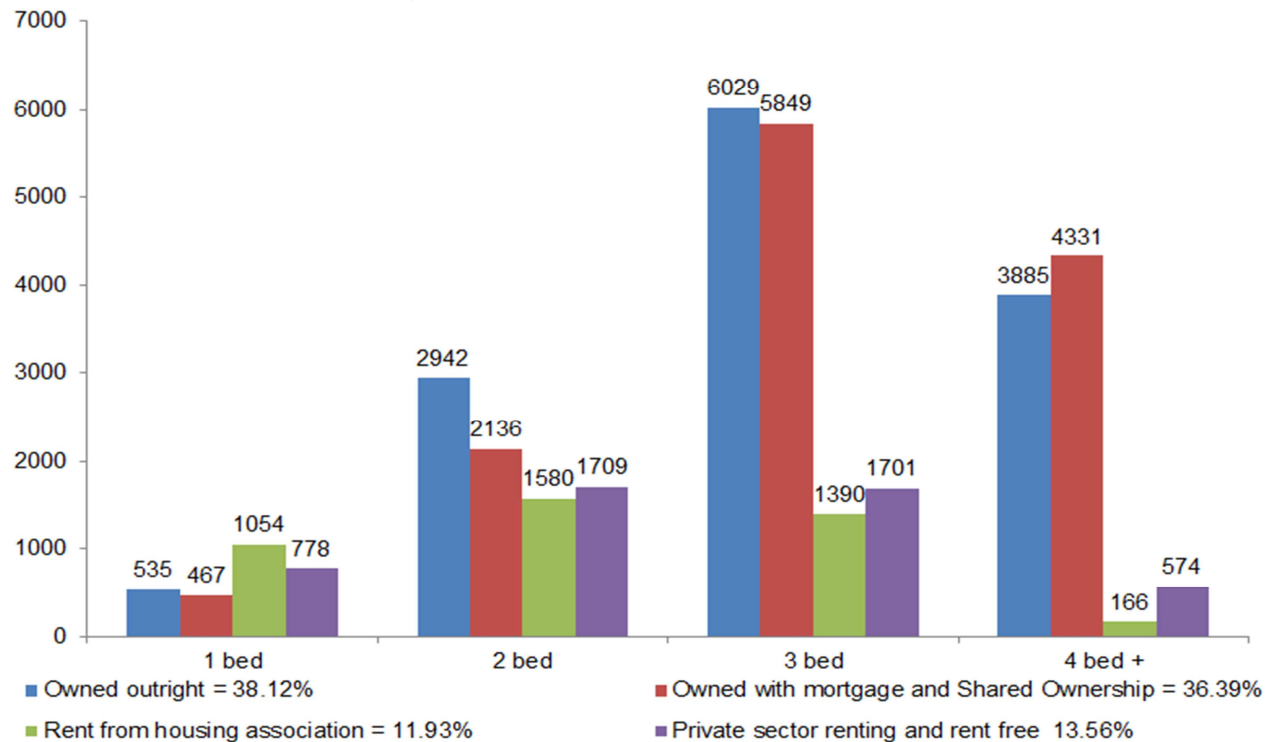
Chart 2: How the mix of households has changed and is projected to change



Source: What Homes Where 2013

The Census 2011 shows 35,126 households in Tewkesbury Borough. It informs us of the tenure that households state they are living in along with number of bedrooms, see Chart 3 below.

Chart 3: Households by housing tenure and house size, 2011



Source: ONS, Census 2011

Based on population and household changes, the What Homes Where toolkit also advises on suitable house sizes. For Tewkesbury Borough the main need is for smaller family housing:

Table 1: Mix of household sizes required to 2033

House size	1 bed	2 bed	2/3 bed	3 bed	3/4 bed	4/5+ bed
As % of all homes	3.12%	14.14%	27.59%	23.31%	17.64%	14.19%

Source: What Homes Where 2013

The extent of housing growth across Tewkesbury Borough has been beneficial for our households in need and the affordable housing dwelling stock in Tewkesbury Borough has been gradually increasing; however as an overall percentage of total dwelling stock there are just 11.8% of social housing stock homes. This number has increased by only 0.1% since 2010³.

The majority of the borough's housing stock (88.2%) therefore is privately owned (outright, mortgaged and private rented) and is generally in good condition. However homes in our borough are larger, more expensive properties. Affordable housing needs registers, Homeseeker Plus and Help to Buy South, as at July 2016 inform us of the needs of households currently seeking to rent or buy an affordable home in Tewkesbury Borough, see Table 2. The actual need/demand is for smaller properties:

Table 2: July 2016 housing register data as percentage of need

House type	1 bed	2 bed	3 bed	4 bed	5+ bed
As % of all Homeseeker Plus Tewkesbury Borough need	52.45%	32.88%	10.25%	3.90%	0.52%
As % of all Help to Buy South Tewkesbury Borough need	12.20%	53.90%	32.20%	1.69%	0.00%
Total	64.65%	86.78%	42.45%	5.60%	0.52%

Source: Tewkesbury Borough Council datasets

The Homeseeker Plus rented housing register has seen no turn around in need/demand for social rented housing. Since the commencement of choice based lettings in October 2009 and despite new build affordable rented homes (as shown in Table 3 overleaf), housing need in Tewkesbury Borough sees little shrinkage.

³ ONS Dataset: Housing summary measures: summary measures data, Table 14, October 2016

<http://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/housingsummarymeasuressummarymeasuresdata>

Table 3: Number of completions and number of households registered for social housing

Year End	2010	2011	2012	2013	2014	2015	2016	Total
Homeseeker snapshot as at 1 st April*	1498	1702	1877	2405	2010	1662	1928	
Open Market	261	271	277	322	360	428	390	2309
Affordable Housing rented	34	48	33	93	86	122	159	575
Affordable Housing home ownership	3	12	8	46	70	23	70	232
Total of all new build**	298	331	318	461	516	573	619	3116
Percentage of which is Affordable Housing	12%	18%	13%	30%	30%	25%	37%	26%

*Source: DCLG Local Authority Housing Statistics

**Source: Tewkesbury Borough Council Annual Monitoring Reports

The total number of Homeseeker Plus applicants fluctuates all year round but the snapshot in the table depicts an accurate picture of the number of households in need based on issues occurring, such as the commencement of initiatives of the Localism Act 2011 and Welfare Reform Act 2012.

The need for smaller homes is further demonstrated by the Strategic Housing Market Assessment Final 2014⁴ (SHMA) as below:

Table 4: Size of additional units required to meet housing need (general needs) in Tewkesbury Borough-excluding households suitable for shared housing

Size of home	Need requirement				
	Gross annual need	Gross annual supply	Net annual need	As a % of total net annual need	Supply as a % of gross need
One bedroom	218	67	151	29.7%	30.9%
Two bedrooms	490	179	311	61.4%	36.5%
Three bedrooms	81	61	20	3.9%	75.6%
Four or more bedrooms	38	13	25	5.0%	33.2%
Total	827	320	507	100.0%	38.7%

Source: Gloucestershire County Strategic Housing Market Assessment, 2013

⁴ Strategic Housing Market Assessment Final 2014
<https://drive.google.com/file/d/0B4KyFQA43JaOZTR5S2RGR21sUDA/view>

3 Planning for Development

3.1 Affordable Housing Objectively Assessed Need

The Objectively Assessed Housing Need (OAN) for Tewkesbury Borough 2011-2031 is 9,983 dwellings. Of this, 5,514 is already delivered or committed in this period. There is therefore 4,469 housing left to deliver in the period 2016-2031.

The OAN determines an annual requirement of 495 homes per year with 2,475 homes over first 5 year period (starting 2016/17). Tewkesbury Borough saw 2,469 delivered over the previous 5 year period (2011-2016).

Our net affordable housing need based on the Strategic Housing Market Assessment (SHMA) is 126 affordable homes per year (from 2015 SHMA base date). This means that over the next 5 year period from 2016/17, delivery must be 630 affordable homes. 25% of total housing need of 5 year period is for affordable housing.

From Table 3 on the previous page we can see that from 2010 to 2015, gross delivery of new affordable homes was 578 dwellings; net delivery in that period being 404 dwellings. This equates to 67 new affordable homes per year in that period; significantly below the requirement of 126. Therefore the Tewkesbury Borough Council Plan 2016-2020 target is 150 affordable homes per year so that we can ensure that we meet the net requirement. Reasons to build above the net requirement include:

- Where developments are not policy compliant due to viability and therefore a lesser number of homes are built.
- Tewkesbury Borough Council housing services team must consider the introduction of new government initiatives and policies such as removing planning obligations for small sites (10 dwellings or less), Starter Homes and so on.
- The losses of rented homes through the Right to Buy⁵
- The losses of shared ownership dwellings through household's staircasing to 100% ownership.

We are seeking to be as ambitious as possible as a Local Planning Authority and Local Housing Authority to meet the needs of our community now and in the future.

3.2 Planning Policy

Tewkesbury Borough Council Saved Local Plan 2006-2011 requirement for Affordable Housing through planning obligations stated 30%, of which rented 68% and shared ownership 32%.

The emerging Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (JCS) requirement is 40%; there is no tenure split suggested at this level as it will be detailed in the new Tewkesbury Borough Plan.

⁵ Right to Buy <https://righttobuy.gov.uk/>. Also see Section 5 of this document.

3.3 Delivery against Local Plan Policy

Five yearly analyses of the Council's new-build affordable housing completions shows that:

- In the period 2001-2006 (5 years prior to the Local Plan 2006-11), affordable housing delivery was 23% of all new build housing in the borough.
- In the Local Plan 2006-2011 period, delivery was 25% of all new build housing in the borough.
- From 2011-2016 where we have had saved affordable housing policies and the JCS emerging policy, delivery was 29% of all new build housing in the borough.

3.4 Construction

3.4.1 Self-Build and Custom-Build

Paragraphs 50 and 159 of the National Planning Policy Framework, 2012⁶ and related planning practice guidance make it clear that local planning authorities need to identify local demand for people who want to build their own homes and make provision for it in their local plans. Failure to do this may lead to plans being found unsound, as highlighted in the letter from the Minister for Housing and Planning to all English Local Authorities on 5 March 2015.

Self-build is where the individual partly or wholly controls the design, funding, planning and building of a home. This can involve building part or all of a home oneself or alternatively hiring a contractor to do the same. Self-builders can work as individuals or as a group. Self-build can offer an alternative to traditional home ownership and an opportunity to own a sustainable and high quality designed home.

Custom Build Homes describe that custom-build it can be “*purchasing a fully serviced plot from a custom build developer and working with either the site architect, or your own, to design a home that's truly yours. It's all about choice, flexibility and putting you in control.*”⁷

The Self Build and Custom Housebuilding Act 2015⁸ places a duty on local authorities to maintain a register of people who have expressed an interest in self-build and custom build projects and to have regard to the demand on their local Register when exercising their planning and other relevant functions.

Tewkesbury Borough Council's register⁹ as at November 2016 had 21 entries for self-build or custom-build housing within the borough:

- 7 of the 21 entries are interested in considering potential 'collective' or 'serviced plots on a larger development' as an option.
- 17 of the 21 entries are interested in building detached homes, with 2 of these specifically planning to build bungalows.

⁶ National Planning Policy Framework, march 2012

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁷ Custom Build Homes <http://custombuildhomes.co.uk/what-is-custom-build/>

⁸ The Self Build and Custom Housebuilding Act 2015

<http://www.legislation.gov.uk/ukpga/2015/17/contents/enacted/data.htm>

⁹ Self-Build Register: Tewkesbury Borough Council <http://www.tewkesbury.gov.uk/index.aspx?articleid=3051>

- 10 of the 21 entries are interested in building 4 or 5 bedroomed homes, 6 interested in 3 or 4 bedroomed and only 3 interested in 2 bedrooms, 1 in 2 or 3 and 1 in a home of any size.
- 16 of the 21 entries are interested in building a home with a Garage and Garden.
- 3 of the 21 entries are not looking for a plot; 2 owning their own land and 1 has an option on land.

There are several approaches the council could consider in meeting this need for example, including but not exclusively:

- Allocating suitable housing sites in the Tewkesbury Borough Plan where private homebuilding is encouraged or preferred;
- Selling either our own or encouraging the County Council to sell land.
- Buying land ourselves for this purpose, working through the proposed Borough Council development company to provide serviced plots
- Adopting policies in the Tewkesbury Borough Plan that ask for a mix of different types of housing on larger sites, with self-build and custom house building listed as suitable development Councils want to see coming forward;
- Adopting policies which ask for a percentage of self-build and custom housebuilding plots to be provided when larger housing projects come forward.
- Prepare and adopt Supplementary Planning Guidance/Documents on self-build as the Tewkesbury Borough Plan may take a long time to go through all of its processes.

To continue to understand the need/demand and affordability of Self-Build and Custom-Build housing, the council will include this as part of a newly commissioned Strategic Housing Market Assessment.

3.4.2 Flood resilience

During our consultation period it was brought to our attention that the borough needs to have an awareness of the potential improvements to new housing developments in terms of flood resilience. Flood resilience measures can be incorporated in construction where appropriate, for example reflecting Environment Agency flood zones.

Whilst planning permission requires zero effect in terms of flooding, the cost, both emotional and financial, of being flooded would be far less if measures are taken at the start of the development process. There are a variety of possible measures that can be taken at the construction stage and also post-flooding 'resilient repair'. For example, Two Castles Housing Association in Carlisle have constructed homes that have built in flood defence measures; the details can be found here <http://www.ukfloodbarriers.co.uk/2016-the-changing-face-of-uk-flood-defence>

The Tewkesbury Property Support Network¹⁰ is a project set up to provide support, solutions and low-cost measures for communities at risk of flooding. "*The project's aim supports the long-term goal of enabling individuals and communities to take more ownership for the management of their flood risk and to recover more quickly as a result.*" The project's flood repairable project leaflet provides information about resilient repair¹¹.

¹⁰ Tewkesbury Property Support Network website <https://floodrepairable.wordpress.com/>

¹¹ Tewkesbury Property Support Network, flood repairable project leaflet <https://floodrepairable.files.wordpress.com/2016/01/flood-repairable-project-leaflet.pdf>

Tewkesbury Borough Council continues to support communities through the employment of a Tewkesbury Borough Flood Project Support Officer that reports regularly to the Flood Risk Management Group.

3.4.3 Alternative construction methods

The need to increase the supply of new homes and the high demand has meant that house builders have not been able to keep up; with manufactures unable to supply to sheer amount of bricks for example pushes such prices too high. This, along with labourer wages, that according to the EAC¹² rose in London to £240 per day in 2013 means that traditional construction methods are dwindling and alternatives are reaching new heights.

Alternative construction methods are not new, yet the mass-builders have largely retained traditional methods. Tewkesbury Borough Council is currently working with Severn Vale Housing Society, as our stock transfer housing association provider, to seek alternative, modular and off-site construction of new homes on council-owned land. The aim is to speed up the delivery of homes in a much more sustainable, productive, efficient, and environmentally-friendly manner for our communities. .

¹² EAC website <http://www.building.co.uk/>

4 Incomes, house prices and home ownership

The growth in income levels has not kept pace with the increases in property values meaning that many people are priced out of owner occupation the borough.

Table 5 shows the disparity between incomes and house prices. Median house prices and median incomes are shown from the year 2005 to show the change from pre-economic downturn.

Table 5: Median income and house prices 2005 and 2015, along with the ratios for 2015¹³

District	2005 Median House Price	2015 Median House Price	2005 Median Gross Annual Salary	2015 Median Gross Annual Salary	2015 Income:House Price ratio
Cheltenham	£175,000	£225,000	£20,917	£24,051	9.36
Cotswold	£242,000	£319,000	£18,560*	£19,131**	15.42**
Forest of Dean	£160,000	£182,975	£18,920	£20,682	8.85
Gloucester	£132,000	£165,000	£17,206	£20,779	7.94
Stroud	£180,000	£225,000	£19,378	£23,282	9.66
Tewkesbury	£167,500	£225,000	£19,485	£23,524	9.56
Gloucestershire	£176,083	£223,663	£15,984	£21,908	10.21
South West>	£180,368	£224,181	£12,283	£18,272	12.27
England>>	£168,428	£238,406	£17,071	£20,847	11.44

*Cotswold data for 2006 as 2005 not available

**Cotswold data for 2014 as 2015 is not available.

>Several Local Authorities' data missing

>> Several Local Authorities' data missing

The ONS state that “Average house price statistics themselves do not give a full picture of the affordability of privately owned housing, because these figures do not take into account average earnings which in part dictate how much people can afford to pay to buy their own home. Looking at the ratio of median house prices to median annual salary sheds light on the relative affordability of owner occupied housing across the local authorities of England...”

Housing in Tewkesbury borough is relatively expensive as against national and regional averages with the east of the borough¹⁴ having the highest values given its proximity to the AONB. Isbourne ward has the highest average house price of £490,996 with detached properties fetching over £600,000. The disparity between incomes and house prices in the Borough continues to escalate.

In their essay, *Unfinished Business: The ownership agenda, thirty years on*¹⁵, ResPublica state that more people are private renting their homes than ever before:

“...thirty years ago 61% of the UK's households owned their own home...The main shift in the ownership of the UK's housing stock is around rented accommodation, with the number of households renting from private landlords doubling in thirty years. In 1985 30% of households rented from public landlords, and 9% from private landlords. Today the emphasis has changed, with 22% renting from private landlords and 9% from public.”

¹³ ONS Dataset: Housing summary measures: summary measures data Release date: 7 October 2016, <http://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/housingsummarymeasuressummarymeasuresdata>

¹⁴ Tewkesbury Area Map <http://tewkesbury.gov.uk/CHttpHandler.ashx?id=2912&p=0>

¹⁵ ResPublica Essay published October 2015 <http://www.respublica.org.uk/our-work/publications/unfinished-business-the-ownership-agenda-thirty-years-on/>

4.1 Ability to purchase a home in Tewkesbury Borough

Mortgage lenders must limit the proportion of mortgages at loan to income multiples of 4.5 and above to no more than 15% of their new mortgages. Given this restriction on mortgages, Tewkesbury Borough's income to house price ratio, may make it difficult for first time buyers to get on the property market. This may result in the out migration of young people in the lower income brackets or alternatively encourage people to commute into Tewkesbury Borough for work, while living in areas where housing is cheaper outside of the borough.

In the June 2014 Financial Stability Report¹⁶, the Bank of England announced measures to cut the risk of a damaging house price bubble emerging by limiting the number of high-risk mortgages; the proportion of mortgages at loan to income multiples of 4.5x and above to no more than 15% of their new mortgages.

The impact therefore in Tewkesbury Borough will be continued difficulties for (young) local people to purchase a home in the areas and the likelihood they'll be forced to bordering authority areas in search of more affordable housing to buy, private rented or increased demand on shared ownership and other intermediate housing products.

4.2 Accessing the housing market

With a small private rental market in Tewkesbury Borough, the demand for home ownership has been growing since 2012 when Help to Buy South¹⁷ became our area's help to buy agent.

As at April 2012 just 52 households were registered for home ownership schemes; these include shared ownership and shared ownership resales, rental schemes, and developer schemes (such as help to buy equity loan). As at November 2016, 359 households are currently registered.

It is to be noted that under the help to buy equity loan scheme and previous mortgage guarantee scheme, households register at the time of application. Therefore we will never see the true picture of demand.

In the 4 year period April 2012 to March 2016, there were a total of 23,656 house sales (existing dwellings and new-build) in Tewkesbury Borough. Of these:

- 4,139 (17.5%) were new-build housing¹⁸.
 - Just 438 (10.5%) of this new-build development were supported through a government scheme or as affordable housing, that is help to buy equity loan and shared ownership.
- Less than 1% of all existing dwelling sales¹⁹ were shared ownership re-sales.

A total of 451 home ownership sales were logged in this time period under the help to buy agent. Table 6 overleaf shows the sales by schemes and by Tewkesbury Borough parish.

¹⁶ Financial Stability Report, 2014, Bank of England
<http://www.bankofengland.co.uk/publications/Pages/fsr/2014/fsr35.aspx>

¹⁷ Help to Buy South <http://www.helptobuysouth.co.uk/>

¹⁸ ONS: Number of residential property sales for national and subnational geographies (newly built dwellings) – HPSSA Dataset 7 table 2a <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/numberofresidentialpropertysalesforationalandsubnationalgeographiesnewlybuiltdwellingsquarterlyrollingyearhpssadataset07>

¹⁹ ONS: Number of residential property sales for national and subnational geographies (existing dwellings) – HPSSA Dataset 8 table 2a
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/numberofresidentialpropertysalesforationalandsubnationalgeographiesexistingdwellingsquarterlyrollingyearhpssadataset08>

Table 6: Home ownership sales under the help to buy agent, by Parish, Tewkesbury Borough April 2012-March 2016

Parish	Help to Buy Equity Loan	Shared Ownership	Shared Ownership Resale	Total
Alderton	0	4	0	4
Badgeworth	0	24	0	24
Bishop's Cleeve	70	79	8	157
Brockworth	68	56	0	124
Longford	68	10	0	78
Norton	0	4	0	4
Stoke Orchard	24	11	5	40
Winchcombe	0	20	0	20
Total	230	208	13	451

It is evident that government supported schemes and affordable housing home ownership are extremely popular and needed but with these options being less than 12% of all sales in the borough the opportunities for younger people to get on the housing ladder are limited.

Many young people may not be accessing all the options available to them due to lack of understanding of the range open to them. Tewkesbury Borough Council believes that it can do more to encourage local people to register for home ownership schemes.

4.3 Starter Homes

The government manifesto to provide more homes and more homes for sale for young people has meant their Starter Homes initiative being brought in via the Housing and Planning Act 2016.

A vision of 'discounting' new homes by up to 20% has been out for consultation and at the time writing the sector is waiting for the decision as to how this product will work in reality.

Home ownership is the government's driver in housing at present believing more homes will be built, particularly Starter Homes, in the near future. If Starter Homes are to be considered Affordable Housing in the future, this will affect the council's current position of what we can provide on-site on new developments particularly impacting the rented element. The affects will need to be fully assessed as part of the SHMA alongside other home ownership products.

4.4 Planning obligations: changes to government policy

The government continues to reduce planning obligations on developers to incentivise development of new homes through a policy of no affordable housing contributions on sites of 10 or less dwellings or less than 1000sqm unless in a designated area (for Tewkesbury Borough this is AONB only).

For a rural local authority where much development comes through on small sites this will result in less Affordable Housing for Tewkesbury Borough. Housing services must work with planning and development management colleagues to ensure that both the JCS and Tewkesbury Borough Plan policies maximise affordable housing delivery.

The impact can be quite significant as we currently estimate that just under 12% of our Affordable Housing stock is in our most rural parishes.

5 Right to Buy

Although Right to Buy (RTB) applications fluctuate year on year in Tewkesbury Borough Council, the loss of housing stock puts pressure on our affordable housing supply no matter how many are bought. The removal of a rented home in Tewkesbury Borough impacts greatly on our ability to house those in housing need.

Since the transfer of the council housing stock to Severn Vale Housing Society in 1998, there have been 300 RTB sales (see Table 7).

Table 7: Sales of Severn Vale Housing Society residential dwellings under Right to Buy from 1998/99 to July 2016

Year End	N.o. properties sold	Year End	N.o. properties sold
2017 (to July 2016)	6	2007	3
2016	2	2006	7
2015	5	2005	11
2014	9	2004	23
2013	1	2003	32
2012	4	2002	32
2011	1	2001	32
2010	1	2000	67
2009	0	1999	68
2008	2		

Source: Severn Vale Housing Society dataset

According to ResPublica, the Right to Buy has increased the number of private landlords: *“The Right to Buy programme will undoubtedly have increased home ownership in the short term, but the long term housing landscape is more a story of replacing public landlords with private landlords, rather than with home owners.”* A ResPublica Essay, Unfinished Business: The ownership agenda, thirty years on, 2015²⁰

5.1 Voluntary Right to Buy

In 2015, the government announced the extension of the Right to Buy to housing association tenants. The Voluntary Right to Buy (VRTB) is still being planned out along with housing associations and the National Housing Federation to ensure it scheme works effectively for housing associations and their tenants. In additional, the Autumn Statement 2016²¹ stated that the pilot scheme will be extended:

“The government will fund a large-scale regional pilot of the Right to Buy for housing association tenants. Over 3,000 tenants will be able to buy their own home with Right to Buy discounts under the pilot.”

Housing associations are currently producing their sales policies in which they will details the principles for selling a rented home to an eligible tenant. Eligibility is yet to be determined by government. Tewkesbury Borough will need to be up to speed eligibility and understand each the sales policies that each housing association with stock in the borough are operating.

²⁰ ResPublica Essay, Unfinished Business: The ownership agenda, thirty years on, 2015

<http://www.respublica.org.uk/wp-content/uploads/2015/10/Unfinished-Business-1.pdf>

²¹ Autumn Statement 2016 <https://www.gov.uk/government/publications/autumn-statement-2016-documents/autumn-statement-2016>

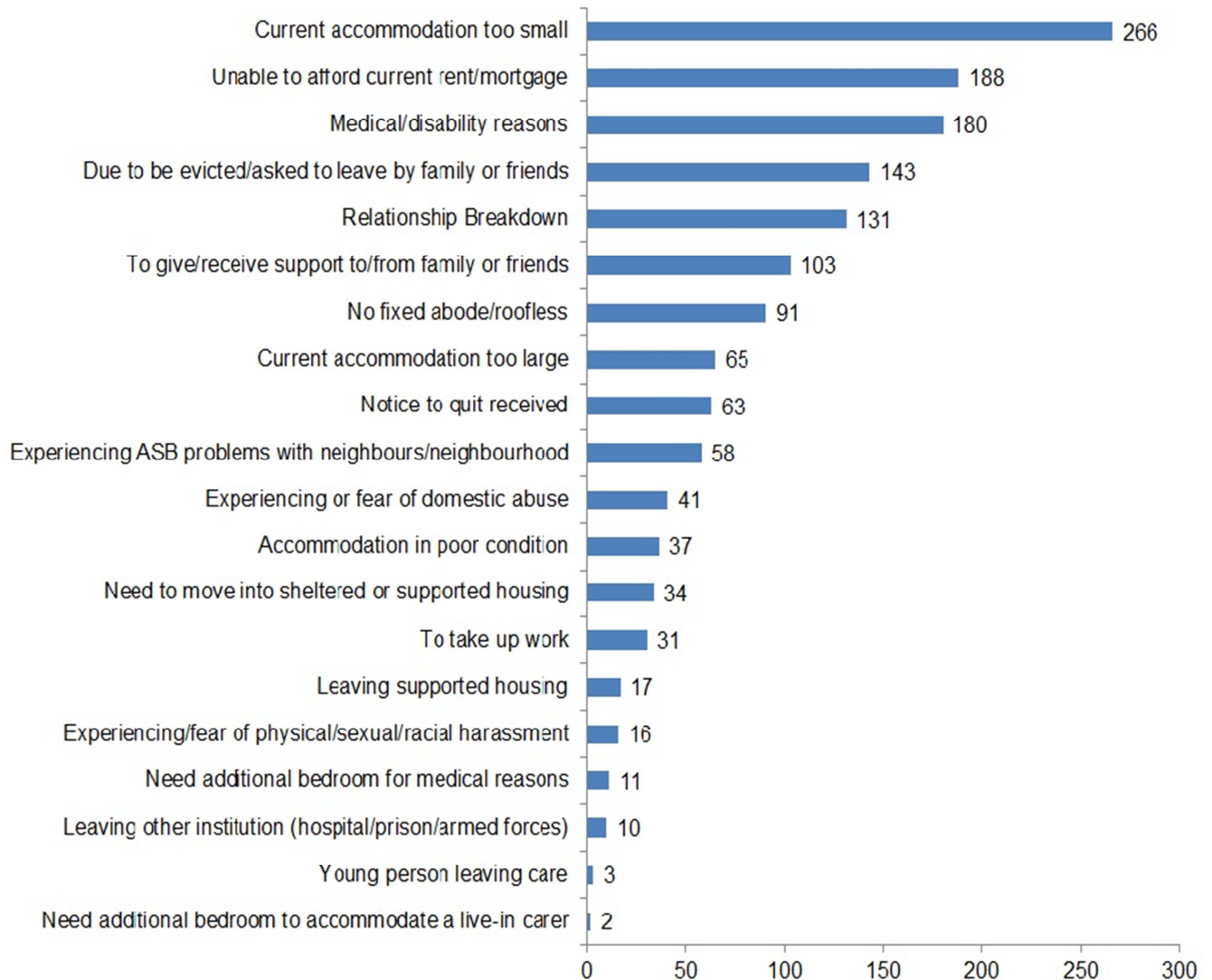
6 Housing Register (choice based lettings)

As at July 2016 there were 1,925 households registered for housing in Tewkesbury Borough on the Council’s choice based lettings system, which is now known as Homeseeker Plus.

Households are able to tick a box or state the reason why they have applied to Tewkesbury Borough Council for housing. The majority of applicants stated their accommodation is too small.

‘Other’ (438) allows applicants to write in their circumstances but this is difficult to analyse. The reason typically fits into one of the tick box categories:

Chart 4: Main reason for applying to Homeseeker

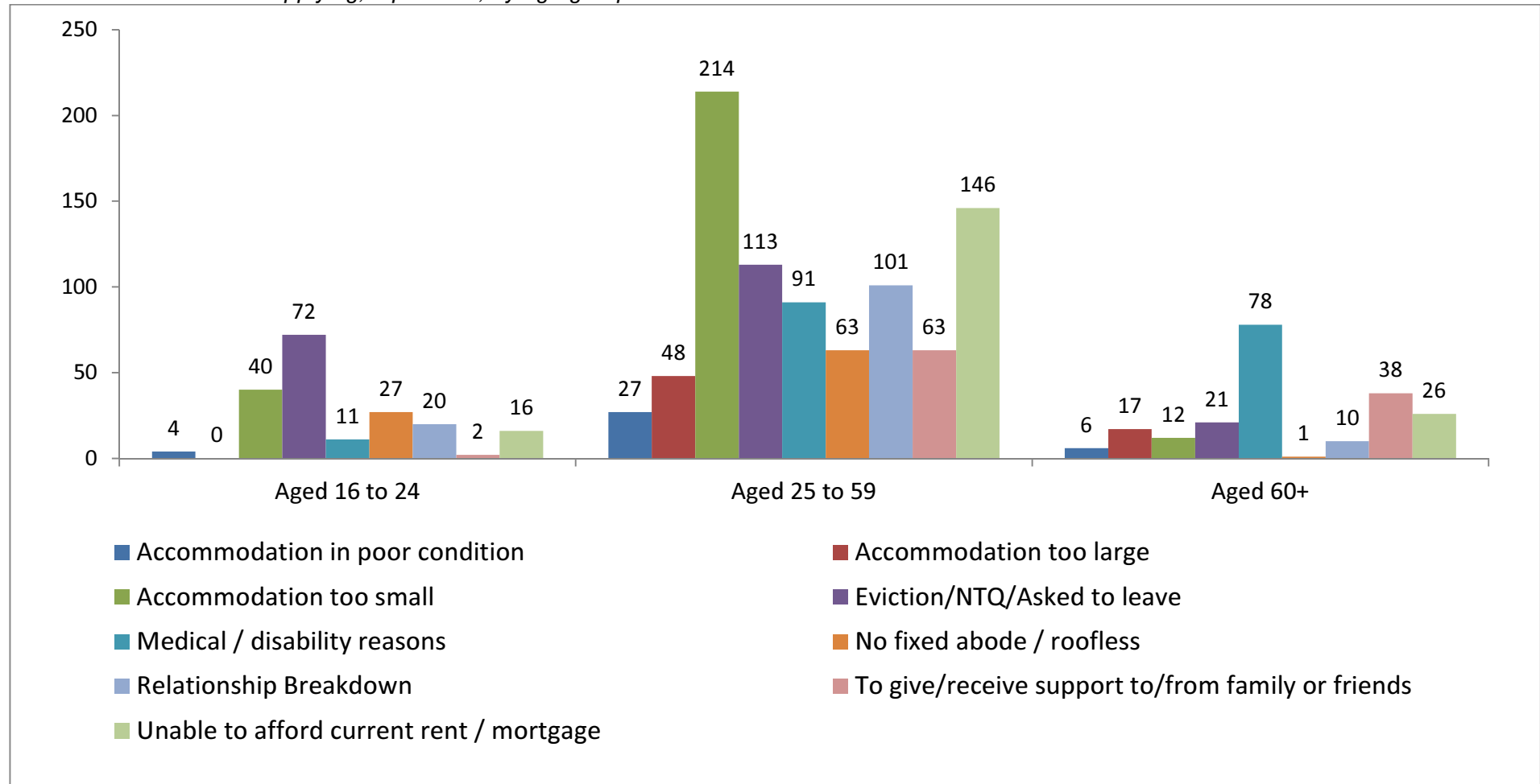


Source: Gloucestershire Homeseeker dataset July 2016

Chart 5 overleaf details the main reasons by age group. In summary:

- 66% of applicants are aged 25 to 59 living in accommodation that is too small for their needs or unable to afford their current property as the 2 most significant issues.
- For young people aged under 25 the majority have been asked to leave their accommodation.
- For older people aged 60+ the main reason is medical or disability reasons require them to move.

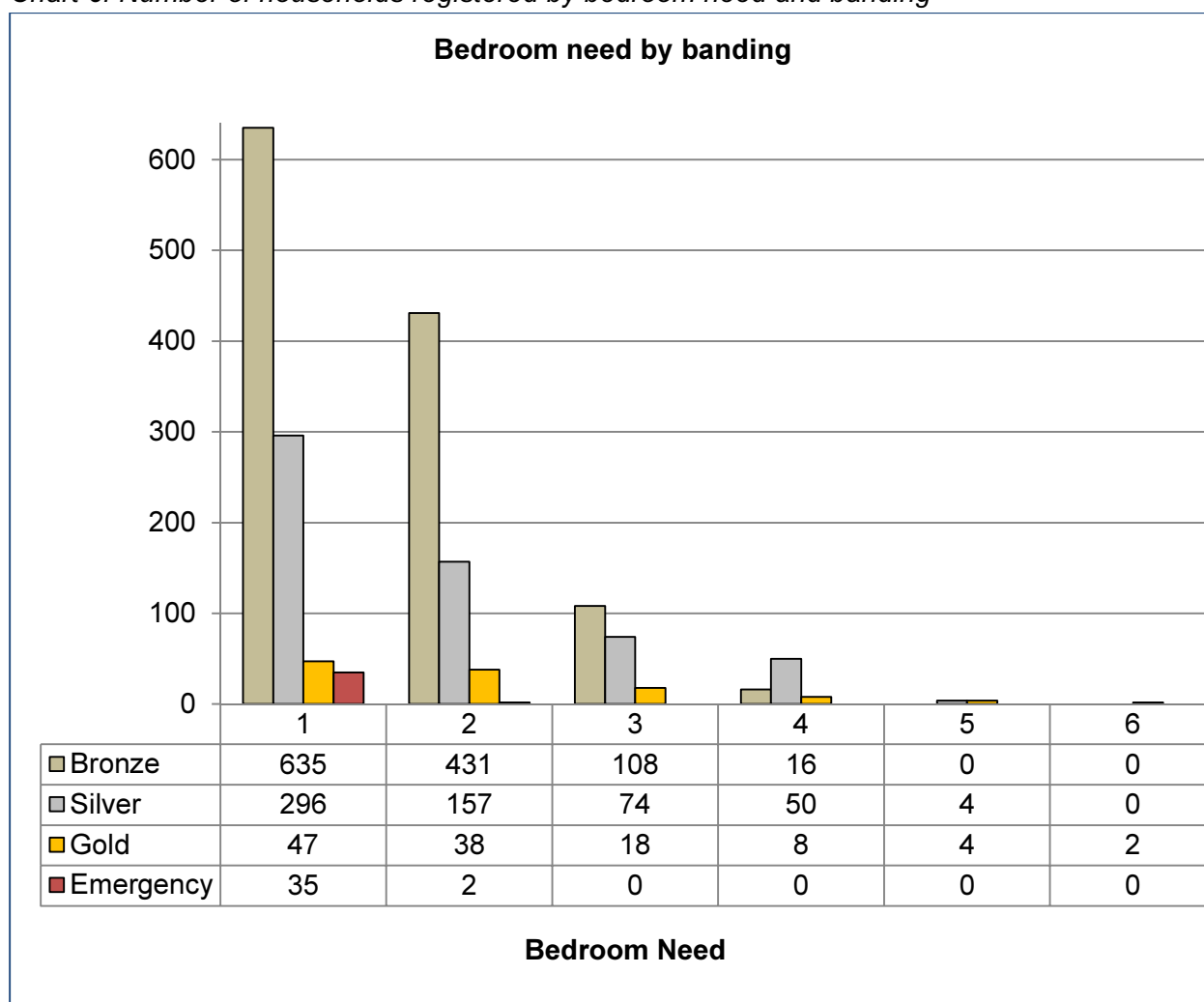
Chart 5: Main reason for applying, top issues, by age group



Source: Gloucestershire Homeseeker dataset July 2016

A third of all households registered in July 2016 were in 1-bed need in Bronze banding. Overall nearly 62% of the housing register applicants are in Bronze with little or no housing need. In addition Table 8 overleaf shows the bedroom need and banding as a percentage of the housing register.

Chart 6: Number of households registered by bedroom need and banding



Source: Gloucestershire Homeseeker dataset July 2016

Table 8: Households registered by bedroom need and banding as a percentage of all applicants

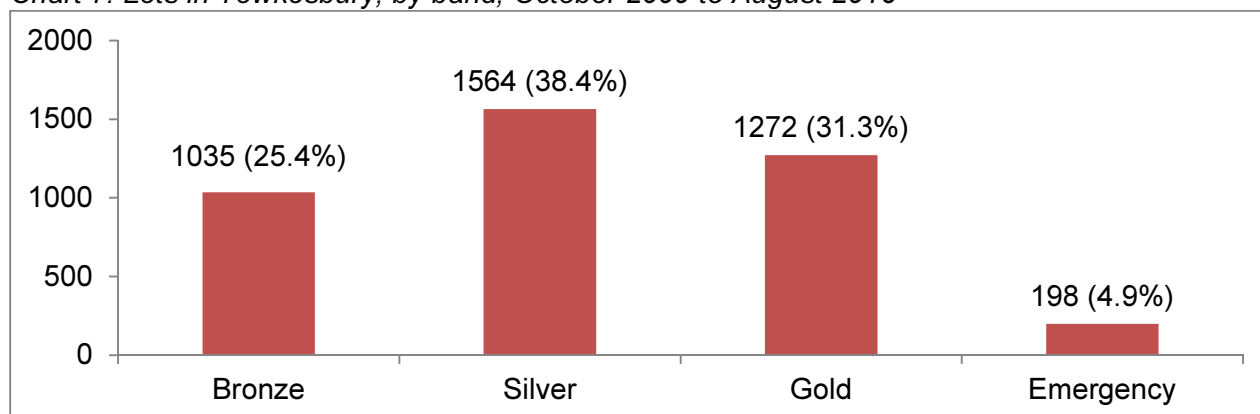
Band	Bronze	Silver	Gold	Emergency	Total
1-bed	33.16%	15.23%	2.39%	1.82%	52.60%
2-bed	22.30%	8.21%	2.13%	0.10%	32.74%
3-bed	5.56%	3.79%	0.94%	0.00%	10.29%
4-bed	0.83%	2.60%	0.00%	0.00%	3.85%
5-bed	0.00%	0.21%	0.21%	0.00%	0.42%
6-bed	0.00%	0.00%	0.10%	0.00%	0.10%
Total	61.85%	30.04%	6.19%	1.92%	

Source: Gloucestershire Homeseeker dataset July 2016

There have been 4,069 lets in Tewkesbury Borough from October 2009 to August 2016. Chart 7 shows the distribution across each of the bandings. When compared to the

percentage of applicants by band in Table 8 on the previous page, there is a good spread of homes let across the bandings in Tewkesbury Borough Council.

Chart 7: Lets in Tewkesbury, by band, October 2009 to August 2016



Source: Gloucestershire Homeseeker dataset July 2016

It is also useful to understand those households seeking a larger home, smaller home or same size home. Table 9 shows how many households currently registered have a calculated bedroom need that means their move would be like-for-like in terms of number of bedrooms, whether they'd be up-sizing to a larger property or downsizing to a smaller property.

In terms of whether a household is seeking a larger or smaller home or they require a like-for-like move, Table 9 below shows the bedroom need by house type required. In summary:

- 51% of households are in need of a 'like for like move' i.e. a 2-bed for a 2-bed. The majority of which, 50% are 1-bed need:
 - 214 (21%) of households in 1-bed need are seeking a home of their own (as they state they are living in a shared house or with friends/parents/relatives).
 - 19% of households in 2-bed need are seeking a like for like move; this may simply mean they live in a flat and are seeking a house with garden for example.
- 23% require a larger home (are up-sizing); 11 households are in need of a 5 or 6 bed home.
- 26% downsizing - the majority (61.8%) of which are in 1-bed need.

Table 9: Bedroom need and current house type

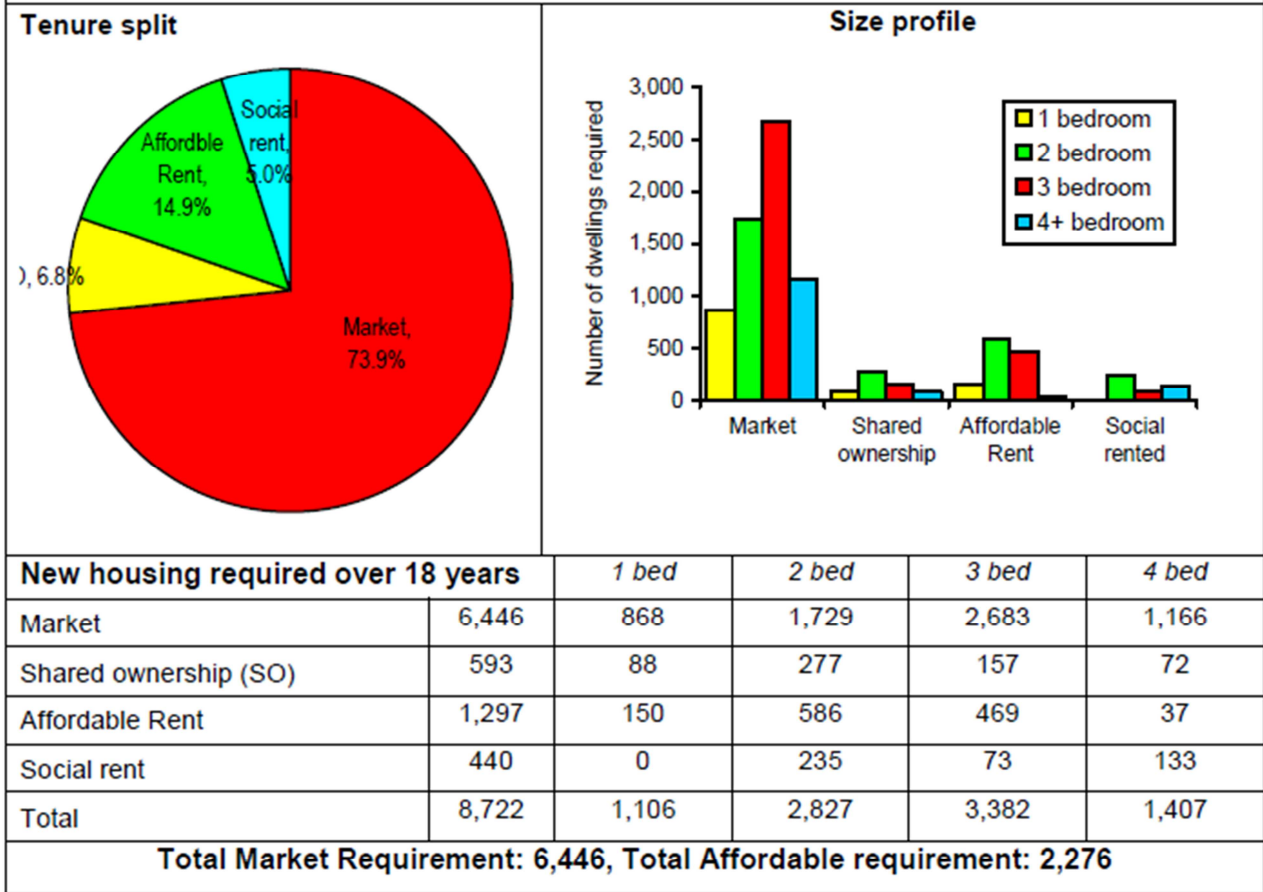
Bedroom Need	'Like for like' move	Up-sizing	Down-sizing
1-Bed	493	214	311
2-Bed	367	100	161
3-Bed	108	61	28
4-Bed	13	60	3
5-Bed	0	9	0
6-Bed	0	2	0
Total	981 (51%)	446 (23%)	503 (26%)

Source: Gloucestershire Homeseeker dataset July 2016

7 Profile of new accommodation

The SHMA 2014 informs us that Tewkesbury Borough requires a minimum of all new build housing to be 27% affordable housing. The assessment provides us with evidence of the affordable housing tenures and house types that the council should be negotiating on new developments to 2031:

Chart 8: Profile of new accommodation required in Tewkesbury (lower scenario)



Source: Gloucestershire Strategic Housing Market Assessment updated household dataset 2013

Over the last 8 years the affordable housing split overall in Tewkesbury Borough has been 64% social and affordable rented housing to 36% shared ownership on completed eligible sites. The percentage varies on a site by site basis depending on the constraints of the development such as the location of the site and local demand and specific housing need, i.e. bungalows and wheelchair accessible homes, and viability where a site may require an increase in homes for sale in order to achieve a policy compliant overall percentage of affordable homes.

The Council’s housing services team continues to negotiate a suitable percentage of rent and home ownership across appropriate house types and will continue with a flexible approach to achieving policy compliant developments to meet the housing needs of our borough. This is likely to mean that while the SHMA analysis guides our negotiations we must stray from these figures on occasions and when appropriate to create the best possible development for local people and taking into account the particular needs of our communities.

At home in Tewkesbury Borough

A housing strategy for our borough 2017-2021

Appendix 1b: Our Local Evidence – Homelessness Prevention



This page is intentionally left blank

Contents

1	List of charts and tables	Page	4
2	Introduction	Page	5
3	Homelessness in Tewkesbury Borough	Page	6
3.1	Homelessness acceptances	Page	6
3.2	Homelessness prevention decisions	Page	9
3.3	Reason for loss of last settled home	Page	11
4	Rough Sleeping	Page	15
4.1	Defining rough sleeping	Page	15
4.2	Rough sleepers count	Page	15
5	Impact of Welfare Reform	Page	18
5.1	General statistics about the cohort	Page	19
5.2	Characteristics of households affected by the LHA cap	Page	19
5.3	Analysis of the Benefit Cap	Page	20
5.4	Cumulative impact of Welfare Reform	Page	23
5.5	The impact of Universal Credit	Page	23
5.6	In-work conditionality	Page	26
5.7	The minimum income floor	Page	27
5.8	Moving out of Universal Credit	Page	27
6	Changes to benefits for young people	Page	28
7	The National Living Wage and increased personal living allowance	Page	28
8	Rents	Page	29
8.1	Median rents	Page	29
8.2	Social housing 'Rent in Advance'	Page	29
8.3	Affordable Rents	Page	30
8.4	Housing Benefit capped at LHA rates for social rents	Page	31
8.5	Pay to Stay	Page	31
8.6	Rent comparisons across the sectors	Page	32

1 List of charts and tables

Chart 1	UK Homelessness acceptances	Page 6
Chart 2	The trends of homeless acceptances and households in temporary accommodation	Page 7
Chart 3	Total approaches over the last 5 financial years by quarter: Tewkesbury Borough	Page 7
Chart 4	Homeless approaches, accepted homeless case and successful preventions: Tewkesbury Borough, by year, 2011/12 to 2015/16	Page 9
Chart 5	Homelessness preventions in Tewkesbury Borough where household was able to remain in their existing home, October 2015-September 2016	Page 10
Chart 6	Homelessness prevented or relieved in Tewkesbury Borough where households moved to alternative accommodation, October 2015-September 2016	Page 10
Chart 7	National homelessness by reason: UK	Page 11
Chart 8	Snapshot numbers of households in B&B: Tewkesbury Borough	Page 12
Chart 9	Households placed in B&B, average length of stay and cost per household per placement day: Tewkesbury Borough	Page 13
Chart 10	Total households placed in temporary accommodation: Tewkesbury Borough	Page 14
Chart 11	Rough sleepers in Tewkesbury Borough, by gender and household type, April 2015-September 2016	Page 17
Chart 12	Number in the cohort affected by the Benefit Cap: Tewkesbury Borough	Page 21
Chart 13	Percentage of those that will be capped by household type: Tewkesbury Borough	Page 21
Chart 14	Number of households affected by impact level: Tewkesbury Borough	Page 23
Chart 15	The impact of Universal Credit for Tewkesbury Borough cohort on household income in 2016	Page 25
Chart 16	Number and type of households affected: Tewkesbury Borough	Page 26
Chart 17	Median rents in private rented housing, social housing and the Housing Benefit rates, by bedroom size and cost (in pounds) in Tewkesbury Borough, 2016	Page 33
Table 1	Main reason for loss of last settled home of accepted homeless cases: Tewkesbury Borough 2015/16	Page 11
Table 2	Table 2: Number of rough sleepers reported to DCLG in the P1E returns, Tewkesbury Borough compared to the South West and England for the year 2011 to 2015	Page 16
Table 3	Rent uprating in the social and private sectors, from 2015 to 2020: Tewkesbury Borough	Page 22
Table 4	A summary of the reduction of work allowances by household type: Tewkesbury Borough	Page 24
Table 5	Earnings required to move out of entitlement to Universal Credit	Page 27
Table 6	Median rent (before Housing Benefit) by type of accommodation, full household sample	Page 29
Table 7	Impact of Localism Act 2011	Page 29

2 Introduction

This document outlines the evidence gathered by Tewkesbury Borough Council showing the homelessness context in which the council is working.

We have used this evidence as part of identifying our 4 key priorities for housing and homelessness along with key objectives for the next 5 years. Priority 2 of the Housing Strategy 2017-2021 is Homelessness and Homelessness Prevention.

The Housing Strategy will link with the priorities outlined in the Council Plan 2016-2020, set out the council's priorities and objectives for housing, and appropriate activities that will help us to meet our statutory housing duty under the Housing Act 1996.

Housing is a priority in the Tewkesbury Borough Council Corporate Plan because:

“We recognise how important it is for residents to be able to access good quality housing and housing related services that make a real difference to their lives.

“Not only is housing important for the health and well-being of residents it is also an important part of building and maintaining strong communities and supporting the economic prosperity of the borough.”

Tewkesbury Borough Council recognises that access to quality affordable housing underpins the success of our area and all of the overarching corporate priorities.

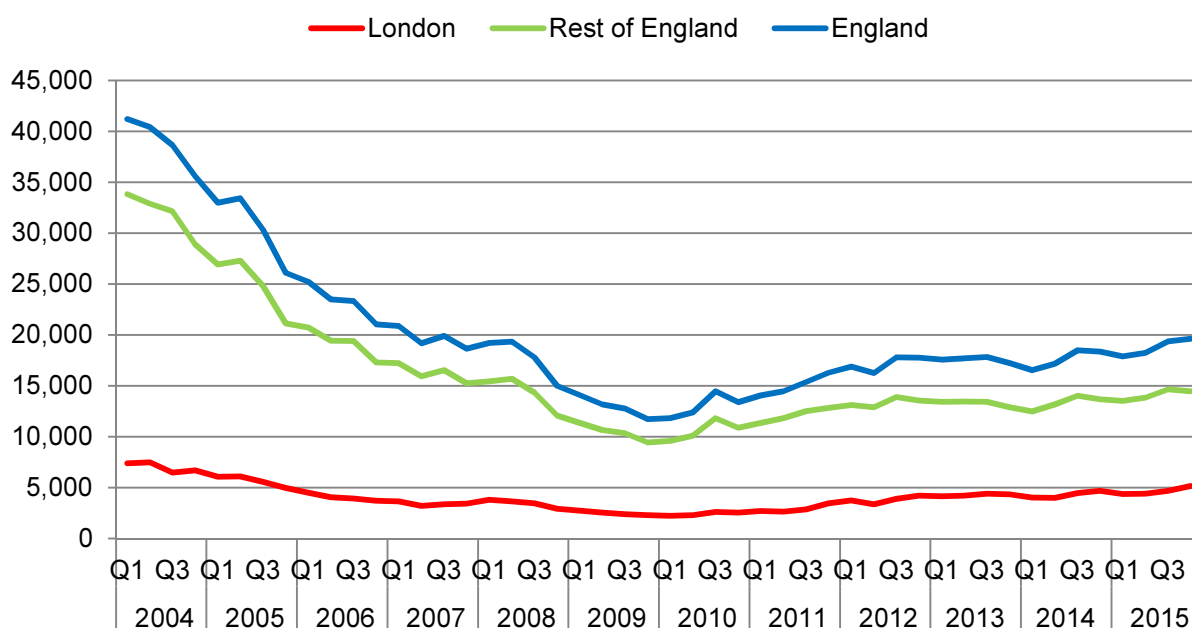
3 Homelessness in Tewkesbury Borough

Local Housing Authorities have a statutory duty to provide advice and assistance to anyone who is homeless or threatened with homelessness (as outlined in the Housing Act 1996 as amended).

3.1 Homelessness acceptances

Chart 1 shows the national trends in accepted homeless cases, compiled by the Department of Communities and Local Government (DCLG) 2016. It indicates a sharp fall in homeless acceptances between 2004 and 2010, and a gradual ongoing increase in homeless acceptances from 2011 onwards.

Chart 1: UK Homelessness acceptances



Source: DCLG, 2016

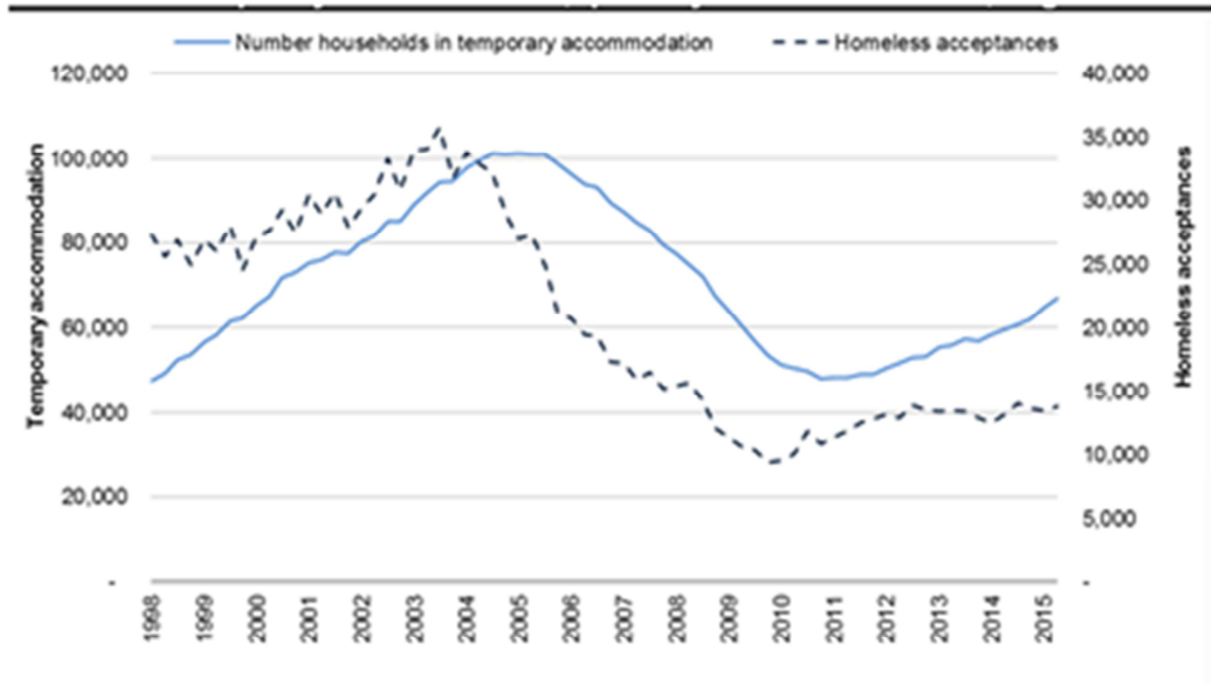
Points to note regarding this chart:

- Acceptances in 2015 are up 6% on 2014
- Acceptances up 6% on same quarter last year
- London saw a 10% increase in acceptances on Q4 2014.

We look at ethnicity of our homelessness cases in order to determine whether any groups are disproportionately affected by homelessness. Our homelessness data submitted to the DCLG shows that in 2015/16, 100% of our homelessness acceptance households were White.

Chart 2 overleaf demonstrates that the use of temporary accommodation nationally is rising with homeless acceptances. According to our own dataset of the number of households who have approached the Council by quarter over the last 5 years, there does not appear to be a seasonal pattern to the Borough’s homelessness approaches.

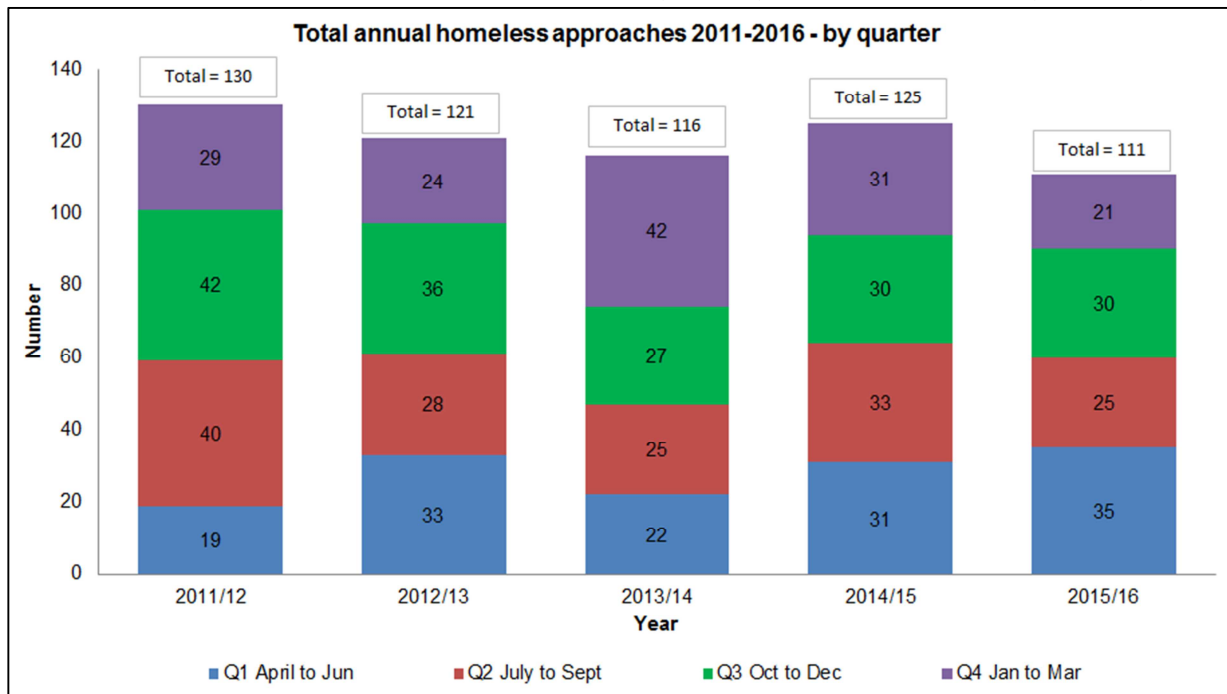
Chart 2: The trends of homeless acceptances and households in temporary accommodation



Source: DCLG, 2016

Overall we are unable to predict the number of households that will approach. Chart 3 shows the change in annual figures and by quarter to shows no trends.

Chart 3: Total approaches over the last 5 financial years by quarter: Tewkesbury Borough



Source: Tewkesbury Borough Council dataset

The three primary causes of homelessness within Tewkesbury in 2015/16 were:

- Loss of Assured Shorthold tenancy (private sector tenancies) (20%)
- Relationship breakdown involving domestic abuse (19%)
- Parents or family no longer willing to accommodate (17%)

Underlying vulnerabilities often contribute to the immediate causes of homelessness outlined above. These vulnerabilities include poor education, poor physical and mental health, involvement in crime, unemployment, and poor life skills. The government have set out overarching priorities to meet these vulnerabilities¹. These are:

- tackling troubled childhoods and adolescence
- improving health
- reducing involvement in crime
- improving skills, employment and the availability of financial advice.

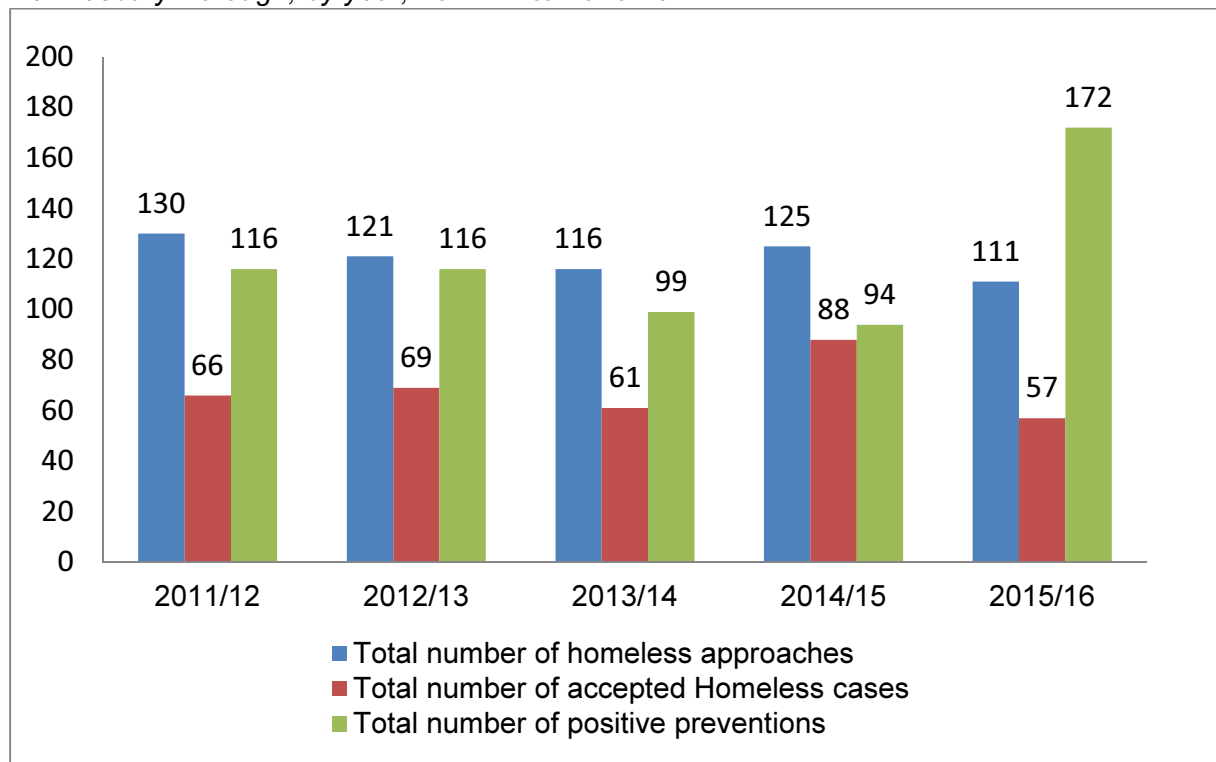
The importance of partnership working is imperative to tackle homelessness, particularly the underlying vulnerabilities and priorities. Tackling underlying causes and the prevention of homelessness is better for those affected and more cost effective than seeking to assist households through statutory homelessness provisions or bringing them inside from rough sleeping.

Chart 4 overleaf shows the number of approaches each year alongside the number of homeless cases accepted and number of positive preventions by housing services. From the start of 2015, the council's housing services team have concentrated efforts towards a more prevention-focussed service and are enhancing their housing advice work to support people to remain in their present homes if possible or find an alternative solution with the household.

Homeless acceptances have fallen within Tewkesbury Borough as a result of this, as households are assisted to find alternative housing solutions. The numbers approaching our service, however, have increased as indicated by the national statistics indicated by the DCLG.

¹ Making Every Contact Count
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7597/2200459.pdf

Chart 4: Homeless approaches, accepted homeless case and positive preventions: Tewkesbury Borough, by year, 2011/12 to 2015/16



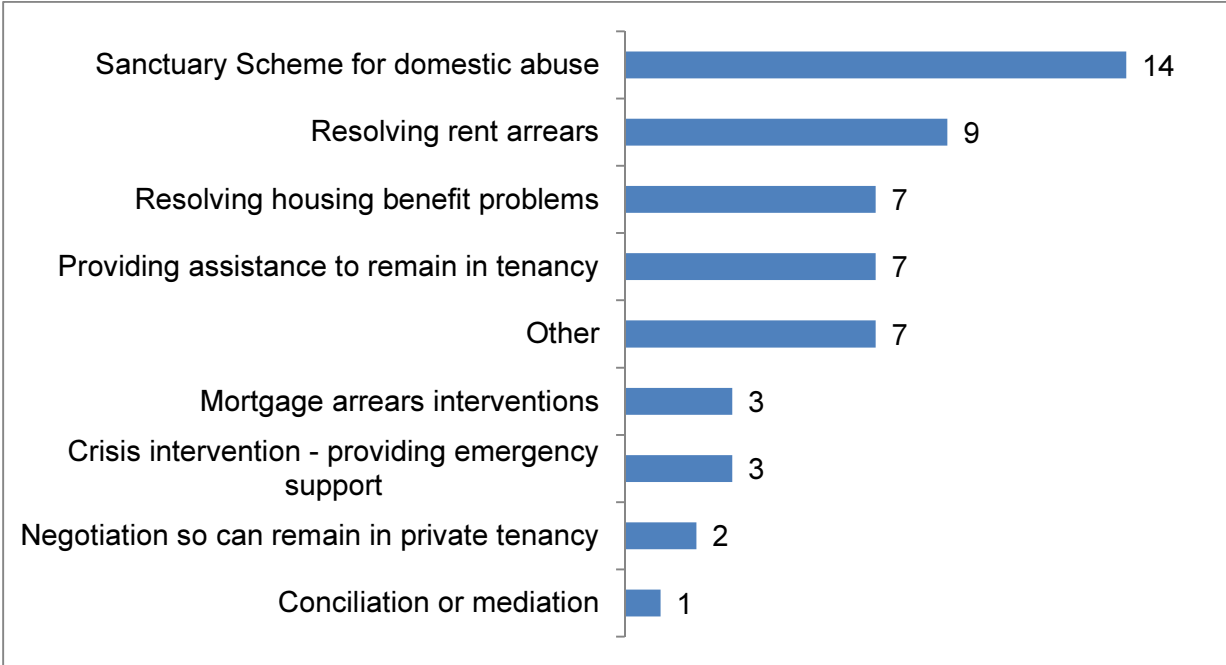
Source: Tewkesbury Borough Council dataset

Accepted homeless households are prioritised on the council's choice based lettings system, Homeseeker Plus, and therefore are able to be placed relatively quickly providing the right type of accommodation becomes available in good time.

3.2 Homelessness prevention decisions

For the 12 months October 2105-September 2016 the housing advice team assisted 53 households to remain in their home, see Chart 5.

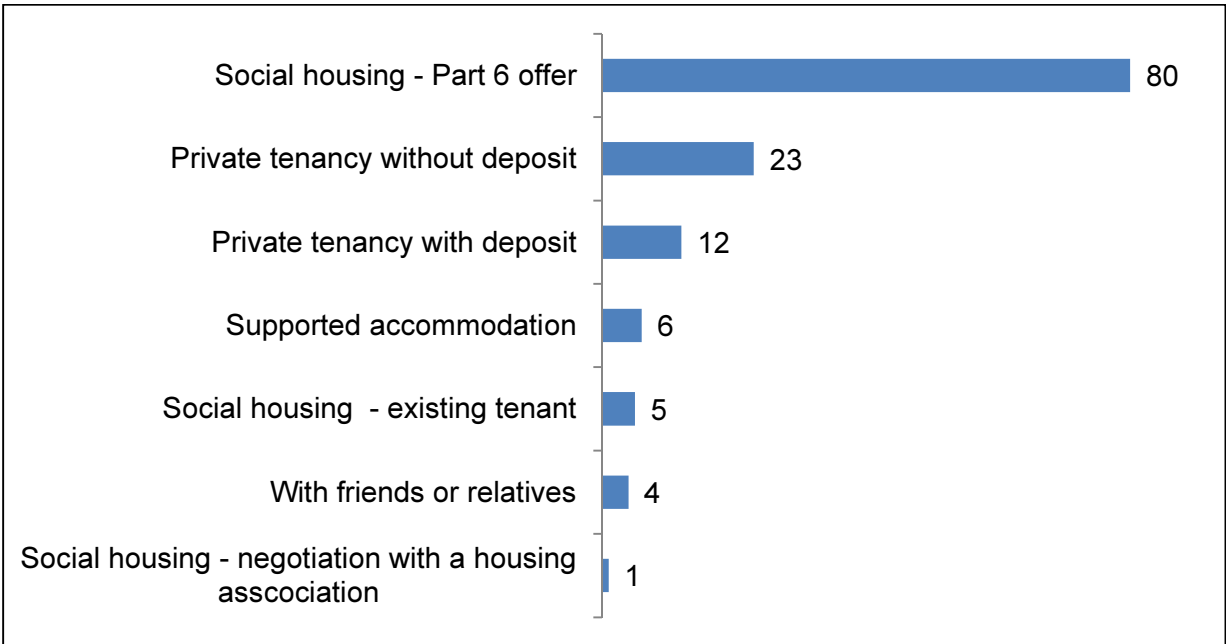
Chart 5: Homelessness preventions in Tewkesbury Borough where household was able to remain in their existing home, October 2015-September 2016



Source: Tewkesbury Borough Council dataset

For the 12 months October 2105-September 2016 the housing advice team prevented or relieved 131 households homelessness, see Chart 6 below.

Chart 6: Homelessness prevented or relieved in Tewkesbury Borough where households moved to alternative accommodation, October 2015-September 2016

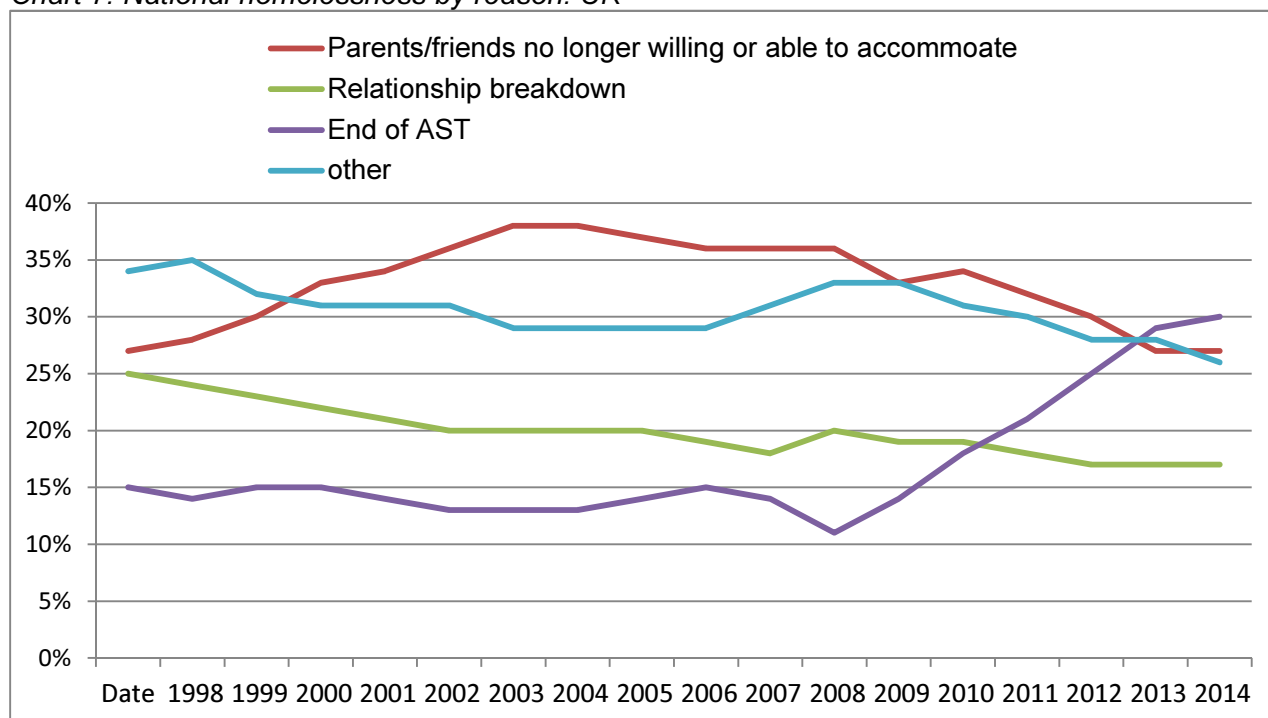


Source: Tewkesbury Borough Council dataset

3.3 Reason for loss of last settled home

Chart 7 shows the main reasons for the loss last settled homes for homeless households nationally. It demonstrates that the loss of private rented tenancies has become the primary cause of homelessness nationally, having risen from just over 10% of homeless applications in 2008 to 30% in 2014.

Chart 7: National homelessness by reason: UK



Source: DCLG 2016

Table 1 below lists the main reasons for loss of the last settled homes the Borough for the 57 accepted homeless cases during the financial year 2015-16.

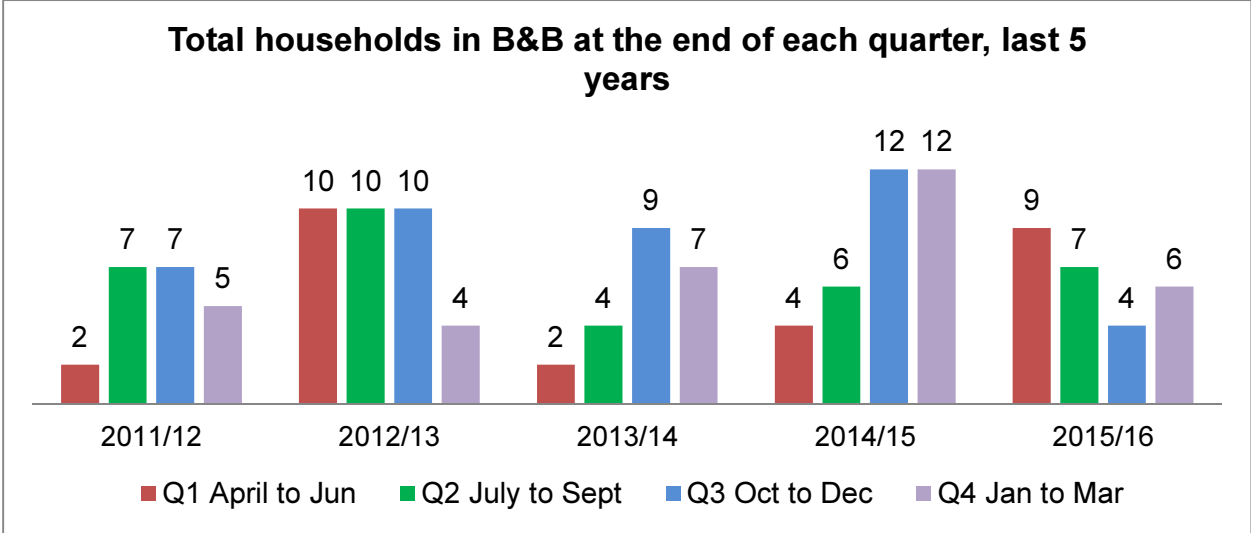
Table 1: Main reason for loss of last settled home of accepted homeless cases: Tewkesbury Borough 2015/16

Termination of Assured Shorthold Tenancy	20%
Violent breakdown of relationship with partner	19%
Parents no longer willing/able to accommodate	17%
Other forms of harassment	14%
Non-violent breakdown of relationship with partner	10%
Other forms of violence	5%
Other	4%
Mortgage Arrears	3%
Other relatives/friends no longer willing/able to accommodate	3%
Violent breakdown of relationship with associated persons	2%
PRS rent arrears	2%
Left prison/ on remand	2%

Source: Tewkesbury Borough Council dataset

Placing households in bed and breakfast (B&B) is a last resort but continues to be used to provide short term emergency accommodation for individuals and families. Chart 8 below indicates the snapshots of numbers in B&B at the end of each quarter in the P1E returns to DCLG². The numbers of households placed in B&B have fluctuated year on year. There does not appear to be seasonal trends.

Chart 8: Snapshot numbers of households in B&B: Tewkesbury Borough



Source: Tewkesbury Borough Council dataset

Our review of homelessness indicates that violent relationship breakdown continues to be one of the main causes of homelessness locally. We have worked hard to develop solutions and alternatives to emergency accommodation for those who are experiencing violence in their home.

Following the recent closure of women’s refuges in the county, a joint bid from the six District Councils in Gloucestershire to the DCLG was successful in securing £500,000 for ‘Places of Safety’ to provide safe self-contained emergency accommodation for those fleeing domestic abuse in April 2015. 12 properties will be made available across the county for this purpose in partnership with Gloucestershire Domestic Abuse Support Services (GDASS) and local housing associations.

Four properties are currently available across Gloucestershire, and in Tewkesbury Borough our partner Severn Vale Housing Society is currently identifying two properties which will be available within our area. These will be used as emergency homeless accommodation for all household types, including men, and households with older boys, with bespoke support from GDASS. We will continue to work with this group and our partners to ensure that a high quality alternative to bed and breakfast continues to be available for those who become homeless as a result of violence.

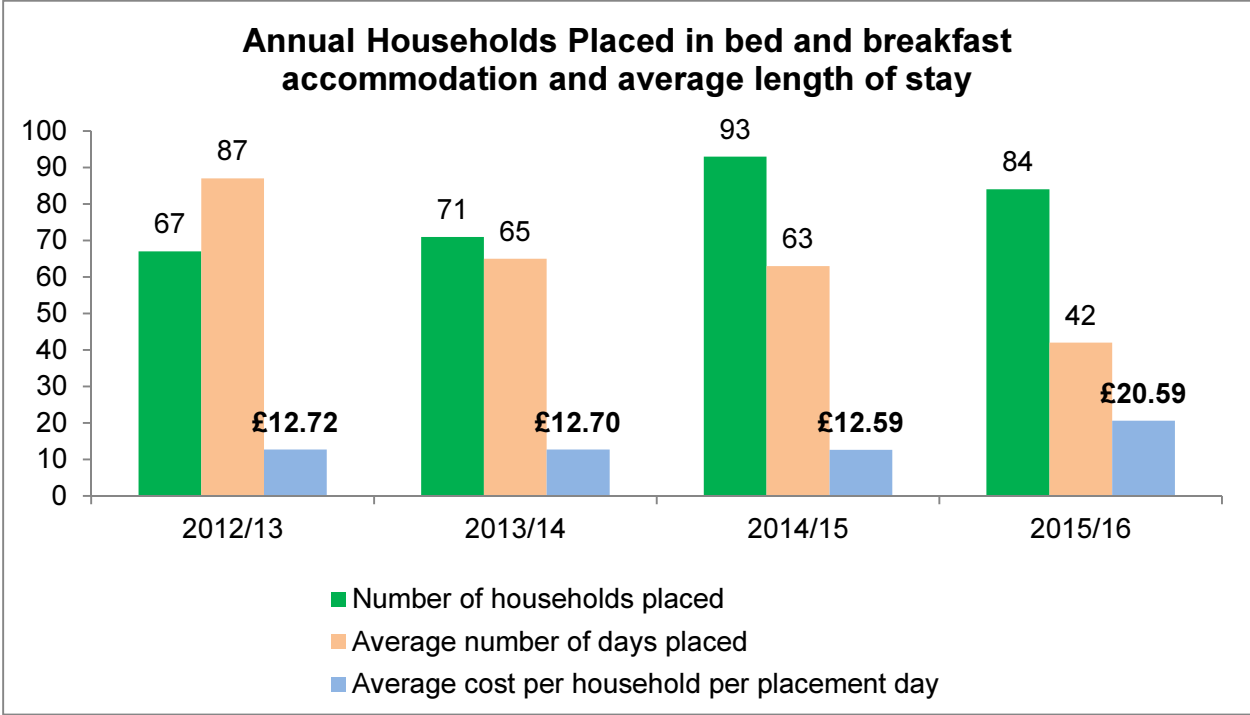
The council has access to five three bedroom houses across the borough which is primarily used for homeless family households and has been invaluable to largely avoid the use of bed and breakfast for families in our area. In times of high demand, however, homeless family

² P1E return is a DCLG form that all Local Housing Authorities complete stating the households dealt with under the homelessness provisions of the 1996 Housing Act, and homelessness prevention and relief.

households may be placed into bed and breakfast, and we will seek further alternative accommodation provision for this group.

Chart 9 overleaf shows the number of households placed in B&B (in green) by the average length of stay per household (in orange) and the cost per household per day whilst they were placed in B&B (in blue).

Chart 9: Households placed in B&B, average length of stay and cost per household per placement day: Tewkesbury Borough



Source: Tewkesbury Borough Council dataset

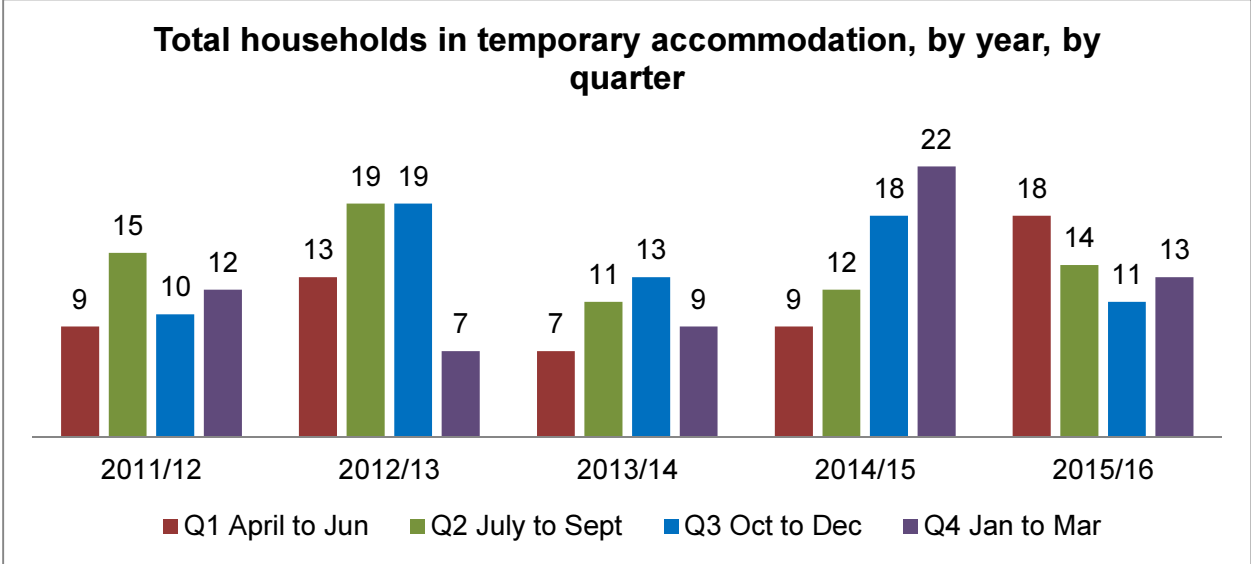
Most B&B accommodation sourced by Tewkesbury Borough tends to be within the urban areas of Gloucestershire, which results in homeless clients having to move out of district. Furthermore, the demand and cost of emergency accommodation across the county has risen, placing extra pressure on the service, and further disruption for homeless households.

Further work needs to be undertaken within the borough to source appropriate emergency accommodation for single homeless people locally. This is important to enable them to maintain their support networks and prevent isolation. As well as being less suitable for our applicants than local solutions, the cost of private B&B continues to be problematic for the service. Whilst we have been successful in reducing the number of placements and length of stay in bed and breakfast during 2015/16, the average cost of emergency B&B has remained similar to previous years. Locally we need to source suitable alternative emergency accommodation which also minimises housing benefit subsidy losses and costs to Housing Services through unsuccessful claims.

While the council’s housing services team have reduced the average number of days placed during 2015/16, Tewkesbury Borough Council is paying much more for B&B because more often than not currently smaller B&B’s are full and the council have to use more expensive national chains of hotels. Whilst such chains are accessible 24 hours a day allowing for better service, the costs are comparatively more expensive.

Chart 10 shows the numbers placed in temporary accommodation (overall) including Tewkesbury Borough Council owned temporary accommodation and B&B. These figures are based on the quarterly snapshot figures collated for the P1E returns. The chart indicates the numbers have fluctuated year on year. There does not appear to be seasonal trends.

Chart 10: Total households placed in temporary accommodation: Tewkesbury Borough



Source: Tewkesbury Borough Council dataset

If vulnerable households are roofless or become roofless during homeless enquiries, local authorities have a duty to provide accommodation, often in an emergency, while homeless enquiries are ongoing. The review of our housing and homelessness statistics indicate that the local demand for emergency and temporary accommodation will continue, and we expect this trend to continue due to the economic climate and the impact of ongoing welfare reform.

Emergency and temporary accommodation is an important resource used to house urgent homelessness cases quickly and locally. Many local authorities, including Tewkesbury Borough Council, rely heavily on privately owned B&B accommodation. However it is widely recognised to be of variable quality, expensive, and damaging to family life as households often don't have their own kitchen facilities or access to more than one room.

We are committed to limit the use of B&B accommodation for all groups. This is especially important for Tewkesbury Borough applicants as there is limited private B&B style accommodation available within our Borough. We are reducing the use of B&B in many client groups through use of prevention initiatives and other more suitable temporary accommodation provision.

4 Rough Sleeping

4.1 Defining rough sleeping

As part of the government's guidance for rough sleeper counts³, they state that:

"In order to ensure a consistency of results, it is essential that those included in the count figure fall into the following definition:

People sleeping, about to bed down (sitting on/in or standing next to their bedding) or actually bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments). People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations, or "bashes").

The definition does not include people in hostels or shelters, people in campsites or other sites used for recreational purposes or organised protest, squatters or travellers.

It does not include people who were rough sleeping in the area on a previous night or earlier in the evening but who were not there at the time of the count. It does not include people wandering around or empty sleeping sites.

Bedded down is taken to mean either lying down or sleeping. About to bed down includes those who are sitting in/on or near a sleeping bag or other bedding. The intention is to establish that they are or will be rough sleeping on the night of the count.

Research has found that in many areas people seen drinking in the street or begging (even if they have a blanket or a sleeping bag) are not necessarily sleeping rough and they should not be included unless they are clearly bedded down or about to bed down at the time of the count."

Source: DCLG, Evaluating the Extent of Rough Sleeping: A new approach

Note: "bashes" is a temporary structure made by a rough sleeper to protect themselves against the elements.

4.2 Rough sleeper count

The most recent snapshot rough sleepers count⁴ in 2015 indicated there were no people sleeping rough in Tewkesbury Borough. Whilst the prevalence of rough sleeping within the borough is low, there are instances of rough sleeping throughout the year and we are committed to ensuring that rough sleepers in our area have the assistance they need to find and maintain accommodation.

For the past two years, the officially reported Tewkesbury Borough rough sleepers estimate⁵ indicated that there were zero rough sleepers.

³ DCLG, Evaluating the Extent of Rough Sleeping: A new approach

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6009/1713784.pdf

⁴ A count is a single night snapshot of the number of rough sleepers in a local authority area. Counts are independently verified by Homeless Link.

⁵ An estimate is the number of people thought to be sleeping rough in a local authority area on any one night in a chosen week.

Table 2 shows the number of estimated rough sleepers (individuals) in the borough along with the actual count results on the night of a count from 2011 to 2015. This is compared with the South West and England.

Table 2: Number of rough sleepers reported to DCLG in the P1E returns, Tewkesbury Borough compared to the South West and England for the year 2011 to 2015

Area	Year	Total (no)
Tewkesbury Borough Council	2011	2
	2012	2
	2013	1
	2014	4
	2015	0
South West	2011	337
	2012	301
	2013	308
	2014	362
	2015	509
England	2011	2181
	2012	2309
	2013	2414
	2014	2744
	2015	3569

Source: DCLG, P1E dataset <https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2015> Note: Official 2016 data is yet to be released

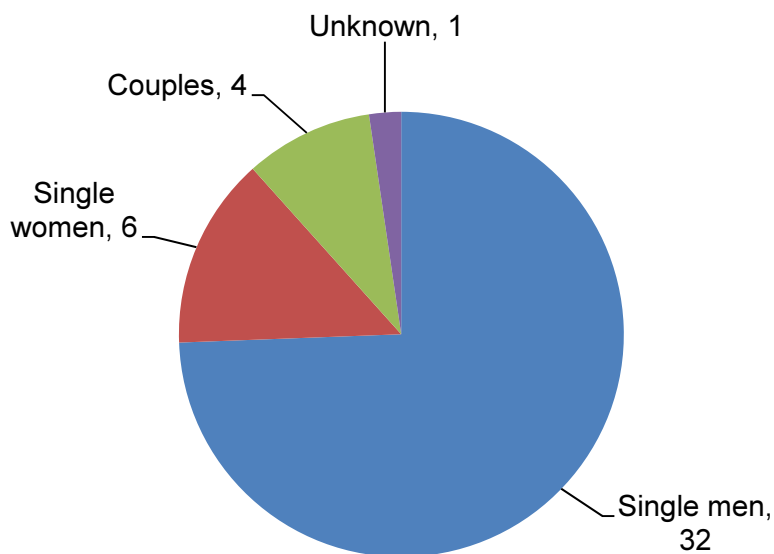
Our low figures are comparable with the Forest of Dean with the other rural districts in Gloucestershire, Stroud and Cotswolds, having a much higher rate; although Stroud have seen a fall from 5 in 2013 to 1 in 2014 and 1 in 2015.

The rough sleeper outreach service within Tewkesbury Borough has been provided as part of a county-wide service by St Mungo’s Broadway with effect from April 2015. Notifications to the service can be made by members of the public or professional agencies via Streetlink⁶. They are then visited by St Mungo’s Broadway to link them into local services, support, housing services, and accommodation in the county.

We have been notified of 43 incidents of people sleeping rough within Tewkesbury Borough by Streetlink since April 2015. The reports indicate that the majority of those who have slept rough in our area have been men. Chart 11 overleaf shows the breakdown of rough sleepers by gender and household type. It is not surprising that the majority are single men.

⁶ Streetlink website: <http://www.streetlink.org.uk/>

Chart 11: Rough sleepers in Tewkesbury Borough, by gender and household type, April 2015-September 2016



Source: Streetlink

The majority of rough sleepers in Tewkesbury Borough are reported to be aged 25-50 (62.7%) and many are identified as likely to have substance misuse and/or mental health problems (37.2%)

Rough sleeping reports indicate that there does not tend to be popular sleep sites within the borough. 58% of rough sleepers were found to be in the Tewkesbury Town area, with the remaining 42% spread across the borough; 9% of were in the rural parishes of Gotherington, Woodmancote, Uckington Sandhurst and Twigworth.

We are unable to understand through the data from Streetlink if any have been double-counted as no data is collected by Streetlink that can identify the individual at this early stage.

5 Impact of Welfare Reform

A number of welfare reforms have already been introduced such as:

- The under-occupation charge (also known as the 'removal of the spare room subsidy' or the 'bedroom tax') reduces Housing Benefit for households living in the social-rented sector who are deemed to have a 'spare' room.
- The Local Housing Allowance limits the amount of Housing Benefit tenants in the private-rented sector can receive.
- The benefit cap limits the total benefit income most working-age households can receive.

A number of further measures were announced in the Summer Budget in July 2015 including:

- The benefit cap has been reduced to £20,000 per year for couples and families with children and to £13,400 for single people without children.
- Work allowances under Universal Credit have been reduced, to £0 for non-disabled households without children and substantially for families with children.
- Reforms affecting young people, including the loss of Housing Benefit for people under 21; the introduction of 'earn or learn' for 18-21 year olds, and the capping of Housing Benefit at LHA rates for tenants in the social-rented sector (overwhelmingly affecting people under 35).
- The withdrawal of entitlement to child tax credit for families having a third child (to be introduced after April 2017).
- Increases in the minimum wage, the personal allowance, and additional childcare support for 3-4 year olds.

In 2016 Policy in Practice⁷ undertook analysis of all households receiving either Housing Benefit or Council Tax Reduction as at May 2016. There are 5,217 households in the cohort, which represents approximately 14.85% of the population of Tewkesbury Borough.

Of the cohort, 46.27% is of pension age and thus protected from the vast majority of welfare reforms.

The remaining 53.73% of the cohort are working-age households and are the focus of analysis in this report.

⁷ The Cumulative Impact of Welfare Reform in Tewkesbury Borough, Policy in Practice

5.1 General statistics about the cohort

44% are lone parents
33% are single
18% are couples with children
5% are couples without children
37% are receiving DLA and/or ESA (the remaining 63% are not disabled)
60% are in social rented housing
29% are in private rented accommodation
11% are owner occupiers
0.46% are temporary accommodation
24% of households have no savings
39% are in employment

Policy in Practice assessed those affected by the under-occupation charge. The under-occupation charge (or more commonly known as the bedroom tax) was introduced in April 2013. It applies to households who are tenants of social housing who are deemed to have a 'spare' room. The rent used in the calculation of any Housing Benefit is reduced by 14% if the house is assessed as having one spare room and 25% if the house is assessed as having two or more spare rooms.

A total of 322 (19.3%) of the 1,687 working-age households living in social housing, receive reduced Housing Benefit due to the under-occupation charge. The average Housing Benefit reduction is £16.49 per week for affected households.

The majority of affected households, 81.73%, have one spare room and 17.34% have two or more spare rooms.

The majority of households affected are singles (50.15%), followed by lone parents (20.80%). 31.80% of households affected by the under-occupation charge have children.

There are 171 children living in affected households in Tewkesbury Borough.

5.2 Characteristics of households affected by the LHA cap

The Local Housing Allowance (LHA) was introduced in April 2008 and significantly changed Housing Benefit for people living in the private-rented sector. It places a cap on the maximum amount of rent taken into account for the purposes of Housing Benefit calculation. The applied LHA rate is based on broad geographical regions, household composition and age of household members. In effect, Housing Benefit is not related to the actual rent charged unless the rent is at or below the applied LHA amount.

There are 1,152 households living in the private-rented sector in the cohort. The data shows that 55.58% (657) of these households are charged rent at a level that is above the LHA rate applied to calculate their Housing Benefit. Households paying rent above their applied LHA rate have an average reported difference between their rent and their Housing Benefit of £31.97 per week.

The Local Housing Allowance applies to both working age and pension age households. The majority (72.30%) of the 657 households affected by the LHA cap in Tewkesbury Borough are of working-age.

5.3 Analysis of the Benefit Cap

5.3.1 Number of households affected by the current benefit cap of £26,000 per annum, by weekly Housing Benefit reduction

There are 5 households in Tewkesbury Borough affected by the benefit cap, with an average Housing Benefit reduction of £45.17 per week. The household most heavily affected has a £95.64/week reduction to their Housing Benefit. No households currently lose all of their Housing Benefit as a result of the benefit cap.

All of the affected households have children, on average 4.20 per household. 60% of households affected are lone parent families and 40% of households are couples with children. A total of 21 children are currently affected.

None of these households appear to be living in temporary accommodation. The majority of affected tenants are in the social rented sector (60%), with the remainder (40%) being private renters.

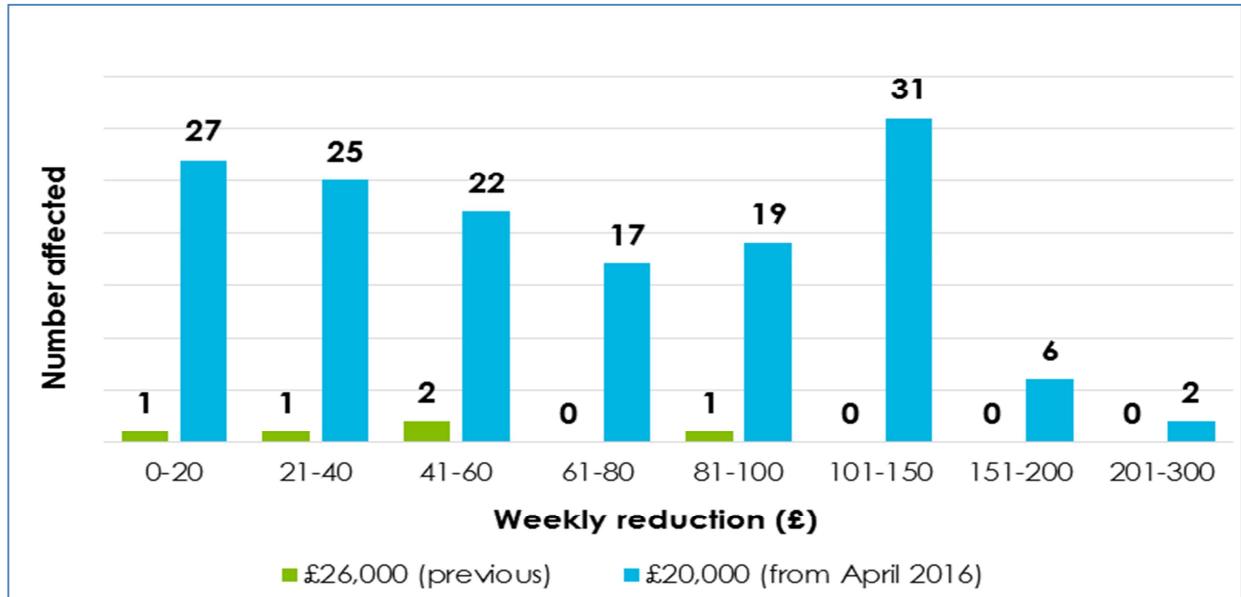
5.3.2 Reducing the benefit cap to £20,000

The benefit cap in Tewkesbury Borough will be reduced to £20,000 per year (£380 per week) for couples and households with children and to £13,400 per year (£258 per week) for single people with no children.

Policy in Practice's analysis estimates that the number of households that will be affected by the lower benefit cap will range between 149 (for couples and households with children) and 80 (for single people with no children). This is between 29.8 times and 16 times the number of households that are currently capped.

The analysis finds that the average Housing Benefit reduction as a result of the benefit cap will increase from £45.17 per week under the current benefit cap to £68.41 per week under the new, lower, benefit cap. For households already affected by the benefit cap, the average weekly loss under the new cap will be £120.71 see Chart 12.

Chart 12: Number in the cohort affected by the Benefit Cap: Tewkesbury Borough



Source: Policy in Practice

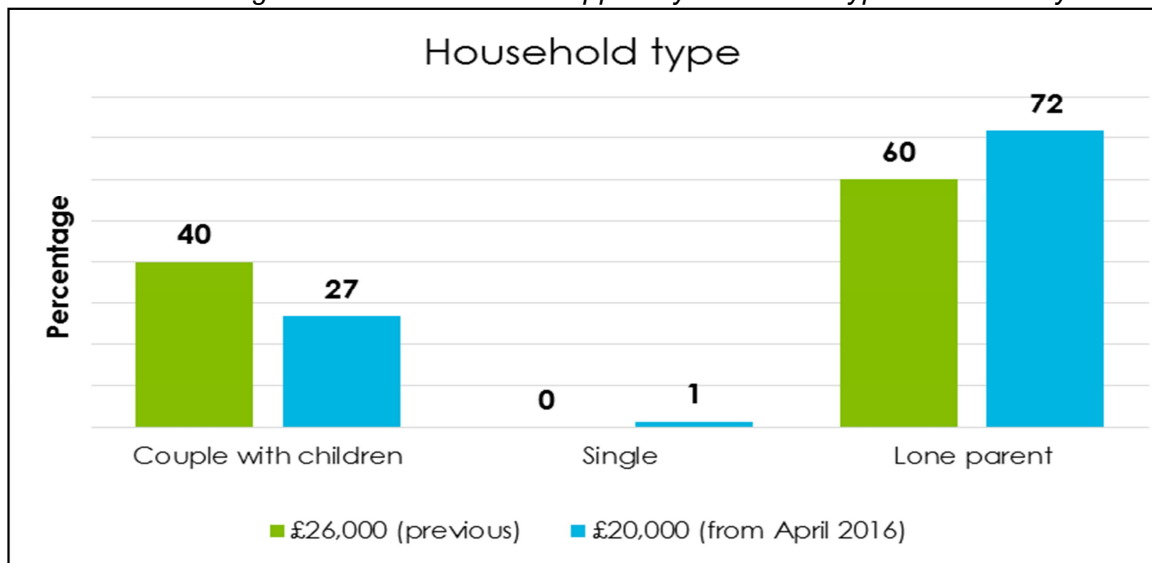
32 households can expect to lose their Housing Benefit altogether as a result of the lower cap. Under Universal Credit these households may lose even more income since the cap will be achieved through reduction from all Universal Credit and not be limited to just the housing element.

5.3.3 The profile of households that will be capped

72% of those capped are lone parent households, with 27% couples with children and just 1% single households. 79% live in social rented housing with 21% in private rents.

Chart 13 shows all household types affected by the £26,000 benefit cap (in green) and now the £20,000 benefit cap (in blue).

Chart 13: Percentage of those that will be capped by household type: Tewkesbury Borough



Source: Policy in Practice

The lower benefit cap (to £20,000) will change the types of families that are affected:

- Smaller families.
- The number of children affected by the reduced benefit cap will rise from 21 to 499.
- 1.34% of those affected have no children; these new cases occur due to the lower benefit cap of £13,400 for single households having to rent 1-bedroom properties as introduced in November 2016.
- Those affected by the lower benefit cap are predominantly lone parents, and from the social rented sector.
- The proportion of affected households living in the private-rented sector will fall significantly from 40% to 21.48%. A greater proportion of households living in the social rented sector properties will be affected, rising from 60% to 78.52%.

The Chancellor of the Exchequer has also announced his intention to freeze LHA rates in the United Kingdom for the next four years. The Government has stated that this will provide a cap on rental increases. However, this did not occur in most areas with the introduction of LHA rates and therefore the freeze in LHA rates is unlikely to have any significant impact on rent levels.

We assume that private rents in Tewkesbury Borough will continue to rise at the current rate of 1.5% p.a. for the next four years while LHA rates remain stable. Rents for social tenants are assumed to fall by 1% per year as instructed by the Government in the Summer Budget 2015.

Table 3 shows average rents according to our model in the social and private sectors, in 2015 and in 2020.

Table 3: Rent uprating in the social and private sectors, from 2015 to 2020: Tewkesbury Borough⁸

	Private Rent		Social Rent	
	Current average	2020 average	Current average	2020 average
1 bedroom	£98.32	£102.80	£97.24	£94.36
2 bedrooms	£140.43	£143.25	£101.05	£98.06
3 bedrooms	£160.14	£163.35	£111.12	£107.83
4 bedrooms	£204.38	£208.48	£135.91	£131.88
5 bedrooms	£201.83	£205.89	£150.82	£146.33

Source: Policy in Practice

Analysis suggests that an additional 28 private tenants would be affected by the LHA cap if rents in Tewkesbury Borough continue to increase at current rates. This would bring the total number of households affected by the LHA cap to 685, and the average weekly shortfall of these households, between their rent and their Housing Benefit, will be £33.73. For social sector tenants, 51 properties could fall back below the LHA cap once the LHA rate is applied to all social tenancies in 2018.

⁸ Table note: rents for 5 bedroom properties in the private rented sector are slightly lower than for 4 bedroom properties; this is likely to be due to the low number of households living in such large properties.

5.4 Cumulative impact of Welfare Reform

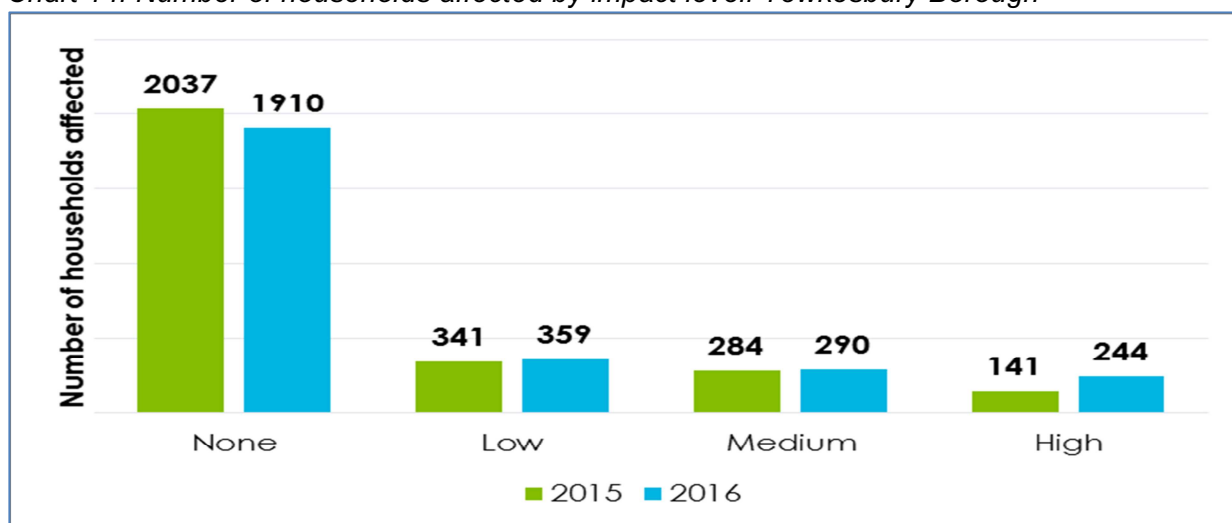
By taking into account the impact of reforms already effective, we identify 141 households will be highly impacted. The analysis suggests that as a result of the reduced benefit cap, there will be an additional 103 further households for which welfare reform will have a high impact.

Low-income working-age households in Tewkesbury Borough have seen their incomes fall by an average of £6.30 per week as a result of welfare reforms implemented in the previous parliament. These include the under-occupation charge, the benefit and LHA caps.

The lower benefit cap introduced in November 2016 will result in a rise in the average income loss to £9.85 per week across the whole working age cohort of this analysis. As Universal Credit is rolled out, these losses will be partly mitigated by increases in the minimum wage and tax allowance. This could lead to an average loss of £7.22 per week by 2020 compared to 2016 if Universal Credit is fully rolled out.

Chart 14 shows 244 households are estimated to face a 'high' impact, defined as a fall in household income of over £30 per week as a result of the under-occupation charge, the reduced benefit cap, LHA cap, and cuts to council tax support. Lone parents, households in the private-rented sector, and those in work are most likely to have a 'high' impact due to welfare reform. There are no households affected by four welfare reforms.

Chart 14: Number of households affected by impact level: Tewkesbury Borough



Source: Policy in Practice

5.5 The impact of Universal Credit

Universal Credit (UC) will replace six⁹ existing means-tested benefits and is intended to simplify the system and improve work incentives. The implementation of UC in Tewkesbury Borough has begun for single people making a new claim for who would have claimed income-based Jobseeker's Allowance.

⁹ The six existing means-tested benefits: income-based Jobseeker's Allowance, income-related Employment and Support Allowance, Income Support, Housing Benefit, Child Tax Credit, and Working Tax Credit.

Numbers in receipt of UC will remain low in the short term, but our analysis estimates that at least 2,932 households in Tewkesbury Borough will receive UC when it is fully implemented.

For modelling purposes, if we assume that Universal Credit was fully rolled out in 2016 and circumstances remained the same, then:

- 1,291 households (44.03%) would have a lower benefit entitlement under Universal Credit and need transitional protection
- 702 households (23.94%) would have a higher income under Universal Credit
- 939 households (32.03%) would see no change in entitlement.

The transition to Universal Credit is expected to extend over the course of the next five years. Based on the same cohort in 2020, and assuming circumstances remained the same:

- The percentage of households with lower benefit entitlement and in need of transitional protection will fall slightly to 41.58%
- 27.11% of households would see their entitlement increase under Universal Credit
- 31.31% would face no change in income.

The extent to which the reduction in work allowances will affect income will depend upon level of earnings, as well as household type. It is estimated that at least 2,932 households in Tewkesbury Borough will receive UC when it is fully implemented. This is shown in Table 4.

Table 4: A summary of the reduction of work allowances by household type: Tewkesbury Borough

	2015	2016	Change
Single person	£1,332.00	£0.00	-£1,332.00
Lone parent (without housing support)	£3,156.00	£2,304.00	-£852.00
Lone parent (with housing costs)	£8,808.00	£4,764.00	-£4,044.00
Couple without children	£1,332.00	£0.00	-£1,332.00
Couple with children (with housing support)	£2,664.00	£2,304.00	-£360.00
Couple with children (no housing costs)	£6,432.00	£4,764.00	-£1,668.00
Disabled people (no housing support)	£2,304.00	£2,304.00	-
Disabled people (no housing costs)	£7,764.00	£4,764.00	-£3,000.00

Source: Policy in Practice

5.5.1 Assuming full Universal Credit implementation 2016

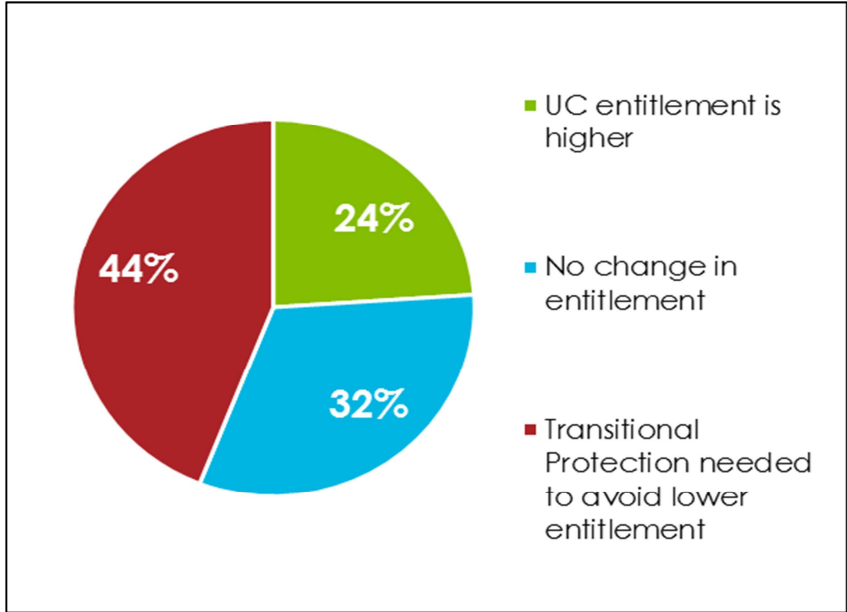
The analysis takes into account welfare reforms that come into effect from April 2016. This includes changes to the benefit cap and the reduction of work allowances in Universal Credit.

The analysis is based on the current caseload of HB and CTRS claimants on the understanding there are no changes in circumstances except for earnings increasing in line

with minimum wage levels for claimants in work. Differences in entitlement are identified as those that are greater than £5 per month.

Chart 15 overleaf shows that under Universal Credit, 23.94% of households will have a higher income than under the current system. 44.03% will have a lower income and need transitional protection and 32.03% will see no change in income if their circumstances remained the same. This analysis does not take into account any changes in behaviour (e.g. moving into or out of work) as a result of Universal Credit.

Chart 15: The impact of Universal Credit for Tewkesbury Borough cohort on household income in 2016

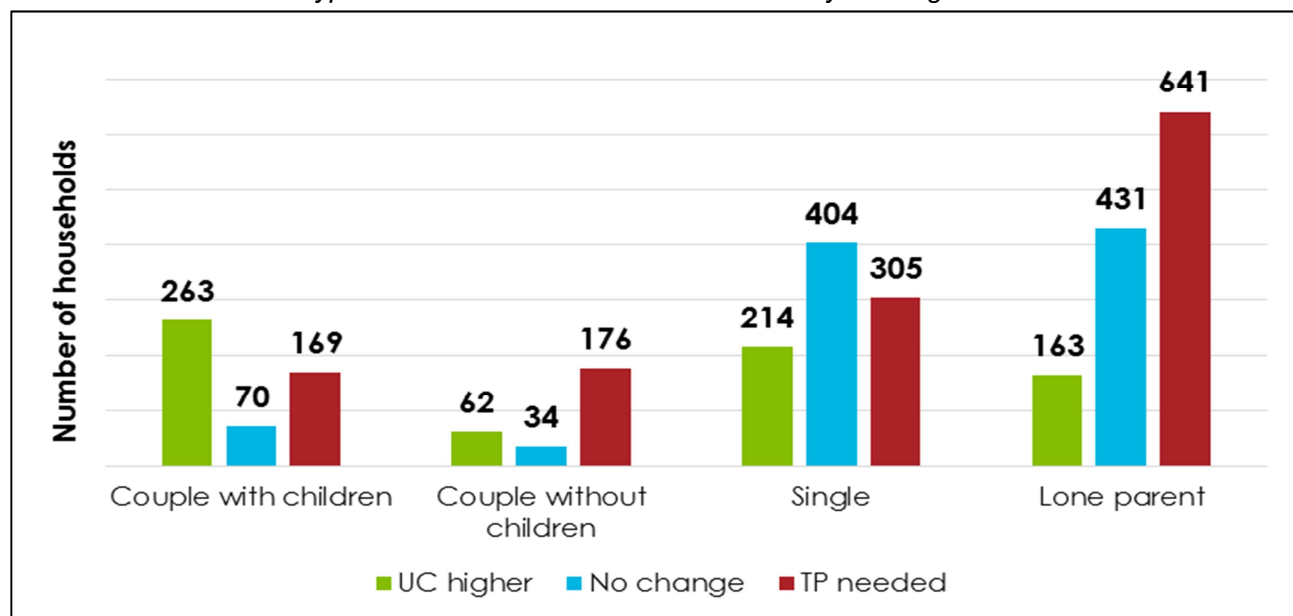


Source: Policy in Practice

5.5.2 Impact of Universal Credit on different household types

Chart 16 shows that there are ‘winners’ and ‘losers’ within each household type. All household types are more likely to be worse off than better off, except for couples with children, who are the most likely group to see an increase in their income. Couples without children and lone parents are most likely to be worse off, and singles are the most likely to see no change in income.

Chart 16: Number and type of households affected: Tewkesbury Borough



Source: Policy in Practice

Following the implementation of Universal Credit, tenants are more likely to see incomes reduced and therefore need transitional protection. Owner-occupiers and those in temporary accommodation have a slightly greater likelihood of not being affected, but are the least likely to see their income increase. Social and private renters are most likely to lose income under Universal Credit.

Almost half of households that will need transitional protection are in work. This is due to the reduction in work allowances under Universal Credit. The result of these cuts to work allowances is to make Universal Credit less generous to those in work than the current tax credits system.

Households in receipt of a disability-related benefit are also significantly more likely to see their income fall under the new system than other economic groups.

The numbers used in this report are based on assumptions around employment and support allowance (ESA)¹⁰ categories and may differ under further investigation.

In general, those not in-work are less likely to see a change in their income following migration to Universal Credit.

5.6 In-work conditionality

For the first time, Universal Credit will introduce conditionality for recipients who are in work but have earnings below a certain level. This conditionality threshold will be set as the number of hours the householder is expected to work (similar to the current hour requirement in tax credits), multiplied by the minimum wage. Certain groups, such as disabled people and lone parents with children under five, will still not be subject to full conditionality under Universal Credit.

¹⁰ Employment and support allowance is a benefit for people who are unable to work due to illness or disability

26.64% of working-age households in the cohort will be subject to conditionality under Universal Credit. Of these, 371 households are in work and will be subject to conditionality because earnings are below the required threshold. These households do not have any conditionality in the current system and could be subject to sanctions for not fulfilling their conditionality requirements under Universal Credit.

5.7 The minimum income floor

Universal Credit will introduce a 'minimum income floor' that will apply to self-employed people. Similar to the in-work conditionality threshold, this will be set at the number of hours the individual is expected to work multiplied by the minimum wage.

For self-employed households earning below this threshold, Universal Credit will be awarded based on an assumed level of income rather than actual earnings. Many of these households will see a fall in their Universal Credit entitlement as a result.

In Tewkesbury Borough, there are 171 households with at least one partner who is self-employed. 49.71% of these households are earning below their applicable 'minimum income floor' and are at risk of seeing their income fall under Universal Credit.

5.8 Moving out of Universal Credit

On average, households in Tewkesbury Borough will have to earn at least £22,343.69 per year to move beyond an entitlement to Universal Credit. However, this varies by household type and tenure, as shown in Table 5.

5.9 Table 5: Earnings required to move out of entitlement to Universal Credit

By Household Type	
Single	£15,432.48
Lone parent	£25,174.41
Couple without children	£16,730.96
Couple with children	£31,128.10
By Tenure	
Private Rent	£24,421.45
Social Rent	£23,061.58
Owner Occupier	£13,619.18

Source: Policy in Practice

6 Changes to benefits for young people

There are 2 core changes to benefits for young people were announced in the Summer Budget 2015:

- 18 to 21 year olds will no longer have an automatic entitlement to the housing element of Universal Credit if they are out of work. In Tewkesbury Borough, there are 45 such households at risk of losing their housing support under Universal Credit.
- 18-21 year olds will be expected to 'earn or learn' and will have to participate in an intensive regime of support under Universal Credit. There are 75 young people in the Tewkesbury Borough cohort (including non-dependants) that could be affected if they make a claim for Universal Credit. It is not yet clear how much, if any, of this support will be provided by Local Authorities.

In addition there are significant implications for people under the age of 35 in terms of LHA entitlement. Since they are only eligible for the lower shared accommodation rate of the Local Housing Allowance they would be unable to afford a 1-bed social/affordable rented property through a Registered Provider. Chart 17 on page 30 shows how the actual median rent levels compare to LHA rate.

7 The National Living Wage and increased personal living allowance

The Summer Budget 2015 announced an increase in the minimum wage for people over 25, called the 'National Living Wage'. It has been set at £7.20 per hour from April 2016 (compared to £6.70 before). From 1 April 2017, the National Living Wage will increase from £7.20 to £7.50 and will rise to £9.00 per hour by 2020.

This does not apply to 70 under-25s in work in Tewkesbury Borough, or to 171 self-employed people, but it could affect the income of the latter under Universal Credit.

The impact of the National Living Wage combined with the increased personal allowance will help 791 households in work, by an average £22.96 per week.

It is worth pointing out that this will only happen if all employers respond to the higher National Living Wage by increasing their workers' wages accordingly rather than reducing hours or hiring younger people who are not affected by the reform.

From April 2016, the new minimum wage (£7.20) will increase the earnings of 886 low-income families in Tewkesbury Borough. 764 of households in receipt of Housing Benefit and Council Tax Support aged 25 or over, in work (not self-employed) earn below £9 per hour. Source: Policy and Practice analysis

8 Rents

8.1 Median rents

Over the period all social sector rents have increased by 35% and private sector rents by 15%. The gap between the two sectors is lessening; this is shown in Table 6.

Table 6: Median rent (before Housing Benefit) by type of accommodation, full household sample

Median £ per week	Year						
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15
All social sector renters	£68	£72	£74	£79	£83	£88	£92
All private sector renters	£130	£133	£137	£138	£138	£144	£150
<i>Difference</i>	<i>1.91x</i>	<i>1.84x</i>	<i>1.85x</i>	<i>1.75x</i>	<i>1.66x</i>	<i>1.64x</i>	<i>1.63x</i>

Source: English Housing Survey

Table 7 shows that with the introduction of affordable rents from 2011 the percentage change over a 3 year period has been quite significant for the social/affordable rented sector, while the same period for the private sector there has actually been a decrease.

Table 7: Impact of Localism Act 2011

Median £ per week	3 years prior to Act 2008/09 to 2010/11		3 years post-Act 2011/12 to 2013/14	
	Change (£)	% change	Change (£)	% change
All social sector renters	6	8%	9	11%
All private sector renters	7	5%	6	4%

Source: English Housing Survey

8.2 Social housing 'Rent in Advance'

A key concern for housing professionals over the last 18 months has been that many housing associations are enforcing the rent in advance condition ranging from 1 weeks rent to 1 months rent.

New tenants on low incomes often struggle to afford this in a lump sum, particularly those who may have been rehoused in crisis (following relationship breakdown or homelessness) and local authorities have been concerned that vulnerable people may be financially excluded from social housing.

In practice, our housing association partners within Tewkesbury Borough who apply this policy have been sensitive to financial hardship and have agreed small weekly payments over the first few months of tenancies to enable new tenants to meet the rent in advance criteria. We will continue to work with our partners to ensure that when the rent in advance condition is applied to new tenancies; there will be a generalised sensitivity to financial hardship which does not exclude new tenants.

8.3 Affordable Rents

Affordable rents were encouraged by the DCLG through the HCA who provided grant funding through the Affordable Homes Programme 2011-2015 and are defined as part of the affordable housing definition in the National Planning Policy Framework 2012¹¹.

Tewkesbury Borough is an area where there is significant new-build housing development and the introduction of affordable rents¹² has become the preferred rental tenure in Affordable Housing on these new developments.

Higher rent levels mean more income for housing associations to build capacity within and to develop new affordable housing. Affordable rent also meant the increased viability of new sites particularly market-led development where the affordable housing provision is more likely to be met with increased value of the homes.

The introduction of the LHA rates as a maximum housing benefit rate for social/affordable housing is likely to cause significant affordability issues for our residents in affordable rented properties. This is because the market value of a rental property takes into account the desirability of a local location and the property type. The LHA rate, however, applies to: flats, maisonettes, houses and bungalows irrespective of where they are located. This has caused significant affordability issues for our residents.

Whilst affordable rents may be less expensive for a similar property in the same location in the private sector, they can considerably exceed the social rental values and the LHA rates. This is demonstrated in the following example:

In Tewkesbury Borough, a flat rate of £122.36 per week housing benefit is payable in the Gloucester broad rental market area.

A recent completion of a 2-bed new build bungalow in Longford is rented at an affordable rent of £165 per week.

This leaves a shortfall of £42.64 per week or £184.77 per calendar month.

A significant issue at present has arisen with the LHA rates where a single person, with no children, under the age of 35 will only be granted a set amount known as the single room rate regardless of the accommodation type. This amount is not sufficient to cover the rent for a 1-bed property (as shown in Chart 13 on page 30) and so single people are left with few options to meet their housing needs.

It has been confirmed that the LHA rate will apply to supported and sheltered accommodation for tenancies commencing after April 2017 with take effect in the next 2 years. The cohort likely to be most affected will be those in supported accommodation under the age of 35 (as they will be affected by the single room rate).

¹¹ National Planning Policy Framework 2012

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹² Affordable rents are to be set at a maximum of 80% of the market rent (inclusive of service charges) of an area (based on mean rental levels).

Tewkesbury Borough has just one supported housing project based in Tewkesbury Town for vulnerable homeless young people (aged 16-22). Rents in this sector are considerably higher than the LHA to reflect the amount of housing management costs associated with supported accommodation. Supported housing providers in Gloucestershire have confirmed they are concerned regarding the future of their projects following these reforms.

An example of the financial impact on young people is below:

The LHA shared accommodation rate for Tewkesbury Town (Cheltenham area broad market rental area) is £67.08 per week or £290.68 per calendar month
Whereas the rent at the supported scheme in Tewkesbury Borough is £114.03 per week or £494.13 per calendar month
This represents a shortfall of £46.95 per week.

8.4 Housing Benefit capped at LHA rates for social rents

There are 375 households in social/affordable rented housing in Tewkesbury Borough paying rent above the applicable LHA rate. 94.21% of these tenants live in a 1-bedroom property and the average age of these tenants is 69 years. In Tewkesbury Borough the average difference between the weekly rent of affected properties and their applicable LHA rate is £16.42.

Source: Policy and Practice analysis

In November 2015, the Chancellor announced the extension of the LHA cap to the social/affordable rented sector. This measure will apply to new tenancies started after April 2016 and it will become effective in April 2018.

8.5 Pay to Stay

In a House of Commons Library briefing paper¹³, the detail of the now discretionary 'pay to stay' scheme is published. The full report details the issues where higher income earners are paying low rents and therefore needing fairer rents in social housing. In November 2016 it was announced that mandatory pay to stay would not be introduced and so Councils and housing associations have discretion over whether or not they wish to implement higher rents for higher earning tenants:

*"On 21 November 2016 the Housing Minister, Gavin Barwell, announced that the Government had decided **not to proceed with a compulsory approach** and that local authorities and housing associations "will continue to have local discretion."*

Source: Parliament; House of Commons Research Briefing 06804

<http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN06804#fullreport>

¹³ House of Commons Briefing Paper Number 06804, 22 November 2016 Social housing: 'pay to stay' at market rents <http://researchbriefings.files.parliament.uk/documents/SN06804/SN06804.pdf>

8.6 Rent comparisons across the sectors

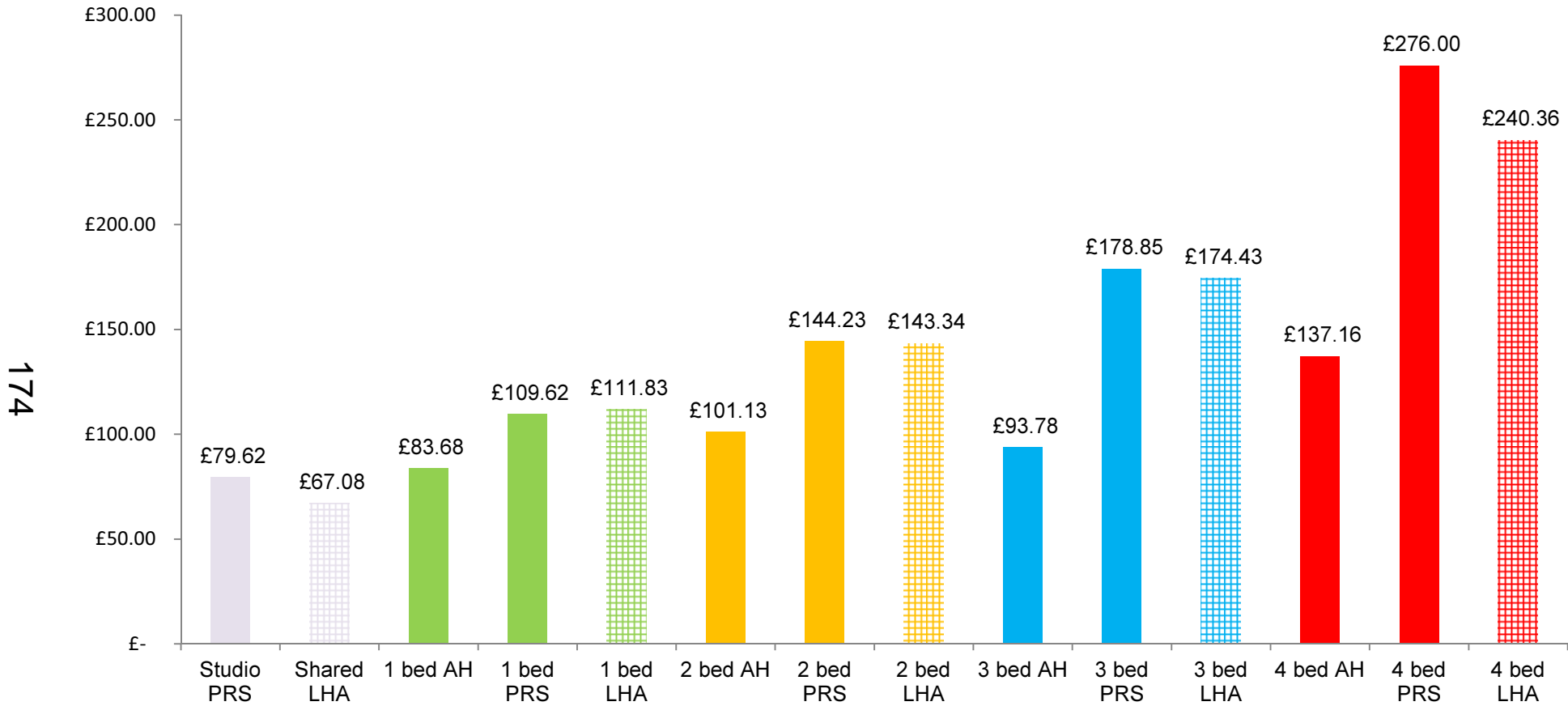
Chart 17 overleaf shows the median rents in Tewkesbury Borough in the private rented sector (PRS), the affordable rented sector (AH), and the LHA rates in the Cheltenham Broad Rental Market Area¹⁴ for 2015/16.

The hatched columns in Chart 17 show the LHA and so comparisons can be made between the rental sectors and against the LHA rate. Analysis shows that:

- 1-bedroom accommodation in all sectors is unaffordable to the under 35s on housing benefit who receive the shared accommodation rate.
- 1-bedroom accommodation for those over 35 - the median rent would be affordable for all households on housing benefit in all sectors.
- 2-bedroom and 3-bedroom properties are affordable providing properties are let to the correct sized households; the median rent is affordable on housing benefit in all sectors.
- 4-bedroom properties - the median private sector rent would be difficult to afford to households on housing benefit.

¹⁴ A broad rental market area is where a person could reasonably be expected to live taking into account access to facilities and services <https://www.gov.uk/government/publications/understanding-local-housing-allowances-rates-broad-rental-market-areas>

Chart 17: Median rents in private rented housing, social housing and the Housing Benefit rates, by bedroom size and cost (in pounds) in Tewkesbury Borough, 2016¹⁵



Source: Tewkesbury Borough Council dataset

¹⁵ Chart notes:

There is no shared/studio social rented housing in the borough at this time and so no 'AH' amount can be shown.
There is no information on the PRS rents for in 5 bedrooms and above and so the 4 bedroom LHA rate would apply.

At home in Tewkesbury Borough

A housing strategy for our borough 2017-2021

Appendix 1c: Our Local Evidence – Specific Housing Needs



This page is intentionally left blank

Contents

1	Introduction	Page 4
2	Deprivation	Page 5
3	Ex-military Personnel	Page 5
4	Older people	Page 6
5	Adapted and adapting properties	Page 9
6	Rural housing development	Page 11
7	Gypsies, travellers and travelling show people	Page 12
7.1	Planning policy for Traveller sites	Page 12
7.2	Rental liabilities on Traveller sites	Page 13
8	Refugees and asylum seekers	Page 13

List of charts and tables

Chart 1: Gloucestershire County Council community adult care services by area for those aged 65+	Page 7
Table 1: Estimated number of vulnerable people in need of support, 2011 to 2021	Page 6
Table 2: Number of households registered stating that a medical issue is worsened by their housing circumstance by age group	Page 8
Table 3: List of the most rural parishes in Tewkesbury and the affordable housing stock they have as percentage of all affordable housing stock in Tewkesbury Borough, as at July 2016	Page 11
Table 4: Total amount of authorised provision in Tewkesbury (March 2016)	Page 12
Table 5: 2016 Gypsy and Traveller Accommodation Assessment outcomes	Page 13

1 Introduction

This document outlines the evidence gathered by Tewkesbury Borough Council showing the housing and homelessness context in which the council is working.

We have used this evidence to identify 4 priorities for housing and homelessness along with key objectives for the next 5 years.

The strategy will link with the priorities outlined in the Council Plan 2016-2020, set out the council's priorities and objectives for housing, and appropriate activities that will help us to meet our statutory housing duty under the Housing Act 1996.

Housing is a priority in the Tewkesbury Borough Council Corporate Plan because:

"We recognise how important it is for residents to be able to access good quality housing and housing related services that make a real difference to their lives.

"Not only is housing important for the health and well-being of residents it is also an important part of building and maintaining strong communities and supporting the economic prosperity of the borough."

Tewkesbury Borough Council recognises that access to quality affordable housing underpins the success of our area and all of the overarching corporate priorities.

2 Deprivation

Tewkesbury borough as a whole is generally an affluent area; however this can mask pockets of significant inequality.

Indices of Multiple Deprivation (IMD¹) provides data on relative deprivation in small areas in England and the borough includes two lower super output areas (LSOAs) in the top 10% most deprived. These LSOAs are Tewkesbury Priors Park 2 and Tewkesbury Priors Park 3. Both perform poorly on employment, education, skills and training, and income deprivation affecting children. Priors Park 3 also performs poorly on income deprivation affecting older people.

The effects of changing government legislation and housing and homelessness policies impact greatly on households with low incomes in our Borough. The detail regarding affordability and specific groups is analysed more intensively in the appendix 1b homelessness evidence and appendix 2 homelessness and homelessness prevention strategy.

The need to assess the housing needs of specific groups who are unable to access mainstream housing options and are not homeless or rough sleeping is essential in understanding how residents in our borough cope in housing crisis.

3 Ex-military Personnel

Tewkesbury Borough Council is part of the Community Covenant between the local authority services in Gloucestershire and The Armed Forces Community in Gloucestershire. Joint protocols and preventative advice and assistance for those leaving the armed forces have been successful in meeting the needs of those leaving the services that approach in the prevention of homelessness. We work closely however with support services available for ex-military personnel such as the Royal British Legion, Alabare supported accommodation, and SAFFA to assist more vulnerable ex-military personnel.

¹ Source: <https://inform.gloucestershire.gov.uk/viewpage.aspx?c=page&page=-Deprivation>

4 Older people

The most vulnerable client groups as determined by the Homes & Communities Agency (HCA) shows that the most significant are the frail elderly and older people with mental health needs and support needs aged over 65 years old:

Table 1: Estimated number of vulnerable people in need of support, 2011 to 2021

Client group	2011 (no.)	2021 (no.)	Change 2011-21 (no.)	Change 2011-21 (%)
Teenage parents - 15-17 year old females in need	135	130	-5	-3.7
Young people - 16-17 year olds in need	11	11	0	0
Alcohol misuse - 18-64 year olds in need	251	262	11	4.4
Learning disabilities-18-64 year olds in need	130	137	7	5.4
Mental health problems-18-64 year olds in need	172	181	9	5.2
Offenders - 18-64 year olds in need	103	108	5	4.9
Physical or sensory disability - all -18-64 year olds in need	127	135	8	6.3
Refugees- 18-64 year olds in need	5	6	1	20
Rough sleepers- 18-64 year olds in need	1	2	1	100
Single homeless with support needs-18-64 year olds in need	131	138	7	5.3
Frail elderly-65+ year olds in need	383	496	113	29.5
Older people with mental health needs-65+ year olds in need	633	820	187	29.5
Older people with support needs-65+ year olds in need	2083	2698	615	29.5

Source: Homes & Communities Agency dataset

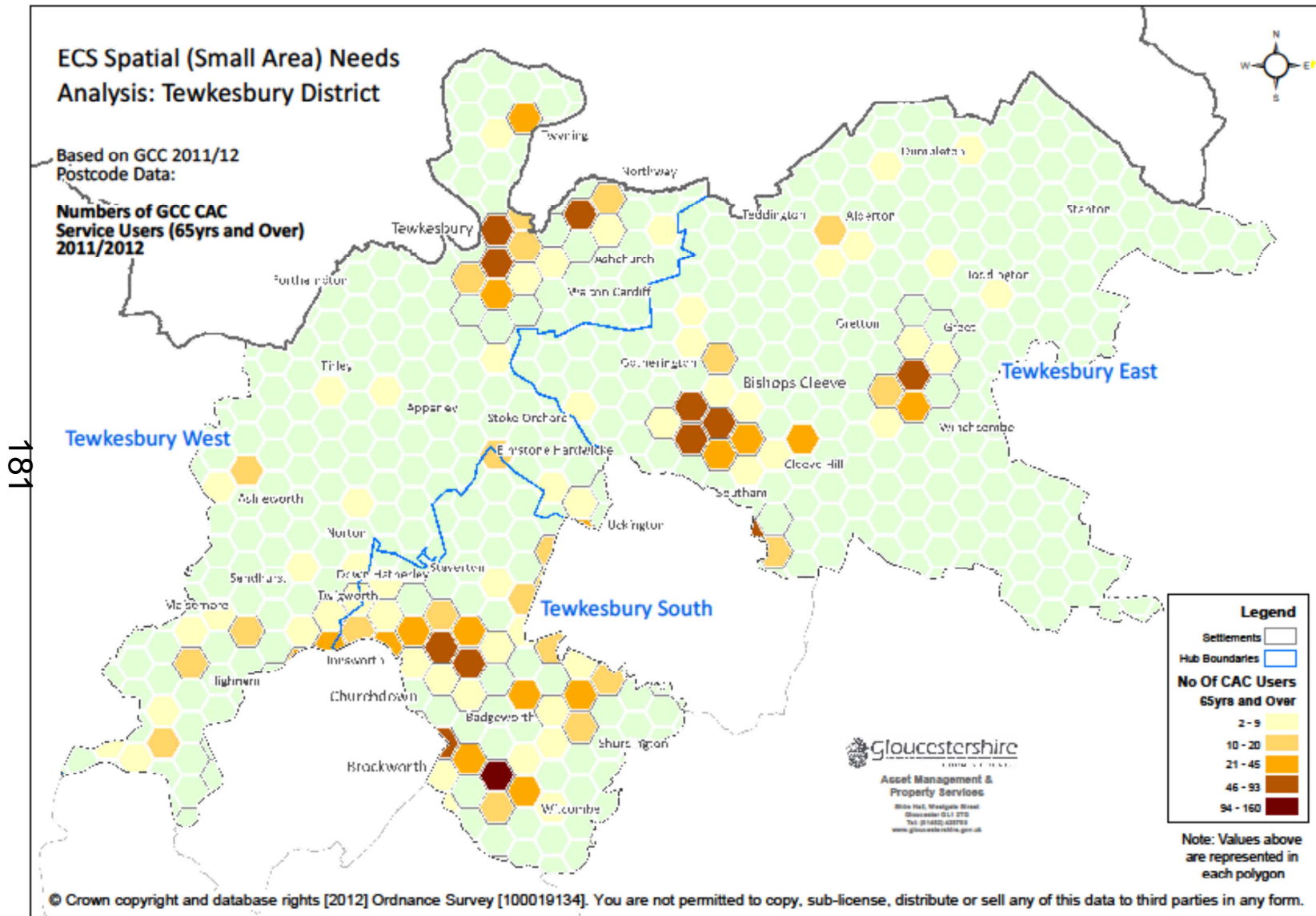
The table shows the main client group areas that will be in need of support. It is estimated that the increasing demand from over 65's as we live longer but needs are acute for many reliant on public services.

Also, the increasing demand on services for vulnerable groups where at present provision in the borough will not be able to support even these small increases in clients.

Research undertaken by Gloucestershire County Council in 2012 shows the areas within Tewkesbury Borough where households aged 65 and over are receiving community adult care services (see Chart 1 below).

It is no surprise that in the areas of the borough where population is highest (Tewkesbury Town and surrounding area, Bishop's Cleeve, Winchcombe, Brockworth and Churchdown) there is the greatest need. However it is clear there that for some rural areas the need is relatively high such as Twyning, Alderton, Woodmancote, Southam, Coombe Hill, Shurdington, Ashleworth, Sandhurst, Highnam and Minsterworth. This detail can be seen overleaf in Chart 1.

Chart 1: Gloucestershire County Council community adult care services by area for those aged 65+



Source: Planning Resource Pack Tewkesbury District 2012, Gloucestershire County Council and Ridgeway Associates Consulting Ltd

Tewkesbury Borough has 40 retirement homes, sheltered housing and extra care housing made up of 1,004 dwellings. There are also 25 care homes of 798 units of accommodation. Of the care homes, 12 are specific for older people (aged 55 and over), with the remaining accommodating any person with care needs and for people with specific disabilities.

Tewkesbury Borough will see significant growth in its older population and accommodation needs for this group are likely to change (as shown in Chart 1, page 6 of this document). 36.42% of households registered on Homeseeker Plus state that their medical issue is worsened by the housing circumstance. Of this, a quarter (around 180 households) is over 60 years old. Table 2 shows these issues by age group of the main household member.

Table 2: Number of households registered stating that a medical issue is worsened by their housing circumstance by age group

Age Group	16-17	18-24	25-59	60-64	65-74	75+	Total
Drug / Alcohol problems	0	1	15	0	0	0	16
Learning Disability	0	7	21	0	1	0	29
Medical Condition	0	19	142	17	42	34	254
Mental Health problems	1	31	179	6	10	2	229
Physical Disability	0	6	44	10	23	16	99
Social / Welfare problems	0	5	38	1	7	7	58
Total	1	69	439	34	83	59	685

Source: Gloucestershire Homeseeker dataset: Tewkesbury Borough

25.7% of these households are aged over 60 with a medical condition outside of the main categories; this may be a mobility issue or care need.

The majority of 25-59 year olds have mental health problems (40.7%) with a third stating a medical condition which upon further investigation appears to mostly be anxiety and depression. This is a worrying statistic and becoming more prevalent in the issues of our applicants. Particularly reported is low-level anti-social behaviour and neighbour disputes causing applicants distress and although adequately and appropriately housed, they register to move to escape such issues.

5 Adapted and adapting properties

Table 1 on page 6 shows the estimated number of vulnerable that will be in need of support in 2021 and the change from 2011.

There are 309 applicants (16.4%) on the housing register who have stated they are in need of ground floor accommodation, with 63 of these households requiring wheelchair adapted properties. Of this, 48 households will require specific adaptations for their needs. The HCA estimates that the need for support for vulnerable groups including those with physical disabilities and mobility issues will increase in almost every area.

No Place Like Home, research published in 2014² estimates that 300,000 disabled people are on housing waiting lists in Great Britain and that *“one in ten British adults (11%) - over 5 million people in Great Britain - say that they have a mobility problem”*. Only 5% of homes can be visited by someone in a wheelchair. The research states:

“Every year, more than 800,000 people become disabled – this could be from a car or sports accident, an illness like multiple sclerosis or a stroke, an injury on the battlefield, or simply due to old age. The total number of disabled people is also rising. Many disabled people – with a broad range of impairments – are living longer due to advances in medical treatment and social support.

For example, over the past 30 years, the life expectancy of people with Down’s Syndrome has more than doubled (from 25 in 1983 to 55 today), and for people with cystic fibrosis it has tripled (from 14 in 1980 to 41 today). Stroke mortality rates have also halved over the last 20 years”

Government statistics³ show that people with disabilities have a poorer quality of life with a *“substantially higher proportion of individuals who live in families with disabled members live in poverty, compared to individuals who live in families where no one is disabled.”* Barriers to employment and education are improving but remain significant as there is *“a 30.1 percentage point gap between disabled and non-disabled people, representing over 2 million people”* and that disabled people *“are around 3 times as likely not to hold any qualifications compared to non-disabled people, and around half as likely to hold a degree-level qualification”*.

In terms of housing these statistics say that *“Although the gap in non-decent accommodation has closed over recent years, 1 in 3 households with a disabled person still live in non-decent accommodation. 1 in 5 disabled people requiring adaptations to their home believe that their accommodation is not suitable”*.

With 2.5% of the housing waiting list requiring a ground floor, wheelchair property with specific adaptations, we must work with partners across the housing, health and social care

² No Place Like Home, 2014, Leonard Cheshire Disability <https://www.leonardcheshire.org/sites/default/files/no-place-like-home-leonard-cheshire-disability.pdf>

³ Figures published in 2014 by the Office for Disability Issues Department for Work and Pensions <https://www.gov.uk/government/statistics/disability-facts-and-figures>

sectors to consider how these homes will be built. We must also consider the challenges faced when working with the house-building sector, particularly larger house-builders, when Affordable Housing that is outside of the norm is requested as part of Section 106 agreements. Tewkesbury Borough Council often has to negotiate reduced overall Affordable Housing contributions in order to build specialist housing due to the costs associated.

Of all household in our Homeseeker dataset at July 2016, 16.4% (309) require ground floor accommodation of which 109 (or 35%) state they require special adaptations to meet their needs. 78 (or 4%) of households, require wheelchair accommodation and nearly 70% of these will require additional special adaptations for their needs.

6 Rural housing development

Seventeen, or 42.5%, of the 40 most rural parishes in Tewkesbury Borough have zero affordable homes at the time of writing. This is over a third (34%) of all the parishes (50) in Tewkesbury Borough.

The majority of rural affordable homes in Tewkesbury Borough are rented; typically these are at social rent levels but it is likely that we will see a change to an increasing number of affordable rents as more new homes are built. Affordable rents and rents across the borough and their impact are discussed in depth in appendices 1a and 1b.

The aspirations of households seeking to move to or move back to rural communities is to purchase a home. More often the Council is being approached to facilitate more home ownership opportunities in rural areas:

Table 3: List of the most rural parishes in Tewkesbury and the affordable housing stock they have as percentage of all affordable housing stock in Tewkesbury Borough, as at July 2016

Parish Council	As % of all Affordable Housing stock	Parish Council	As % of all Affordable Housing stock
Alderton	0.70%	Maisemore	0.40%
Ashchurch Rural	0.20%	Minsterworth	0.00%
Ashleworth	0.60%	Norton	0.10%
Badgeworth	2.60%	Oxenton	0.00%
Boddington	0.00%	Prescott Parish Meeting	0.00%
Buckland	0.00%	Sandhurst	0.30%
Chaceley	0.00%	Snowhill Parish Meeting	0.10%
Deerhurst	1.00%	Southam	0.00%
Down Hatherley	0.00%	Stanton	0.10%
Dumbleton	0.10%	Stanway	0.10%
Elmstone Hardwicke	0.10%	Staverton	0.10%
Forthampton	0.00%	Stoke Orchard & Tredington	1.00%
Gotherington	0.00%	Sudeley Parish Meeting	0.00%
Great Witcombe	0.00%	Teddington & Alstone	0.10%
Gretton	0.10%	Tirley	0.80%
Hasfield Parish Meeting	0.00%	Toddington	0.00%
Hawling Parish Meeting	0.00%	Twigworth	0.00%
Highnam	0.00%	Twynning	0.70%
Leigh	0.10%	Uckington	1.30%
Longford	0.90%	Woodmancote	0.40%

Source: Registered Providers

At the time of writing, the council's housing services team are working with the Gloucestershire Rural Community Council's Rural Housing Enabler in 11 Tewkesbury Borough parishes on specific affordable housing development opportunities.

7 Gypsies, travellers and travelling show people

As a rural borough, our proximity to larger towns and cities and to the M5 corridor has provided for a vibrant Travelling community and it is no surprise that we have significant accommodation needs for gypsies, travellers and travelling show people. The current provision in Tewkesbury Borough is as follows:

Table 4: Total amount of authorised provision in Tewkesbury (March 2016)

	Sites/Yards	Pitches/Plots
Private with permanent planning permission	16	94
Private sites with temporary planning permission	2	8
Public Sites (Council and Registered Providers)	3	72
Public Transit Provision	0	0
Private Transit Provision	1	8
Travelling Showpeople Provision	2	21
Total	24	203

Source: Gypsy and Traveller Accommodation Assessment 2016 Update

7.1 Planning policy for Traveller sites

The planning policy for traveller sites⁴ is one that supports provision such as rural exception sites to meet need, but changes the definition of gypsies, travellers and travelling show people.

Through the JCS examination an updated Gypsy and Traveller Accommodation Assessment⁵ (GTAA) was undertaken in 2016 to take into account this latest Government guidance. This reduced the council's requirement for Gypsy and Travellers from 2016-2031 owing to many gypsies and travellers Tewkesbury Borough not meeting the new definition.

We continue to have an accommodation need for the residents who are now to be considered under the SHMA as a general accommodation need. Those residents who do meet the definition will continue to have their accommodation needs assessed through the GTAA.

The 2016 GTAA also provided an assessment of 'non-travelling' households who no longer meet the Government definition.

There is also a further element of 'unknown' households who through the GTAA could not be contacted to confirm whether they meet the Government definition. The Government guidance indicates that households that no longer meet the definition should be picked up as part of wider housing need through the SHMA. Full figures are shown in Table 5 overleaf:

⁴ Planning policy for traveller sites 2015 <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

⁵ GCT-JCS Gypsy and Traveller Accommodation Assessment (2016) <http://www.gct-jcs.org/Documents/Examination-Documents-Library-6/EXAM-223B---Gloucestershire-GTAA-Update-Summary---210416.pdf>

Table 5: 2016 Gypsy and Traveller Accommodation Assessment outcomes

	'Travelling' Households No.	'Travelling' Showpeople Households No.	'Unknown' Households No.	'Unknown' Showpeople Households No.	'Non- Travelling' Households No.
Total Supply	0	0	0	0	0
Total Current Need	0	12	12	0	1
Total Future Needs	5	10	36	2	24
Net Need	5	22	48	2	25

Source: Gypsy and Traveller Accommodation Assessment 2016 Update

Table 5 note: Net Need = Current plus Future Need minus Total Supply

7.2 Rental liabilities on Traveller sites

With regards to rental liabilities of the traveller sites within Tewkesbury Borough, the amounts vary from the lowest being £37.00 per week to the highest being £140.00 per week⁶.

The tenant has the option of applying for a Discretionary Housing Payment to help make up the difference in the shortfall if they are not able to afford the difference themselves.

At present the rental value on private sites could be restricted by Local Housing Allowance or the Rent Officer meaning that any housing benefit the Council pays may not meet the full amount of rental liability. More and more travellers are becoming reliant on housing benefit to subsidise their rental costs.

8 Refugees and asylum seekers

Not only are local people in need but wider groups. The Council must adhere to the policies of central government in working with groups such as refugees and asylum seekers and provide suitable housing.

Accommodation is sought not only from the social rented sector but also private rented. Tewkesbury Borough Council is a partner within the Gloucestershire Syrian Resettlement Programme and has worked with our partners Severn Vale Housing and Gloucestershire Action for Refugees and Asylum Seekers to provide accommodation for vulnerable families in our borough.

⁶ Source: Tewkesbury Borough Council Housing Benefits Team

At home in Tewkesbury Borough

A housing strategy for our borough 2017-2021

Appendix 1d: Our Local Evidence – Improving the Health and Well-Being of Local People



This page is intentionally left blank

Contents

1	Introduction	Page 4
2	Long term empty homes	Page 5
3	Housing Standards	Page 6
3.1	Improving Housing Conditions in the Private Rented Sector	Page 7
3.2	Houses in Multiple Occupation	Page 7
3.3	Private sector leasing scheme	Page 8
4	Housing Conditions	Page 9
4.1	Disabled Facilities Grants	Page 9
5	Fuel Poverty	Page 11
5.2	Affordable warmth – Warm & Well	Page 11
6	Vacant Properties	Page 13

List of Charts and Tables

Chart 1: Number of long term empty properties: Tewkesbury Borough 2011/12	Page 5
Chart 2: Number of housing condition complaints made to Tewkesbury Borough Council 2011/12 - 2015/16	Page 6
Chart 3: DFG funding: Tewkesbury Borough Council 2008-2015	Page 10
Chart 4: Percentage of all households in fuel poverty, 2014	Page 11
Chart 5: Measures installed, 2001–2015, Tewkesbury Borough	Page 12

Table 1: Number of completed DFGs and the total spend per year by Tewkesbury Borough Council 2011/12-2015/16	Page 9
Table 2: Home ownership sales under the help to buy agent, Tewkesbury Borough April 2012-March 2016	Page 13

1 Introduction

This document outlines the evidence gathered by Tewkesbury Borough Council showing the housing and homelessness context in which the council is working.

We have used this evidence to identify 4 priorities for housing and homelessness along with key objectives for the next 5 years.

The strategy will link with the priorities outlined in the Council Plan 2016-2020, set out the council's priorities and objectives for housing, and appropriate activities that will help us to meet our statutory housing duty under the Housing Act 1996.

Housing is a priority in the Tewkesbury Borough Council Corporate Plan because:

“We recognise how important it is for residents to be able to access good quality housing and housing related services that make a real difference to their lives.

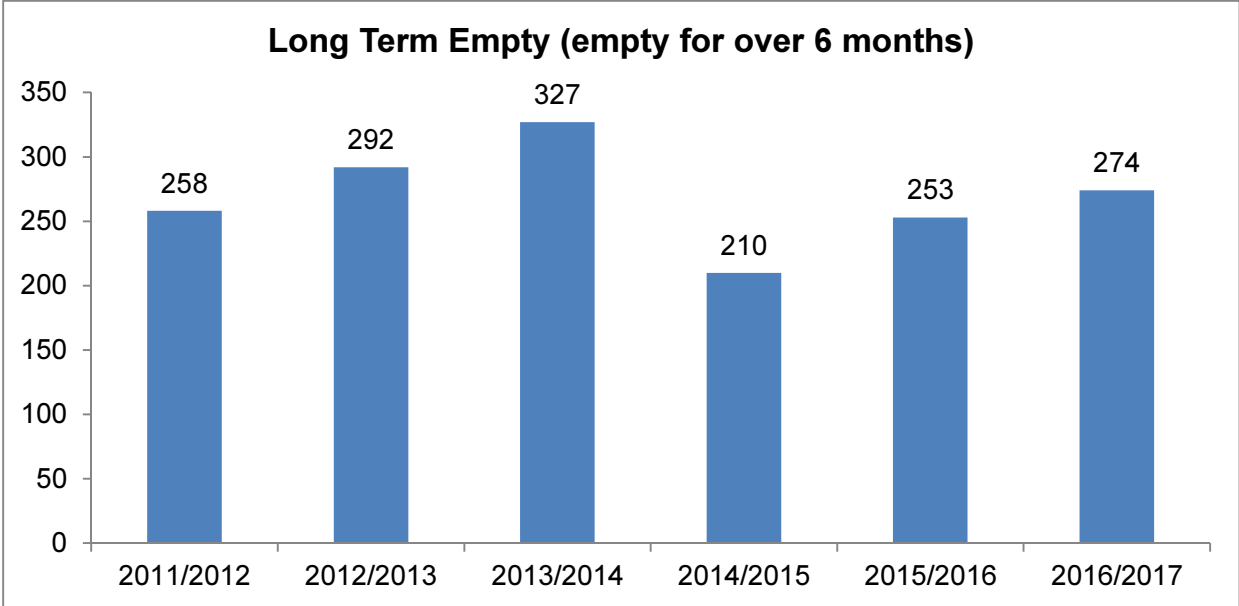
“Not only is housing important for the health and well-being of residents it is also an important part of building and maintaining strong communities and supporting the economic prosperity of the borough.”

Tewkesbury Borough Council recognises that access to quality affordable housing underpins the success of our area and all of the overarching corporate priorities.

2 Long term empty homes

The Environmental Health team works closely with partners on initiatives handling operational (enforcement) actions to bring empty homes back into use. Most empty homes brought back into use will become private sector homes. Chart 1 shows the number of long term empty properties since 2011/12.

Chart 1: Number of long term empty properties: Tewkesbury Borough 2011/12



Source: Tewkesbury Borough Council dataset

The Council’s Environmental Health team aims to ensure that each property achieves the highest standard. Enforcement options will include the Housing Health and Safety Rating System (HHSRS) under the Housing Act 2004, Empty Dwelling Management Orders, enforced sale and compulsory purchase orders.

The Council recognises that the private rented sector is growing and will need to continue to do so to help meet housing needs in the district. The Council takes its statutory enforcement role seriously and where landlords are not meeting the standards required will deliver a robust service. This is particular important that the Council can now discharge its homelessness duty into the private rented sector. Ensuring such homes are available and appropriate and that the tenancy can be sustained is, therefore, increasingly important.

However, whilst a large proportion of the Environmental Health team's time is spent on enforcement this is only to deal with a small proportion of the worst private rented housing. Enforcement should only need to be a last resort. We wish to place a larger emphasis on the proactive role the Council will play in helping landlords in the early stages. This is in particular for owners where being a landlord is not their core business, or reluctant landlords such as those who inherit a property but do not wish to sell it. The Council will promote sources of advice that are available to landlords, existing private tenants and residents considering private renting.

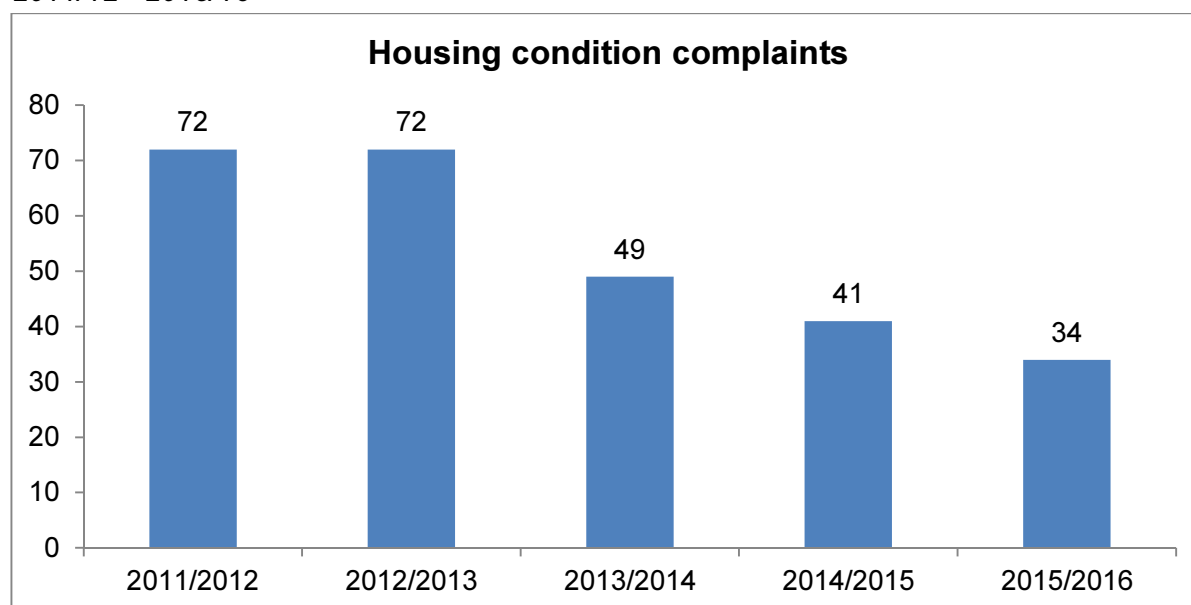
3 Housing Standards

Tewkesbury Borough Council has duties under the Housing Act 2004 to keep standards in homes under review and to take action on poor housing conditions.

The condition of the existing housing stock is important to ensure that residents are living in decent, safe accommodation which is suited to their needs. The condition of the housing stock is important to ensure that the increase in net housing stock through growth is not offset by a reduction in the number of existing homes which are habitable. Equally it is necessary to mitigate against the potential unintended consequence of growth that poor quality private sector housing leads to migration from existing communities into more attractive new housing developments leading to low demand neighbourhoods.

Living in poor condition, cold, damp homes that are not suitable for a household's needs have a detrimental effect on the health and wellbeing of the occupiers. When accidents and illness occur because homes are not fit, it has an impact on a person's ability to participate in work, education, social and other activities and consequently impacts on social care services and the NHS. Chart 2 shows the number of housing condition complaints to Tewkesbury Borough Council since 2011/12.

Chart 2: Number of housing condition complaints made to Tewkesbury Borough Council 2011/12 - 2015/16



Source: Tewkesbury Borough Council dataset

The majority of home owners will, therefore, be offered no more than self-help to secure home improvements. Nevertheless, the Council recognises that there will be situations where support is necessary and appropriate for vulnerable home owners.

The Environmental Health Team offers advice that aims to demonstrating to a private landlord the works that are needed to avoid enforcement action being taken against them, for landlord accreditation and or for the property to be accepted onto a Local Letting Agency; they also provide an owner of an empty home with details of the works necessary to put the property in a state suitable for letting or that are likely to affect the sale price of the property.

The Council will take appropriate action against landlords and home owners as appropriate in accordance with the Council's Enforcement Concordat, Enforcement Policy and Scheme of Officer Delegation. This includes a period of informal action to encourage a landlord to take action voluntarily.

There are thought to be exceptionally few Houses in Multiple Occupation (HMO) requiring mandatory licensing in Tewkesbury Borough. Progressing licenses has, therefore, not been a priority to date. Nevertheless, the Council now recognises it should pursue owners operating a licensable HMO illegally. Where a HMO requiring a license comes to the attention of the Council, the Environmental Health team shall send a standard application pack to the owner.

Discussions with our local Registered Providers have indicated that following the 1% rent reduction and assessments of their financial position, they are seeking alternatives to their current ways of working. This is particularly important when the council has become increasingly more reliant on them to provide Affordable Housing. Some are looking to reduce non-essential elements of the business such as community work, levying service charges to counteract the impact of these reductions and also bringing in stricter affordability levels to house only those tenants with good payment histories to guarantee rent is paid.

3.1 Improving Housing Conditions in the Private Rented Sector

Tewkesbury Borough Council along with the other district councils in Gloucestershire run and encourage landlords to join the "Fit to Rent" property accreditation scheme to inspect and approve houses let out to tenants. It is a voluntary and free service for landlords in the county which recognises good quality, well managed private lettings. The scheme aims to encourage good practice in the private rented market by giving approval to landlords and lettings that meet property standards and a management code of practice.

Certain minimum standards are required before a Fit to Rent certificate is issued to a landlord. The inspection is by the Environmental Health Department and covers such issues as fire safety, kitchen and bathroom facilities and room sizes. Annually, a landlord event is hosted by the six local authorities in Gloucestershire. This, together with an annual newsletter, helps to disseminate information from central government on legislative requirements and changes that will affect landlords.

Currently, there is a countywide website hosted by Cotswold District Council¹ We have also produced a landlord handbook which is free to all Fit to Rent landlords. Over 180 properties have already been accredited in Gloucestershire. At Tewkesbury Borough Council there are 6 landlords with 9 properties awarded 'Fit to Rent' status.

3.2 Houses in Multiple Occupation

In addition to the Fit to rent Scheme some properties are required to pass more stringent legal requirements for a House in Multiple Occupation (HMO) licence.

¹ www.cotswold.gov.uk/go/landlord

There are only 6 houses in multiple occupation licensed in the borough. Nevertheless we will continue to regulate these and other houses in multiple occupation and work to identify others who may need a licence.

3.3 Private sector leasing scheme

The Gloucestershire Private Sector Leasing Scheme is a project to lease properties from private landlords to provide housing for local people from all sectors of the community. Private sector landlords who want to rent their property out, but do not wish to manage it, can lease the property to a partner housing association for up to five years. The housing association will manage the property on behalf of the landlord, housing tenants from the council's waiting list. When the lease period comes to an end the housing association guarantees to return the property to the landlord in the same condition as at the start of lease. Throughout the lease period the landlord receives a guaranteed monthly rent, even during void periods.

Mears Plexus who operate the scheme is dedicated to managing residential property in partnership with landlords, investors and local authorities. At the time of publication, 9 properties are managed by the service in Tewkesbury Borough.

4 Housing Conditions

Tewkesbury Borough Council gives advice on, and can take enforcement action to deal with problems arising in rented properties. Examples include housing conditions, drainage, nuisance, vermin and accumulations.

The housing health and safety rating system (HHSRS) is the means by which a home is judged for suitability to be lived in. It applies to all homes be they owner-occupied or tenanted. Tewkesbury Borough Council officers are trained to use the HHSRS. Enforcement action to remedy any hazards found in a property can be in many forms. It can range from a legal notice to make sure the owner is aware of a problem or hazard, right through to immediate closure of a property considered to be too dangerous to live in.

Between 1st April 2015 and 31st March 2016 Tewkesbury Borough Council dealt with 36 complaints regarding property conditions and served one housing conditions improvement notice.

Tewkesbury Borough Council has built relationships and contacts with organisations such as the National Landlords Association and Gloucestershire Landlords Association. This has helped to spread the message of encouraging landlords to make their properties available. For example, officers meet regularly with both organisations and share information.

4.1 Disabled Facilities Grants

Disabled Facilities Grants (DFGs) were introduced by the Housing Grants, Construction and Regeneration Act (HGCR) 1996. There are also annual regulations called the Housing Renewal Grants Regulations which govern how Local Authorities administer Disabled Facilities Grants and there is a good practice guidance which Local Authorities are encouraged to follow when administering DFG's².

DFG's provide households with any number of aids and adaptations to ensure their home is suitable to live in. From 2010/11 to 2015/16, 674 households have benefited from a DFG in Tewkesbury Borough as shown in Table 1. Households come from all tenures and the number of application vary year on year. The table also shows the total spend per year.

Table 1: Number of completed DFGs and the total spend per year by Tewkesbury Borough Council 2011/12-2015/16

	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16
Number of DFG's	111	109	108	118	129	99
Total Spend	£621,627	£689,192	£618,521	£676,577	£772,409	£543,351

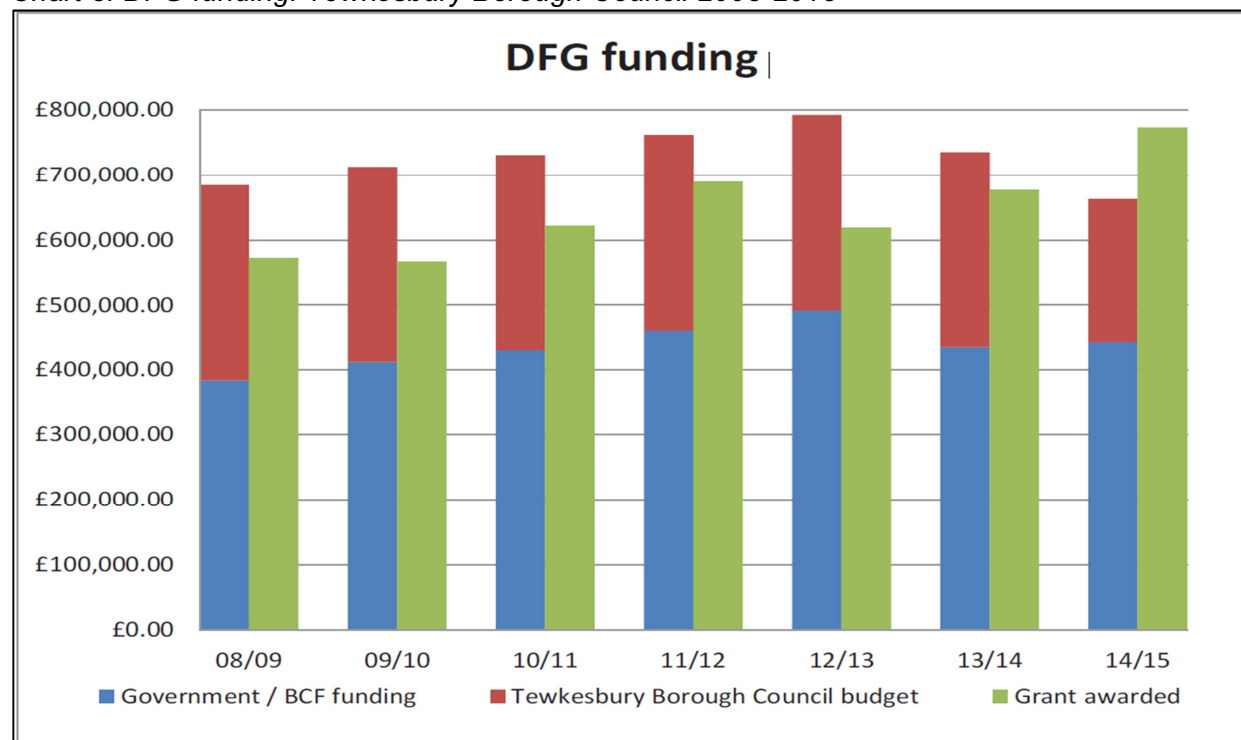
Source: Tewkesbury Borough Council dataset

Although central government funding has gradually risen over the past 15 years it has only kept pace with inflation. Consequently the central government subsidy only accounts for a proportion of the resources local authorities put into DFG's. Tewkesbury Borough Council's

² Home adaptations for disabled people: a detailed guide to related legislation, guidance and good practice <http://careandrepair-england.org.uk/wp-content/uploads/2014/12/DFG-Good-Practice-Guide-30th-Sept-13.pdf>

medium term financial plan offers £220,000 of capital funding over the next five years to meet the local demand. Chart 3 shows the funding for DFGs.

Chart 3: DFG funding: Tewkesbury Borough Council 2008-2015



	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15
Government/BCF	£384,000	£412,000	£430,000	£460,923	£491,847	£434,717	£442,446
Tewkesbury Borough Council	£300,000	£300,000	£300,000	£300,000	£300,000	£300,000	£220,000
Grant awarded	£570,984	£565,192	£624,627	£636,404	£674,509	£676,577	£772,409

Source: Tewkesbury Borough Council dataset

As part of the June 2013 Spending Review the government announced the creation of a pooled fund to enable the NHS and local authorities to jointly commission health and social care services. The 2015-16 allocations to the Better Care Fund (BCF) for Gloucestershire have been confirmed by the Gloucestershire Health and Wellbeing Board. This year the funding allocation to all districts for DFGs has been ring-fenced at the capital levels from 2014/15, however, this ring-fence ceases next financial year, i.e. the administrators of the fund are not obliged to specifically provide funding for DFG's.

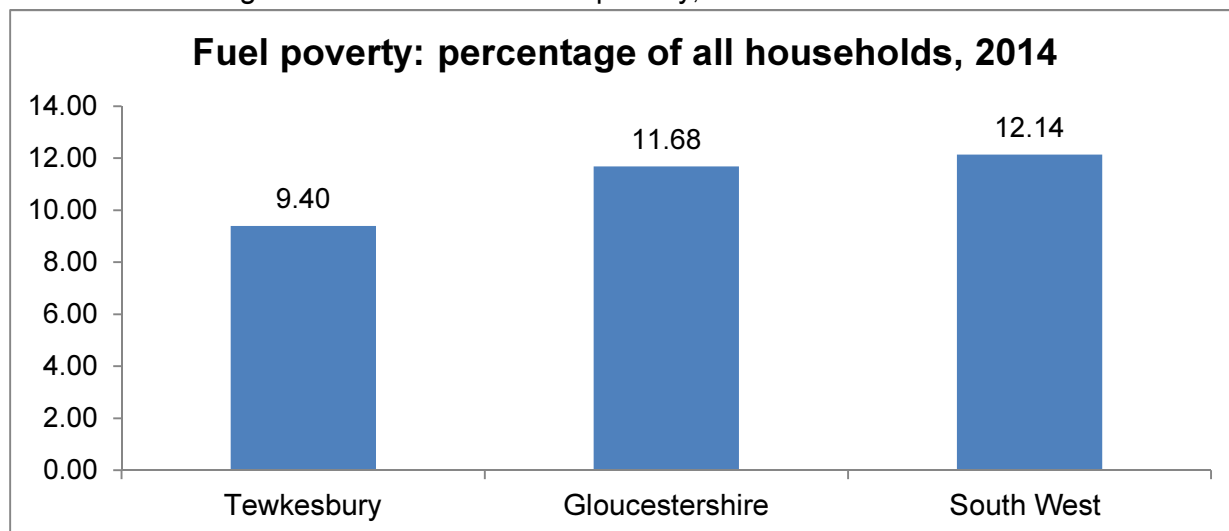
Nevertheless the direction of travel is a move to more planned care and to avoid unplanned admissions to hospitals and care homes where care can be provided more effectively in people's homes or the community.

It is ultimately the health service rather than local authorities that benefit financially from the preventative measures of DFGs and funding mechanisms need to reflect this reality. A number of studies have recognised that there is a financial benefit to the government as a whole in providing DFGs that enable applicants to remain in their own homes. When weighed up against the cost of a place in a residential home, the cost of a DFG which allows an applicant to remain in their own home makes financial sense.

5 Fuel Poverty

Fuel poverty is defined as where a household spends more than 10% of its income on providing adequate heating. 9.4% of households are living in fuel poverty in the borough; this is lower than the figure for Gloucestershire at 11.7% and 12.1% for the South West (2014), see Chart 4.

Chart 4: Percentage of all households in fuel poverty, 2014



The energy efficiency of a property is a contributing factor to excess cold and damp and mould hazards and therefore to cold related illness. Excess cold can be caused by poor housing conditions or simply because an occupier cannot afford to adequately heat their home (fuel poverty). The indoor temperature of a home can affect an occupant's physical, mental and social health and wellbeing. The Environmental Health team have powers to tackle such issues, especially when the property is tenanted. The Borough Council expects all providers with stock in its area, to respond to the needs of those in fuel poverty, either by way of property improvements or through the involvement of external advice agencies.

Free advice on energy efficiency promotion and fuel poverty is available from the Warm and Well Advice Line.

5.1 Affordable warmth – Warm & Well

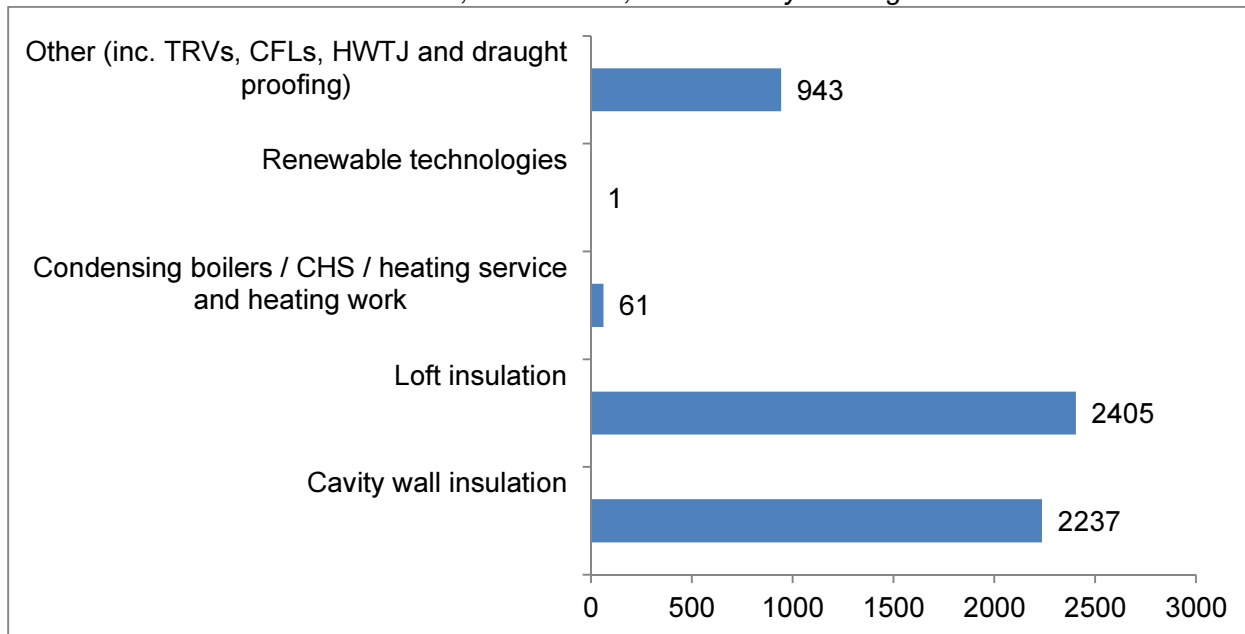
The countywide home improvement agency, Safe at Home, is funded by the six Gloucestershire district authorities, Gloucestershire County Council and the Gloucestershire NHS Trust, to assist clients with major works to their properties, focussing on providing services and assistance to elderly and vulnerable clients. Whilst this is the contracted countywide home improvement agency, Tewkesbury Borough Council provides information on other agencies and surveyors in the local area that can help.

The current contract has been extended until 2017 and at the time of writing, partners are considering priorities for future delivery. Providing adaptations is seen as particularly important given the possible health implications, care and support costs of residents not obtaining essential disabled adaptations in a timely fashion. However, it is essential that delivery of this aspect of the private sector housing service is integrated with all other aspects.

We therefore work across services to assess housing need and whether a move to more appropriate accommodation is required.

Chart 5 details the measures installed in Tewkesbury Borough via Warm & Well from 2001-2015.

5.2 Chart 5: Measures installed, 2001–2015, Tewkesbury Borough



Source: Tewkesbury Borough Council dataset

For detail about the affordable warmth strategy in Gloucestershire please see the Action for Affordable Warmth; A strategy for Gloucestershire and South Gloucestershire, 2013-2018³ and Gloucestershire Affordable Warmth Action Plan 2013-2016⁴

³ Action for Affordable Warmth; A strategy for Gloucestershire and South Gloucestershire, 2013-2018 <https://drive.google.com/file/d/0B4KyFQA43JaOWTFxd18zUVZWZ2M/view>

⁴ Gloucestershire Affordable Warmth Action Plan 2013-2016 <https://drive.google.com/file/d/0B4KyFQA43JaOeE81YnA0UjBGSVU/view>

6 Vacant Properties

Tewkesbury Borough does not have a problem with vacant dwellings but nevertheless will work to bring properties back into use.

Total vacant dwellings in 2014/15 averaged:

- 1,157 for council areas in the South West
- 1,242 for councils in Gloucestershire
- 797 in Tewkesbury borough

Source: Communities and Local Government.

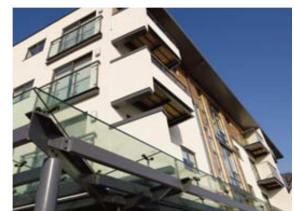
The properties that are of most concern are a smaller proportion of the 727 in Tewkesbury Borough, being those vacant for 6 months or more.

The environmental health team work with housing services and council tax teams to assess empty homes in Tewkesbury Borough to ensure that those that can be brought into use are encouraged.

At home in Tewkesbury Borough

A housing strategy for our borough

Appendix 2: Homelessness and Homelessness Prevention Strategy 2017-2021



This page is intentionally left blank

Foreword



I am pleased to introduce Tewkesbury Borough Council's 'Homelessness and Homelessness Prevention Strategy 2017-2021'. As Lead Member for Health and Wellbeing, I know how important it is for borough residents to have access to excellent advice and assistance when facing housing difficulties – or even the loss of their homes.

Under the Housing Act 2002, the Council is required to publish a strategy setting out how it will address homelessness in its administrative area. We have developed our Homelessness Strategy in conjunction with our overall Housing Strategy to produce a clear direction for a comprehensive customer-focused housing service which will meet the needs of all our borough's residents. This will make it easier for our customers and partner organisations to understand how we intend to address housing issues and deal with homelessness, and when we hope to do it.

Tewkesbury Borough Council is committed to providing early help to those experiencing difficulty with housing. We will ensure that homelessness-prevention options are available to borough residents, to sustain their accommodation and make repossession a last resort. We are also committed to providing excellent and cost-effective homelessness services to all our residents.

Our borough's population is widely dispersed, with relatively low levels of homelessness, and we recognise the need to maximise the availability of solutions for those who experience housing difficulties in our area, by joint commissioning of services with neighbouring authorities and other statutory agencies. This will become particularly important as financial pressures on local authority services continue to drive the necessity of cost-effective solutions for people in need.

We appreciate that housing solutions in isolation for vulnerable people are often unsustainable without support from other agencies, and we will therefore work closely with partners to deliver comprehensive packages of assistance to provide sustainable solutions. These principles are fundamental to meeting the challenges associated with changes to benefit entitlement.

I am confident that Tewkesbury Borough Council's comprehensive Housing and Homelessness Strategy will deliver high quality support and housing advice to Borough residents when they need it, using both existing and newly innovative approaches. Our strategy will also enable the Council to operate effectively, and to work with a range of partner organisations to provide customers with the assistance they need, with a choice of good-quality, affordable and private-market housing in an area where they want to live and work, now and into the future.



Councillor Ron Allen
Lead Member for Health and Wellbeing
Tewkesbury Borough Council

Contents

1	Introduction	Page 5
1.1	Homelessness – an overview	Page 5
1.2	Statutory requirements, evidence base and consultation	Page 7
1.3	Strategy Review	Page 7
2	The Prevention of Homelessness	Page 8
2.1	Homelessness prevention pathways	Page 10
2.1.2	<i>Homelessness prevention pathways process</i>	<i>Page 11</i>
3	Areas of challenge in preventing homelessness	Page 17
4	Homelessness Assistance and Emergency Accommodation	Page 21
5	Full Homelessness Duty	Page 25
6	Strategy Objectives	Page 27
7	Glossary of terms	Page 28

1 Introduction

1.1 Homelessness – an overview

The common perception of homelessness tends to be individuals rough sleeping, but homelessness is a complex issue which affects both individuals and families who lose or face losing their homes as a result of numerous causes.

Homelessness can happen to anyone, is detrimental to every aspect of the lives of those affected and can have a negative impact on others living in the community. It also creates additional costs to public services.

The impact of homelessness and housing disruption on the well-being and life chances of affected children are well recognised as extremely detrimental. The prevention of homelessness and rapid resolution of homeless crisis therefore should be prioritised wherever possible when assisting those facing housing difficulties.

Nationally¹ the most common causes of homelessness for accepted applications have been identified as:

- The end of an Assured Shorthold Tenancy (private sector tenancies) equating to 31% of all homeless cases, and
- Parents or friends no longer willing to accommodate equating to 27% of all homeless cases.

Locally² within Tewkesbury Borough the primary causes of homelessness for accepted applications in 2015/16 were:

- Loss of Assured Shorthold tenancy (private sector tenancies) - 20%
- Relationship Breakdown involving domestic abuse - 19%
- Parents or family no longer willing to accommodate - 17%

Underlying vulnerabilities often contribute to the immediate causes of homelessness outlined above. These vulnerabilities include poor education, poor physical and mental health, involvement in crime, unemployment and poor life skills. The government³ have set out overarching priorities to meet these:

- tackling troubled childhoods and adolescence
- improving health
- reducing involvement in crime
- improving skills, employment and the availability of financial advice

The importance of partnership working is imperative to tackling homelessness, particularly the underlying vulnerabilities and priorities. Tackling the underlying causes and the

¹ Government (DCLG) Live tables on homelessness <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>

² Housing Strategy 2017-2021 Appendix 1b, page 7

³ Making Every Contact Count https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7597/2200459.pdf

prevention of homelessness is better for those affected and more cost effective than seeking to assist households through statutory homelessness provisions or bringing them inside from rough sleeping.

Ongoing welfare reform changes⁴ has, and will continue to, present challenges for those on lower incomes within Tewkesbury Borough. Those most affected are single people aged 18-21 who are out of work, those single on low incomes aged under 35, and larger families on low incomes with 3 or more children.

Assisting those affected to sustain their tenancies will require ongoing bespoke and effective joint working with our partners in the Tewkesbury Borough Financial Inclusion Partnership. Our working relationships with local partners and our neighbouring local authorities are fundamental in delivering successful outcomes for residents facing housing crisis as we are a rural borough with limited resources, and sustainable solutions involve tackling underlying causes of homelessness.

Tewkesbury Borough benefits from the co-location of services at the Public Services Centre on the edge of Tewkesbury Town with:

- Jobcentre Plus
- Tewkesbury Borough Police Station
- Gloucestershire County Council's Children's Services
- Gloucestershire Care Services incorporating Adult Social Services and Health services
- Citizens Advice Bureau
- Severn Vale Housing Society
- The Fire and Rescue Service
- Gloucestershire Rural Community Council, and
- Tewkesbury Borough Council services – including housing services, revenues and benefits, environmental health and planning.

The Public Services Centre enables the housing services team to collaborate closely with our partner agencies and clients to initiative early and sustainable solutions. Our collaboration includes joint training, commissioning, shared intelligence on services and issues challenging residents within our borough.

Tewkesbury Borough Council receives a homelessness prevention grant from the Government (DCLG) which is currently £48,000 per annum. This funding is to be focussed on homelessness prevention within the Tewkesbury Borough local authority area. These monies are spent on:

- Multi agency initiatives to prevent homelessness
- Small grants to partners undertaking prevention activities
- Financial assistance to individual households through deposits, tenancy rescue packages, rent in advance and so on.

⁴ Housing Strategy 2017-2021 Appendix 1b, page 18

We are committed to ensuring homelessness prevention and support services are available to all residents to sustain accommodation and make repossession the last resort.

1.2 Statutory requirements, evidence base and consultation

Local authorities are required to produce a homelessness review and strategy under the Homelessness Act 2002 taking into account:

- Levels of homelessness within the borough
- Services provided to prevent homelessness and to provide accommodation and suitable support and
- The level of resources available to the authority including social services, voluntary organisations and the public agencies to provide these services.

Local authorities are required to keep the Strategy under review, to consult on it, and update it at intervals and to publish a new strategy within 5 years. Tewkesbury Borough Council's previous homeless strategy formed part of the overall housing strategy for 2012-2016, was subject to annual reviews, and informed our current strategic focus.

This Homelessness and Homelessness Prevention Strategy 2017-2021 has been developed as part of the overall Housing Strategy 2017-2021 with full review of services and performance, in conjunction with our Member housing working group, and involved public consultation. The two strategies deliver a comprehensive ongoing review, vision and focus for our housing and homeless activities for the next 5 years. The full national and local data that is used to inform the development of the Housing Strategy and this Homelessness and Homelessness Prevention Strategy and the overall legislative background can be found in the Housing Strategy 2017-2021 appendices 1a, 1b, 1c and 1d.

The demands on the homelessness service in Tewkesbury Borough and the council's housing services performance data can be found in Appendix 1b.

The consultation document and response document can be found on the housing strategy webpages on the council's website⁵.

1.3 Strategy Review

This Strategy will be monitored and reviewed as part of the overarching Housing Strategy 2017-2021.

The action plan will be updated regularly to ensure that we are able to maintain a current and pro-active stance towards new challenges in preventing homelessness in our borough.

Forthcoming changes associated with new legislation, changes in funding streams and further welfare reform will be closely monitored and addressed via the action plan throughout the lifetime of the Strategy. This will ensure we are able to strategically identify and meet new challenges.

⁵ Tewkesbury Borough Council housing strategy webpages www.tewkesbury.gov.uk/housing-strategy

2 The Prevention of Homelessness

As detailed in the overarching Housing Strategy 2017-2021, Tewkesbury Borough is a rural district which with high levels of employment and relatively low numbers of households in housing difficulty. Our area also includes areas of social deprivation, however, and those in housing difficulty on low incomes struggle to find solutions as there is a high demand on social housing, high property value and expensive private rents⁶. The dispersed population across the borough also adds additional difficulties for homeless households to source accommodation in a locality near to existing support networks i.e. family, schools, GP's and so on.

Over the last five years there has been a rise in homelessness nationally which has also been evidenced in homeless approaches within Tewkesbury Borough. The impact of ongoing welfare reform on those on a low income is also likely to increase homeless demand in our area from those on lower incomes. This will be particularly from very young single people 18-21, single people aged under 35, and those in families with 3 or more children. A recent study by Policy in Practice (2016) commissioned by the Financial Inclusion Partnership within Tewkesbury Borough using multi public agency data evidences the projected impact of welfare reform within the borough, and an overview of welfare reform in our borough is examined in the Housing Strategy and evidenced in our local evidence, see Housing Strategy 2017-2021 Appendix 2b.

The prevention of homelessness is receiving increasing recognition as fundamental in services to those facing housing crisis within government and the formalisation of homeless prevention duties are currently under debate in the Homelessness Reduction Bill⁷. In 2015/16 Tewkesbury Borough Council reviewed homeless prevention activity and introduced the present proactive approach to homelessness prevention on a 'spend to save' basis. Our approach includes financial housing options to those threatened with homelessness in financial crisis. This approach significantly reduced both emergency accommodation placements and homeless acceptances during the last financial year⁸.

Duties associated with the draft Homelessness Reduction Bill involve early homeless prevention intervention to all households facing housing crisis, irrespective of whether there would be a statutory obligation to them as 'vulnerable' if they became roofless. We currently provide early intervention to all those in housing difficulty in our area, offering bespoke written advice and financial housing options to those who need financial help to resolve their difficulties. This enables all residents threatened with homelessness to avoid homeless crisis by staying in their existing home if reasonable, suitable and sustainable. This work is likely to be increasingly important for households in social housing facing housing difficulties as a result of welfare reform, as many will currently be in the most affordable suitable accommodation and more suitable alternatives will not be available.

If staying in their current home is not sustainable over the long term, we will offer advice and assistance to enable residents to move to a more suitable home, in an area of their choice,

⁶ Housing Strategy 2017-2021 Appendix 1b page 29

⁷ Homelessness Reduction Bill 2016-17 <http://services.parliament.uk/bills/2016-17/homelessnessreduction.html>

⁸ Housing Strategy 2017-2021 Appendix 1b pages 9 and 10

close to support networks before they reach homeless crisis; without the need for the disruption or the cost of emergency accommodation.

We are also committed to developing multi agency solutions for our applicants with our partner agencies and we work closely with Families First, Gloucestershire County Council Adult Social Care team, the Anti-Social Behaviour group, Greensquare, the Citizen's Advice Bureau, the council's benefits team and the Job Centre Plus to draw together comprehensive outcomes.

The government has set out a vision for social justice that is based on two fundamental principles:

1. Prevention and early intervention throughout a person's life, encouraging carefully designed interventions to stop people falling off track and into difficult circumstances.
2. A 'second chance society' ensuring that no one is 'written off' and that anybody who needs another chance gets access to the support and tools they need to transform their lives.⁹

Early intervention facilitates better choice and control for applicants, more sustainable outcomes, less disruptive solutions than statutory homelessness responses. This is particularly important within rural dispersed boroughs such as ours where there is a high demand for social housing, and large distances between and towns and villages, and statutory offers of accommodation may not be near to households' support.

The DCLG has offered guidance to local authorities on the criteria for a Gold Standard¹⁰ to deliver cost effective excellence in homeless prevention and homelessness services. Tewkesbury Borough Council has engaged with the Gold Standard best practice with a view to meeting the best practice model in our area during the lifetime of this strategy

As well as the advice and financial assistance available to all, including those who have caused their own homelessness, we work with partners to establish pathways for those who need specialist support. We are committed to delivering against the ten challenges set out in 'Making Every Contact Count'¹¹ to benefit our clients and will continue to work with partners to develop our prevention and homeless pathways to benefit those in housing difficulty within our borough.

Tewkesbury Borough Council's housing services assisted 1,360 people with housing advice or homelessness interviews in the borough in the 2015-16 financial year.

⁹ Social Justice: transforming lives, Department for Work and Pensions, March 2012
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/49515/social-justice-transforming-lives.pdf

¹⁰ For more information on the Gold Standard and the requirements of Tewkesbury Borough Council you can visit <http://home.practitionersupport.org/>

¹¹ Making every contact count: A joint approach to preventing homelessness, DCLG, 2012
<https://www.gov.uk/government/publications/making-every-contact-count-a-joint-approach-to-preventing-homelessness>

2.1 Homelessness Prevention Pathways

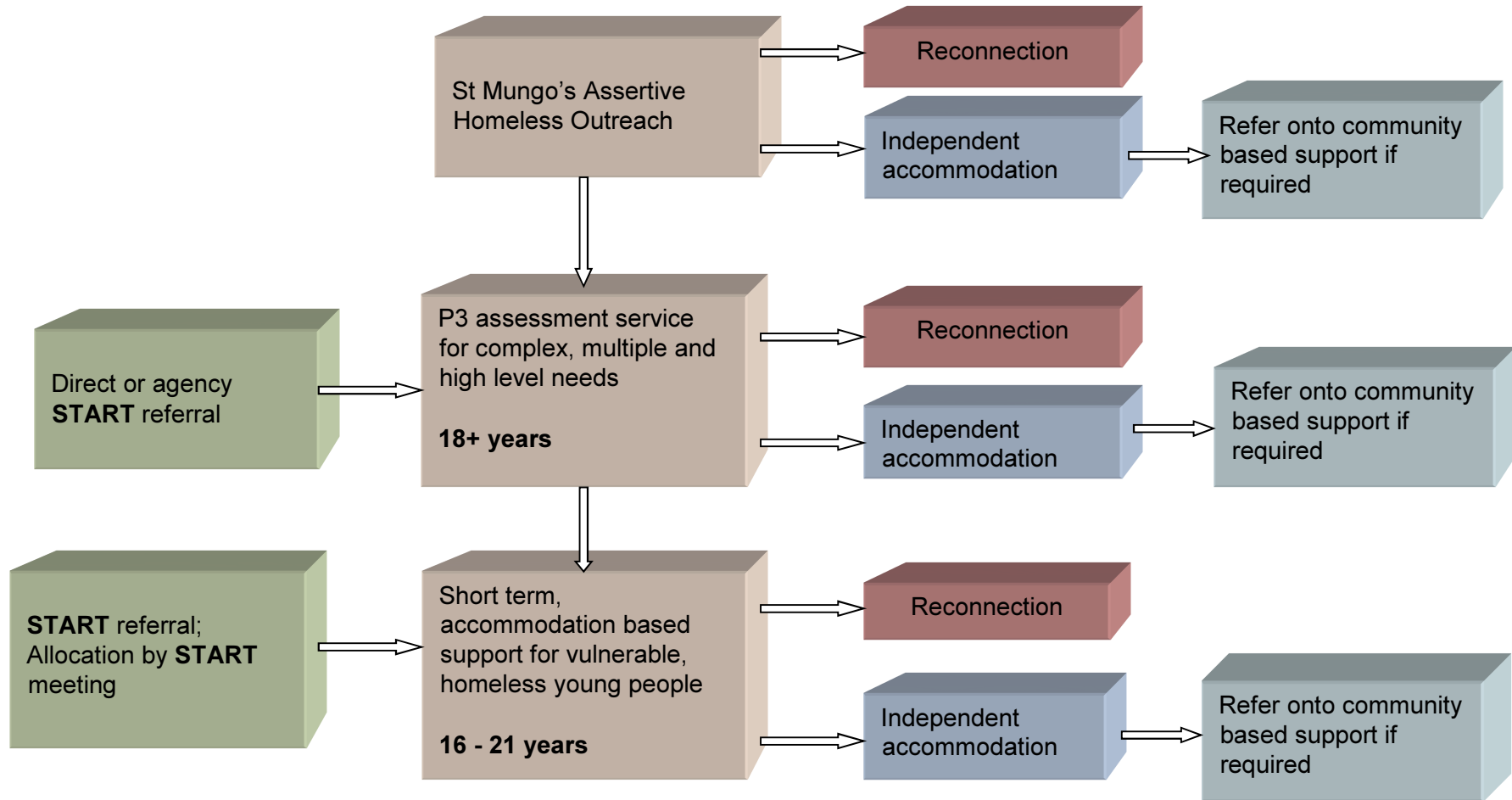
Our support strands and prevention pathways are key to meeting these needs. Pathways for all groups are outlined in this section.

Chart 1 overleaf shows the Homelessness Prevention Pathways process map. START is the process which manages the assessment & access to accommodation based support for those people whose support needs are known and who don't need to go through the assessment service first.

2.1.1 Homelessness Prevention Pathways Process

Chart 1: Homelessness Prevention Pathways Process

211



2.1.2 Community Based Support

One of the principal causes of homelessness is residents losing their tenancies. Households in housing difficulty may be able to sustain their existing tenancies with assistance from Tewkesbury Borough Council, for example to resolve housing benefit difficulties, and continue to benefit from ongoing housing related support.

Similarly, many other households who have become homeless will maintain tenancies in alternative accommodation with the assistance available from community based support.

We have worked closely with Gloucestershire County Council Supporting People commissioners to frame the community based support in our area, and with the support providers Greensquare to support individual cases in maintaining their tenancies and prevent homelessness. This support is critical in engaging with individuals or families when things start to go wrong and looking for solutions to prevent decline and any loss of their home. Greensquare hold regular surgeries in our Public Services Centre and work closely with us to resolve individual challenging cases.

2.1.3 Sanctuary/target hardening scheme

Domestic abuse remains one of the main causes of homelessness within our borough and we are committed to supporting those who experience domestic abuse and enable them to remain in their current accommodation if they are safe to remain. The six District Councils in Gloucestershire and the Police and Crime Commissioner (PCC) pilot sanctuary scheme to offer target hardening and sanctuary room measures to residents wanting to remain in their homes and at risk of domestic violence has been very successful and been extended.

During 2015/16, 13 households from Tewkesbury Borough accessed assistance through this scheme and all continue to remain in their homes. All residents in our area received target hardening measures (lock changes and minor adaptations). No households required sanctuary measures and all those who benefited within our borough were female households.

Those who experience domestic abuse within our borough are also able to receive support through a specialist community based support via Gloucestershire Domestic Abuse Support Services (GDASS).

2.1.4 Young People

Parental eviction is also a major cause of homelessness within our borough. Research by Shelter suggests that the causes of homelessness in young people are associated with adverse housing, economic and family trends, that young people are disproportionately affected by homelessness, and often don't know where to go for help. Local Authorities have duties towards homeless young people and care leavers, under Homelessness legislation and the Children's Act 1989 and Children (Leaving Care) Act 2002. This means young people may be eligible for assistance from the local housing authority or social

services. Any duty owed to homeless 16 and 17 year olds under the Children's Act 1989 takes precedence over the duties under homelessness legislation. As the local housing authority, however, we are still under a statutory duty to assess and assist all 16 and 17 year olds, in addition to any referral we might make to social services.

We work closely with our colleagues in the Gloucestershire Youth Support Team to prevent homelessness in young people and deliver the best outcomes for this vulnerable group and have a 'Southwark' protocol in place that sets out our shared arrangements. We also provide Equitable Tenancies in partnership with G3 for the young people's accommodation available within our borough, in order that Assured Shorthold Tenancies can be offered to those under 18 in supported accommodation in our borough.

2.1.5 Those leaving care

We also work with the Gloucestershire Youth Support Team to support Care Leavers as they approach 18 to establish a planned move on from care into the most appropriate accommodation to provide sustainable solutions so that they do not become homeless at the end of their period in care. This may include supported accommodation, or independent living in the social sector or private rented sector.

2.1.6 Anti-Social Behaviour (ASB) Youth Support worker

Tewkesbury Borough Council benefits from an ASB Youth Support worker within Housing Services to prevent the homelessness of young people through family evictions and reduce nuisance. Our youth support worker engages with young people aged 11-19, families first, social care, schools, and the police to ensure that young people with challenging behaviour are able to stay with their families (if appropriate), and increase their life chances as adults.

2.1.7 Supported Accommodation – younger people and 18+

(18+ accommodation based support and the Young Person's Accommodation based support)

Many households become homeless or threatened with homelessness and need support to develop the skills to maintain their tenancies. Supported housing helps people with a range of needs to find it difficult to maintain tenancies and ranges from rooms to flats, some with 24 hour support, others with support brought in when needed (floating support).

The homelessness prevention pathway as shown on page 11 is linked to changes identified with the Supporting People Strategy 2011¹², the revised budget, and the 'pathway' of accommodation-based support. Providers offer first stage accommodation and assessment centres where individuals can begin to engage with support staff and start the process of identifying and addressing any needs. At this stage they plan their route back to independence, with support options available to fulfil their plans. Second stage accommodation-based support provides an effective county network, able to meet need,

¹² Supporting People Strategy 2011, Gloucestershire County Council
<http://glostext.gloucestershire.gov.uk/documents/s3324/Supporting%20People%20Strategy%20Executive%20Summary.pdf>

whilst also offering the flexibility for individuals to move temporarily to receive support and reconnect back with their home area afterwards.

Most of the accommodation-based support projects within the county are located outside of Tewkesbury Borough and residents needing assistance are able to secure the county-wide supported housing projects. The council's housing services has worked closely with the local authorities in Gloucestershire, Supporting People, and our partners providing accommodation-based support to ensure that there is fair and equitable access to and move on from supported accommodation provision. We are committed to working with residents when they are ready to move back to Tewkesbury Borough through the countywide reconnection policy and offer financial assistance through rent in advance and deposits for those accessing the private sector.

Within the borough we have a young person's supported housing project in Tewkesbury Town. This provision has been recently improved by G3/Rooftop; the housing association have replaced their outdated provision at Tolley House with a redevelopment of accommodation on Tewkesbury High Street to provide high quality self-contained accommodation for young vulnerable adults on a single site alongside the existing services at Jubilee House in the town centre.

Several dispersed units of accommodation have also become available in the borough through Aspire as part of the Fair Chance¹³ programme which supports young people to find independence through training and employment.

Projected ongoing welfare reform may result in a reduction in housing benefit levels for those in supported housing in the future. We will monitor how ongoing reductions will impact and work closely with partners to mitigate wherever possible the effects of possible future cuts on the services to our vulnerable homeless households.

2.1.8 Ex-military personnel

Tewkesbury Borough has a military base within it at Innsworth and is part of the Community Covenant between the local authority services in Gloucestershire and The Armed Forces Community in Gloucestershire (2012). Joint protocols and preventative advice and assistance for those leaving the armed forces have been successful in meeting the needs when they approach and prevent homelessness.

We also work closely with support services available for ex-military personnel such as the Royal British Legion, Alabare supported accommodation, and SAFFA to assist more vulnerable ex-military personnel.

2.1.9 Drug and Alcohol Support

We recognise people may turn to drugs or alcohol and that this frequently leads to homelessness. We have therefore worked with the County Council to commission a

¹³ The Young Engagement Fund and the Fair Chance Fund
<https://www.gov.uk/government/news/30-million-boost-to-improve-the-lives-of-britains-most-vulnerable-young-people>

specialist service currently delivered by Change Grow Live to support individuals and their families to reduce their consumption of substances to safer levels or to abstain. The service specification was designed with the involvement of former and current service users, and understanding the most important features of receiving support to fulfil a person's recovery plans.

Recovery workers offer sessions at a series of hubs or supported housing locations to provide support in a way that works for the individual, linked to support from GPs and specialist nurses.

Successful reduction in substance misuse is expected to lead to improved health improvements, and in some cases reduced levels of crime or antisocial behaviour. The service will be monitored to ensure the best possible outcomes and minimise those losing their accommodation as a result.

2.1.10 Mental Health Accommodation

Accommodation is available in the county to provide short term, intensive housing related support focussing on adults with serious mental illness. Tewkesbury Borough Council works closely with the providers of this accommodation to ensure that our residents can access and exit accommodation back into Tewkesbury Borough when ready to move on.

2.1.11 Older people and people with disabilities

Within Tewkesbury Borough we work closely with Adult Social Care, Occupational Therapists, and our Environmental Health team to deliver solutions for older people/those previously living independently who are no longer able to live within their homes as a result of their disability. Working together with the resident, and our partners in occupational therapy, and social care, we deliver solutions which include: disabled facilities grants, rehousing into more appropriate accommodation including sheltered or extra care properties to prevent homelessness in this vulnerable group.

We also work closely with the community based support in the area to ensure that residents have the most appropriate support for their needs to maintain their lives in their current homes.

Our overall Housing Strategy addresses the projected increase of older smaller households within the borough over the next 30 years.

2.1.12 Ex-Offenders

An Accommodation and Brokerage/Personalisation service is active within the County which links closely with Probation and the Police as well as the other accommodation based support schemes.

2.1.13 Social Rented Properties – Choice Based Lettings

We continue to work closely with our housing association partners within the area to meet housing need including to those who are threatened with homelessness. We promote choice based lettings to those facing homelessness and assist residents to make applications. All those threatened with homelessness and those who are non-statutory homeless receive additional priority banding 'silver' to assist them in their efforts to find alternative accommodation.

3 Areas of challenge in preventing homelessness

3.1 Welfare Reform, the affordability of tenancies, exemptions and assistance

As outlined in the main housing strategy and through the jointly commissioned local Tewkesbury Borough analysis by Policy in Practice, welfare reform changes are and will continue to affect the affordability of tenancies for many residents on a low income. Existing reforms affecting those under occupying properties in the social rented sector are continuing to cause many households arrears in their current properties.

3.1.1 Single person households

Our housing register demonstrates that 50% of those who have applied for social housing have a one bedroom need, and that there is a shortage of smaller properties becoming available. The high demand and low levels of stock indicate a limited ability of the local authority to meet the need of those affected by welfare reforms with a one bedroom need through the existing social housing stock.

Welfare reform following the Localism Act 2011, however, increased the demand for one bedroom accommodation rose following the under occupation reduction in housing benefits for those under occupying social housing. The demand has also increased because the amount of housing benefit to which those under 35 and on a low income were entitled was restricted in private sector rented properties to the 30th percentile of median rents for a room in a shared house. Those under 35 were no longer able to afford self-contained private rented accommodation in our area and there is limited shared private rented accommodation.

Forthcoming reforms in 2019 will also affect smaller households as they impact on single people aged under 35 on a low income in social housing. These reforms will introduce the shared accommodation rate for housing payments to the social sector. These changes are likely to result in significant shortfalls in rent for many younger single tenants within the social rented sector on low incomes as social housing rents are higher than the shared accommodation rate for housing benefit.

There is some uncertainty about the impact of these changes on supported accommodation and we will need to monitor how the reform is introduced for this group. Certain exemptions, however, were put in place which categories of ex-offenders (where there may be risks to others in shared accommodation), and also some provision for individuals who have formerly resided in specialist accommodation.

Care leavers will be one of the most vulnerable younger groups likely to be affected as whilst they are exempt from the single room rate until their 22nd birthday, they will be subject to the shared accommodation rate in social housing if on a low income until they reach 35 years of age.

Forthcoming reforms will impact further on very young single adults aged 18-21 who are not in training or work who will not be eligible for housing payments towards their rent. This is likely to result in both financial hardship and homelessness.

3.1.2 Family households

Welfare reform will also impact on larger households with the reduction of the benefit cap to £20,000 with effect from November 2016. Research undertaken by Policy in Practice indicates these reforms will affect families on a low income with 3 or more children within the borough – but that those most affected are likely to be lone parents in social housing.

3.1.3 Welfare reform work already undertaken with partners

We are committed to preventing homelessness within our borough in those households affected by welfare reform and by informing them of the changes to their income, enable them to either remain in their homes if sustainable, work with them to make their homes sustainable if possible, provide a period of affordable adjustment using transitional discretionary housing payment funds where residents are affected to enable them to make changes, or help them move to affordable accommodation without reaching homeless crisis. We are able to expedite interim solutions through our close working relationship with colleagues in Revenues and Benefits for affected households.

We will also engage closely with residents and our partners in the Tewkesbury Borough Financial Inclusion partnership to mitigate the effects of these reforms on those affected. This work will include identifying exemptions to ensure the most vulnerable receive the assistance to which they are entitled, and multi agency work which includes access to discretionary housing payments and transitional funds to enable residents to meet their rental obligations whilst seeking employment, or move to alternative affordable accommodation if appropriate.

These activities will be fundamental as many of the affected households will be in suitable social housing and cheaper alternatives will not be available. If residents lose their homes as a result of welfare reform, it will be difficult for Tewkesbury Borough Council to find suitable solutions. This joint partnership work with residents will also contribute to our overall Housing Strategy 2017-2021 Priority 4 Objective 4.3.

We will continue to monitor ongoing changes to benefit entitlements affecting our residents throughout the life time of this strategy with a view to preventing homelessness in those affected.

3.1.4 Increasing the numbers of smaller properties

We will encourage Housing associations and voluntary sector partners to focus on supply of affordable suitable smaller accommodation, including good quality shared provision. We will review existing supported accommodation to ensure there is sufficient capacity for those young people needing to gain the necessary skills before being able to live independently.

3.1.5 Working with the Private Housing Sector

13% of the housing stock within the borough is in the private sector rented accommodation, and the private housing sector is an important part of the council's strategic approach to meeting the diverse range of housing needs within the borough as demands on the social housing within the area increases.

Within Tewkesbury Borough rents tend to be higher than in the urban areas of Gloucestershire and those on low incomes often struggle to find landlords willing to rent to tenants on benefits.

Our evidence¹⁴ suggests that the median LHA rates for private rented accommodation in smaller accommodation types are affordable in parts of the borough at the rates of the local housing allowance for those over 35 years. In 2015/16 we extended our financial housing options for those threatened with homelessness, to all residents irrespective of priority need or whether they became homeless intentionally to enable those who were threatened with homelessness to find alternative accommodation within the private rented sector. Our existing schemes such as rental deposits and rent in advance have proven to be successful in preventing homeless crisis to many households.

Further work needs to be undertaken to build a list of landlords willing to work with low income tenants. This work may include: further incentives for landlords taking on clients threatened with homelessness, advice for landlords to build relationships and trust with local landlords in our area. Building relationships within the private rented sector will be a priority throughout the life time of this strategy particularly with a view to providing smaller and shared accommodation.

Tewkesbury Borough Council operates a Landlord Accreditation Scheme which aims to increase the supply of good quality private rented accommodation available for those looking for accommodation. The scheme is called Fit to Rent and has been developed countywide by a consortium of Gloucestershire Councils in cooperation with local landlords.

We are also exploring working in partnership with Housing associations who operate Private Sector Leasing Schemes designed to house vulnerable people in the private sector. These schemes are likely to be of interest to small portfolio/single property owners who would prefer to take a risk free income from properties and do not want to actively manage tenancies. We will develop and promote such schemes within the borough to maximise the available homes for those threatened with homelessness.

3.1.6 Home owners

Tewkesbury Borough has benefited from the Government's Mortgage Rescue Scheme (MRS) in the past although this has been phased out.

The number of presentations from home owners facing a crisis situation with their finances is very low within the Borough. We are not complacent, however, and will continue to offer and develop housing options to homeowners facing repossession, and offer specialist

¹⁴ Housing Strategy 2017-2021 Appendix 1b pages 29, 31 and 32

housing advice and assistance in partnership with the Citizen's Advice Bureau. This will be particularly important for vulnerable or disabled homeowners in mortgage difficulty where their property is adapted and suitable for their needs.

Challenges

- Intervention at the earliest possible stage for households in crisis and ensuring they access our services
- Achieving the GOLD Standard in homeless prevention to give a cost effective and excellent service to those facing housing difficulties
- Working with residents and partners to mitigate the effects of Welfare Reform on tenancy affordability
- Improving choice for residents facing homelessness by improving access to the private rented sector
- Addressing the needs of home owners following the removal of the Mortgage Rescue Scheme.

4 Homelessness Assistance and Emergency Accommodation

If vulnerable households are roofless or become roofless during homeless enquiries, local authorities have a duty to provide accommodation, often in an emergency, while homeless enquiries are ongoing. Tewkesbury Borough Council offers a 24 hour emergency accommodation service to vulnerable households through our housing service during office hours as well as out of hours through the jointly commissioned service with Orbis who make placements on behalf of the council overnight.

The review of our housing and homelessness statistics indicate that the local demand for emergency and temporary accommodation is likely to continue, and may increase due to the impact of ongoing welfare reform.

Emergency and temporary accommodation is an important resource used to house urgent homelessness cases quickly and locally. Many local authorities, including Tewkesbury Borough Council, rely heavily on privately owned bed and breakfast (B&B) accommodation. It is widely recognised, however, that bed and breakfast accommodation can be of variable quality, expensive, and damaging to family life as households often don't have the opportunity to kitchen facilities and have access to only one room.

We are committed to limit the use of bed and breakfast accommodation for all groups. This is especially important for our applicants as there is limited private bed and breakfast style accommodation available within our Borough. We are reducing the use of bed and breakfast in many client groups through use of prevention initiatives and other more suitable temporary accommodation provision, but need to source alternative accommodation for those we cannot prevent.

4.1 Family households

The council has access to five three bedroom houses managed by our partners Stonham across the borough which are used to house homeless family households on an interim basis and have been invaluable to largely avoid the use of bed and breakfast for this group in our area. In times of high demand, however, homeless family households may be placed into bed and breakfast, and we will seek further alternative accommodation provision for this group.

4.2 Young people

We work closely with our partner agencies to avoid using bed and breakfast for young single people. This is because young people are inexperienced and particularly vulnerable in emergency accommodation. Tewkesbury Borough Council part funds Gloucestershire Nightstop who coordinate host families offering short term accommodation solutions for young people under 26. The scheme ensures that young homeless people have a safe environment with an evening meal whilst reconciliation work is ongoing or alternative accommodation is sourced.

Our supported housing providers for young people in the county also offer 'crashpads' as emergency accommodation for very young people in our area. However many, including the one in

Tewkesbury Town, are no longer in use and there are only 2 units remaining in Gloucestershire. The revenue funding (the support staffing element) for these units has been removed and with no further investment it is unlikely that the units will be brought back into use for this purpose. We also work closely with the Gloucestershire youth support team to ensure that very young people can access all appropriate solutions and support. This is possibly going to be through fostering solutions.

4.3 Those experiencing domestic abuse

Our review of homelessness indicates that violent relationship breakdown continues to be one of the main causes of homelessness locally. This is in part due to our co-location with the urban areas in the county, and approaches to Tewkesbury Borough from applicants fleeing perpetrators in these areas. We have worked hard to develop solutions and alternatives to emergency accommodation for those who are experiencing violence in their home.

Following the recent closure of refuges in the county, a joint bid from the six District Councils in Gloucestershire to the DCLG was successful in securing funding for 'Places of Safety' to provide safe self-contained emergency accommodation for those fleeing Domestic Abuse in April 2015. 12 properties will be made available across the county for this purpose in partnership with Gloucestershire Domestic Abuse Support Services (GDASS) and local housing associations. Four properties are currently available across Gloucestershire, and in Tewkesbury Borough our partner Severn Vale Housing Society is currently identifying two properties which will be available within our area. These will be used as emergency homeless accommodation for all household types, including men, and households with older boys, with bespoke support from GDASS. We will continue to work with this group and our partners to ensure that a high quality alternative to bed and breakfast continues to be available for those who become homeless as a result of violence.

We also work closely with GDASS to ensure that community based support is available to those who need it within the borough. This facilitates efficient triage and assessment of risk associated with domestic abuse, and links to IDVAS, MARAC, MAPPA, social care, and the police to facilitate protective action for victims.

4.4 Single households

We continue to regularly use bed and breakfast for single households, particularly single men with complex issues, and have difficulty sourcing alternative emergency accommodation within the borough for this group. Most bed and breakfast accommodation sourced by Tewkesbury Borough Council tends to be within the urban areas of Gloucestershire. This results in homeless clients having to move out of district. Furthermore, the demand and cost of emergency accommodation across the county has risen, placing extra pressure on the service, and further disruption for homeless households.

Further work needs to be undertaken within the borough to source appropriate emergency accommodation for single homeless people locally. This is important to enable them to maintain their support networks and prevent isolation.

As well as being less suitable for our applicants than local solutions, the cost of private bed and breakfast continues to be problematic for the service. Whilst we have been successful in reducing the number of placements and the length of stay in bed and breakfast during 2015/16, the average cost of emergency bed and breakfast has remained similar to previous years¹⁵.

¹⁵ Housing Strategy 2017-2021 Appendix 1b, Chart 9 page 13

Locally we need to source suitable alternative emergency accommodation which also minimises housing benefit subsidy losses and costs to the council's housing services budgets through unsuccessful claims.

4.5 Duration of emergency accommodation

The length of stay within emergency accommodation is also problematic for households who are difficult to move on because of previous rental arrears or behavioural issues. Failure to find more secure accommodation can further isolate homeless households and delays the household's ability to establish longer term support within their locality to resolve underlying issues which have contributed to their homelessness. Furthermore, available emergency accommodation also becomes silted by harder to place households, forcing placements of other households into emergency accommodation further afield.

Consequently, it is important that we work with our partners to secure solutions for our homeless households who have failed to maintain tenancies in the past and support our clients to make the changes to their lifestyles and manageable arrears agreements to prove they are able to cope independently in the future. These solutions could include short term tenancies either in private leasing arrangements or social housing with community based support in which our residents could demonstrate their ability to maintain an arrears agreement and tenancy fitness.

Such temporary accommodation solutions are likely to be both beneficial for applicants and Tewkesbury Borough Council. This is because temporary accommodation will thin the borough will enable them to maintain normal lifestyles not possible in bed and breakfast, and to maintain support networks within the borough. Temporary accommodation is also likely to be less expensive for Tewkesbury Borough Council as the borough council will receive higher subsidies on rents than the capped amount within bed and breakfast.

Discussions are ongoing with housing providers in the area to develop a cost effective alternative to bed and breakfast within Tewkesbury Borough and also longer term tenancies for more challenging households. At the time of writing this strategy, we are awaiting further information regarding the temporary accommodation management fee grant allocation to the borough for April 2017 onwards in order to inform our ongoing negotiations with providers.

We are also active partners in the county-wide homelessness partnerships with the local authorities in Gloucestershire and county council and work with them to find solutions to homeless issues affecting all our authorities including the use of private sector emergency and temporary accommodation.

4.6 Rough Sleeping and 'No Second Night Out'

The most recent snapshot rough sleepers count in 2016 indicated there were no people sleeping rough in Tewkesbury Borough. Whilst the prevalence of rough sleeping within the borough is low, there are instances of rough sleeping throughout the year¹⁶ and we are committed to ensuring that rough sleepers in our area have the assistance they need to find and maintain accommodation.

Tewkesbury Borough Council part fund an Assertive Outreach Service currently provided through St Mungo's Broadway for rough sleepers in partnership with the other authorities in

¹⁶ Housing Strategy 2017-2021 Appendix 1b pages 15-17

Gloucestershire, the County, the PCC and the PCT. This provides a local service which meets the Government's 'No Second Night Out' approach¹⁷.

Any person identified by services or the public through Streetlink as sleeping rough is visited by St Mungo's Broadway to link them into local services, support, housing services, and accommodation in the county. We will continue to monitor rough sleeping levels regularly and work with the supported accommodation commissioners to ensure that suitable accommodation can be accessed quickly by those in need.

4.7 Severe Weather Protocol

In order to provide a humanitarian response in times of severe weather Tewkesbury Borough participates in a protocol with all other districts within the County. The protocol ensures that in periods of severe cold or other extreme weather conditions, no rough sleeper has to remain on the streets. Where necessary we will secure emergency placements in partnership with St Mungo's Broadway. We will continue to review the protocol and consider the involvement of voluntary sector organisations in responding in such circumstances.

There continue to be difficulties finding solutions for single chaotic households with multiple needs (i.e. substance misuse, learning difficulties/mental health problems, with chaotic or high risk offending behaviours) across the county. These residents often fail to maintain accommodation because of challenging behaviour and risk to others, and are vulnerable to street homelessness. Whilst numbers of chaotic households in each district is relatively low, it is difficult to coordinate resources to find timely and appropriate solutions. We will continue to work with our neighbouring local authorities through the county wide strategic homeless group, supporting people, and other statutory agencies to find multi agency opportunities for this group.

Challenges

- Lack of local alternatives to Bed & Breakfast (B&B)
- Limited number of accommodation spaces available for households
- Expense of emergency accommodation/ short term accommodation
- Supporting specific groups to access suitable emergency accommodation
- Supporting households with poor tenancy history to find a sustainable solution
- Lack of temporary accommodation within the borough
- Solutions for single households with dual diagnosis/multiple needs

¹⁷ Vision to end rough sleeping, DCLG, 2011 <https://www.gov.uk/government/publications/vision-to-end-rough-sleeping--2>

5 Full Homelessness Duty

If, following homelessness enquiries, we establish that households are eligible, homeless, and vulnerable, who have not caused their own homelessness, and have a connection to Tewkesbury, the local authority has a full homeless duty to find them suitable accommodation¹⁸.

Temporary suitable accommodation offered by the Borough Council can be in the private rented sector, in supported accommodation through the county network, or within temporary social housing.

Until recently, the homeless duty to provide suitable accommodation could not be ended unless a permanent offer of a tenancy in social housing or if a household left suitable temporary accommodation. This inevitably resulted in homeless households having higher preference for social housing than other applicants with a high degree of housing need which was often considered unfair.

Following the changes introduced by The Homelessness (Suitability of Accommodation) (England) Order 2012¹⁹ and the Localism Act 2011²⁰ local authorities now have the power to end the main homelessness duty with a 12 month private rented sector offer. This new power has an additional safeguard for the household through a 're-application duty' if the household becomes homeless again within two years. Tewkesbury Borough Council has not been using this power to discharge homeless duties to date because additional resources are required to meet the criteria of the legislation. This will be considered during the lifetime of this Strategy.

To assist accepted homeless households find permanent accommodation, our accepted applicants are awarded additional priority through the higher Gold banding on Homeseecker Plus, the council's Choice Based Lettings system, to access permanent social housing within our area.

5.1 Challenges associated with Homeless Duties and welfare reform

The overall impact of the current and forthcoming welfare reforms on financially vulnerable households within Tewkesbury Borough has been detailed in the main Housing Strategy and evidenced in the evidence base. Welfare reform, however, has introduced a number of uncertainties and difficulties for local authorities both assisting those threatened with homelessness, and also those to whom a homeless duty is owed.

Some of the forthcoming reforms remain under consideration, but the current programme of welfare reform will pose difficulties for all local authorities including Tewkesbury Borough Council in meeting their statutory duties to house vulnerable homeless households on low incomes who are single and under 35 years or those in large family households (as outlined earlier). This is because the local authority cannot end its homeless duty to accommodate unless homeless households are offered suitable and affordable accommodation – either within social housing, or an offer of a private sector tenancy of no less than 12 months. It is likely that both these groups will be unable to afford either type of accommodation unless they find employment which either raises their income, or exempts them from the benefit cap.

¹⁸ Housing Act 1996 part VII (as amended) and Homelessness Act 2002

<https://www.gov.uk/guidance/homelessness-data-notes-and-definitions>

¹⁹ The Homelessness (Suitability of Accommodation) (England) Order 2012

www.legislation.gov.uk/ukSI/2012/2601/contents/made

²⁰ Localism Act 2011 <http://www.legislation.gov.uk/ukpga/2011/20/contents>

Tewkesbury Borough Council is an active partner in the Financial Inclusion Partnership that includes the DWP, housing associations, the CAB, and other local agencies. We will continue to monitor the effects of welfare reform and work in partnership with affected households to:

- Identify exemptions from the benefit restrictions.
- Support those affected with interim support from Discretionary Housing Payments if possible.
- Introduce robust referrals for those affected to receive money advice.
- Introduce strong working relationships with the job centre to enable those affected to find employment locally.

5.2 Forthcoming changes in homelessness legislation

At the time of writing, the Homelessness Reduction Bill is progressing through parliament. This legislation will place statutory responsibilities on local housing authorities to prevent homelessness in all client groups irrespective of whether there is a statutory homeless duty to accommodate.

Whilst we currently assist all client groups, changes in our statutory duties will need to be monitored closely to ensure that we offer our residents the best service possible.

Challenges

- Continued use of the social housing sector for discharging homelessness duty
- Sourcing sustainable housing solutions for care leavers and young people under 35.
- Discharging Homeless duties to those affected by welfare reform
- Implement changes associated with the forthcoming Homelessness Reduction Bill

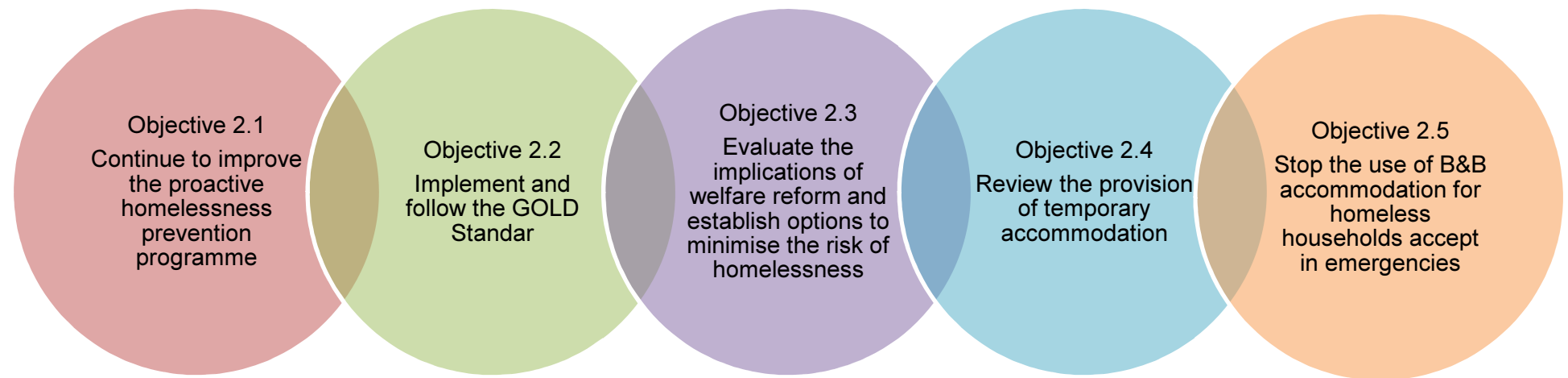
6 Strategy Objectives

The challenges identified in the previous sections of this document have created our 5 objectives for homelessness and prevention and improve our services to homeless residents.

Following consultation homelessness and homelessness prevention was agreed to be a key priority for Tewkesbury Borough Council. We believe we are in a good position to address these challenges the housing services faces over the next 5 years. Homelessness and homelessness prevention is in the overarching Housing Strategy 2017-2021 as Priority 2.

The objectives will be monitored through the wider Housing Strategy action plan; please see the main Housing Strategy 2017-2021 document for the homelessness action plan, page 28.

227



7 Glossary of terms

This glossary aims to consolidate all homelessness terms that are associated with this strategy document. It is also to compliment the over-arching the Housing Strategy 2017-2021 and the evidence base appendix 1b.

Affordable Homes Programme	A funding programme from the DCLG that aims to increase the supply of affordable homes in England
Affordable Housing / affordable homes	As defined by the NPPF, 2012 Annex 2 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
Affordable rents	Rented housing provided by a housing association subject to a rent of up to 80% of local market rents (inclusive of any Service Charge where applicable)
Assertive Outreach Service	A specialist service commissioned by local housing authorities to support rough sleepers. In Gloucestershire this is St Mungo's Broadway
Assured Shorthold Tenancy (AST)	The most common form of tenancy is an AST. Most new tenancies are automatically this type. A tenancy can be an AST if all of the following apply if you're a private landlord or housing association, the tenancy started on or after 15 January 1989, the property is your tenants' main accommodation, you don't live in the property. A guide to tenancy types can be found here https://www.gov.uk/tenancy-agreements-a-guide-for-landlords/tenancy-types
Bed & Breakfast accommodation (B&B)	A small lodging establishment that offers overnight accommodation only with breakfast often included.
Bedroom Tax	The commonly used term for the Under-Occupation Charge (see below)
Benefit Cap	The limit on the total amount of benefit that most people aged 16 to 64 can receive. More information can be found here https://www.gov.uk/benefit-cap/overview
Choice Based Lettings (CBL)	A scheme that gives housing applicants the choice and ability to 'bid' (express an interest) in council and housing association properties that it advertised via the local housing authority.
Council Tax Reduction	Households on a low income may be entitled to assistance in paying their Council Tax. Council Tax Reduction replaced Council Tax Benefit in April 2013.
Department for Communities and Local Government (DCLG)	This government department defines itself as " <i>The Department for Communities and Local Government's job is to create great places to live and work, and to give more power to local people to shape what happens in their area.</i> " https://www.gov.uk/government/organisations/department-for-communities-and-local-government
Emergency Accommodation	The local housing authority has a legal to duty to provide emergency accommodation to help a homeless person. This is when a person is homeless or threatened with homelessness, eligible for assistance and in priority need.

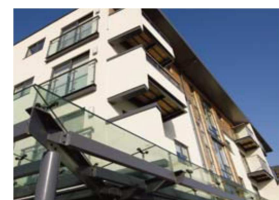
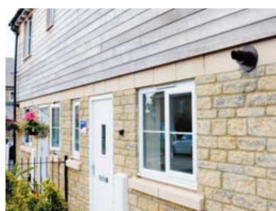
Homelessness / Homeless	Shelter defines homelessness where a person is living in unsuitable housing, don't have rights to stay where they are or are sleeping rough. http://england.shelter.org.uk/get_advice/homelessness/homelessness - an introduction/what is homelessness
Homelessness Acceptances	Households accepted by the local housing authority as being statutory Homelessness.
Homelessness Approaches	The number of households that approaches the local housing authority as Homeless.
Homelessness Prevention	The number of households that approach the local housing authority as Homeless, accepted as Homeless and have had their Homelessness prevented through measures such as mediation with family/relatives to remaining living at home, being moved in supported accommodation or support lodgings, financial assistance such as rent deposit schemes to move into a secure home, installing security measures within the home for people experiencing domestic abuse.
Homeseeker Plus	The Gloucestershire and West Oxfordshire Choice Based Lettings scheme to allocate social housing
Housing association	Also known as Housing associations (RP) or Registered Social Landlords (RSL) a housing association offers homes for rent and sale at below market values in accordance with meeting the definition in Section 1(1a) of the Housing Associations Act 1985 or Section 80 of the Housing and Regeneration Act 2008, or is a body approved or accredited by the Homes and Communities Agency or equivalent successor body whose terms of approval or accreditation have been evidenced to the satisfaction of the Council.
Housing Benefit	Financial support from the local authority to assist low income households to pay their rent
Local Housing Allowance	Used to work out Housing Benefit for tenants who are in private rented housing
National Planning Policy Framework	<i>"The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied"</i> https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
Private rented housing / private rents	Tenants who rent from a private individual or company that is not a housing association.
Roofless	Used to describe a person who is rough sleeping or does not have a 'roof' in terms of bricks and mortar i.e. people living in a vehicle could be defined as "roofless".
Rough Sleeping/ Rough Sleeper	Defined by the DCLG as <i>"People sleeping, about to bed down (sitting on/in or standing next to their bedding) or actually bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments). People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations, or "bashes")."</i>
Social housing	Used to describe housing rented by housing associations and council housing.
Social rents	Rents that are set by the housing association in accordance with the formula set by the Homes and

	Communities Agency (or its successor body)
Streetlink	"A website that enables the public to alert local authorities in England and Wales about people sleeping rough in their area" http://www.streetlink.org.uk/node/1659
Temporary Accommodation	Accommodation provided by councils to Homeless applicants
Under-Occupation Charge	Brought in as part of the Welfare Reform Act 2012 that affects council or housing association tenants of working age with a spare room. Housing benefit is cut to the amount matching the household size. This brings social housing tenants in line with private rented housing tenants.
Universal Credit (UC)	"A new type of benefit designed to support people who are on a low income or out of work. It will replace six existing benefits and is currently being rolled out across the UK. The new system is based on a single monthly payment, transferred directly into a bank account." https://www.moneyadviceservice.org.uk/en/articles/universal-credit-an-introduction
Welfare Reform	Changes to benefits that started in 2013, brought in by the Welfare Reform Act 2012.

At home in Tewkesbury Borough

A housing strategy for our borough

Appendix 3: Tenancy Strategy 2017-2021



This page is intentionally left blank

Contents

1	Background	Page 4
2	Housing need	Page 4
3	Affordable rent	Page 5
3.1	Our expectations on affordable rent	Page 6
4	Tenancies	Page 7
4.1	Our expectations on Tenancies	Page 8
4.2	Our expectations on Tenancy Renewal	Page 9
5	Disposal of Affordable Housing	Page 10
6	Discharging the homelessness duty through the private rented sector	Page 11
7	Our considerations when using the private rented sector	Page 11
8	Monitoring the strategy	Page 11
9	Glossary of Terms	Page 12

1 Background

It is a requirement of the Localism Act 2011 that all local housing authorities in England are to prepare and publish a tenancy strategy that sets out “*the matters to which the registered providers of social housing for its district are to have regard in formulating policies relating to—*

- (a) the kinds of tenancies they grant,*
- (b) the circumstances in which they will grant a tenancy of a particular kind,*
- (c) where they grant tenancies for a term certain, the lengths of the terms, and*
- (d) the circumstances in which they will grant a further tenancy on the coming to an end of an existing tenancy”¹*

It is the aim of Tewkesbury Borough Council to ensure that we are able to increase provision of affordable homes in the future and make the best use of all new and existing affordable homes located in all areas across Tewkesbury Borough. This Strategy considers the overarching Housing Strategy 2017-21 and informs the council’s current position.

2 Housing need

There is a demonstrated need for more affordable housing locally and this is supported by a number of sources such as the Strategy Housing Market Assessment 2014 (SHMA) and Parish Housing Need Surveys where these have been undertaken in the Borough.

Our April 2016 DCLG statistical return² showed 1,928 households registered with Homeseeker Plus³ and actively seeking affordable rented housing in the Tewkesbury Borough. The majority of our housing need is for 1 and 2 bedroomed housing. See the Housing Strategy 2017-2021 appendix 2a pages 7 and 8 detailing these households and their needs.

The Strategic Housing Market Assessment (SHMA) Final 2014⁴ identifies the annual shortfall of affordable homes with the highest need being for smaller dwellings reiterating the picture shown by Homeseeker Plus. The SHMA also identifies a small but acute need for larger affordable family homes. This is because the larger family homes within the existing Affordable Housing stock do not often become available for re-let, and generally, larger families have to wait longer for a suitable home to become available.

In terms of affordable housing tenure, the SHMA also identified that the highest need is for rented affordable housing.

¹ Localism Act 2011, Part 7 Chapter 2 Tenancy Strategy

² <http://www.legislation.gov.uk/ukpga/2011/20/part/7/chapter/2/crossheading/tenancy-strategies/enacted>

³ Local Authority Housing Statistics <https://www.gov.uk/government/collections/local-authority-housing-data>

⁴ Homeseeker Plus is Tewkesbury Borough Council’s choice based lettings scheme for the allocation of social rented housing.

⁵ Strategic Housing Market Assessment (SHMA) Final 2014 <http://www.gct-jcs.org/EvidenceBase/Strategic-Housing-Market-Assessment-2014.aspx>

3 Affordable rent

As previously discussed affordable rent is now a major tenure in the borough's affordable housing provision. The number of new affordable housing dwellings has been increasing year on year since 2012 mainly due to the number of large sites across Bishop's Cleeve, Winchcombe and Longford.

Affordable rents can be set at up to 80% (inclusive of service charge) of market rents at the point of letting, compared to the cost of social rents which are up to 65% of market rents. Social rented housing therefore remains the most affordable and preferred type of tenure for many tenants, particularly those with low incomes. The increased cost associated with affordable rent raises concerns in relation to general affordability, the sustainability of areas and the potential for increased homelessness due to rent arrears.

At affordable rent levels in our Borough, households are likely to struggle to meet their housing costs of the new higher rent levels and may particularly affect:

- Those seeking to return to work but who are dependent upon benefits to make up any shortfall between income and rent charge;
- Those households living in areas with higher market rents; or
- Households living in properties with four or more bedrooms where the housing benefit entitlement may be capped at a rate lower than the rent being charged.

Tewkesbury Borough affordable rent levels vary across the Borough but have a major impact on affordability. Our Borough has seen significant growth and new-build affordable housing delivery with 34% of new affordable housing being affordable rents.

This means that those on higher incomes are more likely to be housed, leaving those on low incomes or reliant on housing benefit waiting for social rented housing which will be few and far between in the future as housing associations seek to maximise income and convert social rented homes to affordable rents where possible. In addition, new-build development is in need of affordable rent housing to ensure the viability of the development and guarantee delivery of new homes.

The council needs to support a wide variety of households to live in our rural areas to support the rural economy and promote mixed and sustainable communities. In our rural areas, market rents are typically higher, the supply of affordable housing is more limited and local pay is often low. The effect of higher market rents will mean that people living in similar affordable rented housing will have to pay a premium to live in our rural areas. Therefore we expect that housing associations will have regard to this when setting affordable rents in rural areas and where appropriate charge less than 80% of market rents to ensure that the homes remain affordable locally

There are specific issues in the use of affordable rent for one-bedroom properties and larger family-size houses. The higher affordable rent charge (compared to that of social rent) for larger homes, in addition to the welfare reform changes including the application of the local housing allowance (LHA) rates for social housing, benefit caps for single people under 35 and families, will also mean that there will be a greater financial impact for those client

groups. These issues will need to be taken into consideration when considering the use of affordable rents on new and re-let 1-bed homes and homes of 4-beds and larger.

3.1 Our expectations on affordable rent

Affordable rent is supported but where the market demands for higher rents that are unaffordable and exceed LHA the housing association should seek to set rents at a suitable rate.

We expect housing associations to set affordable rents that do not unfairly disadvantage rural communities. This may include setting rents lower than 80% open market value where market rents are high and on some homes within specialist schemes or with local occupancy criteria.

We expect housing associations to be proactive in setting and re-evaluating their affordable rent levels so that tenants in receipt of housing benefit or Universal Credit can afford to reside in a property which is suitable for their needs.

We expect housing associations to advertise affordable rent vacancies in accordance with the Homeseeker Plus Allocations Policy (as revised from time to time) to ensure fairness and transparency.

We expect tenure conversions from social rent to affordable rent, at the point of re-let, to be based on the agreed contract with the Homes and Communities Agency (HCA) and that those agreed numbers be shared with the Council in order for effective monitoring to take place.

We expect that conversions will only take place in areas where there is a sufficient supply of stock.

We will not ordinarily support the conversion of social rented properties that are subject to Section 106 agreements to affordable rent unless there is evidence of exceptional circumstances, and a commitment to investment within the borough.

We will seek social rented homes on new developments where rent levels are significantly higher than other areas, in line with identified needs, subject to the viability and the specific nature of the development.

4 Tenancies

Historically social housing tenants have been offered an assured or secure tenancy, which granted them a home for life. Fixed term tenancies were introduced as part of the Localism Act 2011 with the aim of helping housing associations to offer more flexible tenancies that would enable them to make the best use of their housing stock and to better meet local housing needs.

Housing associations will still be able to offer the types of tenancies they currently use, for example secure, assured, introductory and demoted tenancies. The new fixed term tenancies are in addition to those currently available and housing associations do not have to use them. Existing secure and assured tenants cannot have their tenancies converted to a fixed term tenancy and many are offered special protections if they transfer to another home

The potential for fixed term tenancies to make better use of the stock locally relates mainly to under occupation in family housing e.g. where the household has two or more 'spare' bedrooms.

There are limited benefits for use of fixed term tenancies in older persons designated or supported housing where the majority of tenants remain on average, more than 5 years and often for the rest of their lives. There are disadvantages to housing associations in terms of management and administrative costs and to these, often vulnerable tenants, in terms of uncertainty and perceived reduced security.

Every household is individual and a 'one size fits all' tenancy is not likely to work for everyone. We expect those receiving long-term support that is related to their housing, and those with disabilities, to receive special consideration by housing associations in respect of the individual household's needs in terms of deciding the appropriate length of tenancy and renewal.

Automatic renewal of tenancies (unless a major change had occurred in the household's circumstances) is the preferred approach of the Council and its partners; it is also likely to reduce tenants' concerns and feelings of insecurity.

Where a tenancy is not going to be renewed we would expect the provider to consider the implications of their decision on the Council's homelessness duties and work closely with the tenant to explore real alternative housing options. Housing associations should take responsibility for providing advice and assistance to such tenants themselves and not excessively burden partners including housing advice and assistance agencies.

Mutual exchange is a useful tool which can help to make the best use of affordable housing stock. We do not want the introduction of fixed term tenancies to impact upon the effectiveness of mutual exchange and/or tenant mobility. Although there are protections for existing tenants in certain circumstances, these are not universal.

We encourage housing associations to set out within their tenancy policies, what will happen to a tenant's security of tenure if they choose to mutually exchange their home. We

also encourage the promotion and continued use of mutual exchange as a housing option for all tenants.

4.1 Our expectations on Tenancies

We support the use of introductory and probationary tenancies where appropriate.

We expect housing associations to offer lifetime tenancies for vulnerable people and other households in designated or specialist housing. We support the use of fixed term tenancies for other types of accommodation, particularly family housing.

We expect housing associations to use five years as the minimum term for all fixed term tenancies. In exceptional circumstances housing associations may set out shorter fixed term tenancies of a minimum of two years. Such exceptional circumstances should be set out and justified in the provider's tenancy policy.

We expect housing associations to reference their mutual exchange policy within their tenancy policy, clearly highlighting any impacts that exchanging may have on a tenant's security of tenure.

We expect housing associations to assess the housing options and appropriate type of tenancy for households which include a disabled member, to best meet the needs of the household as well as ensure the best use of our limited accessible stock and aid and adaptation budgets.

We expect housing associations to encourage tenants to downsize their home when needed, through the inclusion of safeguards within their tenancy policy.

4.2 Our expectations on Tenancy Renewal

We expect housing associations to clearly set the exact circumstances when a tenancy will and will not be renewed in their tenancy policy and clearly communicate this with the tenant prior to them signing their tenancy agreement.

We expect housing associations to have a presumption of renewal for all fixed term tenancies, except where the tenant(s):

- **Financial circumstances are significantly improved** to the point that they are able to afford and access a different tenure of housing that meets their needs locally. This may include purchasing their current home.
- **Have breached the terms of their tenancy** such that the Registered Provider has to consider taking possession proceedings under the terms of the tenancy agreement (such as rent arrears).
- **Under/over occupy their home.** In cases of under/over occupation, the tenant should normally be offered an alternative home with a Registered Provider. Incentive schemes are also supported to assist such households move.
- **Property has been extensively adapted** but for someone with a disability who no longer requires the adaptations or no longer lives with the tenant. In such cases, the tenant should normally be offered an alternative home with a Registered Provider.

Registered Provider Incentive Schemes are supported to assist such households move.

We expect housing associations to take into consideration the individual circumstances of household members before making a decision not to renew a tenancy and consider circumstances such as ill health, disability or terminal illness, the need for support, impacts on children, including their education, availability of suitable alternative accommodation locally.

We expect notification if Housing associations are minded to end the tenancy, and that adequate reasons for the decision to end the that tenants will be given at least six months' notice if the provider is tenancy are given along with information on the right to appeal the decision.

We expect housing associations to:

- Provide excellent advice, information and assistance to assist such tenants' access alternative accommodation.
- Frame the appeals process in such a way to allow tenants to make an informed decision as to whether to submit an appeal, including how to seek independent advice and where necessary representation.
- Have particular regard to their duty to cooperate with the local housing authority to prevent homelessness.

5 Disposal of Affordable Housing

Given the need for additional affordable housing in the borough, generally we would not wish to see the disposal of affordable housing stock. However, it is recognised that in certain circumstances, this may be justifiable, providing that it allows for future investment within the borough and generally provides an increase in housing that is affordable locally.

There is a very limited amount of supported housing for vulnerable people in the borough. Therefore where possible, it is preferable that such accommodation is retained within the affordable housing stock. If schemes become unviable to run, the Council will need to be assured that adequate, alternative provision has been made for potential residents who are affected by their home being disposed of. Any housing association will need to explore with the Council any opportunities to use these properties or retain the land for the purpose of delivering additional affordable housing in the future. Consideration should also be given to the aims of the countywide Supporting People Strategy⁵ and the availability of Supporting People funding for housing related support.

We aim to create and maintain mixed, balanced and sustainable communities. To make sure that rural areas and areas of high affordable housing need continue to have a supply of affordable accommodation, housing associations will need to carefully consider and limit the number of disposals of affordable housing in those areas. In addition, as there is an acute need for larger affordable family homes, housing associations should not dispose of accommodation that has four or more bedrooms unless exceptional circumstances can be demonstrated.

⁵ Supporting People Strategy 2011-2016, Gloucestershire County Council
<http://glostext.gloucestershire.gov.uk/documents/s3324/Supporting%20People%20Strategy%20Executive%20Summary.pdf>

6 Discharging the homelessness duty through the private rented sector

Local authorities are now able to discharge their duty to homeless households with an offer of suitable accommodation in the private rented sector, provided that the tenancy offered is for a minimum of 12 months. This change is intended to respond to the shortage in affordable housing.

We intend only to use private tenancies in this way where alternatives are not available or where households have had an opportunity to bid for suitable social/affordable housing. We will ensure that we only use suitable accommodation and that we do not encourage repeat homelessness by placing households in housing need into short-term private rented accommodation.

We also need to be aware of the changes due to welfare reform the timescales in which each of these changes is likely to be made. This is to make sure that we do not place anyone to whom we owe the homelessness duty, into a private rented property that they will no longer be able to afford when changes are made to the LHA and other benefits.

7 Our considerations when using the private rented sector

When considering the use of private rented accommodation to discharge our duty to homeless households, where possible, we will consider suitable accommodation to be that provided by private landlords who have been approved through the countywide 'Fit to Rent' property accreditation (or similar Council approved) scheme⁶. This will help to ensure that the accommodation is appropriate and that the tenancy is available for a period of 12 months or more. Where such accommodation is not available, we will work with other reputable landlords to secure suitable safe and well-managed alternative accommodation.

8 Monitoring the strategy

This Strategy will be updated according to the requirements of the Localism Act 2011.

There are no direct actions for the council to take at this time as the Tenancy Strategy is for our housing association partners to have regard to it in forming their own tenancy policies.

Any future actions will be addressed as part of the overarching Housing Strategy 2017-2021 action plan.

⁶ See the Housing Strategy 2017-2021 appendix 1d page 7 for more information.

9 Glossary of terms

Affordable Housing / affordable homes	As defined by the NPPF, 2012 Annex 2 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
Affordable rents	Rented housing provided by a housing association subject to a rent of up to 80% of local market rents (inclusive of any Service Charge where applicable)
Benefit Cap	The limit on the total amount of benefit that most people aged 16 to 64 can receive. More information can be found here https://www.gov.uk/benefit-cap/overview
Choice Based Lettings (CBL)	A scheme that gives housing applicants the choice and ability to 'bid' (express an interest) in council and housing association properties that it advertised via the local housing authority.
Department for Communities and Local Government (DCLG)	This government department defines itself as " <i>The Department for Communities and Local Government's job is to create great places to live and work, and to give more power to local people to shape what happens in their area.</i> " https://www.gov.uk/government/organisations/department-for-communities-and-local-government
Homeseeker Plus	The Gloucestershire and West Oxfordshire Choice Based Lettings scheme to allocate social housing
Housing association	Also known as Registered Providers (RP) or Registered Social Landlords (RSL) a housing association offers homes for rent and sale at below market values in accordance with meeting the definition in Section 1(1a) of the Housing Associations Act 1985 or Section 80 of the Housing and Regeneration Act 2008, or is a body approved or accredited by the Homes and Communities Agency or equivalent successor body whose terms of approval or accreditation have been evidenced to the satisfaction of the Council.
Housing Benefit	Financial support from the local authority to assist low income households to pay their rent
Local Housing Allowance	Used to work out Housing Benefit for tenants who are in private rented housing
Private rented housing	Tenants who rent from a private individual or company that is not a housing association.
Roofless	Used to describe a person who is rough sleeping or does not have a 'roof' in terms of bricks and mortar i.e. people living in a vehicle could be defined as "roofless".
Social housing/ social rented housing	Used to describe housing rented by housing associations and council housing.
Social rents	Rents that are set by the housing association in accordance with the formula set by the Homes and Communities Agency (or its successor body)
Universal Credit (UC)	"A new type of benefit designed to support people who are on a low income or out of work. It will replace six existing benefits and is currently being rolled out across the UK. The new system is based on a single monthly payment, transferred directly into a bank account." https://www.moneyadviceservice.org.uk/en/articles/universal-credit-an-introduction
Welfare Reform	Changes to benefits that started in 2013, brought in by the Welfare Reform Act 2012.

Equality impact assessments – for services and policies

What is an equality impact assessment?

An equality impact assessment is an important part of our commitment to improving equality practice. The form will help us find out what impact or consequences our functions, policies, procedures and practices have on our citizens, employees and potential employees. It should be used alongside the TBC EIA guidance.

By undertaking an impact assessment, we are able to:

- Take into account the needs, experiences and circumstances of those groups of people who use (or don't / can't use) our services.
- Identify any inequalities people may experience.
- Think about the other ways in which we can deliver our services which will not lead to inequalities.
- Develop better policy-making, procedures and services.

Impact assessment are required by law; within the context of the Equality Act 2010

Our view is that we should be using the results of impact assessment to improve service delivery so that we become more accountable to the people that we serve.

Initial Impact Assessment

Background

Name of service / policy and date	Housing Strategy 2017-2021 (incorporating strategies for Homelessness and Homelessness Prevention and Tenancy Strategy)
Lead officer	Paula Baker
Other people involved in completing this form	Erin Davies

Step 1 - About the service / policy

<p>What is the aim of the service / policy and what outcomes is it contributing to</p>	<p>To provide a strategic and operational direction for the delivery of housing, housing related services and homelessness across Tewkesbury Borough.</p>
<p>Are there any key performance indicators against this service / policy?</p>	<p>All KPIs for Council services are dealt with via the Council Plan. This Strategy has annual action plan against a set of objectives to achieve the 4 priorities.</p>
<p>Who will be affected by this service / policy? Who is intended to benefit from it and how?</p>	<p>There are a range of customers already accessing the strategic and operational housing services being provided across the borough. It is acknowledged that there are some residents who could potentially benefit from our services who do not apply for housing. We commission partner agencies who work with difficult to reach groups such as rough sleepers, to ensure that those who do not personally approach the local authority can still benefit from services available.</p> <p>Through the consultation process, we have also endeavoured to consult with partners working with all groups within the Borough in addition to the general consultation activities for all other customers. This has provided an opportunity to identify specific housing issues which may not have been addressed by the draft evidence base for consultation as the Strategy document was being developed.</p>
<p>Who implements the service /policy? Who is responsible for it?</p>	<p>The Council</p>
<p>What potential barriers might exist or are known of to achieving the outcomes?</p>	<p>Barriers could potentially be Council resources and finances to deliver achieve our objectives for housing in Tewkesbury Borough.</p>

Step 2 – What do you know already about your existing / potential customers

<p>What existing information and data do you have about your existing / potential customers e.g. Statistics, customer feedback, performance information</p>	<p>We collate customer feedback, complaints, Housing Market Assessments, Parish Housing Needs Assessments, data analysis of the housing register, local knowledge, and feedback from partner organisations. Stakeholder feedback following consultation has been used to agree the 4 priorities and associated objectives along with analysis of the Council's evidence-base.</p>
<p>What does it tell you about who uses your service / policy and those that don't?</p>	<p>There are a range of customers already accessing the strategic and operational housing services being provided across the borough. It is acknowledged that there are some residents who could potentially benefit from our services who do not apply for housing. Through the consultation process, we have also endeavoured to consult with particular groups in addition to the general consultation activities for all other customers. This has provided an opportunity to identify specific housing issues.</p>
<p>What have you learnt about real barriers to your service from any consultation with customers and any stakeholder groups?</p>	<p>Real barriers are: further changes to Welfare Reform and related legislation impacting on our community's ability to afford housing in the Borough; further changes to the planning system which may impact housing supply; on-going revenue funding constraints across housing, health and social care for vulnerable groups.</p>
<p>If no monitoring is undertaken of the service or policy what monitoring is planned for the future?</p>	<p>The Strategy will be monitored via monthly Lead Cabinet Member briefings and annual reports to Overview and Scrutiny Committee.</p>

Step 3 - Assessing Impact

If you have monitoring information and data please fill in below to show what it tells us about the community and different groups in the community. How does your service / policy impact on different groups in the community?

Group	What are you already doing to benefit this group	What are you doing that might disadvantage this group	What could you do differently to benefit this group	No impact on this group
Ethnicity / Race	The predominant ethnicity for consideration within Tewkesbury Borough is the gypsy, traveller and travelling showpeople population. Provision for this particular client group has been referred to in the Strategy.		Monitoring of the strategy will help to identify issues in the future.	
Gender				There is no specific provision of service for the transgender, male or female groups. The provision of services is available to all gender groups.
Age	The strategy specifically refers to the needs of younger people and older people. However, all ages are accommodated within this Strategy.			

<p>Disability</p>	<p>There is specific reference to meeting the needs of people with disabilities including the need to develop more homes to wheelchair accessible standards.</p>	<p>Those clients with mental health or learning disabilities have not been mentioned specifically though this strategy.</p> <p>Where a client's mental health/ learning disability is low/medium level of care/support then they are able to access general needs accommodation. The Council can assist through working in partnership to ensure they access the appropriate services.</p> <p>Other higher-level mental health/ learning disability services are provided from more specialists supported residential care accommodation units which are already provided within Gloucestershire.</p>	<p>Monitoring of the strategy will help to identify any issues relating to these protected characteristic groups.</p>	
--------------------------	--	---	---	--

Step 3 continued

Group	What are you already doing to benefit this group	What are you doing that might disadvantage this group	What could you do differently to benefit this group	No impact on this group
Religion or belief		Religious needs have not specifically been referred to in this strategy.	The consultation period did not raise concerns regarding specific religions or beliefs. Monitoring of the strategy will help to identify issues in the future.	
Sexual orientation				The evidence available suggests that the housing needs of lesbian, gay, bisexual, and transgender (LGBT) groups can be met within the existing and planned affordable and private market housing provision. If a customer was to approach the council with specific needs due to their sexual orientation, they would be considered through the Homeseeker Plus allocations policy.
Marital status				n/a
Transgender				See Sexual orientation above
Pregnant women and maternity leave				n/a

Step 3 continued

Any other socially excluded groups or communities				There are no other groups.
--	--	--	--	----------------------------

NB You may find that the categories for marital status and pregnant women and maternity leave only apply to internal policies for staff and employees.

Step 4 - what are the differences

249

Are any groups affected in different ways to others as a result of the service / policy?	It is likely that gypsy, traveller and travelling show people are to be considered differently in terms of the accommodation needs they have. Housing Services works with other Council departments to analyse the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment to understand and meet the needs of these groups. All other groups are analysed via the Strategic Housing Market Assessment.
Does your service / policy either directly or indirectly discriminate?	It is believed that no groups are directly or indirectly discriminated against as all customers have been considered in the Strategy in accordance with wider policies such as the Homeseeker allocations policy and legislative requirements.
If yes, what can be done to improve this?	
Are there any other ways in which the service can help support priority communities in Tewkesbury?	None

Step 5 – taking things forward

What are the key actions from this impact assessment to be carried out and how will they be resourced and monitored?	We monitor the effects on specific groups through the monitoring of the Strategy as described above in Step 2.
Is there need for further work through a fuller impact assessment? If yes please attach the resulting action plan highlighting the issues and steps that need to be explored.	No
Who will play a role in the decision-making process?	All relevant Council officers and Members.
What are your learning and development needs?	None
How will you capture these actions in your service planning?	N/A

TEWKESBURY BOROUGH COUNCIL

Report to:	Audit Committee
Date of Meeting:	14 December 2016
Subject:	Appointment of External Auditor
Report of:	Simon Dix, Head of Finance and Asset Management
Corporate Lead:	Deputy Chief Executive
Lead Member:	Councillor D J Waters, Lead Member for Finance and Asset Management
Number of Appendices:	None

Executive Summary:

Following the demise of the Audit Commission, new arrangements were needed for the appointment of external auditors. The Local Audit and Accountability Act 2014 requires authorities to either opt-in to the appointing person regime or to establish an auditor panel and conduct its own procurement exercise.

Recommendation:

To recommend to Council the option to opt-in to the Public Sector Audit Appointments Ltd (PSAA) as the Sector Led Body (SLB) for the appointment of the Council's External Auditors from 2018/19.

Reasons for Recommendation:

Opting-in to PSAA's national SLB potentially provides the best opportunity to limit future fees or costs, in terms of both appointment of auditors (removing the need to establish a local auditor panel) and the audit (by entering into a large scale collective procurement arrangement). Use of the PSAA will also be less resource intensive than establishing an auditor panel and conducting our own procurement.

Regulation 19 of the Local Audit (Appointing Person) Regulations 2015 requires that a decision to opt in must be made by Council (authority meeting as a whole). To comply with this regulation the Audit Committee is asked to make the recommendation above to Council.

Resource Implications:

The LGA considers that current external fees levels are likely to increase when the current contracts end in 2018.

The cost of establishing a local or joint auditor panel (a requirement of the section 5 alternative options) would include:

- the cost of recruiting independent appointees;
- servicing the panel;
- running a bidding and tender evaluation process; and
- letting a contract.

These costs are not currently reflected within the Council's budget.

Opting-in to a national SLB provides maximum opportunity to limit the extent of any increases by entering in to a large scale collective procurement arrangement and would remove the costs of establishing an auditor panel.

Legal Implications:

Section 7 of the Local Audit and Accountability Act 2014 (the Act) requires a relevant authority to appoint a local auditor to audit its accounts for a financial year not later than 31 December in the preceding year. Section 8 governs the procedure for appointment including that the authority must consult and take account of the advice of its auditor panel on the selection and appointment of a local auditor.

Section 12 makes provision for the failure to appoint a local auditor: the authority must immediately inform the Secretary of State, who may direct the authority to appoint the auditor named in the direction or appoint a local auditor on behalf of the authority.

Section 17 gives the Secretary of State the power to make regulations in relation to an 'appointing person' specified by the Secretary of State.

The Local Audit (Appointing Person) Regulations 2015 (SI 192) gives the Secretary of State the ability to enable a SLB to become the appointing person and confirms the decision to opt-in must be made by the authority meeting as a whole (i.e. Council).

Risk Management Implications:

As set out in the report, use of PSAA minimises the risks inherent in undertaking our own procurement.

Performance Management Follow-up:

Head of Finance & Asset Management to act as lead for the Council in liaising with PSAA to ensure the appropriate appointment takes place in the required timescale.

Environmental Implications:

None

1.0 INTRODUCTION/BACKGROUND

1.1 The Local Audit and Accountability Act 2014 brought to a close the Audit Commission and established transitional arrangements for the appointment of External Auditors and the setting of audit fees for all local government and NHS bodies in England. On 5 October 2015 the Secretary of State for Communities and Local Government (CLG) determined that the transitional arrangements for local government bodies would be extended by one year to also include the audit of the accounts for 2017/18.

1.2 The Council's current External Auditor is Grant Thornton UK LLP, this appointment having been made under a contract let by the Audit Commission. Following closure of the Audit Commission, the contract is currently managed by Public Sector Audit Appointments (PSAA), the transitional body set up by the LGA with delegated authority from the Secretary of State CLG. Over recent years there have been significant reductions in fees in the order of 60% compared with historic levels. This has been the result of a combination of factors including new contracts negotiated nationally with the firms of accountants, savings from closure of the Audit Commission and Council led improvements to internal year end processes and controls. The indicative scale fee for the audit of Tewkesbury Borough Council is £44,921 for both 2015/16 and 2016/17, which is a reduction in audit fee of 24% when compared to the 2014/15 audit fee of £58,995. In addition, the fee for the certification of claims and returns is approximately £9,525.

2.0 FUTURE AUDITOR APPOINTMENTS

2.1 When the current transitional arrangements come to an end on 31 March 2018 the Council will be able to move to local appointment of the auditor. There are a number of routes by which this can be achieved, each with varying risks and opportunities. Current fees are based on discounted rates offered by the firms in return for substantial market share. When the contracts were last negotiated nationally by the Audit Commission they covered NHS and local government bodies and offered maximum economies of scale.

2.2 The scope of the external audit will still be specified nationally. The National Audit Office (NAO) is responsible for writing the Code of Audit Practice which all firms appointed to carry out the Council's audit must follow. Not all accounting firms will be eligible to compete for the work. They will need to demonstrate that they have the required skills and experience and be registered with a Registered Supervising Body approved by the Financial Reporting Council. The registration process has not yet commenced and so the number of firms is not known but it is reasonable to expect that the list of eligible firms may include the top 10 or 12 firms in the country, including our current auditor. It is unlikely that small local independent firms will meet the eligibility criteria.

2.3 There are three broad options open to the Council under the Local Audit and Accountability Act 2014 (the Act) and the Council have until December 2017 to make an appointment. The preferred option, based on consideration of the advantages and risks, is as follows:

Preferred option: Opt-in to a Sector Led Body (SLB)

In response to the consultation on the new arrangement, the LGA successfully lobbied for Councils to be able to 'opt-in' to a SLB appointed by the Secretary of State under the Act. A SLB would have the ability to negotiate contracts with the firms nationally, maximising the opportunities for the most economic and efficient approach to procurement of external audit on behalf of the whole sector. At this stage, it is expected that the length of such contracts will be 5 financial years. The audit contracts between the SLB and the audit firms will require firms to deliver audits compliant with the NAO Code of Audit Practice.

2.4 Advantages of this option include:

- a) The costs of setting up the appointment arrangements and negotiating fees would be shared across all opt-in authorities, thus minimising the cost to each individual authority.
- b) By offering large contract values the firms would be able to offer better rates and lower fees than are likely to result from local negotiation.
- c) Any conflicts at individual authorities would be managed by the SLB which would have a number of contracted firms to call upon.
- d) The appointment process would not be ceded to locally appointed independent members. Instead a separate body is set up to act in the collective interests of the 'opt-in' authorities.

2.5 The disadvantages of this option include:

- a) Individual elected Members will have less opportunity for direct involvement in the appointment process other than through the LGA and/or stakeholder representative groups.
- b) In order for the SLB to be viable and to be placed in the strongest possible negotiating position the SLB will need Councils to indicate their intention to opt-in before final contract prices are known.

2.6 The LGA have been working on developing a SLB arrangement, with around 270 Councils and local bodies who expressed initial interest in a national scheme. In late July 2016 under the Local Audit (Appointing Person) Regulations 2015, the DCLG approved PSAA's bid to become the SLB for the independent appointment of auditors for principal authorities in England beginning with responsibilities for the financial year 2018/19.

2.7 A decision to become an opted-in authority must be taken in accordance with the Regulations, that is by the Members of an authority meeting as a whole, except where the authority is a corporation sole, such as a Police and Crime Commissioner, in which case this decision can be taken by the holder of that office.

2.8 Audit Committee is requested to recommend to Council that Tewkesbury Borough Council opt-in to the national scheme. The Council has until the 9 March 2017 to formally opt-in to the scheme.

3.0 OTHER OPTIONS CONSIDERED

3.1 The remaining two options open to the Council under the Act are not recommended as the preferred option, due to their associated disadvantages and costs.

3.2 Alternative option 1: To make a stand-alone appointment

In order to make a stand-alone appointment the Council will need to set up an auditor panel. The panel membership must be wholly or a majority independent members as defined by the Act. Independent members for this purpose are independent appointees. This excludes current and former elected Members (or officers) and their close families and friends. This means that elected Members will not have a majority input to assessing bids and choosing which firm of accountants to award a contract for the Council's external audit. A new independent auditor panel established by the Council will be responsible for selecting the auditor.

Advantages/benefit:

- a. Setting up an auditor panel allows the Council to take maximum advantage of the new local appointment regime and have local input to the decision.

Disadvantages/risks:

- b. Recruitment and servicing of the auditor panel, running the bidding exercise and negotiating the contract are estimated by the LGA to cost in the order of £15,000 plus ongoing expenses and allowances.
- c. The Council will not be able to take advantage of reduced fees that may be available through joint or national procurement contracts, and is therefore likely to end up paying significantly higher fees.
- d. The assessment of bids and decision on awarding contracts will be taken by independent appointees and not solely by elected Members.

3.3 Alternative option 2: Local joint procurement arrangements

The Act enables the Council to join with other authorities to establish a joint auditor panel. Again this will need to be constituted of wholly or a majority of independent appointees. Further legal advice will be required on the exact constitution of such a panel having regard to the obligations of each Council under the Act and the Council need to liaise with other local authorities to assess the appetite for such an arrangement.

Advantages/benefits:

- a. The costs of setting up the panel, running the bidding exercise and negotiating the contract will be shared across a number of authorities.
- b. There is greater opportunity for negotiating some economies of scale by being able to offer a larger combined contract value to the firms.

Disadvantages/risks:

- c. The decision making body will be further removed from local input, with potentially no input from elected Members where a wholly independent auditor panel is used or possibly only one elected Member representing each Council, depending on the constitution agreed with the other bodies involved.
- d. The choice of auditor could be complicated where individual Councils have independence issues. An independence issue occurs where the auditor has recently or is currently carrying out work such as consultancy or advisory work for the Council. Where this occurs some auditors may be prevented from being appointed by the terms of their professional standards. There is a risk that if the joint auditor panel choose a firm that is conflicted for this Council then the Council may still need to make a separate appointment with all the attendant costs and loss of economies possible through joint procurement.

- e. Even if the Council joins with one or more other local authorities, it will still not be able to offer the scale of appointment that would be available on a nationwide process. It would therefore be likely to incur higher fees than the preferred option detailed in Paragraph 2.3.

4.0 CONSULTATION

- 4.1 The Lead Member for Finance and Asset Management has been consulted on the requirement to appoint external auditors and the options available under the regulations.

5.0 RELEVANT COUNCIL POLICIES/STRATEGIES

- 5.1 None

6.0 RELEVANT GOVERNMENT POLICIES

- 6.1 None

7.0 RESOURCE IMPLICATIONS (Human/Property)

- 7.1 None

8.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)

- 8.1 None

9.0 IMPACT UPON (Value For Money/Equalities/E-Government/Human Rights/Health And Safety)

- 9.1 The route of appointment recommended offers the Council the best value in the process of appointing its external auditors and is likely to result in the best value ongoing cost of providing an external audit service.

10.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS

- 10.1 None

Background Papers: None

Contact Officer: Simon Dix, Head of Finance & Asset Management
01684 272005 Simon.Dix@teWKesbury.gov.uk

Appendices: None

TEWKESBURY BOROUGH COUNCIL

Report to:	Audit Committee
Date of Meeting:	14 December 2016
Subject:	Counter Fraud Unit Business Case
Report of:	Simon Dix, Head of Finance and Asset Management
Corporate Lead:	Deputy Chief Executive
Lead Member:	Councillor D J Waters, Lead Member for Finance and Asset Management
Number of Appendices:	Three

Executive Summary:

The purpose of the report is to present the Audit Committee with a summary of the activity undertaken by the Counter Fraud Unit in order to provide assurance over the counter fraud activities of the Council and the on-going counter fraud project.

Following the successful DCLG bid to fund the set-up of a Gloucestershire wide Counter Fraud Unit, the team has been undertaking feasibility work (both strategic and operational) on behalf of a number of Gloucestershire Authorities, West Oxfordshire District Council and Cheltenham Borough Homes.

This work has been undertaken as a pilot and the attached business case has been drafted to reflect the financial sustainability of creating a permanent Counter Fraud Unit which will serve the partner Councils across the region including Cheltenham Borough Council.

Recommendation:

1. To **CONSIDER** the progress to date of the Counter Fraud Unit.
2. To **RECOMMEND TO COUNCIL** the approval of option 3 of the business case to establish a permanent Counter Fraud Unit, subject to similar approval being made at all partner authorities; should all necessary approvals not be forthcoming, option 2 will be this Council's default position.

Reasons for Recommendation:

The formation of a permanent Counter Fraud Unit tackling issues of fraud on a Countywide basis provides the Council with the best opportunity to have an effective, corporate-wide fraud prevention and detection function. It is estimated that fraudsters cost local government £2.1bn every year and therefore it is of paramount importance that this Council strives to protect the public purse and ensure resources are directed to this activity.

Resource Implications:

The base budget currently held by the Council for Counter Fraud work is £39,346. The recommended option of full integration of all partners would result in a total cost of £53,813 for this Council, an increase over the approved base budget of £14,467. Whilst this will be an increase in the base expenditure of the Council from 1 April 2017, it can effectively be found from the increased ongoing income resulting from the successful work already undertaken. The business case also illustrates the potential additional income that could be generated from detecting and preventing fraud through the establishment of a permanent unit.

Should all authorities not join the unit the option 2 model would result in an increased cost of £3,029 but would only release 70 days of investigatory time as opposed to 210 under option 3.

Legal Implications:

The proposed arrangement will require appropriate delegation of functions, officer secondments and data sharing protocols as referenced in the report and business case.

Risk Management Implications:

If the Council does not have effective counter fraud and corruption controls it risks both assets and reputation. Without appropriate strategy and resources in place the Council is at risk of losses as a result of fraudulent activity.

Performance Management Follow-up:

The Counter Fraud Unit will provide quarterly updates on activity to the Audit Committee as well as ongoing liaison with Council officers.

Environmental Implications:

None

1.0 INTRODUCTION/BACKGROUND

- 1.1** In 2013/14 the government announced that local authority responsibility for the investigation of benefit fraud was to be transferred to the Department of Works and Pensions with only a referral role being retained by Councils. All other aspects of fraud detection and prevention remained with the Council.
- 1.2** In February 2015, Cotswold District Council was successful in a bid for £403k funding from Department of Communities and Local Government (DCLG) on behalf of the Local Authorities in Gloucestershire and West Oxfordshire District Council. The funding was a one-off payment to enable the introduction of a Gloucestershire-wide Counter Fraud Unit that is able to use data matching to gather intelligence and skilled investigators to help counter all forms of fraud and misuse of public funds against the Councils and Social Housing Providers in the region.
- 1.3** Tewkesbury Borough Council retained investigator resources under the direction of the Head of Revenues and Benefits. The Council's fraud investigator has been working alongside the Counter Fraud Unit building the operational, legal and data matching requirements to deliver the project along with actual operational investigation of fraud. This has also included building the partnership network in the region and understanding what resources each authority had to contribute to the hub.

- 1.4** The shared legal team at Cotswold District Council and West Oxfordshire District and One Legal, on behalf of Tewkesbury Borough Council, have been engaged to cover the data sharing and usage requirement, along with the access, accountability and authority provisions required at each organisation involved.
- 1.5** The Counter Fraud Unit is in the process of creating a range of new policies and procedures to enable data matching and criminal investigations to be legally undertaken and in support of each service area. It is anticipated that the service will be a value adding unit that supports all enforcement sections including Revenues, Planning and Licencing, etc. In addition, the team may tackle fraud as it is discovered with new intelligence/data matching software and reacting to normal referrals of fraud and whistleblowing. It is also in the process of developing an agreement with the Police and other enforcement agencies to aid in the early prevention/detection of fraud.

2.0 PROGRESS UPDATE

- 2.1** The work undertaken for all authorities in Gloucestershire and West Oxfordshire is summarised in Appendix A. In addition to the fraud and error detection detailed, a number of policies recently approved including the Counter Fraud and Anti-Corruption Strategy have been prepared by officers from the Counter Fraud Unit.
- 2.2** All of the work undertaken within the pilot has been carried out with existing resources supported by additional resources funded from the government grant.

3.0 BUSINESS CASE

- 3.1** Attached at Appendix B is the business case for the permanent establishment of the Counter Fraud Unit. Appendix C details the latest financial forecast of the partnership costs.
- 3.2** The work to date of the Counter Fraud Unit has been undertaken as a pilot and the attached business case and financial detail have been drafted against the early findings of the pilot work to reflect the financial sustainability of creating a permanent Counter Fraud Unit which will serve the partner Councils across the region including Tewkesbury Borough Council.
- 3.3** The Counter Fraud Unit will be a Support Service reporting to the Chief Finance Officer at each partner site. The employing partner will be Cotswold District Council and day to day management of the Unit will be undertaken by the same.
- 3.4** Initially, from April 2017, Counter Fraud Unit employees will be seconded to each partner as set out in the provisions of Section 113 Local Government Act 1972, which enables the employing Council to make its Officers available to other Councils. For the purpose of the secondment, the secondee becomes an officer of the Council to whom he or she is seconded.
- 3.5** In relation to governance arrangements, policy and corporate strategy; all will be determined by each partner individually and the Counter Fraud Unit will report quarterly to each partner Audit Committee.
- 3.6** The business case outlines three potential options to the Council – carry on as is; partial formation of a Countywide unit; full formation of a Countywide unit – including the pros and cons of each option and the financial costs and benefits associated with each option.

3.7 Given the performance to date and the potential for further counter fraud work to be undertaken, it is the Officers' view that this Council should be supportive of the option to form a unit comprising all authorities resulting in 210 days of investigatory time being allocated to each partner. This is, of course, subject to each partner agreeing the same; in the event that not all are able to do so, it is suggested that the Council fall back to the second option and support the partial creation of a Countywide unit with effect from 1 April 2017.

4.0 CONSULTATION

4.1 The work to date of the Counter Fraud Unit and the business case for the permanent establishment of the Unit have been presented and discussed with both Exec/CLT and the Transform Working Group. In both cases, Members were impressed with the output of the Unit and supportive of its permanent establishment.

5.0 RELEVANT COUNCIL POLICIES/STRATEGIES

5.1 The Council has a number of fraud, anti-corruption and recovery strategies in place. There is also a requirement within the Financial Procedure Rules for adequate resources to be dedicated towards the prevention and detection of fraud.

6.0 RELEVANT GOVERNMENT POLICIES

6.1 None

7.0 RESOURCE IMPLICATIONS (Human/Property)

7.1 If the business case is approved by Council there will be a requirement for formal TUPE consultation to commence with the officer currently employed by the Council to undertake counter fraud related activity.

8.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)

8.1 None

9.0 IMPACT UPON (Value For Money/Equalities/E-Government/Human Rights/Health And Safety)

9.1 The proposed formation of a Countywide Counter Fraud Unit provides a platform for the most cost effective solution for the detection and prevention of fraud.

10.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS

10.1 None

Background Papers: None

Contact Officer: Simon Dix, Head of Finance & Asset Management
01684 272005 Simon.Dix@tewkesbury.gov.uk

Appendices: Appendix A – Counter Fraud Unit Update
Appendix B – Business Case
Appendix C – Financial Update

Summary of Feasibility Work for the Counter Fraud Unit Project

Cheltenham Borough Council

1. The Counter Fraud Officers currently undertake the single point of contact role and acts as the Department of Work and Pensions liaison following the transfer of Benefit Fraud investigation to the Single Fraud Investigation Service, Department for Work and Pensions. The team also investigate any allegations related to the Council Tax Reduction Scheme (or Council Tax Support) offences on behalf of the Revenues and Benefits Department.

The unit has administered the following sanctions:

- 2 Cautions.
- 4 Administrative Penalties generating £1,100.
- There have been 6 Prosecutions working jointly with the Department for Work and Pensions involving Council Tax Support and Housing Benefit.
 - Sentence - 8 month's imprisonment.
 - Sentence – (2 offenders received 2 years and 4 years imprisonment respectively. The Council were awarded £21,500 in compensation via Proceeds of Crime Confiscation Order.
 - Sentence – Fined £75 / Costs £75
 - Sentence – Fined £800 / Costs £250
 - Sentence – 21 month's imprisonment; suspended for 2 years.
- There is a further trial listed for April 2017.

From cases investigated, in the region of £25,000 in overpaid Council Tax Support has been identified and subsequently re-billed. (Resulting Housing Benefit overpayments are not recorded as this is not within the remit of the CFU).

During the project period, the Counter Fraud Unit received 231 fraud referrals in relation to Housing Benefit and the Council Tax Reduction Scheme. These are referred to the Department for Work and Pensions where appropriate or investigated by the Counter Fraud Unit in relation to the Council Tax Reduction Scheme.

2. Service of Court documents on behalf of Housing Benefit debt recovery:-
 - Customer debts totalling in excess of £20,000 have been served papers.
3. The Counter Fraud Unit has received referrals for 4 extraordinary cases of alleged misconduct and/or fraud; 2 external attempts and 2 internal cases relating to employees. Reports have been issued in relation to findings where appropriate.
4. A review of the Housing Applications list for Cheltenham Borough Council was undertaken:
 - 51 applications were cancelled (7 Gold Band and 44 Silver Band) = £561,000 loss avoidance.
 - 56 applications were downgraded to Bronze banding (low priority need).

Each cancelled application represents a property which can be reallocated to another eligible family. For each reallocation, a figure of £18,000 per annum can be identified as a loss avoidance figure because there is no need for temporary accommodation to be utilised. (£18,000 is the Audit Commission figure for the average annual cost to a Local

Authority when housing a family in temporary accommodation). In the Cheltenham Borough this rate would be considerably lower, approximately £11,000 per year as indicated in the figure above. In addition the result of the band reprioritisation is that those families who are correctly banded have a greater chance of being housed and more speedily.

Following this exercise a review report was produced to summarise the work and make recommendations regarding future processes and system reviews.

5. A sample single person discount review was undertaken for the Revenues (Council Tax) Department. 50 cases were subjected to more robust verification; discounts were removed retrospectively and for the financial year 2016/2017. This increased future liability by £17,500 and generated £22,000 retrospectively.

Council Tax Penalties were not administered but could have been where appropriate generating £70.00 per account approximately £3,000 in fines. There was also the potential to levy a penalty on occupiers who failed to respond to the requests for information – approximately 368 accounts which would have generated £26,000 in fines. In these instances the single person discount of 25% could also have been removed from the start of the financial year generating further liability.

Engagement with Senior Management across the Council has now commenced to establish areas in which the Counter Fraud Unit could focus.

Tewkesbury Borough Council

1. A sample single person discount review was undertaken for the Revenues (Council Tax) Department. 53 cases were subjected to more robust verification; discounts were removed retrospectively and for the financial year 2016/2017. This increased future liability by £17,000 and generated £4,700 retrospectively.

A further data match was undertaken comparing electoral role details and single person discount awards. This increased future liability by £8,600 and generated £8,200 retrospectively.

Council Tax Penalties were not administered but could have been where appropriate generating £70.00 per account.

2. A review of the Housing Applications list for Tewkesbury Borough Council was undertaken:
 - 63 applications were cancelled (3 Emergency, 3 Gold Band and 57 Silver Band) = £630,000 loss avoidance.
 - 32 applications were downgraded to Bronze banding (low priority need).

Each cancelled application represents a property which can be reallocated to another eligible family. For each reallocation, a figure of £18,000 per annum can be identified as a loss avoidance figure because there is no need for temporary accommodation to be utilised. (£18,000 is the Audit Commission figure for the average annual cost to a Local Authority when housing a family in temporary accommodation). In the Tewkesbury Borough this rate would be considerably lower, approximately £10,000 per year as indicated in the figure above. In addition the result of the band reprioritisation is that those families who are correctly banded have a greater chance of being housed and more speedily.

Following this exercise a review report was produced to summarise the work and make recommendations regarding future processes and system reviews.

3. The Counter Fraud Unit is in the process of completing a review of the list of exempt and empty business units. To date £132,000 of additional revenue has been charged to 31 March 2017 although this is still subject to the provision of various reliefs where applicable. In addition a number of units are still subject to internal decisions or have been referred to the Valuation Office for rateable value.

Overall in the region of £275,000 has been identified by the Unit and referred to the Revenues Team to consider billing or referral.

4. The Counter Fraud Unit is now working with the Environmental and Housing Services Team with the investigation and prosecution of fly-tipping offenders and some proactive deterrent work.
5. A joint investigation with Gloucestershire County Council is underway in relation to care provision and alleged abuse of the Council Tax Reduction Scheme.

West Oxfordshire District Council

The Counter Fraud Unit has received referrals for 5 extraordinary cases of alleged misconduct and/or fraud; all internal cases relating to employees. Reports have been issued in relation to findings where appropriate. 1 Caution has been administered.

Engagement with Heads of Service across the Council has now commenced to establish areas in which the Counter Fraud Unit could focus.

Cotswold District Council

The Counter Fraud Unit has received referrals for 4 extraordinary cases of alleged misconduct and/or fraud; 2 external attempts and 2 internal cases. Reports have been issued in relation to findings where appropriate.

Engagement with Heads of Service across the Council has now commenced to establish areas in which the Counter Fraud Unit could focus.

Forest of Dean District Council

The Counter Fraud Unit received 1 referral of attempted fraud; external attempt. A report has been issued in relation to findings where appropriate.

Gloucestershire County Council

Planning with regard to a verification exercise / proactive fraud drive in relation to social care provision, specifically direct payments, is underway.

Stroud District Council and Gloucester City Council

Discussions to be held in relation to the provision of counter fraud services with both authorities.

GO Shared Services (Cotswold, Forest of Dean and West Oxfordshire District Councils / Cheltenham Borough Council)

Sample of debts checked via the National Anti-Fraud Network to assist in debt recovery on behalf of the Accounts Receivable Team to reduce the number of debts passed for write off.

This was a small sample of 24 cases to test the merits of the exercise. Utilising only the free consent data check on the system, further information was found in 18 cases out of 24 – including email addresses, phone numbers and confirmation in many cases that the debtor was still resident at the address held, and also indications that some customers may have used a false name when registering.

This pilot piece of work is now the subject of an enhanced feasibility study. All Cheltenham Borough Council debts are being passed to the Counter Fraud Unit for trace details prior to write off. Figures will be recorded to include costs and debt recovery with a view to rolling the work out to all other GOSS partners if successful.

UBICO

The Unit is providing counter fraud services where needed. 2 extraordinary cases of alleged misconduct and/or fraud; both internal have been received.

Cheltenham Borough Homes

In partnership with CBH the unit has worked to prevent incorrect or fraudulent applications for properties under the 'Right to Buy' scheme.

The Audit Commission (Protecting the Public Purse report 2014) detailed that the average cost to a Local Authority replacing a Social Housing property lost through the Right to Buy scheme would be in the region of £150,000.

In addition, future rental income is lost and emergency housing costs are increased because the property is no longer available for housing provision and allocation. With insufficient properties to meet demand, more costly temporary accommodation must be found.

To date the Unit has assisted in the prevention/recovery of 5 CBH properties – representing £750,000.

The Unit has also worked with CBH Housing Officers to provide intelligence and investigate abandoned or illegally sub-let property, general tenancy fraud allegations and any suspicious applications for social housing.

This has led to 13 properties being recovered/not allocated – a loss avoidance figure of £143,000 (as per the £11,000 figure for the cost of housing a homeless family from the waiting list).

There is also a very real non-monetary value in ensuring that social housing properties are being let to those tenants who are genuinely in need of assistance and not those who are abusing the system for gain.

There have been 5 successful prosecutions for housing offences and one case is currently listed for Crown Court trial.

Sentence – 21 month's imprisonment; suspended for 2 years

Sentence – Fined £200 / Costs £170

Sentence – 100 hours Community Service / Costs £700

Sentence – 12 month Supervision Order

Sentence – 16 weeks imprisonment; suspended and 200 hours Community Service / Costs £200

Detailed reports have been issued to Cheltenham Borough Homes suggesting high risk areas and proactive fraud drives which the team could assist with. The team also produced a review of work undertaken so far highlighting any risks and learning points with remedial recommendations.

Training

Human Resources, Internal Audit and Investigation staff across the County in relation to undertaking employment and criminal investigations internally. To incorporate any relevant updates or process changes, the team are working with Human Resources.

Criminal Procedure and Investigations Act; refresher and update training being rolled out across the County for all Enforcement, Legal and Internal Audit members of staff.

Regulation of Investigatory Powers Act; refresher and update training being rolled out across the County for all Enforcement, Legal and Internal Audit members of staff.

Proceeds of Crime Seminar conducted by Barristers from Albion Chambers organised for Enforcement, Legal and Internal Audit members of staff across the County. To provide an overview and highlight where this legislation could be utilised within the Councils.

Staff and Member Awareness is being undertaken to introduce the Counter Fraud Team, the new policies which the team have drafted, to include where these are applicable, and general fraud awareness.

Data Warehouse Software

The Counter Fraud Unit is working with Procurement, Legal and ICT Departments and Corporate Management in relation to the procurement of the software and related data sharing agreements.

Specification documentation has been drafted and the tender process is planned for 2017.

This area also involves a large work stream with regard to Fair Processing notices on the internet and paperwork across all partnership Councils.

The team has drafted more extensive fair processing notices and statements to reflect legislative requirements and any future data matching. Draft documentation is being presented to Corporate Management / Senior Leadership Teams for implementation throughout the partner Council's.

Policies

A Counter Fraud and Anti-Corruption Policy has been drafted and approved at a number of the partner authorities.

A Regulation of Investigatory Powers Act (Communications) Policy has been drafted and is undergoing the appropriate consultation and approval process at a number of the partner authorities.

Whistle-Blowing Policy has been drafted and is undergoing the appropriate consultation and approval process at a number of the partner authorities.

A Council Tax, Council Tax Reduction Scheme and Housing Benefit Penalty and Prosecution Policy is being drafted. Consultation and approval process to commence.

Further policies are planned – Prosecution Policy, A Regulation of Investigatory Powers Act (Social Media) Policy, Proceeds of Crime and Anti-Money Laundering Policy.

Other Work Streams

Work is planned in relation to a generic document pack for Gloucestershire for criminal investigation to include all the relevant investigation, interview under caution and prosecution processes.

Paperwork received in relation to signing the memorandum of understanding with HM Revenue and Customs – liaison with all enforcement teams pending.

A work stream to engage the Police and enter into an appropriate joint working mechanism is to be commenced.

A work stream to engage Trading Standards and enter into an appropriate joint working mechanism commences 30 November 2016.

A work stream to engage NHS Counter Fraud Team and enter into an appropriate joint working mechanism to be commenced.

Work on transparency reporting for fraud work – again this involves capturing information from around the organisations across the different sites.

Housing Associations and Registered Social Landlords. Draft Goods and Services Contract developed for engagement with Registered Social Landlords for the provision of Tenancy Fraud work. This work stream is on hold pending business case consideration. Agreement received from Cheltenham Borough Homes to support and endorse this based on results and work undertaken by the team.

Counter Fraud Unit Business Case

Project Name:	Counter Fraud Unit		
Date:	9 June 16	Release:	Draft
Authors:	Kate Seeley, Emma Cathcart, Ruth Jones and Alex Lawson		
Owner:	Jenny Poole		
Client:	Cotswold District Council		
Document Number:	1.2		

Revision History

Date of next revision:

Revision Date	Previous Revision Date	Summary of Changes	Changes Marked
9 June 16	26 May 16	Drafting	

Approvals

This document requires the following approvals. A signed copy should be placed in the project files.

Name	Signature	Title	Date of Issue	Version
Jenny Poole		Head of GOSS and S151 Officer, CDC	5 May 16	Draft 1

Distribution

This document has been distributed to the following Officers:

Name	Title	Date of Issue	Version

Executive Summary

Introduction

In 2011/2012 Cotswold District Council, West Oxfordshire District Council and Cheltenham Borough Council started to informally work together to collate and apply a more consistent approach to counter fraud work through the Internal Audit Partnership; Audit Cotswolds.

In 2013/2014, the government announced that Local Authority responsibility for the investigation of benefit fraud was to be transferred, with the counter fraud investigation staff, to the Department for Work and Pensions. A successful counter fraud pilot project was initiated through the Cheltenham partner targeting tenancy fraud with Cheltenham Borough Homes; an arm's-length management organisation (ALMO). This enabled the partner Council's to assess the effectiveness of specialist counter fraud staff within other enforcement areas and consider retaining the resource within the organisation.

In February 2015, building on this pilot work, Audit Cotswolds successfully bid for £403,000 funding from the Department of Communities and Local Government (DCLG) on behalf of the Local Authorities in Gloucestershire and West Oxfordshire District Council to accelerate the development of a dedicated Counter Fraud Unit (the unit) within the partner organisations.

The funding is a one off payment to enable the introduction of a Gloucestershire and West Oxfordshire Counter Fraud Unit that is able to use data matching to gather intelligence and skilled investigators to help counter all forms of fraud against the Councils and Social Housing Providers in the region.

The bid set out a phased approach. The unit's first objective was to counter fraud through better intelligence and enhanced proactive partnership working in Gloucestershire and West Oxfordshire District Council with the aspiration to create a 'Gloucestershire Hub'. It built on the existing three authority partnership and introduced other partners namely: Gloucestershire County, Forest of Dean, Stroud, Tewkesbury and Gloucester City Council, plus Cheltenham Borough Homes Ltd and in time other registered social landlords.

The second phase of the project links the Gloucestershire Hub to other Hubs (Oxfordshire) through data sharing activity.

This business case translates the DCLG funded project into a permanent service model that is fully self-sufficient whilst continuing to manage and utilise the DCLG fund to set up the unit.

The business case sets out the roles and responsibilities of the new service and the financial strategy to ensure it is sustainable. It reflects upon the most effective and efficient use of resources and necessary governance structure to ensure it continues to deliver on service objectives.

Feasibility studies have been undertaken in financial years 2015/16 and 2016/17 to show that the unit can expect to generate revenue and provide risk assurance. In addition, the unit has identified additional areas of savings and loss avoidance, thereby adding value for all partners. The work included such legal documentation as data sharing and access agreements that enabled the feasibility studies to be undertaken and investigations to be conducted legally.

The S151 Officers form a significant role in terms of the unit's objectives, rationale and financial strategy but they also have a responsibility in the enabling of counter fraud activity within their own organisations.

The Audit Committees, as the body charged with governance, at each of the partner Local Authorities will be required to ensure Member level engagement is achieved and be a means for reporting of counter fraud activity. This will enable the Committee to confidently sign the annual declaration for the External Auditor in support of the accounts. It also provides a route for the unit to publicise activity, benefits and outcomes such as savings achieved and prosecution results.

The Counter Fraud Unit requires data matching and sharing, along with partner collaboration, to occur in an effective and efficient manner. Therefore the business case covers operational and strategic elements.

The business case is designed to describe the delivery of a fully self-sufficient service that counters fraud in Gloucestershire and West Oxfordshire from April 2017. It also ensures that the unit can engage with similar counter fraud departments such as Oxford City and Birmingham City.

This business case argues that the benefits of a counter fraud unit outweigh the costs of setting up and operating the unit. This is evidenced within the results shown in the feasibility study section. In addition, the benefits are summarised within this document and this business case recommends a Counter Fraud Unit that is resourced and embedded into the host organisations. The unit will be capable of delivering a full range of counter fraud and error detection services.

The business case explores three possible options for a counter fraud function within the organisations detailing the services which could be provided, benefits and dis-benefits and financial implications. These options are;

Option 1 – The provision of the minimum statutory requirements with no dedicated Counter Fraud Unit.

Option 2 – Counter Fraud Unit for the provision of an enhanced service to four partner Councils.

Option 3 – Counter Fraud Unit for the provision of an enhanced service to Gloucestershire District Councils, West Oxfordshire District Council and Gloucestershire County Council with the ability to work for third party organisations such as Registered Social Landlords.

Project Rationale

The project was developed to reflect the changes to the counter fraud arrangements nationally in 2014 brought about by the creation of the Single Fraud Investigation Service (operated by the Department for Work and Pensions) which subsumed the Council's responsibilities for investigating Housing Benefit Fraud.

Cotswold District Council and Cheltenham Borough Council retained investigator resources under the direction of Internal Audit. The Counter Fraud Unit has been building the operational, legal and data matching requirements to deliver the project along with actual operational investigation of fraud.

The team have engaged with partners across the region building an understanding in relation to available resources, high risk areas and collaborative working. In July 2015 a Project Manager was recruited (2 days per week) to assist with project delivery across the multiple partners.

It was anticipated that the service would become a value adding unit that supports all enforcement sections including Revenues, Planning and Licensing. In addition, the team would tackle fraud with new intelligence/data matching software and react to referrals of fraud, whistleblowing and money laundering.

The project would use an evolutionary (literally) and holistic approach starting with a limited number of partners and grow as capabilities and line of business systems became available; leading to the development of intelligence led counter fraud capability that services contracts for third parties such as Registered Social Landlords and Housing Providers.

Finally, the project would lead to the development of agreements or memoranda of understandings with the Police, HM Revenue and Customs, the National Health Service and other enforcement agencies to aid in the early prevention and detection of fraud and savings to the public purse, for the benefit of the wider community.

National Picture

In 2011, the Cabinet Office Counter Fraud Taskforce issued a report on 'Illuminating Public Sector Fraud' which outlined four strategic priorities;

- Collaboration,
- Assessment of Risk,
- Prevention and
- Zero Tolerance.

"The scale of fraud against Local Government is extensive and hard to quantify with precision. Fraud costs UK public services an estimated £21 billion per year, of which £2.1 billion is the estimated cost to Local Government. A further £14 billion is lost to tax fraud and vehicle excise fraud and £1.9 billion to benefit and tax credit fraud. Reducing this is now a major priority across all areas of government." *Cabinet Office 2016*

The National Fraud Authority and the Audit Commission have closed. However fraudsters are becoming increasingly sophisticated. All public services organisations are more vulnerable than ever to criminal activity.

Although resources remain stretched, the reduction of fraud within the public sector is a priority and is reflected by the CIPFA Counter Fraud Centre which was launched in 2014 to lead and coordinate the fight against fraud and corruption across local and central government amongst other sectors. CIPFA are currently undertaking a national survey to gather and benchmark fraudulent activity within local government.

Digitisation of public services is increasing the opportunities for criminals, and counter fraud experts believe prevention is the best policy when tackling this.

Regional Picture and Local Impact of the Project

The National Policing Fraud Strategy 2015 recognised that the key role in the policing of fraud is played at the local level. Public Sector bodies do see Counter Fraud Units as a cost, but it is an investment in a much greater return.

The Local Government Counter Fraud and Corruption Strategy 2016–2019, supported by CIPFA, builds on the previous publications and provided the incentive for Local Authorities to shift their focus from benefit fraud to other areas that present high risk losses, to include those which arise unintentionally from national directives such as the Right to Buy legislation.

The project was focused on the four strategic objectives outlined above in the national picture; collaboration, risk assessment, prevention and zero tolerance. Further, the project sought to deliver this innovatively. Locally the 2020 Partnership, which is providing shared services across Cotswold District Council, Cheltenham Borough Council, Forest of Dean District Council and West Oxfordshire District Council and the Regulatory and Environmental Services Transformation project (Cheltenham Borough Council only) aim to improve efficiency. However it inevitably means the loss internally of resources to tackle other forms of misappropriation for which the Councils remain responsible. The unit can therefore seek to provide support and address this across all partners through collaboration and data sharing. Areas of fraud high risk across the region can be identified and a single solution applied to promote best practice and uniformity whilst remaining flexible in relation to individual requirements.

Proposed Outcomes

- Produce real and demonstrable savings for partners from intelligence based counter fraud activity.
- Pursue criminals with an effective, self-sufficient and robust fraud investigation team, which can operate locally with partners or with third parties and other public bodies.
- Continue to operate and adapt to any reorganisation, restructure or political change.
- Fight local fraud by matching datasets across all demographics.
- Fight regional fraud by legally exchanging data

Overarching Goals

- Detect abuse of public services.
- Be a self-financing unit.
- Prevent the public purse being abused.

Strategic Alignment to Organisational Objectives

A Counter Fraud Unit would support a number of drivers which are reflective of the challenges facing all of the project partners and addresses each one of these as follows:

- **Financial:** the need to respond to long-term financial pressures by assuring money is not lost through illegal fraudulent activity.
- **Efficiency:** the need to continue to find ways of delivering value for money by assessing risk, promoting best practice and adding value through loss avoidance.
- **Resilience:** each authority needs a wider pool of expertise and greater capacity to respond to events by retaining counter fraud specialists who can be both reactive and proactive in relation to criminal activity.
- **Impact:** more depth in strategic capacity is needed to support the drive towards service improvement and wider social and economic benefits by publicising a zero tolerance approach to abuse and misappropriation of public funds.
- **Democracy:** each authority needs to have sufficient resources to be able to exercise choice and community leadership so that it can champion local needs and priorities by identifying local high risk areas which can be proactively tackled.

Feasibility Studies

To evidence the financial aspect of the business case, the unit has undertaken corporate and strategic work for the partner Councils; Cotswold District Council, West Oxfordshire District Council and Cheltenham Borough Council. Proactive feasibility work has also been carried out for the partner authorities and third parties; Cheltenham Borough Homes and Tewkesbury Borough Council. The unit is also fully engaged with Gloucestershire County Council in relation to collaborative working. A summary of the areas of pilot work and the results are set out below.

Audit Partnership Work – Cotswold District Council, West Oxfordshire District Council and Cheltenham Borough Council

The unit has tried to illustrate the effectiveness of a centralised counter fraud unit with responsibility for counter fraud corporate strategy, policy drafting, centralised and uniform data collation, fraud awareness, specialist training and legislative updates and reactive planning to emerging threats.

- Legal framework for operation

Secondment Agreements (S113 Local Government Act 1972), for two Investigation Officers, drafted by the team and approval gained from legal representatives at Cotswold District Council, West Oxfordshire District Council and Cheltenham Borough Council.

One Internal Audit Officer mitigating the need for any additional legal documentation in relation to employment.

- Work April 2015 to date
 1. 2 internal referrals received in relation to alleged theft and corruption against the Council (not internal staff, external attempts). These are currently on-going.
 2. Referrals received via Internal Audit in relation to staff investigations where criminal offences are identified. Reports and recommendations are being referred to the appropriate Director at suitable intervals.
 3. Transparency data capture and general fraud data recording and reporting across all partners to ensure consistency and bench marking where appropriate.
 4. Training and Advice;
 - i. Internal employee investigation training provided to Internal Audit and Human Resources staff.
 - ii. Criminal Procedure and Investigations Act refresher and updates being provided across the County and West Oxfordshire for all Enforcement, Legal and Internal Audit members of staff.
 - iii. Regulation of Investigatory Powers Act; refresher and updates being planned and rolled out across the County for all Enforcement, Legal and Audit members of staff.

- iv. Proceeds of Crime Seminar planned with Barristers from Albion Chambers for all Enforcement, Legal and Audit members of staff across the County.
 - v. Member of the Gloucestershire Tenancy Fraud Forum promoting best practice and tenancy fraud work undertaken by the team. The work has been credited nationally at various conferences.
5. Policies;
- i. The drafting of a Counter Fraud and Anti-Corruption Policy and full approval process completed. The policy has been approved by all partner Audit Committees and adopted by Cabinet at all three authorities. Staff and Member awareness training to commence to include a fraud referral process.
 - ii. A new Regulation of Investigatory Powers Act policy has been drafted to cover new legislation in relation to staff obtaining Communications data; approval across the partnership has commenced. Following approval, training with Enforcement staff and Authorising Officers to commence.
 - iii. The team has been given responsibility for the Whistle Blowing Policy which needs to be redrafted for use by all partners.
 - iv. The unit is also reviewing Anti-Money Laundering and Proceeds of Crime Policies, Prosecution Policies and Regulation of Investigatory Powers Act (Surveillance) Policies across the partners.
6. The drafting and implementation of Fair Processing Notices and Statements to reflect legislative requirements and any future data matching.
7. The drafting and implementation of Lone Working protocols for Investigation Officers.

Overview of Cheltenham Borough Council results and significance

The unit undertook additional specific proactive work for Cheltenham Borough Council. It should be noted that Cotswold District Council and West Oxfordshire retained additional enforcement resource within the Revenues and Housing Support Department and as such the unit was not engaged within this area.

During the course of the year the unit was engaged in a publicised fraud case, working collaboratively with the Police and the Department for Work and Pensions. The defendants were handling fake currency and hoarding contraband tobacco. During the course of the investigation, the Council were asked to investigate allegations of benefit fraud. The defendants were recently sentenced and received custodial terms. In addition, the Court awarded a Proceeds of Crime Confiscation Order and the Council should receive compensation of approximately £21,000.

- Legal framework for operation

Two Investigation Officers conducted the work; both are directly employed by Cheltenham Borough Council therefore mitigating the need for any additional legal documentation in relation to employment and system access.

Provision of the required data sharing agreements to allow work on the Home-Seekers Housing Application List Review; this included the drafting of the agreements, legal approval and required signatures / consent from the affected system administrators.

- Work April 2015 to date
 1. Single point of contact role for Department of Work and Pensions liaison following the transfer of Benefit Fraud Investigation to the Single Fraud Investigation Service.
 2. Council Tax Reduction Scheme; criminal investigation, interview under caution and appropriate sanction/prosecution action on behalf of the Revenues and Benefits Section.
 3. Home-Seekers Housing Application List Review on behalf of Housing Options Team (Cheltenham Borough Homes). The team undertook an exercise to verify the application details and confirm that the criteria had been met for the relevant band in to which the application had been placed.
 4. A sample Single Person Discount Review was undertaken on behalf of the Revenues Department. 50 cases were subjected to more robust verification.
 5. Service of court documentation on behalf of Housing Benefit debt recovery.
 6. Sample of absconded debtors passed to the team to be traced prior to debt write off.

- Results
 1. 141 Housing Benefit and Council Tax Reduction Scheme referrals received, 83 referred on to the Department for Work and Pensions, 4 referred on to Housing Provider/Registered Social Landlord and 34 cases opened for investigation by the team. 20 referrals were rejected.
 2. Of the 34 cases investigated by the team;
 - i) Overpayments identified totalling £16,738 to be recovered.
 - ii) 4 individuals prosecuted and sentenced; 1 prosecution listed for trial.
 - iii) 2 Administrative Penalties applied totalling £796 to be recovered.
 - iv) 2 Formal Cautions given.
 3. The housing list review resulted in 51 cancelled applications (7 Gold Band and 44 Silver Band) representing £918,000 in loss avoidance. Each cancelled application represents a property which can be reallocated to another eligible family. For each reallocation, a figure of £18,000 per annum can be identified as a loss avoidance figure because there is no need for temporary accommodation to be utilised. £18,000 is the Audit Commission figure for the average annual cost to a Local Authority when housing a family in temporary accommodation. In addition 56 applications have been downgraded to Bronze band. The result of this reprioritisation is that those families who are correctly banded have a greater chance of being housed and more speedily.
 4. Discounts were removed retrospectively and for the financial year 2016/2017. The investigation of only 50 cases generated £37,000 in additional Council Tax liability. It should be noted that the major beneficiary of this will be the County Council who receive the majority of the revenue collected. Council Tax Penalties were not administered. However, had they been applied at the legislative value of £70 then approximately £3,000 would have been generated for collection and for retention and use by the Local Authority alone.
 5. Debt Recovery:
 - i. £634 paid in full.

- ii. £870 paid, arrangement agreed for outstanding £300.
 - iii. £906, arrangement agreed and £211 paid to date.
 - iv. £1858, arrangement of £40 per month agreed.
 - 6. 24 cases passed for investigative trace. Utilising only free consent data checks, further contact/residency information identified in 18 cases.
- Review
 - 1. On-going liaison with the Benefit Section Manager and the Single Fraud Investigation Service, Department for Work and Pensions.
 - 2. On-going liaison with the Benefit Section Manager. Proactive work can be undertaken if needed.
 - 3. The team have prepared a detailed report evaluating the housing list review to include recommendations regarding future processes and system reviews. We are awaiting updates and further instruction from Cheltenham Borough Homes.
 - 4. The team have prepared a report reviewing the Council Tax discount work to include recommendations regarding future processes and system reviews. We are awaiting updates and instruction in relation to further discount and/or exemption fraud drives.
 - 5. On-going instructions received from the Benefit Team.
 - 6. Recommendations made to the Accounts Receivable Team within GO Shared Services that the team consider results and future collaboration.

Overview of Cheltenham Borough Homes results and significance

- Legal framework for operation

Two Investigation Officers conducted the work; both are directly employed by Cheltenham Borough Council therefore mitigating the need for any additional legal documentation in relation to employment and system access. Any investigations undertaken were in relation to properties owned by Cheltenham Borough Council only.

- Work September 2014 to date

In addition to the details below, the housing list review on behalf of Cheltenham Borough Council was conducted and the review report is with Cheltenham Borough Homes.

1. Tenancy Fraud investigation work has been on-going for approximately 18 months and the team received 23 referrals from varying sources during the period (Cheltenham Borough Homes staff, anonymous informants, One Legal, Housing Benefit Team, Police and other internal systems).
2. National Anti-Fraud Network Membership – introduction to the not for profit organisation which provides data and intelligence to system users.
3. Fraud Referral Process – drafting of a generic referral form and mechanism for referral with agreed key decision points for investigation and interview under caution and to proceed to prosecute.
4. Reporting plan; content and frequency to include Audit and Risk Committee reports and presentation.

- Results

1. 5 cases referred for prosecution (details below) and a further 8 properties withdrawn or recovered back in to the housing stock. There are 9 open cases currently under investigation.
 - i) 1 prosecution for Right to Buy Fraud – the sale of the 4 bedroom property was prevented, the property recovered and returned to the housing stock. The individual concerned received a 16 week suspended sentence, 200 hours community service order and was ordered to pay £200 costs.
 - ii) 1 prosecution for application fraud – the property was recovered and returned to the housing stock. The individual concerned received a 100 hours community service order and was ordered to pay costs of £700.
 - iii) 1 prosecution for application fraud – the individual was removed from the housing list and received a £200 fine and was ordered to pay £170 costs.
 - iv) 1 prosecution for Right to Buy Fraud listed for trial in July 2016.
 - v) 1 prosecution for application fraud referred for trial and subsequently withdrawn due to inadequate data capture processes.

As detailed previously, each recovered property represents a loss avoidance figure of £18,000. Additionally where the sale of a property through the Right to Buy scheme is prevented the Audit Commission stated that a loss avoidance figure of £150,000 should be reported, representing the average rebuild cost. The work undertaken in this area therefore represents a loss avoidance figure of £444,000.

2. System use for trace and debt recovery work.
3. Referral mechanism in use.
4. Awaiting decision in relation to Senior Management reports and frequency. Agreement in relation to Audit and Risk Committee plan received.

- Review

Reports have been written and submitted for consideration in relation to the following:

- i) Risks – highlighting the impact of Universal Credit, Housing Benefit regulation changes, Right to Buy criteria changes, the introduction of the 1% rent reduction for social landlords and the compulsory pay to stay scheme.
- ii) Strategy – highlighting areas in which the counter fraud team can add value to include use of the Prevention of Social Housing Fraud (Power to Require Information) (England) Regulations 2014, targeted fraud drives and proactive work within high risk areas, Right to Buy verification checks and home-seeker verification checks.
- iii) Assistance with Policy review, drafting and implementation to include training in relation to Counter Fraud, Bribery and Corruption, Whistleblowing, Use of Social Media for intelligence gathering and Lone Working.
- iv) Consideration in relation to internal investigations where fraud is alleged.

Overview of Tewkesbury Borough Council results and significance

- Legal framework for operation

Secondment Agreements (S113 Local Government Act 1972), for two Investigation Officers, drafted by the team and approval gained from legal representatives at Tewkesbury Borough Council and Cheltenham Borough Council.

Provision of the required data sharing agreements to allow work on the Home-Seekers Housing Application List Review; this included the drafting of the agreements, legal approval and required signatures / consent from the affected system administrators.

- Work October 2015 to date

1. Home-Seekers Housing Application List Review on behalf of Housing Options Team. The team undertook an exercise to verify the application details and confirm that the criteria had been met for the relevant band in to which the application had been placed.
2. A Single Person Discount review has been undertaken by Tewkesbury Borough Council. The team are carrying out more robust checks on the replies received on behalf of the Revenues Department.
3. Engagement with Internal Audit in relation to the adoption of Policies and fraud referral mechanism to ensure consistency across the partnership.
4. Reporting plan; content and frequency to include Audit Committee reports and presentation.

- Results (Figures pending, both exercises commenced March 2016)

1. The housing list review has identified 150 applications that appear to have been banded incorrectly or are ineligible. The cases have been referred to the Housing Options Team for review. Currently there have been 3 cancelled applications (all Gold Band) representing £54,000 in loss avoidance. In addition 2 applications have been downgraded to a lesser band.
2. Approximately 60 responses have been received to date. The team have requested further information in each case.
3. Legal agreement received in relation to the adoption of the Counter Fraud and Anti-Corruption policy.
4. To be advised, updates to be presented to Chief Finance Officer and Internal Audit. Attendance at Audit Committee agreed if necessary.

Overview of Gloucestershire County Council results and significance

- Legal framework for operation

The team have undertaken the drafting of Secondment Agreements (S113 Local Government Act 1972), for two Investigation Officers. Legal representatives at Gloucestershire County Council and Cheltenham Borough Council have given final approval in relation to costs. However, final approval is pending in relation to the inclusion of an insurance indemnity clause. Following joint approval, the secondment agreements can be signed and operational work can be commenced.

- Work September 2015 to date

Pending the secondment approval, meetings have been held with Head of Audit, Risk Assurance and Insurance Services and key team members. Collaboration and work plan agreed to include the following:

1. The provision of assistance with internal investigations being investigated and prosecuted by the County Council not the Police and the Crown Prosecution Service.
2. A generic document pack for criminal investigation, interview under caution and internal prosecution.
3. Joint referral and joint reporting mechanisms in relation to fraud allegations and results.
4. District reporting to the County Council in relation to loss avoidance and revenue generation.

Business Options

The executive summary sets out the background and the rationale which supports the need for a Counter Fraud Unit functioning within Local Authorities.

The feasibility studies confirm that a Counter Fraud Unit can generate income, assist in relation to risk assurance, control and management, prevent loss and provide specialist investigation skills.

Each Local Authority has a duty to protect the public purse and there are options in relation to how this is undertaken. The Section 151 Officer has a statutory responsibility to ensure proper arrangements for the Council's financial affairs. This is detailed in full within the Counter Fraud and Anti-Corruption Policy recently adopted by the Councils.

The options are set out below.

Option 1 – Minimum statutory requirement

The provision of the minimum requirement means that full responsibility for counter fraud rests with each individual Council. There will be no resource for collaborative working and any costs and efficiencies will not be shared.

Any existing counter fraud staff will become obsolete and/or redundant however the Local Authority will need to resource a post within the Benefit Section for the liaison between the Council and the Department for Work and Pensions.

Taking this option is likely to result in the following

- Fraud activity within Local Authority may not be detected or managed as thoroughly.
- Mechanisms for reporting and recording fraud data may be inconsistent and dispersed throughout the Council becoming labour intensive.
- The remainder of the DCLG grant may be returned to source.

Benefits

- Full local control of counter fraud resources and activities within district, borough or city boundaries.
- Minimum overheads and expense.
- The possible reallocation of the remaining DCLG grant monies across the appropriate partners (if allowable under the provisions of the grant).

Dis-benefits

- The potential to not meet statutory requirements exposing the Council to risk and financial loss.
- No ability for expansion or innovation to generate income.
- Additional pressure on Internal Audit and Human Resources staff to react to and manage fraud activity and risk.
- No scales of economy.
- No capacity for collaborative working.
- The loss of specialist investigative skills in relation to criminal offences.

- The potential return of the remaining DCLG grant monies, £300,000, if it is not utilised for the purpose for which it was granted.
- A loss of confidence from the public due to a lack of overt counter fraud activity.
- The responsibility for the Department for Work and Pensions single point of contact remains within the Benefit Section to include the cost of recruitment, training and any related overheads.
- A loss of investment and return on the project to date.
- Loss of expertise for relevant policy and procedure drafting and implementation.

Staff Requirements

- One part time member of staff (approximately 16 hours per week) in an administrative role within the Benefit Section to undertake the statutory single point of contact role for the Department for Work and Pensions.

Governance and Legal Requirements

- Local arrangements for staff management.
- Local arrangements for the capture and return of statutory data; transparency, annual audit returns, Regulation of Investigatory Powers Act reporting etcetera.

Financial Implications

- Potential loss of DCLG grant monies (approximately £300,000).
- Cost of staff redundancy for two members of staff at Cheltenham Borough Council (approximately £16,000).
- Cost of Benefit Section member of staff for single of point of contact role. The cost is outside of the bid but within existing budgets (approximately £15,000 per Local Authority subsidised by the Department for Work and Pensions Administration Grant which is in the region of £2,000 per annum).
- No resource provision within the unit.
- Loss of potential revenue and savings (unquantifiable).

-

Option 2 – Counter Fraud Unit for four partners only – Enhanced Service

A small Counter Fraud Unit which can service four partner authorities. The partners could delegate statutory counter fraud duties to the unit thus facilitating the capture and reporting of legislative fraud data.

There is a limited capacity for collaborative working across the agreed partners who would share costs and resources to include the procurement of data warehouse software and a case management system.

Services Provided

- Proactive fraud drives in relation to Council Tax discounts and exemptions to generate revenue through liability and penalties.
- Data matching of internal data sets for fraud and error.
- Provision of the single point of contact for the Department for Work and Pensions Housing Benefit work.
- Council Tax Reduction Scheme investigation, interview and sanction or prosecution (currently not undertaken at Forest of Dean).
- Housing List review in relation to allocation and where appropriate, investigation, interview, sanction or prosecution.
- Right to buy application investigation and verification; where appropriate interview, sanction or prosecution (Local Authority owned property therefore Cheltenham Borough Council only).
- Tenancy fraud investigation, interview, sanction or prosecution (Local Authority owned property therefore Cheltenham Borough Council only).
- Internal employee investigation in relation to criminal offences.
- Drafting and implementation of related policy and procedure.
- Collection and reporting of fraud related statistics and data.
- Staff and Member awareness training.
- Partner wide counter fraud related work where resource allows e.g. Contract and Procurement Fraud or Grant abuse etcetera.

Benefits

- Full local control of counter fraud resources and activities within the partner district and borough boundaries.
- Shared staff overheads and expenses.
- Statutory requirements met limiting the Council's exposure to risk and financial loss.
- Reduced pressure on Internal Audit and Human Resources staff to react to and manage fraud activity and risk.
- Some economies of scale achieved.
- Introduction of enforcement in relation to Council Tax Reduction Scheme at Forest of Dean.
- Some collaborative working.
- Specialist investigative skills in relation to criminal offences are retained.
- Utilisation of the remaining DCLG grant.
- Increased awareness and confidence from the public due to some counter fraud activity.

- The responsibility for the Department for Work and Pensions single point of contact could be provided entirely by the unit rather than each partner therefore reducing the cost of recruitment, training and any related overheads.
- A continued return on the investment in the project to date.
- The retention of expertise for relevant policy and procedure drafting and implementation.

Dis-benefits

- Cost of staff overheads and expense.
- Collaboration within only partner Councils.
- Limited to no ability for expansion of the service to include other Local Authorities within the region or Gloucestershire County Council through delegation of duty secondment agreements to provide an additional income stream.
- No ability for innovative working to secure service and goods contracts with third parties to include Registered Social Landlords and Housing Associations to provide an additional income stream.
- Limited to no capacity to pursue any discussion or implementation in respect of joint working with other public bodies such as the Gloucestershire Constabulary, HM Revenue and Customs or the National Health Service.
- Limited resource for extraordinary investigations within the partner authorities.
- Due to limited staff resource there will be no additional capacity to react to emerging fraud trends.
- Due to the constraint of only working for the partner authorities, there is a risk that the unit is not robust and unable to adapt to changes in the political and business climate.

Staff Requirements

- Three full time Counter Fraud Investigators (to include Team Leader).
- One part time member of staff (approximately 16 hours per week) in an administrative role.
- One part time member of staff (approximately 16 hours per week) as a data analyst / ICT resource for the operation of the data warehouse software.

Governance and Legal Requirements

The governance and reporting arrangement for this team would be via partner Corporate Management / Senior Leadership Teams, and either the 2020 joint committee or via individual partner Committees as appropriate.

It is recommended that Cotswold District Council would be the employing authority for reasons of project continuity, knowledge and budget situation. Officers may undertake work via S113 Secondment Agreements delegating the necessary functions. Officers must be Local Authority employees to ensure that their statutory powers remain intact.

Group Manager – Head of GOSS and S151 Officer for Cotswold District Council / Head of Internal Audit

- Sets the medium term strategy for the unit and directly manages team leader.
- Represents unit at Senior Management Meetings.
- Strategic point of contact for the S151 Officers of partner Council's.

Responsible Manager – Counter Fraud Unit Team Leader

- Represents unit for reporting and negotiations at all levels.
- Responsible for the day to day management of the team.

- Responsible for legislative compliance of operations.
- Responsible for plan based work scheme across the four partners.
- Responsible for policy and procedural drafting, implementation and training.

Senior Counter Fraud Investigation Officers / Investigation Officers

- Investigation of alleged criminal offences across the partnership.
- Interviews under caution and case preparation for appropriate sanction and prosecution.
- Witness Statement preparation and Court attendance.
- Proactive fraud drives across the partnership.

Administrative Support Role

- Responsible for the collation of team results and statistics.
- Case preparation and set up.
- General administration.
- Single point of contact work for the Department for Work and Pensions.

Data Analyst / ICT Support Role (within ICT, financial contribution made)

- Collection of data sets from across the partnership.
- Collation of data sets within the data warehouse.
- Operation and maintenance of data warehouse and case management systems.

Financial Implications

- Potential loss or redistribution of some DCLG grant monies as not utilised fully across the County and West Oxfordshire in accordance with the original bid (unknown).
- Loss of third party revenue and savings (unquantifiable).
- Cost of current overheads including management, part time administrative support and part time data analyst (approximately £106,000).
- Cost of operational staff 2 Investigation Officers (approximately £60,000).
- One off cost of data warehouse and case management software to be met by DCLG fund (£100,000 maximum).
- Annual costs of data warehouse maintenance and support (£10,000 maximum).
- Saving in relation to Single Point of Contact roles across the partnership (approximately £15,000 per Local Authority totalling £60,000). This is an existing resource and may reflect a saving or be used to fund the unit.
- Income Cheltenham Borough Homes (£16,500).
- Partnership Contribution per authority for 70 days per annum (£24,875 maximum plus SPOC role).
- Use of DCLG grant monies to support the set-up of the team and to subsidise partner contribution for the first four years (£40,000 reducing by £10,000 per annum).
- Cost of an exit strategy should the unit be disbanded to be shared across the partner authorities.

Potential Income

- Feasibility Study Income CTRS Overpayments (£16,737 x 4) £67,000.
- Feasibility Study Income Administrative Penalties (£796 x 4) £3,200.
- Feasibility Study CTAX Revenue Generation (£40,000 x 4) £160,000.

Potential Loss Avoidance

- Feasibility Study Loss Avoidance Housing List Review (£918,000 x 4) £3,672,000.
- Feasibility Study Loss Avoidance Tenancy Fraud Work Recovered Property £144,000.
- Feasibility Study Loss Avoidance Right to Buy £300,000.

Option 2 – Counter Fraud Unit for four partners only – Enhanced Service

	Base	Year 1	Year 2	Year 3	Year 4
	(£)	(£)	(£)	(£)	(£)
Overheads	106,000				
Operational Costs	60,000				
Data Warehouse	10,000				
Total Costs	176,000				
CBH income	(16,500)				
Fixed Partner Contribution (4 x £15,000)	(60,000)				
Total Income	(76,500)				
Net Cost of CFU Option 2	99,500	99,500	99,500	99,500	99,500
Partner Contribution (70 days)	£24,875				
Option to draw-down from DCLG Fund		(40,000)	(30,000)	(20,000)	(10,000)
Net Cost of CFU Option 2		59,500	69,500	79,500	89,500
Partner Contribution (70 days)		£14,875	£17,375	£19,875	£22,375

Experience of income generation and loss avoidance (per Partner):

	(£)
Income Generation	57,550
Loss Avoidance	1,029,000

N.B. Potential loss of some DCLG Grant monies and no third party income

Option 3 – Counter Fraud Unit for Gloucestershire and West Oxfordshire District Council – Enhanced and Flexible Service with ability for third party work (Recommended)

A Counter Fraud Unit with the ability to expand, recruit and develop which can service the four partner authorities and the wider Gloucestershire region to include the County Council, other district authorities and third party organisations such as Registered Social Landlords.

This allows the delegation of statutory counter fraud duties to the unit, facilitating the capture and reporting of legislative fraud data for a wider demographic.

There is an unlimited capacity for collaborative working and shared costs and resources to include the procurement of data warehouse software and a case management system for multiple users and organisations.

Services Provided

- Proactive fraud drives in relation to Council Tax discounts and exemptions to generate revenue through liability and penalties to include the three additional Local Authorities.
- Proactive work in relation to National Non Domestic Rates to increase revenue in preparation for full retention in 2020.
- Assistance in relation to the National Fraud Initiative (centralised point of contact undertaking reviews and sifting of the matches where necessary) across the partner Councils.
- Data matching of internal and external data sets for fraud and error across the region and beyond; Oxfordshire, Worcestershire et cetera.
- Provision of the single point of contact for the Department for Work and Pensions Housing Benefit work to include the three additional Local Authorities if required.
- Council Tax Reduction Scheme investigation, interview and sanction or prosecution (currently not undertaken at Forest of Dean) to include the three additional Local Authorities.
- Housing List review in relation to allocation and where appropriate, investigation, interview, sanction or prosecution to include the three additional Local Authorities.
- Right to buy application investigation and verification; where appropriate interview, sanction or prosecution. This function can be undertaken for Local Authority owned property therefore Cheltenham Borough Council and Stroud District Council and in addition by way of goods and services contracts for Registered Social Landlords.
- Tenancy fraud investigation, interview, sanction or prosecution Local Authority owned property therefore Cheltenham Borough Council and Stroud District Council and in addition by way of goods and services contracts for Registered Social Landlords.
- Internal employee investigation in relation to criminal offences across the region to include Gloucestershire County Council.
- Drafting and implementation of related policy and procedure across the region to promote efficiency, continuity and collaborative working.
- Collection and reporting of fraud related statistics and data across the region for benchmarking and publication.

- Staff and Member awareness training across the region to promote efficiency, continuity and collaborative working.
- Region wide counter fraud related work e.g. Contract and Procurement Fraud or Grant abuse etcetera to include the necessary recruitment of staff.
- Expansion of collaboration with the County Council in relation to public services provided to include blue badge abuse, school admission abuse, misuse of social care funding etcetera.
- Third party contractual work for academies, housing providers and other public bodies.
- Implementation of ISO 27001 to provide assurance that data held is secure accessed only for counter fraud purposes.

Benefits

- Ability to comply fully with summary of drivers.
- Full local control of counter fraud resources and activities within the partner district boundaries and the attached region.
- Shared staff overheads and expenses.
- Statutory requirements met limiting the Council's exposure to risk and financial loss.
- Reduced pressure on Internal Audit and Human Resources staff to react to and manage fraud activity and risk on an increased scale.
- Increased economies of scale achieved.
- Introduction of enforcement in relation to Council Tax Reduction Scheme at Forest of Dean District Council, Stroud District Council and Gloucester City Council.
- Extensive collaborative working.
- Specialist investigative skills in relation to criminal offences are retained.
- Utilisation of the remaining DCLG grant.
- Increased awareness and confidence from the public due to a zero tolerance approach to the misuse and fraudulent abuse of public funds across the region.
- The responsibility for the Department for Work and Pensions single point of contact could be provided entirely by the unit rather than each partner therefore reducing the cost of recruitment, training and any related overheads, extended across the region.
- A continued return on the investment in the project to date.
- The retention of expertise for relevant policy and procedure drafting and implementation.
- Easier to expand the service to include other Local Authorities within the region or Gloucestershire County Council through delegation of duty secondment agreements to provide an additional income stream.
- Easier to innovatively work to secure service and goods contracts / ability to trade with third parties to include Registered Social Landlords and Housing Associations to provide an additional income stream.
- Increased capacity to pursue any discussion or implementation in respect of joint working with other public bodies such as the Gloucestershire Constabulary, HM Revenue and Customs or the National Health Service.
- Resource for extraordinary investigations within the partner authorities.
- Additional capacity to react to emerging fraud trends.
- A robust unit which is flexible and adaptable and which can respond effectively to business changes, devolution, unitary or other political changes.

Dis-benefits

- Cost of staff overheads and expense.

- Risk exposure for staff who are lone working across a large region and management of safety and whereabouts
- Short term impact on partner support services (ICT, Legal and Human Resources) for unit set up.
- Complexity of the management of staffing over a large region.
- Management of work delivery over a significant remit.

Staff Requirements

- Scalable number of Counter Fraud Investigators (to include Team Leaders); the model is based on 8 FTE staff.
- One full time member of staff in an administrative role.
- One full time member of staff as a data analyst / ICT resource for the operation of the data warehouse software.

Governance and Legal Requirements

The governance and reporting arrangement for this team would be via partner Corporate Management / Senior Leadership Teams, and either the 2020 joint committee or via individual partner Committees as appropriate. It is also recommended that a Client Officer Group (all S151 Officers) receive updates and assurance at agreed intervals and provide appropriate governance.

It is recommended that Cotswold District Council would be the employing authority for reasons of project continuity, knowledge and budget situation. Officers may undertake work via S113 Secondment Agreements delegating the necessary functions. Officers must be Local Authority employees to ensure that their statutory powers remain intact.

Goods and services contracts with appropriate professional indemnity insurance may be used to undertake work for third parties. In time services may be provided through the medium of a Local Authority trading company.

Group Manager – Head of GOSS and S151 Officer for Cotswold District Council / Head of Internal Audit

- Sets the medium term strategy for the unit and directly manages team leader.
- Represents unit at Senior Management Meetings.
- Strategic point of contact for the S151 Officers and other clients.

Responsible Manager – Counter Fraud Unit Team Leader

- Represents unit for reporting and negotiations at all levels.
- Responsible for the day to day management of the team.
- Responsible for legislative compliance of operations.
- Responsible for plan based work scheme across the partners.
- Responsible for policy and procedural drafting, implementation and training.

Senior Counter Fraud Investigation Officers / Investigation Officers

- Investigation of alleged criminal offences across the partnership.
- Interviews under caution and case preparation for appropriate sanction and prosecution.
- Witness Statement preparation and Court attendance.
- Proactive fraud drives across the partnership.

Administrative Support Role

- Responsible for the collation of team results and statistics.
- Case preparation and set up.

- General administration.
- Single point of contact work for the Department for Work and Pensions.

Data Analyst / ICT Support Role (within ICT, financial contribution made)

- Collection of data sets from across the partnership.
- Collation of data sets within the data warehouse.
- Operation and maintenance of data warehouse and case management systems.

Financial Implications

- Full retention of DCLG grant monies (£300,000).
- Third party revenue RSL Contribution (£99,000).
- Cost of current overheads including management, full time administrative support and full time data analyst (approximately £160,000).
- Cost of operational staff 8 Investigation Officers (approximately £240,000).
- One off cost of data warehouse and case management software (£100,000 maximum).
- Annual costs of data warehouse maintenance and support (£10,000 maximum).
- Saving in relation to Single Point of Contact roles across the partnership and extended region (approximately £15,000 per Local Authority totalling £105,000) This is an existing resource and may reflect a saving or be used to fund the unit.
- Income from third party; Cheltenham Borough Homes (£16,500).
- Possible contribution from Stroud District Council in relation to tenancy fraud work (£16,500).
- Partnership contribution per authority for 210 days per annum (£34,000 maximum plus SPOC role) to reduce with inclusion of third party income
- Use of DCLG grant monies to support the set-up of the team and to subsidise partner contribution for the first four years (40,000 reducing by £10,000 per annum).
- Cost of an exit strategy should the unit be disbanded to be shared across the partner authorities).

Potential Income

- Feasibility Study Income CTRS Overpayments (£16,737 x 7) £117,159.
- Feasibility Study Income Administrative Penalties (£796 x 7) £5,572.
- Feasibility Study CTAX Revenue Generation (£40,000 x 7) £280,000.

Potential Loss Avoidance

- Feasibility Study Loss Avoidance Housing List Review (£918,000 x 7) £6,426,000.
- Feasibility Study Loss Avoidance Right to Buy (Stroud and Cheltenham) £600,000.
- Feasibility Study Loss Avoidance Tenancy Fraud Work Recovered Property (Stroud and Cheltenham) £288,000.

Option 3 – Counter Fraud Unit for Gloucestershire and 2020 Partnership –
Recommended

	Base (£)	Base + Bid (£)	Year 1 (£)	Year 2 (£)	Year 3 (£)	Year 4 (£)
Overheads	160,000					
Operational Costs	240,000					
Data Warehouse	10,000					
Total Costs	410,000					
Cheltenham Borough Homes	(16,500)					
Stroud District Council	(16,500)					
Fixed Partner Contribution (7 x £15,000)	(105,000)					
Total Income	(138,000)					
Net Cost of CFU Option 3	272,000	272,000	272,000	272,000	272,000	272,000
Partner Contribution (210 days)	£34,000					
Potential RSL Contributions (6 as per Bid)		(99,000)	(99,000)	(99,000)	(99,000)	(99,000)
Option to draw-down from DCLG Fund			(40,000)	(30,000)	(20,000)	(10,000)
Net Cost of CFU Option 3		173,000	133,000	143,000	153,000	163,000
Partner Contribution (210 days)		£21,625	£16,625	£17,875	£19,125	£20,375

Experience of income generation and loss avoidance (per Partner):

	(£)
Income Generation	57,550
Loss Avoidance	1,045,000

N.B. There is the potential to increase third party income.

Justification of Option 3

Key Benefits

Benefit and Value	Description	How Measured	Business change required	Value
Ability to comply with summary of drivers and ability to trade.	Financial savings, efficiency, resilience, impact and democracy. Revenue and income through collaboration and innovation.	Success of feasibility work with 2020 partners, Cheltenham Borough Homes, Tewkesbury Borough Council and Gloucestershire County Council.	Continued partner engagement and implementation of legal agreements (already drafted and approved).	Income and revenue generation through trade.
Ability to expand and be robust.	Recruitment where resource is required. Continued delivery regardless of business or political change.	As required and managed according to need.	As above and recruitment.	Adaptable and resilient partner resource.
Exceeds statutory requirement thereby mitigating risk exposure to Local Authorities in their duty to prevent fraud.	Requirement mandated by government that authorities accountable for public funds should protect those funds from abuse. Provision of fraud function above the statutory duty.	Assessment of statutory criteria against services delivered. Benchmarking and collective reporting.	Agreement for the provision of service for remuneration where appropriate.	Reduced overheads and shared expenses in relation to management and services.
Unit is cost neutral	Unit operates to cover costs and overheads derived from planned work.	Unit budget reporting.	Approval of unit and continued pursuit of partners and work streams.	No cost to benefitting partners.

Counter fraud and anti-corruption culture across the region	Common policies and procedures. Staff and Member awareness training. Publicity and public awareness.	Quantity of Councils adopting the same.	Councils to adopt policy and cultural changes where required.	Public perception and region continuity resulting in large scale fraud deterrence.
Increased fraud reporting and detection.	A year on year increase of fraud results and monitoring to measure against the national picture.	Consistency across the region in relation to data capture for comparison.	Fraud reporting methods put in place and maintained: - 1) Email group mail box 2) Fraud hotline advertised 3) Posters in staff areas 4) Intranet pages 5) Training 6)Data capture and publication	Identification of high risk areas leading to swift preventative action and control. National recognition and standards.
Retention of specialist skills.	Specialist Counter Fraud staff trained to undertake criminal investigations.	Vast experience.	Retention and recruitment.	Resource to undertake criminal investigations rather than contracting third party providers. Sharing of knowledge through specific training.

Project Milestones

Milestone	Due Date	RAG	Owner
Secure legal basis for operations	31/03/2016	Green	EC
Complete personal protective equipment	31/05/2016	Amber	EC
Interim resourcing complete	30/06/2016	Green	JP
Data sharing with initial authorities	01/04/2016	Green	IC
Anti-fraud and corruption policy	01/05/2016	Green	EC
Gate review of Business case	26/05/2016	Green	AL, JP
Data sharing agreement within 2020	01/05/2016	Green	IC
CFO's consider business case	09/06/2016	Green	JP
Senior Management consider business case		Green	CFOs
Period of Business Case consultation (Audit Committees / Joint Committee, Cabinet and Full Council where appropriate)	28/02/2017	Green	EC, JP/CFO's
Partner council approval	28/02/2017	Green	CFO's
Compliance with political process and formal decision making in relation to unit approval	28/02/2017	Green	EC, JP/CFO's
Case management system ready	TBC		AL
Data warehouse system ready	TBC		AL

Major Risks

The following risks were evaluated and scored at the last project board which sat on the 26th April 2016.

This risk register is based on the 5 x 5 scoring model.

Risk description	Risk Owner	Date raised	I	L	Sc	Control	mI	mL	mS
If the CFU does not generate enough income to sustain operations then the unit will be downsized or deleted.	Jenny Poole	Jul-16	5	4	20	1) Actively seek new partners 2) Gather evidence for operational activity	5	3	15
If continued pressure of work is maintained due to 2020 program then GO, IT and other service providers will not be able to service CFU project needs at critical times leading to delay.	Jenny Poole	Feb-16	4	4	16	1) Good communications with service providers to understand work load 2) Feed into business planning process.	4	3	12
If the project will not gain the support from the CFO's stakeholders then the project will be closed.	Jenny Poole	Feb-16	5	3	15	1) Demonstrate success feasibility operations 2) Develop business case	5	2	10
If the unit becomes oversubscribed with work then there could be a failure in capacity to deliver	Jenny Poole	Jan-15	4	3	12	Mitigate through proactive recruitment	4	2	8
The contract for Data warehouse and Case management system will be longer than the current life of the project, there is a risk that the project will be cancelled and leave this contract in force with nobody to use it	Jenny Poole	Dec-15	2	5	10	Tolerate	2	5	10

COUNTER FRAUD UNIT**Option 2****4 Partners**

	Base	Year 1	Year 2	Year 3	Year 4
	£				
2 Investigators	70,000				
Strategic Lead	10,000				
CFU Team Leader	47,000				
Part Time Data Analyst	24,000				
Part Time Admin Support	15,000				
Supplies and Services	10,000				
Support Services - GOSS & Legal	10,000				
Data Warehouse Annual Maintenance	10,000				
SPOC Resource for all partners	30,000				
Overheads	156,000				
Total Cost	226,000	226,000	226,000	226,000	226,000

Fixed Contributions:

Partnership Contribution to SPOC	(30,000)	(30,000)	(30,000)	(30,000)
Partnership Contribution to fixed overheads	(126,000)	(126,000)	(126,000)	(126,000)
	(156,000)	(156,000)	(156,000)	(156,000)

Draw down DCLG funding	(40,000)	(30,000)	(20,000)	(10,000)
Partners Contribution to Fixed Overheads	(116,000)	(126,000)	(136,000)	(146,000)

Partner Contribution for Investigation Work

CBH	(16,500)	(16,500)	(16,500)	(16,500)
Partnership Authorities	(53,500)	(53,500)	(53,500)	(53,500)
	(70,000)	(70,000)	(70,000)	(70,000)

Net Surplus/Deficit on Unit	0	0	0	0
------------------------------------	----------	----------	----------	----------

Net Contribution per Authority for fixed overheads and 70 days of Investigation work

	42,375	44,875	47,375	49,875
Fixed Overheads per Authority	21,500	24,000	26,500	29,000
SPOC per Authority	7,500	7,500	7,500	7,500
Investigation Officer Costs - 70 days	13,375	13,375	13,375	13,375
	42,375	44,875	47,375	49,875

Option 3**8 Partners**

	Base	Year 1	Year 2	Year 3	Year 4
	£				
8 Investigators	280,000				
Strategic Lead	10,000				
CFU Team Leader	47,000				
Full Time Data Analyst	50,000				
Full Time Admin Support	30,000				
Supplies and Services	20,000				
Support Services - GOSS & Legal	10,000				
Data Warehouse Annual Maintenance	10,000				
SPOC Resource for all partners	30,000				
Overheads	207,000				
Total Costs	487,000	487,000	487,000	487,000	487,000

Fixed Contributions:

Partnership Contribution to SPOC	(30,000)	(30,000)	(30,000)	(30,000)
Partnership Contribution to fixed overheads	(177,000)	(177,000)	(177,000)	(177,000)
	(207,000)	(207,000)	(207,000)	(207,000)

Draw down DCLG funding	(40,000)	(30,000)	(20,000)	(10,000)
Partners Contribution to Fixed Overheads	(167,000)	(177,000)	(187,000)	(197,000)

Partner Contribution for Investigation Work

CBH	(16,500)	(16,500)	(16,500)	(16,500)
Partnership Authorities	(263,500)	(263,500)	(263,500)	(263,500)
	(280,000)	(280,000)	(280,000)	(280,000)

Net Surplus/Deficit on Unit	0	0	0	0
------------------------------------	----------	----------	----------	----------

Net Contribution per Authority for fixed overheads and 210 days of Investigation work

	53,813	55,063	56,313	57,563
Fixed Overheads per Authority	17,125	18,375	19,625	20,875
SPOC per Authority	3,750	3,750	3,750	3,750
Investigation Officer Costs - 210 days	32,938	32,938	32,938	32,938
	53,813	55,063	56,313	57,563

Need to acknowledge each partner council will underwrite any one-off costs associated with a future reduction in the number investigator days required i.e. if CDC is required to make redundancies the partner councils will pick up their share of these costs.

TEWKESBURY BOROUGH COUNCIL

Report to:	Council
Date of Meeting:	24 January 2017
Subject:	Schedule of Meetings 2017/18
Report of:	Lin O'Brien, Head of Democratic Services
Corporate Lead:	Sara Freckleton, Borough Solicitor
Lead Member:	Councillor R J E Vines
Number of Appendices:	One

<p>Executive Summary: To agree a Schedule of Meetings for 2017/18.</p>
<p>Recommendation: To ADOPT the Schedule of Meetings shown at Appendix 1.</p>
<p>Reasons for Recommendation: To ensure that there is a Schedule of Meetings in place for the 2017/18 Municipal Year.</p>

<p>Resource Implications: None.</p>
<p>Legal Implications: None.</p>
<p>Risk Management Implications: None.</p>
<p>Performance Management Follow-up: Once adopted, the Schedule of Meetings will be distributed and published by Democratic Services and monitored to assess whether any problems arise which need to be addressed in the future.</p>
<p>Environmental Implications: None.</p>

1.0 INTRODUCTION/BACKGROUND

1.1 The Council's Constitution requires the Council, at the first meeting of the calendar year, to agree a programme of dates and times of meetings for the forthcoming Municipal Year.

2.0 SCHEDULE OF MEETINGS 2017/18

2.1 The Schedule of Meetings attached at Appendix 1 has been prepared on the same basis as the current Schedule, however, particular attention is drawn to the following points:

- The date of the Council meeting in February 2018 cannot be confirmed until the County Council sets its meeting schedule later in the year.
- The Planning Committee meetings at the end of August 2017 and the beginning of May 2018 are on Thursdays to avoid meetings being held on the day after a Bank Holiday.

3.0 OTHER OPTIONS CONSIDERED

3.1 None.

4.0 CONSULTATION

4.1 The Schedule of Meetings 2017/18 has been considered by the Corporate Leadership Team and Heads of Service.

5.0 RELEVANT COUNCIL POLICIES/STRATEGIES

5.1 None.

6.0 RELEVANT GOVERNMENT POLICIES

6.1 None.

7.0 RESOURCE IMPLICATIONS (Human/Property)

7.1 None.

8.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)

8.1 None.

9.0 IMPACT UPON (Value For Money/Equalities/E-Government/Human Rights/Health And Safety)

9.1 None.

10.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS

10.1 None.

Background Papers: None.

Contact Officer: Jennifer Murray, Member Services Officer
01684 272021 jennifer.murray@teWKesbury.gov.uk

Appendices: Appendix 1 – Proposed Schedule of Meetings 2017/18.

TEWKESBURY BOROUGH COUNCIL SCHEDULE OF MEETINGS 2017/18

MEETING	TIME	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY
Council	6.00 pm	Tu 9 Tu 16	Tu 27	Tu 25		Tu 19			Tu 5	Tu 23	Tu 20 OR Th 22*		Tu 17	Tu 8 Tu 15
Executive	2.00 pm		W 7	W 12	W 30		W 11	W 22		W 3 W 31		W 14	W 25	
303 Planning	9.00 am		Tu 6	Tu 4	Tu 1 Th 31	Tu 26	Tu 24	Tu 21	Tu 19	Tu 16	Tu 13	Tu 13	Tu 10	Th 3
Licensing	2.30 pm		Th 15				Th 19				Th 8			
Overview and Scrutiny	4.30pm		Tu 13	Tu 18		Tu 5	Tu 17	Tu 28		Tu 9	Tu 6	Tu 20		Tu 1
Audit	2.00 pm			W 19		W 27			W 13			W 28		
Standards	2.00pm					M 18						M 19		

* The date of the Council meeting in February 2018 can only be confirmed once the date of the County Council meeting has been set.

Bank Holidays: 1 & 29 May 2017, 28 August 2017, 25 & 26 December 2017, 1 January 2018, 30 March & 2 April (Easter) 2018 and 7 & 28 May 2018.

Agenda Item 18

Document is Restricted