

Cheshire East Council

Report of Consultation: Draft Homelessness and Rough Sleeping Strategy 2021-2025

September 2021

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Homelessness and Rough Sleeping Strategy Consultation

Between 21 April and 14 July 2021 Cheshire East Council conducted a consultation on its recently updated draft Homelessness and Rough Sleeping Strategy.

Survey promotion and responses

The survey was promoted on the Council's consultation webpage, and a press release was issued, as listed in Appendix 1 of this document. Partner organisations and key stakeholders were contacted via email and invited to respond, as well as a reminder sent out 3 weeks prior to the closing date.

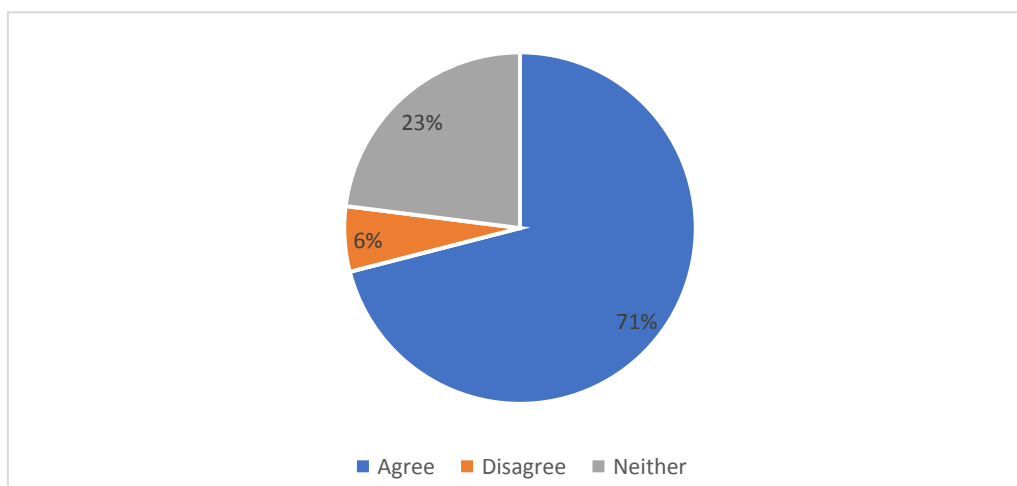
In total, 28 consultation responses were received.

Outlined below are:

- the questions asked during the consultation
- graphs which demonstrate the ratio of agreement or disagreement with regards to each strategy priority
- details where the strategy has been amended
- details where we have responded to the consultation comment but didn't feel the strategy needed to be amended.

It was decided that the consultation would make use of *open comment* questions. Therefore people did not always answer 'agree' or 'disagree'. It has been necessary to go through the responses and to interpret whether people agree or disagree from what they have said in their open comments.

Q1: - How strongly do you agree or disagree with each of the 4 strategic priorities as outlined within the draft document?



Q1: - Comments received where amendments have been made to the strategy:

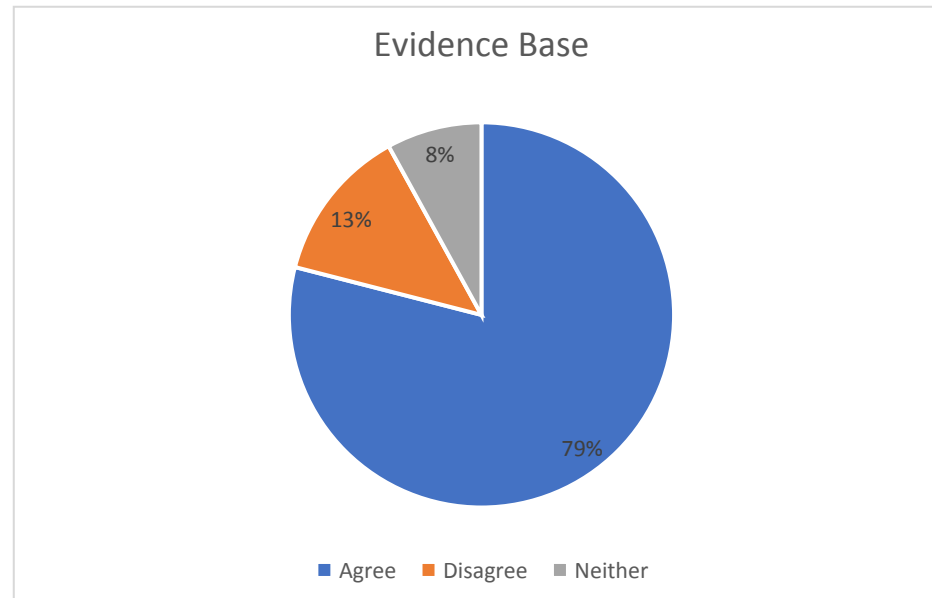
Comment	CEC response	Detail added to strategy
There should be a specific priority in relation to domestic violence. Some of the terminology in this report is challenging - rough sleeping is no longer an appropriate term to use.	<p>Thank you for the comment. Responses to domestic abuse, including housing need, are specifically co-ordinated through the work of the Cheshire East Domestic and Sexual Abuse Partnership (CEDSAP). CEDSAP has the prevention of homelessness as a key priority, working to keep people safe in their homes where possible, and only sending people out of the area as a last resort.</p> <p>'Rough sleeping' is a usual description, but some organisations use 'street homeless' as an alternative.</p>	Additional commentary relating to domestic abuse now included on pg. 8 of the strategy.

Q1: - Comments received where amendments have *not* been made to the strategy:

Comment	CEC response
Agree but Priority 3 should read 'eliminate' not 'reduce' rough sleeping.	Noted, and thank you for your comment. The Government has committed in its Rough Sleeping Strategy to halve rough sleeping in this Parliament and to end it for good by 2027.
Agree with the priorities but given 50% of Cheshire East residents live in rural areas and You have zero information of homelessness in such areas I have NO confidence it will work for all.	Noted, and thank you for your comment. Homelessness in rural areas is often hidden homelessness rather than traditional rough sleeping. This does not require a bespoke approach to tackle it as it fits the homelessness prevention and relief model. CEC wants to enable people to live in affordable housing in rural communities and this is addressed by the affordable housing approach, and community connection criteria used in the CEC Allocations Policy.

	Cheshire East addresses this issue in the Homelessness and Rough Sleeping Strategy, and if evidence suggests this is a significant problem, then a number of things could be pursued, such as new models of partnership working, and improved monitoring.
Firstly, prevention of homelessness must be taught at an early age, as its occurrence forms a pattern of how life is tackled.	Noted, and thank you for your comment. Such early intervention activities are not technically school programs. Rather, they are community-based strategies that are placed within schools. Young people are being seen through our connections with the YOT, CAMHS, and Care Leavers Services.
on paper this looks good, it will only actions that will ensure good outcome the rural areas need help, they are often forgotten	Noted, and thank you for your comment. Cheshire East has no specific information about homelessness in local rural settlements. This will be looked at in partnership with parishes and villages.
The current priorities do not seem to address the link between homelessness social dysfunction and substance misuse. Making reference to the 'Report into Homelessness and Drug Misuse' (2019), treatment for drug misuse and housing should be addressed at the same time, otherwise we are treating the symptoms and disregarding the root of the problem. Conversely, the proposed strategy will perpetuate the same vicious circle: funding and housing is provided to individuals accustomed to a lifetime of social dysfunction who will likely continue to prioritise their vices over their day to day, normal life responsibilities (e.g. paying bills / rent, food). Long term, this does not achieve the proposed goal. My suggestion is that the local / central government think about a more comprehensive strategy.	<p>Noted, and thank you for your comment. There has been a re-commission of the Cheshire East Substance Misuse Service. A core value and key principle is engagement, co-production and co-design with service users.</p> <p>Priorities include the aim of reducing homelessness and the risk of homelessness related to alcohol- related crime, anti-social behaviour and domestic abuse.</p> <p>The Housing Related Support service is outcome - focused, allowing people the opportunity to access the support they need to maintain accommodation through tenancy sustainment, and prevent homelessness.</p>

Q2: - How strongly do you agree or disagree that the evidence base is robust?



Q2: - Comments received where amendments have been made to the strategy:

No amendments made

Q2: - Comments received where amendments have *not* been made to the strategy:

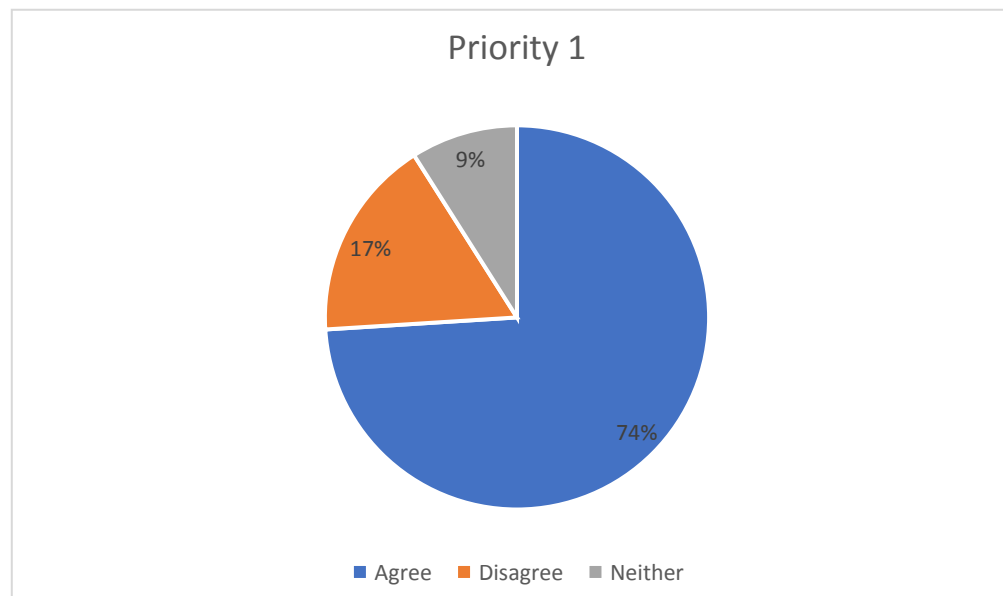
Comment	CEC Response
I agree with the strategy to address the problem, but a backward and forward conversation is needed in education, personally and collectively	Noted, and thank you for your comment. Early intervention initiatives aimed at preventing youth homelessness involve identifying young people who are at risk of homelessness, dropping out of school, or other significant and negative life altering circumstances and then providing them with the

	<p>necessary supports to reduce these risks, strengthen families and keep them in their community.</p> <p>We are presently working with colleagues in Children's Services to develop more robust strategies and assessment tools to tackle youth homelessness.</p> <p>CEC has developed a pathways model for young people, working in partnership with youth agencies (such as Children's Services, other statutory partners, and local 3rd sector agencies).</p> <p>Such early intervention activities are not technically school programs. Rather, they are community-based strategies that are placed within schools.</p> <p>The Strategy will develop different methods of communicating information and giving advice, via social media, advertising, etc. so that stakeholders are more aware of services for those at risk of homelessness.</p>
It's fine. A little old fashioned, doesn't really recognise the gendered nature of homelessness.	Noted, and thank you for your comment. Household type by gender is recorded and acknowledged in the Strategy. There are women only housing related support services which recognise the particular needs of women, especially when domestic abuse is an issue.
Lack of data in rural areas in a glaring miss and time would be better served understanding the rural area homelessness situation rather than guessing your actions will help	Noted, and thank you for your comment. Cheshire East has no specific information about homelessness in local rural settlements. This will be looked at in partnership with parishes and villages.
Page 3 provides a broad description of the local picture. In reality, the Housing / Homelessness Prevention Act caters to the individual who has a 'priority need'. The statutory instrument categorises those	Noted, and thank you for your comment. Being a woman does not make anyone more vulnerable. CEC is not in a position to change the Homelessness legislation concerning 'priority'.

<p>in 'automatic right' to access emergency housing as: 1. pregnant women / those who live with a pregnant woman 2.households with dependent children 3. all 16/17 year olds (with certain exceptions) 4.all 18 to 20 year olds other than students, provided they meet certain statutory criteria 5. all who lost their accommodation due to an emergency 6. a person whom' the Council has 'reason to believe' they are 'vulnerable'. In effect, the Local Authorities have a 'duty to provide interim accommodation where they have reason to believe that an applicant is homeless, eligible, and in PRIORITY NEED'. Problems arise with those who fall under the 'vulnerable' section. In my experience, Cheshire East Council have a tendency to mis-apply s.189 of the Act, 'satisfied that [an individual] is vulnerable' by demanding (and even disregarding) medical evidence prior to taking action under their duty of care which sets the (legal) test at 'reason to believe' (as opposed to 'satisfy'). This means that if a local authority has a 'reason to believe' that someone is vulnerable, they should trigger their duty of care. Unfortunately this is not the case with Cheshire East - to my knowledge, single women and (medically) vulnerable individuals have been declined emergency accommodation because the Council wasn't 'satisfied' they had a priority need. Lastly, I would challenge the Council / Central Government to consider if declining single women emergency accommodation because they are not, statutorily classed as 'vulnerable' is the correct approach? I make reference here to the recent events concerning Sarah Everard.</p>	<p>CEC is confident our vulnerability test is robust and have factored into this conclusion a comparison of neighbouring boroughs. We use a clear and consistent assessment tool that was developed in consultation with independent homelessness advisors, and put into practice, in December 2020.</p> <p>We do think that for those "people" (not all women) who fall short of the vulnerability test generally but continually place themselves (decision made with the capacity to understand the consequences of the action) by means of drink/ drugs in vulnerable situations we do need options. This is something we are exploring as an extension of our duties beyond those imposed on us by the Homelessness Act, by means of commissioning supported accommodation and support services to meet the needs of this client group.</p> <p>As a comparator with other local authorities the funding we have been able to attain to support those people whom are not in priority need or are in priority need but intentionally so means that outside of our legislative assessments we have been able to extend outreach options.</p> <p>We have not received one legal challenge to our priority decisions in the last 2 years, since the implementation of the Homelessness Reduction Act.</p> <p>The Housing Related Support Service has commissioned beds in women only accommodation.</p>
<p>The rural areas have been forgotten for too long, hope that what is said will happen does</p>	<p>Cheshire East has no specific information about homelessness in local rural settlements. This will be looked at in partnership with parishes and villages.</p>

<p>The vision is based up on sound knowledge of the policy interventions and a rich source of data. This clearly shows an understanding of the impacts of homelessness and an awareness of the other strategies in play within the nation and at a more local level within the local authority. There is a strong emphasis on prevention and partnership working which we know is key to delivering solutions to prevent or act on homelessness thus producing a strategy that should produce demonstrable outcomes. As a Housing Association with stock in Cheshire East, Onward is keen to support the vision of the local authority to do all we can to prevent homelessness. Onward has a financial inclusion team that works to prevent evictions by exploring options with residents to maximise their income and often sign posts to external organisations that can provide further support to prevent evictions over the past two years Onward has received 53 internal Financial Inclusion referrals for residents in Cheshire East, where support has been provided to help maintain tenancies. Teams across Onward feel that partnership links are strong and work well however Onward would welcome the opportunity to further strengthen these relationships with the local authority.</p> <p>Onward has recently demonstrated the benefits of strong partnership working to prevent homelessness in Liverpool. Working in partnership with Liverpool City Council, a consortium of registered housing providers, charities, and support providers worked together to provide sustainable tenancies for homeless people. The project team re-housed over 1000 people in appropriate accommodation with support packages and furniture packages to meet their needs and sustain their tenancies.</p>	<p>This is acknowledged and appreciated by CEC, which wants to continue and enhance partnerships with our Registered Provider partners.</p>
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Q3: - Do you agree or disagree that the action plan for Priority 1 will achieve the priorities? If not, why?



Q3: - Comments received where amendments have been made to the strategy:

Comment	CEC response	Detail added to strategy
With respect to 'Support partnerships with the 3rd Sector, voluntary sector, and other local partners to address support, education, employment, and training needs' I would welcome a simple link to refer clients to - although homelessness and rough sleeping is rare in Alsager.	Homelessness is prevalent throughout Cheshire East and the most visible form of homelessness, rough sleeping, can happen anywhere. It is constantly monitored, and people can report rough sleeping to CEC so that outreach work with the person sleeping rough can commence.	Included contact details at the end of the Strategy for Housing Strategy (e-mail) and Street Link details so people can report rough sleepers on page 55.

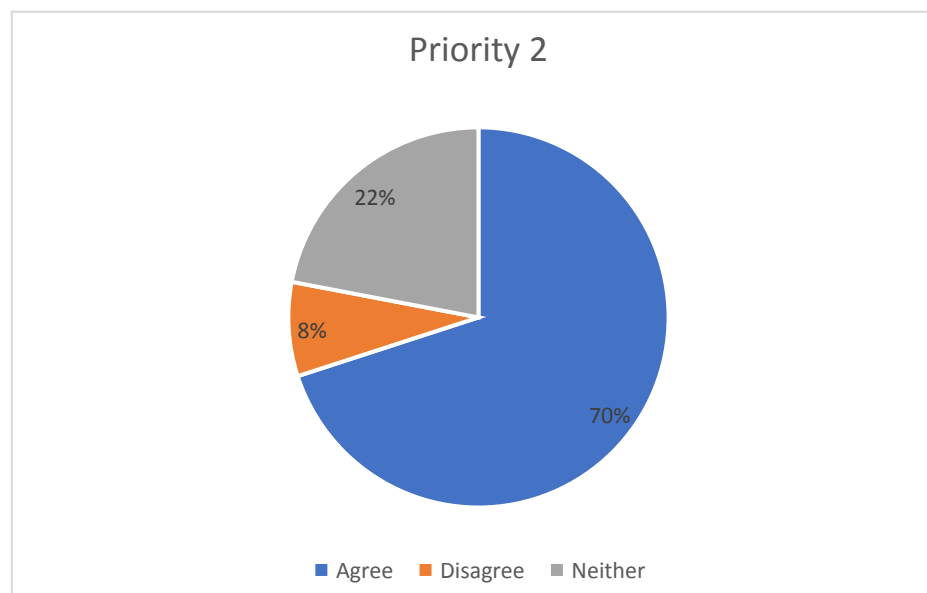
Q3: - Comments received where amendments have *not* been made to the strategy:

Comment	CEC Response
As far as I'm aware we do not know who the Landlords are as landlord licensing isn't mandatory in Cheshire East	Noted, and thank you for your comment. CEC works with many landlords in the private sector. CEC offers free advice to help landlords with tenant issues including Anti-Social Behaviour and rent arrears, and can mediate with tenants and help landlords to find a solution to most tenancy issues.
Lack of data in rural areas where 50% of people live No alignment with Cheshire and Warrington recovery plan	Noted, and thank you for your comment. Cheshire East has no specific information about homelessness in local rural settlements. This will be looked at in partnership with parishes and villages.
<p>Onward agrees that the actions contained within the Priority 1 action plan will enable people to remain in their own home. Onward is keen to further strengthen relationships through partnership working with Cheshire East Council.</p> <p>As well as financial inclusion support Onward has a plan to support local people within Cheshire East to upskill and gain employment through its supply chains and development opportunities. There are plans in place to work with Crewe College to provide apprenticeship opportunities too. Onward is well positioned to share information and best practice to unlock any barriers to provide the best possible opportunities for its tenants and providing them with more money in their pockets to allow them to sustain their tenancies. Over the past 2 years Onward has sent 16 referrals to Cheshire East Duty to Refer, from this 13 were successful, bringing in £7529.50 for customers who were potentially due to be evicted for breach of possession orders and helping them sustain their tenancies.</p> <p>Onward has a Safer Neighbourhoods team that try every available venue including mediation or warning, injunctions before eviction is even</p>	Noted, and thank you for your comment. This is acknowledged and appreciated by CEC, which wants to continue and enhance partnerships with our Registered Provider partners.

<p>contemplated. The Safer Neighbourhood Specialist attends the Multi Agency Action Group (MAAG) North Meetings with the police, Senior Environmental officers and the ASB Team leaders from Cheshire and Peaks to discuss any ongoing ASB cases. The team also support victims of domestic abuse to stay in their homes if they wish. They attend MARAC meetings to discuss cases in the round and deliver the best possible outcome for the victim.</p> <p>The action plan is thorough and covers many different angles to prevent homelessness, Onward are keen to support Cheshire East Council in preventing homelessness in the area.</p>	
<p>totally agree, hard with difficult to engage tenants. There is a need for intensive floating support for people at risk of losing accommodation</p>	<p>Noted, and thank you for your comment. The Housing Related Support service provides short - term floating support (re-settlement and sustainment). This could be for re-settlement, for example to help someone settle into their new home after moving out of a hostel or hospital, etc. It could also be to help someone where they may be at risk of losing their home and becoming homeless.</p> <p>There are 70 placements in the South, and 55 in the North.</p>
<p>We agree that the information presented in the plan would go a long way to achieving the priority. However, from experience we could see difficulties with fully realising some elements such as exploring “early identification” triggers and information sharing with external agencies from the authority, such as the DWP, as these have been difficult to engage with and get information from historically. We would perhaps like to see some further information in the strategy on how this might be achieved such as via meetings / working group etc. We also think that there could be a task to push floating support in terms of tenancy sustainment / homeless prevention from the authority to stakeholders. Concrete has already been promoting the services we provide more but we think there should be a general push amongst all partner agencies in this regard on top of our own promotion activities so everyone is giving out the same message.</p>	<p>Noted, and thank you for your comment. CEC has developed a direct link with the majority of our Registered Providers, with all providers with over 500 units of stock – as well as some of the smaller providers. Our work and links with the DWP will be maintained and sustained. Cheshire East has explored options with the DWP for working on joint local initiatives aimed at reducing homelessness and unemployment, such as improved communication and direct dialling between services to fast track cases to prevent homelessness.</p> <p>There will be a review of partnership working and information sharing between the CAB, Job Centres, DWP, Benefits Section and Housing Options.</p>

	<p>This has seen improved partnership working and preparedness for any increase in evictions, money management and debt problems.</p> <p>The Housing Related Support service provides short - term floating support (re-settlement and sustainment). This could be for re-settlement, for example to help someone settle into their new home after moving out of a hostel or hospital, etc. It could also be to help someone where they may be at risk of losing their home and becoming homeless. There are 70 placements in the South, and 55 in the North.</p>
While some of the actions outlined are measurable generally speaking the actions are aims, aspirational, rather than quantifiable objectives which can be measured. Clear measurable objectives would more accurately identify evidence for supporting the meeting of the action plan. it would help identify actions required to address areas requiring further development.	Noted, and thank you for your comment. Cheshire East knows that it is essential that it works in partnership to achieve the shared vision of preventing homelessness and has produced delivery plans with tasks clustered under the 4 key priorities. The Delivery Plans are specific, measurable, achievable, realistic, and timed (SMART).
Who could disagree? Very broad - could encompass anything from grab rails to tenancy support for households placed in the private rented sector (PRS). The biggest driver from the limited data you provide would suggest that repressions from social landlords is a significant issue - this requires some work to ensure that social landlords also take appropriate steps to prevent rent arrears and other issues that might lead to eviction and homelessness.	Noted, and thank you for your comment. An action to be carried out is to explore 'early identification' triggers and information sharing with key agencies such as DWP, Benefits Section, supported accommodation, and Registered Providers. The aim is a reduction in households evicted due to rent arrears. This is something that is under discussion with Registered Providers and was an agenda item at a recent Steering Group meeting.
Yes, but please note the issues I've raised concerning 'rehabilitation' and 'vulnerable' individuals.	Noted, and thank you for your comment. CEC works with residents that have barriers to accessing housing, due to prison release, or substance misuse issues. Accommodation and floating support is available through the Housing Related Support services.

Q4: - Do you agree or disagree that the action plan for Priority 2 will achieve the priorities? If not, why?



Q4: - Comments received where amendments have been made to the strategy:

Comment	CEC response	Detail added to the strategy
Council must also work on reducing the length of time applicants are often faced with when trying to secure accommodation via Homechoice. Currently, many individuals have to wait a minimum of 6 months, but more likely closer to a year prior to being shortlisted for new accommodation.	The number of people on Cheshire Homechoice exceeds the number of affordable housing properties available. The number is high each year, with the number of people on Homechoice varying year to year based on annual reviews of applicants, applicants' circumstances changing, and on affordable housing stock availability (the number of lets available).	Included in the strategy on page 18.

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<p>Additionally, private landlords (outside Homechoice) request a 'guarantor' or flatly refuse to consider an applicant who relies on social welfare payments because their 'insurance doesn't cover them'. Perhaps the government could find a manner of putting private landlords at ease, so that they wouldn't decline applicants from a social welfare background? I suggest some form of financial incentive offered to private landlords perhaps? Furthermore, I note that applicants from non-commissioned supported accommodation services (hostels) are not prioritised by the Council on Homechoice, by not changing their banding to a higher priority, simply because they are not from Council commissioned services. This is a typical case of 'false economy' - supported accommodation services are likely to incur weekly charges of over £700 paid by the taxpayer for a minimum of 6 months. Surely it is in the taxpayer's interest to expedite the rehousing of all individuals currently housed in hostels? Therefore, I stress these matters need to be addressed if the Council is to reach their goal of 'securing affordable accommodation' within a reasonable timeframe. For those experiencing multiple and severe disadvantage homelessness, access to accommodation should not be contingent</p>	<p>People in higher bands wait considerably less time than people in lower bands. Applicants are made aware of the average length of time they can expect to wait.</p> <p>The Cheshire East Allocations Policy gives 'reasonable preference' to those households threatened with homelessness.</p> <p>CEC has a 5-year land supply, using a standard formula of build rates and lead-in times which are applied to all housing sites. The delivery of affordable housing units only goes some of the way to meeting housing need.</p> <p>A range of incentives, some of them financial, are being explored to increase the number of private landlords willing to work with CEC.</p> <p>CEC gives priority to applicants who are ready to move on from non-commissioned supported housing. We have in-reach officers working on evictions, and a planned move-on process for all supported accommodation providers, not just our commissioned services.</p> <p>We are currently delivering a private rented sector access scheme for those who have / are experiencing street homelessness. This was funded through Next Steps and Rough Sleeper Initiatives 20/21 and 21/22. As of July 2021 we have approval to recruit a Link Worker role to liaise with private rented sector landlords to encourage and facilitate people who are homeless or in emergency accommodation into their own tenancy. Funding is available including rent in advance payments, deposits and Emergency</p>	
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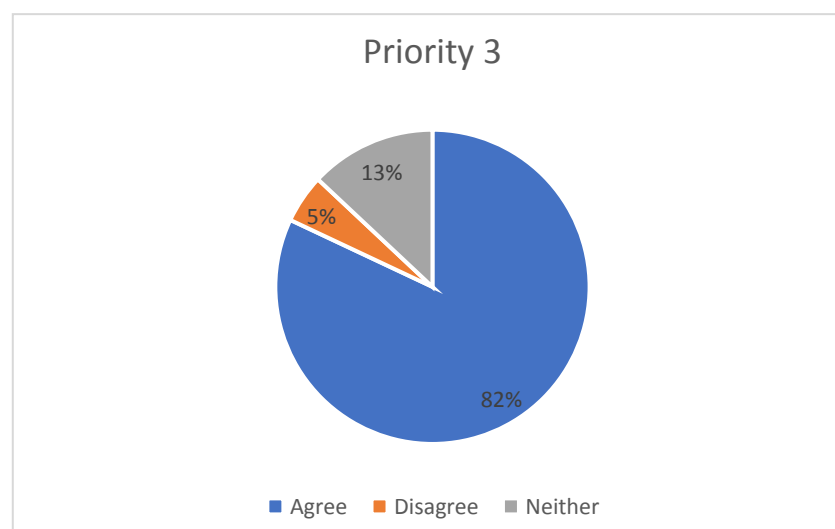
on abstinence or behaviour targets, and appropriate should not be limited to Housing First but include a range of supported and supportive accommodation	<p>Assistance funds for setting up home through our partner services in Benefits.</p> <p>We are dedicating £20,000 in 2021/2022 towards those who have moved into the private rented sector who at risk of homelessness, which can enable payments to reduce rent arrears.</p> <p>Easy access on the CEC website to free information when it is needed may help some people to find their own housing solutions.</p>	
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Q4: - Comments received where amendments have *not* been made to the strategy:

Comment	CEC Response
As far as I'm aware we do not know who the Landlords are as landlord licensing isn't mandatory in Cheshire East and there is no licensing of small HMOs up to 5 individuals.	<p>Noted, and thank you for your comment. This in line with current legislation, which states that a landlord must have a licence for a privately rented HMO if the property being rented out:</p> <ul style="list-style-type: none"> •is occupied by five or more people; •those people form two or more households; •tenants share some amenities like kitchen, bathroom or laundry.
Onward agrees that the actions in the Priority 2 action plan will enable people who are homeless to secure appropriate accommodation. It may however be worthwhile considering how the council can support mechanisms to utilise two-bedroom properties for single applicants. Onward has responded to a number of	Noted, and thank you for your comment. This is acknowledged and appreciated by CEC, which wants to continue and enhance partnerships with our Registered Provider partners.

homelessness strategies in the recent months. A lack of one-bedroom properties as identified in this Homelessness and rough sleeping strategy is a trend across the region. Onward are working hard to deliver more affordable housing in the area investing £93m in the Basford East development, which will build 449 homes for affordable sale and rent.	
We are pleased to see that there are tasks to specifically looking at single homelessness and separately looking into accessing the private rented sector but we think perhaps these should be a singular task particularly given the rise in single homelessness over the last few years, especially amongst under 35's, to try to develop initiatives to open up the private rented sector focusing in the areas where homelessness approaches are higher such as Crewe and Macclesfield areas.	Noted, and thank you for your comment. The Government has announced that, from October 2023, it will be extending the age thresholds for Care Leavers and homeless hostel exemptions so that they both apply to under 25 year olds. For Care Leavers, this means extending the qualifying age from 22 up to 25 years old and for those who have spent at least three months in a homeless hostel, the lower age limit will be removed to include all claimants aged under 35.

Q5: - Do you agree or disagree that the action plan for Priority 3 will achieve the priorities? If not, why?



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Q5: - Comments received where amendments have been made to the strategy:

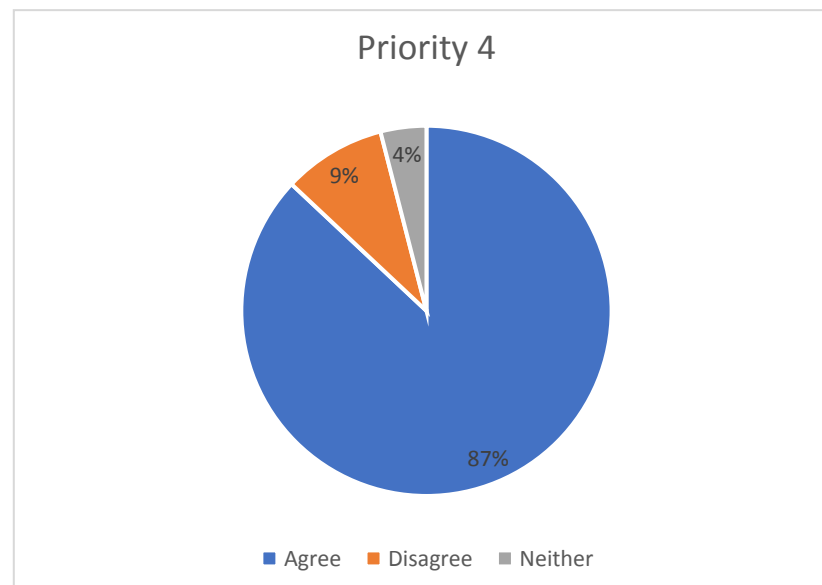
No amendments made

Q5: - Comments received where amendments have *not* been made to the strategy:

Comment	CEC Response
I welcome 'Develop links with partners and local churches / faith groups to provide services to rough sleepers'	<p>Noted, and thank you for your comment. Fundamental to the Government's 2027 elimination of rough sleeping vision is that all parts of society, including the general public, business, faith and voluntary groups and communities come together to support people at risk of rough sleeping.</p> <p>CEC wants to ensure the voices of small charities, including faith groups, are heard and form part of our future work. The Homelessness and Rough Sleeping Strategy Steering Group will monitor the overall action plan and monitoring plans for each strategic priority and be responsible for driving forward the delivery of the action plan. Membership will be reviewed in 2021 to ensure that it is as inclusive as necessary, with a wider role for voluntary, third sector, and Faith groups.</p>
'Rough sleeping' is a particularly problematic term. The strategy needs to be linked to other key areas within the council including CAMHS and leaving care services.	<p>Noted, and thank you for your comment. 'Rough sleeping' is an accepted description, but some organisations use 'street homeless' as an alternative.</p> <p>The Strategy highlights links to other key areas. A task in the Strategy is to examine options for joint meetings, profile raising, and joint training with the Care Leaver Service leading to improved outputs for care leavers.</p>
We agree with the tasks / measures being considered for reducing and preventing rough sleeping in the borough and think the key to that is going to come from enhanced partnership working but we'd be keen to see how the voluntary and statutory	<p>Noted, and thank you for your comment. The Homelessness and Rough Sleeping Strategy Steering Group will monitor the overall action plan and monitoring plans for each strategic priority and be responsible for driving forward the delivery of the action plan. Membership will be reviewed in 2021 to ensure that it is as inclusive as necessary, with a wider role for voluntary, third sector, and Faith groups.</p>

sectors can be brought closer together to work towards the overall aims and whether this can be done in a multi-agency meeting / forum.

Q6: - Do you agree or disagree that the action plan for Priority 4 will achieve the priorities? If not, why?



Q6: - Comments received where amendments have been made to the strategy:

Comment	CEC response	Detail added to the strategy
Although we agree that the tasks set out are beneficial, we think there could perhaps be a task or alteration of a task around	An improved understanding and awareness of the Single Point of Access needs to be developed. Increased awareness of the SPA amongst partners is also required to ensure that clients are aware of where to go to access	Included in the Strategy on page 28.

<p>promotion of the services commissioned and non-commissioned who are providing floating support to maintain and sustain accommodation as well. We also think that there could be specific task in this section to explore greater involvement in the role Housing Associations can play in tenancy sustainment especially as social housing makes up a substantial portion of the housing market in the borough.</p>	<p>services. An exercise to promote the SPA to partners and stakeholders will be carried out. This can highlight the role of non-commissioned services which can contribute to a menu of options for vulnerable people.</p> <p>Registered Providers have their own tenancy sustainment policies and want tenancies to succeed. However, CEC is aware that many fail.</p> <p>One of the actions of the Strategy is to create a working group to review the provision of tenancy sustainment and life skills training for service - users before moving into settled accommodation. This will improve tenancy sustainment for service -users coming from supported accommodation in commissioned and non-commissioned providers, and reduced repeat homelessness.</p> <p>Sustainment of registered provider tenancies especially in the first 12 months will be on the agenda of the CEC Housing Delivery Group, and the Choice Based Lettings Partnership.</p>	
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Q6: - Comments received where amendments have *not* been made to the strategy:

Response	CEC Response
<p>For households placed in the private rented sector, there needs to be better tenancy sustainment support and work with landlords</p>	<p>Noted, and thank you for your comment. The Strategy highlights private landlords who operate good management practices and maintain good property standards. Cheshire East Private Landlord Liaison Officers provide support and advice to private landlords and tenants.</p>

	Housing Related Support commissioned floating support units are specifically commission support for this purpose.
Onward agrees that the actions in the Priority 4 action plan will help to ensure adequate support is in place to help maintain and sustain accommodation. The plan identifies appropriate measures to support residents to sustain their tenancies. Interventions such as Housing First and the LCC homelessness project are successful because a tailored approach to service design is a key factor in successfully maintaining and sustaining a tenancy. Onward is well placed to support this objective through partnership working and a commitment to make a positive difference in the communities we serve.	Noted, and thank you for your comment. This is acknowledged and appreciated by CEC, which wants to continue and enhance partnerships with our Registered Provider partners.

Q7: - Are there any additional issues that need to be added, and if so against which Priority?

Responses to consultation included within strategy:

Comment	CEC Response	Detail added to the strategy
Definition of 'affordable' housing, both owned and rented, needed.	<p>The most commonly referred to definition of affordable housing is set out in Annex 2 to the National Planning Policy Framework (NPPF). This is the definition that local planning authorities apply when making provision within their areas to meet local demand/need for affordable housing. The most recent version of the NPPF was published in July 2021.</p> <p>Affordable housing is housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:</p>	Included in the Strategy page 6.

	<ul style="list-style-type: none"> • Affordable housing for rent • Discounted market sales housing • Other affordable routes to home ownership <p>An Affordable Rent is set at up to 80% of the market rent, the average rent for local private lettings).</p>	
Needs to be more on the gendered nature of homelessness - 80% of people experiencing street homelessness are men, but most people experiencing homelessness are women. Women experiencing street homelessness have a particularly tough time. Interventions targeted at DV need to focus on men who commit DV not on the expectation that women should leave the home.	<p>Household type by gender is recorded and acknowledged in the Strategy. There are women only housing related support services which recognise the particular needs of women especially when domestic abuse is an issue.</p> <p>Cheshire Without Abuse offers Behavioural Change programmes for those who harm or who are concerned about their behaviour. There is also</p> <ul style="list-style-type: none"> - support for victims to remain in their accommodation, where it is safe to do so - Target hardening of properties, such as provision of alarms, or a panic room - Support for victims to use Council services to get help with accommodation problems. <p>The Government is extending homelessness priority need to all eligible victims of domestic abuse.</p> <p>This legal change will come into force through the Domestic Abuse Act 2021 which contains a clause amending the Housing Act 1996 and Homelessness (Priority need for Accommodation) (England) Order 2002. The aim of the policy is to give those who are homeless as a result of being a victim of domestic abuse priority need for homelessness assistance and accommodation secured by the local authority.</p>	Included in the Strategy on page 8.

Responses to consultation *not* included within strategy:

<p>Priority 2 look at how CEC Homechoice weighs priority banding. For example recently a veteran in housing need who has been released from Prison early for good behaviour was put in band E due to their conviction not taking into account they were released early for good behaviour and they are a veteran which should have put them in band B.</p>	<p>Noted, and thank you for your comment. The CEC Allocations Policy is clear on behaviour that would make someone an unsuitable tenant, and the Strategy does not propose a review of the Allocations Policy at this stage.</p> <p>The Policy is written in partnership with our Registered Provider partners, and is geared towards creating sustainable communities, and anti-social behaviour can be a problem.</p> <p>There are other housing options that would be open to a veteran with a housing need and these could be explored through advice from the CEC Housing Options Service.</p> <p>Once having passed a period of 12 months with improved behaviour a veteran will be given an enhanced priority in accordance with CEC's commitment to the Armed Forces Covenant.</p>
<p>Priority one, sometimes it isn't safe to keep individuals in their homes due to different factors, such as, domestic abuse and health and safety.</p>	<p>Noted, and thank you for your comment. There is support for victims to remain in their accommodation, where it is safe to do so.</p> <p>CEC uses Part 1 of the Housing Act 2004 to assess the health and safety risks in housing. If we identify hazards we will consider what is the best way to bring about improvements, which could result in formal enforcement action against the landlord. We will have regard to the severity of the hazard(s) when deciding the course of action to be taken, and wherever possible will liaise with the owner and / or the person having control of the property to resolve the issues amicably.</p> <p>Where this is not possible, the hazard is too severe, or there is a high risk of imminent harm, we will serve a notice requiring action to be taken, and the household will be moved out into temporary accommodation.</p>

<p>putting into practice and ensuring homeless are looked after and given education and job if needed</p>	<p>CEC is supporting partnerships with the 3rd Sector, voluntary sector, and other local partners to address support, education, employment, and training needs. People in Housing Related Support schemes are helped to access training, education, and employment.</p> <p>One of the priorities of the Rough Sleeping Initiative is recovery. Work is carried out with our Housing Related Support partners around education / training/ employment and other life improvements, such as mental health recovery and substance misuse reduction.</p>
<p>To be added against the priority around preventative measures to reduce rough sleeping: steps should be taken to ensure that people experiencing homelessness who have companion animals with them (usually but not always dogs) are not excluded from accommodation due to having their companion animal(s) with them. The work done by the St Mungo's charity (see www.mungos.org) on this issue has been very successful, and it recognizes that for some people experiencing homelessness, companion animals are vital allies, and sometimes representing the only meaningful relationship in the person's life. When shelters and other accommodation options exclude companion animals, it can lead to people choosing to sleep rough instead.</p>	<p>Agreed, and thank you for your comment.</p> <p>Research has shown that human–animal bonds have well-being consequences and that people benefit from the presence of animals, and in particular companion animals. Benefits can be physical, psychological, and psychosocial.</p> <p>One of the providers of Housing Related Support accommodation is willing to consider service – users with their companion animals.</p> <p>We are happy to review this within future commissioning processes in the lifespan of the Strategy. The factors leading to, or keeping, people on the streets is closely monitored and reported on – so any influencing factors can be addressed through our strategic and commissioning work.</p>
<p>We think that with regards to tasks in priority 1, there could be a task linked to relationships with landlords and “call before you serve” initiatives etc, which includes enhanced links between</p>	<p>Noted, and thank you for your comment. The Strategy highlights private landlords who operate good management practices. Cheshire East Private Landlord Liaison Officers provide support and advice to private landlords and tenants. Landlords can contact Officers for eviction notice advice.</p>

housing options and private sector teams, particularly where landlords are operating HMO's which have been licenced by the authority as the links have already been partially established in that regard. Whether there could be something written into the licencing process to the effect that landlords should call before they service notices to tenants in licenced HMO's for example or for this to be explored?	A range of incentives for private landlords are being explored aimed at tenancy sustainment.
You must get the base data right not knowing the homelessness situation in 50% of Cheshire East any investment will be wasted, we need to look after the many not the few	Noted, and thank you for your comment. Cheshire East will address this issue in the Homelessness and Rough Sleeping Strategy, and if evidence suggests this is a significant problem, then a number of things could be pursued, such as new models of partnership working, and improved monitoring. Homelessness is most prevalent in urban areas, and this is where services are currently provided.

Q8: - Are there other issues which should be prioritised in 2021 / 2022?

Responses to consultation *not* included within strategy:

Comment	CEC Response
As well as meeting affordable housing on new developments, the compulsory purchase and improvement of empty properties should be looked at.	Noted, and thank you for your comment. It may be possible for some empty properties to be brought back into use which may accommodate homeless households via leasing schemes or nominations. Work is carried out with owners to incentivise them to bring the property into use. We are looking at good practice models, such as the CWAC nominations scheme for properties supported via improvement loans grants from the Council. A 5 year 'nomination agreement' is in place and has had some success in considering single homelessness referrals.
CEC has been very successful in this field in recent years can we transfer that success story to rural	Noted, and thank you for your comment. Cheshire East will address this issue in the Homelessness and Rough Sleeping Strategy, and if

<p>areas? The Strategy identifies the shortfall in knowledge of rural communities. Given that 50% of CEC area is made up of rural communities an obvious priority is to address this issue. the nature of rural communities could well hide many issues relating to homelessness or security of accommodation. The lack of rural transport could well increase isolation of those struggling and possibly cut off from access to services. The pandemic could well have increased the levels of homelessness or threat of homelessness in rural areas with the loss of employment and difficult access to alternative employment. in order to assist CEC make progress quickly is there a contribution that the third tier of elected representatives might make ie parish councils? Local knowledge could well help inform the picture in rural communities. Are there grounds for providing some basic awareness training for parish councils on homelessness so that they might guide people in the right direction in the event of their help being sought? Given transport and mobility issues is there scope for rural hubs or popup advice centres to deal with housing and money management issues?</p>	<p>evidence suggests this is a significant problem, then a number of things could be pursued, such as new models of partnership working, and improved monitoring. Local parishes have access to local data and will be asked to assist CEC.</p> <p>Cheshire East will address this issue in the Homelessness and Rough Sleeping Strategy, and if evidence suggests this is a significant problem, then a number of things could be pursued, such new models of partnership working, and improved monitoring. Local parishes have access to local data and will be asked to assist CEC.</p>
<p>Cheshire East needs a good consistent approach to floating support across the county</p>	<p>Noted, and thank you for your comment.</p> <p>Floating Support is available in the north and south: 55 units in the North 70 units in the South</p>
<p>Consider adding single women to the 'vulnerable' category and train homelessness staff on the legal requiem to which trigger the Council's duty of care.</p>	<p>Noted, and thank you for your comment. Being a woman does not make one 'vulnerable'. CEC is not in a position to change the Homelessness legislation which specifies 'priority'.</p>

	CEC Housing and Homelessness staff receive regular training on legislation and good practise in delivery of our homelessness functions.
do not forget the rural areas ,ensure people have follow on support	Noted, and thank you for your comment. Cheshire East will address this issue in the Homelessness and Rough Sleeping Strategy, and if evidence suggests this is a significant problem, then a number of things could be pursued, such as new models of partnership working, and improved monitoring.
Homelessness and the availability of Homes must be linked	Noted, and thank you for your comment. The Cheshire East Allocations Policy underpins the ability to move people who are in housing need to appropriate social housing. With an average of 8,600 registered for housing on Homechoice each year, and an average of 1,300 properties available annually, the Policy strikes a balance between supporting sustainable, settled neighbourhoods, whilst giving priority to those people who are in urgent housing need.
More data needed on Rural Homelessness situation. Research into why properties are vacant long-term. Review of long-term vacant commercial premises and assessment of potential for redevelopment for residential use - which is what happened to old warehouses in central Manchester.	Noted, and thank you for your comment. New models of partnership working, and improved monitoring are to be explored. Council Tax records show why properties are empty, with the majority short term transactional empties. Commercial properties are not suitable for accommodation and the cost is prohibitive. Manchester redevelopments were carried out by private developers.
Potential impacts of pandemic - in the intro but perhaps add as specifics in the priorities & continuing impact on later years as recovery won't be a one-year recovery	Noted, and thank you for your comment. CEC recognises the positive effect government policies have had on levels of homelessness during the pandemic, particularly Everyone In, the pause in evictions, and temporary uplift in local housing allowance. However, CEC is monitoring the temporary nature of these changes and the impact these may have on homelessness in the future, especially the newly emerging need for

	services as we start to see the impacts of the wider economic context and the cumulation of rent arrears in the local area.
Reach out to PC in local areas we will help supporting you with homelessness in our rural areas	Noted, and thank you for your comment. Cheshire East will address this issue in the Homelessness and Rough Sleeping Strategy, and if evidence suggests this is a significant problem, then a number of things could be pursued, such as new models of partnership working, and improved monitoring. Local parish councils have access to local data and will be asked to assist CEC.
There could be more of an emphasis in terms of the impact the pandemic has already had on homelessness and is likely going to continue to have with eviction bans being lifted and the potential increase in presentations which that may bring especially in 2021/22 financial year	Noted, and thank you for your comment. CEC recognises the positive effect government policies have had on levels of homelessness during the pandemic, particularly Everyone In, the pause in evictions, and temporary uplift in local housing allowance. However, CEC is monitoring the temporary nature of these changes and the impact these may have on homelessness in the future, especially the newly emerging need for services as we start to see the impacts of the wider economic context and the cumulation of rent arrears in the local area.
We would suggest strategy includes pre tenancy support for single males and care leavers and links/referrals can be made to post tenancy support where needed	Noted, and thank you for your comment. Tenancy sustainment as a key part of homeless prevention is highlighted in the Strategy, and this includes life skills training for service - users before moving into settled accommodation. Housing Related Support contracts also have an emphasis on preparing service - users for independent living.
Yes, you haven't mentioned issues that affect people of ethnic minority community in Cheshire East who may be faced with homelessness but are invisible due to barriers, e.g. language, cultural background, immigration status and so on.	Noted, and thank you for your comment. An Equality Impact Assessment has been carried out. In evaluating who would be affected, account has been taken in relation to existing service - users of Homelessness services. This includes residents who are vulnerable and require accommodation, supported accommodation, or floating support to enable them to remain in their home, or help moving into alternative housing. Quarterly data and household flow information shows

	successful outcomes and why some failures occur. The Strategy is expected to have a positive impact as strategic actions will ensure that the diversity of the local population is reflected based on Census data, Homechoice data, and other local research.
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Q9: - Do you have any further observations on the Strategy as a whole?

Responses to consultation included within strategy:

Comment	CEC response	Detail added to strategy
It would be beneficial to ensure that contact details of key personnel are shared with partner organisations. Onward would welcome a conversation to ensure Cheshire East has all the information it needs to access its services and vice versa. Please contact Sam Haslam samantha.hasalm@onward.co.uk if you would like to receive and up to date contact list.	Noted, and thank you for your comment. Contact details are normally circulated such as the SPA, Housing Options, etc. Contact details will be included at the end of the Strategy.	Contact details included at the end of the document.

Responses to consultation *not* included within strategy:

Comment	CEC Response
Am happy you have plan, at some point you need to stop consulting and get on with implementation, regular reviews should tweak the strategy as needed and you need to make sure this is built in.	Noted, and thank you for your comment. The Council is every day already working towards reduced homelessness, which is reflected in this Strategy. The Strategy will be monitored in partnership, with accountability for delivery resting with identified leads to support performance management of the Strategy. The Homelessness and Rough Sleeping Strategy Steering Group will monitor the overall action plan and monitoring plans for each strategic priority, and be responsible for driving forward the delivery of the action plan. The Strategy will be reviewed annually.

Community education should be linked to the education system as a whole	Noted, and thank you for your comment. Educational attainment and reform is outside the remit of this Strategy.
No but please do not ignore the please to help, we have ideas such as rural outreach initiatives and can build on your achievements thus far to help understanding of rural homelessness	Noted, and thank you for your comment. The offer of help is noted and appreciated. Cheshire East will address this issue through things such as new models of partnership working, and improved monitoring. Local parishes have access to local data and will be asked to assist CEC.
The lack of involvement of lay members of the public. There is not much accessible information on this topic, for example, how do people with no access to internet or cannot read get hold of this information and if they don't have the information, how can they have a say?	Noted, and thank you for your comment. Housing contact details are made available at CEC offices, where a copy of the Homelessness Strategy is available for free consultation by members of the public.
The success thus far in addressing homelessness is very welcome. initiatives to identify and accredited responsible landlords is crucial given the shortfall in affordable housing both for rent and for purchase. Particularly at risk are young care leavers who need good safe accommodation and ongoing support to make a successful transition to independence. Similar principles might apply to ex-service persons and ex-offenders and it is encouraging to see mention of these groups in the draft strategy. The plight of care leavers is a particular challenge the strategy hopefully will address with a sense of priority.	<p>Noted, and thank you for your comment. Cheshire East, Cheshire West and Chester and Warrington Borough Councils have launched the Cheshire Landlord Accreditation Scheme. The Scheme aims to recognise private landlords who operate good management practices and maintain good property standards.</p> <p>There are homeless pathways working alongside pathways agreed by the Care Leavers Service aimed at a reduction in care leavers facing homelessness.</p>
To improve employment opportunities, I hope CEC also invests in Green Economy sector. To aid personal financial management skills, I hope CEC supports education in this area and develops sense of responsibility for self and one's home. The Everyone In intervention success proves what can be done when people are taken off the streets and engaged with.	Noted, and thank you for your comment. CEC is leading our communities to protect and enhance our environment, tackle the climate emergency, reduce the carbon footprint, and drive sustainable development. A working group will be set up to review the provision of tenancy sustainment and life skills training for service - users before moving into settled accommodation. This includes money management, paying rent and bills, etc.
We have noted that the pandemic is only mentioned on 7 occasions throughout the whole strategy, 5 of those	Noted, and thank you for your comment. The Strategy states that delivering a first-class service to those requiring assistance is CEC's

<p>are within the introduction page alone, the only other two mentions are on page 4 when discussing about the national context and what nationwide efforts have been undertaken in terms of the “Everyone in” and “Protect Programme”. The strategy does not really seem to have much acknowledgement on a local level around the impact that the pandemic is highly likely to have on homelessness over the lifetime of the strategy or at least a significant part of it. For example, it could lead to a rise in rough sleeping and general presentations if individuals who have previously been amongst the “hidden homeless” and staying with friends / extended family are no longer able to do this due to concerns around spreading the virus going forward, which was the case during the summer of 2020 especially. Another task perhaps might be something around working with housing associations to try to map the likely impact the eviction ban has had over the last year and therefore what can be done to manage it going forward, and if any initiatives need to be created for housing associations who have been under financial pressure because of people not paying their rent etc. Finally, there is discussion in the strategy (page 6) about looking into any potential homelessness in rural locations as roughly 50% of the CE population live in that kind of setting, but there aren’t any specific tasks within the actions plans toward that aim. We are also aware from experience that a portion of those who have been rough sleeping over the last year or so have been located in rural settings.</p>	<p>priority, and any person who is homeless or facing homelessness will receive all the advice and support they need, when they need it. CEC has continued to fulfil homelessness prevention and relief work 7 days a week.</p> <p>CEC is aware that impacting on this work has been the impact of the pandemic, in putting already vulnerable groups at extra risk, such as rough sleepers, hidden homeless such as ‘sofa surfers’, young people who have fallen out with family members, couples facing relationship breakdown, and victims of domestic abuse.</p> <p>The ban on evictions applied to private, not social, landlords.</p> <p>Cheshire East will explore new models of partnership working, and improved monitoring.</p> <p>Local parishes have access to local data and will be asked to assist CEC.</p> <p>Previously when parish councils were consulted there was no indication of rural rough sleeping at that time, however this can be monitored throughout the lifetime of the strategy.</p>
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Appendix 1:

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Council to consult on homelessness strategy

21 April 2021

Cheshire East Council is putting together a clear plan for preventing homelessness in the borough and is asking its residents for their views via a consultation.

The council's housing team has developed a draft homelessness and rough sleeping strategy for the next four years. At its heart is a vision to prevent homelessness and give residents the ability to access and sustain affordable housing with an improved quality of life.

The draft strategy is based on feedback collected from partners about progress made during the last three years and looks at areas that the council may focus on going forward.

This initial review found that the council could:

- Identify the main reasons for the present and potential future levels of homelessness and housing need;
- Look at services in place to prevent homelessness and to provide accommodation and support to those in need;
- Identify resources available to provide support for homeless people through prevention activity diverting people away from becoming homeless
- Check for any gaps in provision

The council recognises that a mix of both generic and specialist services are required to address homelessness in Cheshire East and means the approach is more likely to fit the person rather than the person needing to fit the offer.

Many homeless people have had difficult lives, which are often complex and chaotic, however homelessness can happen to anyone. The council urges residents to seek support and advice as early as possible – it is not the case that only those with complex needs can ask for assistance.

Frank Jordan, Cheshire East Council executive director of place, said: "Our normal homelessness prevention and relief work is taking place seven days a week but of course the pandemic has made this task more challenging.

"This draft strategy sets out what we intend to do and what ambitions we have to achieve between now and 2025.

"We are working with a range of external organisations, stakeholders, and voluntary groups, which will help meet the strategy's priorities. I am very grateful to all of them for their assistance and contributions in tackling homelessness, and I look forward to the continuation of that work to deliver the commitments of this new strategy.

"The strategy is out for consultation for 12 weeks up to Wednesday 14 July. I would encourage you to respond and tell us what you think."

You can [read the draft strategy, and comment on it on our website](#).

