

Appendix 5

Consultation Feedback

Welsh Government Feedback

Overall the Strategy has a clear structure and layout.

- **Section 1- Introduction**

- 1.2.5: The Strategy should set out the priorities for the Housing Support Programme which covers both the HSG and statutory homelessness functions funded through the revenue settlement. You therefore need to update this sentence to reflect that.
- 1.4.13: the heading doesn't seem to correspond with the narrative which appears underneath in 1.4.14 and 1.4.15.
- The information that has been included in the Introduction (1.1) section and the Purpose of the Strategy (1.2) is very detailed and there is some duplication of information. You may wish to consider combining these two to create an '*Introduction and Purpose*' section.
- 1.5 It is not clear if the vision included is the overarching vision for the Council or a specific vision for housing support/homelessness services? Can you confirm? It also currently reads as a list of aims rather than an overall vision.
- 1.6: Whilst it's good to see the key achievements and what is currently being delivered, it is not particularly relevant as the Strategy should focus on the priorities for future delivery of services. Would suggest you could incorporate some of it in an Annex or relevant detail included in your needs assessment document.

- **Section 2: Needs assessment**

- 2.1 - It would be useful if this section also listed the data sources (as set out in the HSP Template) used to inform your needs assessment as well as the process/method.
- The key findings section is very detailed. There could be an opportunity to better draw out the key themes by perhaps using thematic sub-headings.
- You will need to include a conclusion paragraph to highlight the key needs, gaps in provision and issues that need to be addressed as a result of the findings from the needs assessment.

- **Section 3: Strategic Priorities**

We welcome that you have provided the context for each strategic priority setting out the how and why, although some of 'reasons why' listed don't always appear relevant to the priority. We have made the following suggestions for how the strategic priorities could be strengthened:

- P1 – you may want to make it clearer exactly what you're prioritising and the specific gap that is being addressed. Is this about strengthening targeted

prevention i.e. pathways for certain cohorts, or general early intervention and prevention services, or both? The priority combines a number of cohorts/needs i.e. young people, mental health, substance misuse and would therefore benefit from being more focused/specific. Suggest rephrasing to '*strengthen early intervention and prevention services.*', and then draw out the key cohorts/groups in the detail underneath.

- P2 – this priority slightly overlaps with P1 and reads as a business as usual activity rather than a priority. Would suggest making it clearer and more action focused around what is the specific gap being addressed i.e. is this priority around strengthening support services or increasing supply of suitable accommodation? The priority also combines a number of cohorts/needs i.e. young people, mental health, substance misuse and would benefit from being more focused. Therefore, you may wish to consider rephrasing and splitting into 2 priorities as follows: One to '*Increase or strengthen support provision for people with complex needs*' focusing on mental health and substance misuse provision (linking in a multi-agency approach, including health, to support those with complex need), and the other priority around strengthening housing support provision for younger people.

P3 – this priority could be clearer about what you are prioritising i.e. is it about increasing allocations for people already in temporary accommodation or building more temporary accommodation? What type of accommodation (single person accommodation etc.)? You could therefore explicitly draw out in the narrative what you are going to do, what are the gaps and the cohorts that you are trying to address. Would also suggest changing 'Welsh Government 'Annex D' accommodation standards' to 'Welsh Government relevant standards'.

- We note that there is no priority around workforce development although you mention that staffing is an issue in the stakeholder engagement section (4.2.6).
- You will also need to include a priority around your approach to targeted prevention as set out in the Housing (Wales) Act 2014, that perhaps is not covered sufficiently in P1.
- The Strategic regional priorities of the Gwent RHSCG could be referred to here instead of in 1.4.16 (local policy section), under a 'Regional priorities' sub heading and drawing out any specific actions for Monmouthshire.

- **Section 5: Impact assessment and Action Plan**

- As you have noted, this section will need to be completed. We note that some information in the Action Plan is missing. You will need to complete these before the Strategy is published.

- **Section 6: Implementing, monitoring and reviewing the Strategy**

- You may wish to consider listing some of the key partners integral to delivering the strategy.

End Youth Homelessness Cymru Feedback

Question 1- Do you agree the draft Housing Support Provision & Homelessness Strategy identifies the key priorities to tackle homelessness within Monmouthshire?

Yes

Partially X

No

Don't know

Please explain:

EYHC broadly welcomes the four key priority areas identified in the Strategy and believe they will be effective in tackling homelessness within Monmouthshire. As our focus at EYHC, is on youth homelessness, and our main piece of work – the 'Roadmap to Ending Youth Homelessness in Wales' is soon to be published, below follow a number of comments on how the priority areas relate to youth homelessness and some ways in which provision can be enhanced.

It's great to see such a focus being placed on prevention of homelessness, as we know that to be successful in ending both youth homelessness and broader homelessness, we have to make a pro-active effort to shift our services, and our focus, further 'upstream' to try and prevent people from even coming into contact with the homelessness system per se. Within this section it was also good to see the appreciation of the interconnectedness with issues such as poverty; as we know this is a key indicator of propensity homelessness.

Furthermore, we believe that the three other priority areas will also be effective in tackling homelessness, as they ensure that support will be provided to those who at need it, exploring a greater range of accommodation options and committing to the systems shift of 'rapid re-housing'.

Within the prevention section, focusing on young persons as a key group at 'high risk' of homelessness was good to see, a claim that was well-backed up throughout the Statement of Need, and is well supported by extensive research into homelessness and youth homelessness. At EYHC we would recommend the formation of a separate Action Plan, specifically focused on young people, that sits below this strategy and in partnership with the wider Action Plan to ensure that young people's specific needs are addressed throughout every aspect of the strategy. The data shows us that in Wales 48% of people became homeless for the first time before the age of 21, and of that number, 73% went on to experience homelessness more than once, showing the likelihood of reoccurring homelessness. The greater number of young people Monmouthshire can prevent from coming into the homelessness system, the more likely it will be in successfully tackling homelessness. Furthermore, young people are at a key developmental, social and psychological time in their life, often without the resilience of adulthood, and research has consistently shown that they have frequently differing causes of homelessness from their older adult peers, with family breakdown being the key cause, compared to 'rent arrears' as stated in the Statement of Need. This, coupled with the fact that are treated differently by a number of different aspects of the law, primarily the welfare system, means that youth homelessness requires an approach that reflects these differences.

Within the 'what we will do' section of each priority, it's very encouraging to see young people's needs and potential schemes addressed specifically. At EYHC we would recommend the creation of a separate young person Action Plan to sit under this strategy. Having a distinct but complimentary specific Action Plan would allow you to reflect the aforementioned differences between youth homelessness and broader homelessness in greater detail, than is

currently possible in an all-ages Action Plan and ensures that the best possible support is provided to young people in your local authority; in relation to all four priority areas. It would allow you to explore the establishment of a Housing First for Youth scheme, which again has complimentary but distinct principles for implementation from wider Housing First Models. What increasing housing options looks like for young people, when we know, as a cohort, they are treated differently by the welfare system and whose employment is frequently characterised as being insecure and low paid. Finally it would allow you to examine what Rapid Re-Housing means for young people, to ensure that their aforementioned distinct needs continue to be addressed in such a significant systems change to the housing system.

Question 2 – To address the key priorities and deliver the Strategy Monmouthshire County Council has identified a number of actions as set out in the attached draft Action Plan.

Do you agree with the planned actions?

Yes (Tick Box)

Partially X

No (Tick Box)

Don't know (Tick Box)

Please explain: There a number of commendable actions identified in the Action Plan, below follows a few comments on some of the actions identified. As above, EYHC would recommend the formation of a separate young person specific Action Plan but hopefully the comments below are helpful in relation to a number of the plans.

1.3 – as I'm sure you're aware, Shelter Cymru have been commissioned by Welsh Government to review and update the 'Barnados Framework for Care Leavers' which will attempt to make the document more user friendly and will contain a lot of practical guides and advice for local authorities. Due to be published by the end of March. Furthermore, Welsh Government are also working with stakeholders on updating their 'corporate parent' guidelines, which may some findings relevant to this area. Also due to be made available soon.

1.5 – Upstream Cymru is the perfect example of homelessness prevention, based on an Australian model where in the regions it's been rolled out in over the past decade, they have achieved a nearly 40% reduction in youth homeless presentations. The initial findings from the Welsh pilot can be found [here](#).

1.13 – there's a number of local authorities who have well established co-located services, commonly focused specifically at young people. EYHC will be publishing a best practice guide on this area in the near future which will be available on our website.

2.4 – A number of Housing First for Youth schemes are now up and running across Wales, with a specific HF4Y Network meeting quarterly, facilitated by Cymorth Cymru. There is also the evaluation of the Rock Trust's (Scotland) HF4Y scheme, specifically for care leavers that might be of [interest](#).

2.11/12 – A great example of this is the work of Tai Ffres, a Welsh Government innovation Funded project between Llamau and United Welsh with the specific aim of increasing housing options for young people, ensuring that the homes on offer are safe, secure and affordable.

Support is available if required but is not a pre-condition of a tenancy. More information is [here](#).

3.5 – another option that could be explored to increase the supply side, in particular for young people is Community Hosting (sometimes known as supported lodgings). We have recently completed a study into this accommodation model and how it can relief homelessness whilst providing young people with a strong support network around them. There are a number of models, focused on both short-term (more emergency stays) or long-term were on average a young person stays with a host family for 18 months or so. The report will be published at the end of March and would be happy to provide you with any further information if interested.

4.1 – this again underlies the need for a separate young person specific Action Plan to ensure that their diverse and separate needs are recognised and addressed in such a significant shift in our housing system.

Compass Feedback

Question 1- Do you agree the draft Housing Support Provision & Homelessness Strategy identifies the key priorities to tackle homelessness within Monmouthshire?

Yes (Tick Box)

Partially (Tick Box)

No (Tick Box)

Don't know (Tick Box)

Please explain: the strategy provides a clear progressive set of priorities through 1-5: early identification and prevention being key from as young as pupils attending Key Stage 3 education (although future consideration needing to be applied to even younger age groups) to identify and apply appropriate interventions for them and their families to reduce future homelessness; through to availability of options to support initiatives such as rapid rehousing underpinned by the appropriate resources and staffing from across all sectors to support it.

Question 2 – To address the key priorities and deliver the Strategy Monmouthshire County Council has identified a number of actions as set out in the attached draft Action Plan.

Do you agree with the planned actions?

Yes (Tick Box)

Partially (Tick Box)

No (Tick Box)

Don't know (Tick Box)

Please explain: re: 1.5 it makes reference to continue investment in Upstream homeless prevention in places of education. Upstream provision is not currently operating in MCC educational provisions: this being delivered via the MCC Compass programme across all secondary schools and PRS. This equally linking into relevant family support provision inclusive of Children's Services Care and Support Plan meetings, SPACE panel, School multi-agency panels, etc. Working collaboratively with CAMHS and PMHCS, substance misuse organisations inclusive of GDAS/N-Gage, mediation services, etc.

Re: point 1.14, Compass staff have completed PIE Foundation training to contribute toward this.

Shelter Feedback

Question 1- Do you agree the draft Housing Support Provision & Homelessness Strategy identifies the key priorities to tackle homelessness within Monmouthshire?

Yes

Question 2 – To address the key priorities and deliver the Strategy Monmouthshire County Council has identified a number of actions as set out in the attached draft Action Plan. Do you agree with the planned actions?

Yes

Please explain

We think this is a comprehensive plan of action to deliver on the strategy. In particular we welcome the inclusion of 1.7 “To review exclusion practices from social housing” and the stated purpose “to aid “move on” options by ensuring that those most in need of social housing are not unreasonably excluded: and support is available to address the causes of exclusion” In relation to former tenant arrears in both the private and social rented, but particularly the former, we do not believe that people should be penalised for arrears upon rents that were unaffordable for them. Please see our good practice guide on former tenant arrears [here](#).

We also welcome 1.3 and feel that this inclusion and managed pathway approach could be key in ensuring care leavers do not leave care under risk of repeat homelessness and that they can receive support necessary in the first years of adulthood. They are still likely to benefit from additional support at this stage.

We also welcome 3.2 “continue to co-ordinate a newly established Strategic Housing Forum with housing association partners to help identify opportunities to develop new affordable housing.”

We welcome that you have sought to address housing issues for a wide range of vulnerable groups, (including young people, those experiencing substance misuse and/or mental health issues, victims of domestic abuse and sexual violence) in the Action Plan. We suggest the strategy would benefit from considering BAME, LGBTQ+ and Gypsies & Travellers inclusion in the action plan, to ensure that equal consideration is given in terms of what needs to be considered when addressing the housing needs of marginalised groups.

The statement of need, at paragraph 11.1.4.3 states that there is “scope to work with adult social care to improve services for those who are neurodiverse”. We believe there should be solid reference to this in the Action Plan and main strategy document, as it is not mentioned in either. In our report [Working together to end evictions into social housing](#) we noted that there was a good approach to joint-working in Monmouthshire, with a wide range of agencies sitting on the Housing Intervention Panel. This report also contains a wide range of good practice examples from across the UK relating to partnership-working and other areas. We would also like to see consideration of adding actions upon ‘ending evictions from social housing into homelessness’ In relation to 3.12 To seek to establish links with local voluntary organisations and local churches/faith groups to develop new services; although this action clearly references

Melin Homes Feedback

Question 1- Do you agree the draft Housing Support Provision & Homelessness Strategy identifies the key priorities to tackle homelessness within Monmouthshire?

Yes

Partially (Tick Box)

No (Tick Box)

Don't know (Tick Box)

Please explain (Text Box)

Question 2 – To address the key priorities and deliver the Strategy Monmouthshire County Council has identified a number of actions as set out in the attached draft Action Plan.

Do you agree with the planned actions?

Yes

Partially (Tick Box)

No (Tick Box)

Don't know (Tick Box)

Please explain

Question 3 – Do you have any other comments about the Council's draft Housing Support Provision & Homelessness Strategy?

Answer

Very thorough process followed with wide reaching feedback across sectors which has been taken into account, looking forward to see the further development work surrounding the HIP panel, Housing Support & Homelessness forum.

I also feel that there is scope to develop a further a complex case allocations panel, linked to the identified high/complex needs from the surveys. MCC & Partners could then discuss the range of available accommodation and ensure that the right properties are matched to the right person/applicant eg: supported housing move on, homelessness, prison leavers, Detoc etc. This would help support with community integration and tenancy sustainability.

Monmouthshire Housing Association Feedback

Question 1- Do you agree the draft Housing **Support Provision & Homelessness Strategy** identifies the key priorities to tackle homelessness within Monmouthshire?

Partially (X)

Please explain (Text Box)

MHA's comments are:

- The strategy makes no reference to working with the Regional Partnership Board and working with ABHB to access ICF capital and revenue funding for supported accommodation, particularly for people with complex needs.
- The strategy does not link to the Population Needs Assessment recently produced by Phil Diamond from the Regional Partnership Board. The RPB's housing priorities include: taking a collaborative approach to homelessness and ceasing to use B&B for young people. There is no link in the strategy to the RPB's work.
- MCC to continue to lobby Welsh Gov and NRW to exempt social housing developments from the phosphate issues due to acute affordable housing shortages in the County and the numbers of households in temporary accommodation.
- Housing support should continue once a homeless client is rehoused by an RSL and there should be a clear support plan in place on handover to ensure that the tenancy is sustained, appropriate support is in place and future homelessness is prevented.
- We couldn't find any mention of recycled capital grant (MCC don't hold but other RSL's may). Could this be shared around if another RSL has a scheme that could come forward?

- The mention of *...S106 contributions to help private owners...* MHA wouldn't be comfortable with this without knowing the specifics. We fully endorse and support the general idea of preventing homelessness but we would want to see as much S106 contribution going towards affordable housing provision as possible... Not subsidising a homeowner?
- Sally has previously mentioned internal funding available for reducing temporary accommodation users. This was ad hoc and requires a business case to be put together on each occasion. We couldn't find any mention of this in the Strategy or action plan. This funding could be utilised with RSL's to purchase and/or refurbish existing stock to prevent disposal where SHG is not available.
- Beyond funding, the greatest barrier to new affordable homes is land availability. MCC should ONLY dispose of land and bring forward land for affordable housing development only. MCC may find that the reduction in temporary accommodation requirements push the effective land receipt way past open market prices. Could even be a case that one department subsidise land receipt for another department to benefit.
- We couldn't see any reference to MCC developing an intermediate market housing framework or a rapid rehousing framework –

Question 2 – To address the key priorities and deliver the Strategy Monmouthshire County Council has identified a number of actions as set out in the attached draft **Action Plan**.

Do you agree with the planned actions?

Partially (X)

Please explain

MHA's comments are:

- Section 1.7 The exclusion policy was recently reviewed by the Homesearch partners and current procedures ensure that all mitigating information is taken into account before reaching a decision, therefore, we disagree that applicants in the most housing need are "unreasonably excluded".
- Section 1.10 MCC already have full access to the reports in Locata. Is this a staff training need instead?
- Section 2.3 MHA supports the decision to re-model shared housing due to first-hand experience of vacancies being hard to let and issues around the compatibility of sharers leading to disputes/ASB.
- Section 2.5 – Need to understand the type of accommodation required to support successful outcomes for those with long term complex needs e.g. shared housing, supported living schemes or hub & spoke models.
- Section 2.6 Review of HSG – the review should include support offered by specialist providers particularly for those with protected characteristics e.g. women only domestic abuse services. Review should avoid a race to the bottom where the quality of the service is equally weighted to the price and that those with specialist and/or local knowledge are not disadvantaged. **Lyn**
- Section 3.3 Flexible letting quotas are already in place and agreed quarterly by the Homesearch partners.

- Section 3.4 - we are unsure of what you mean with this action? RSL's allocate properties in accordance with the Monmouthshire Allocation Policy which sets out a household size criteria.
- Section 3.6 - in addition to land owned by MCC what about Health and other statutory agencies who have a land portfolio?
- MHA agree that MCC should develop a clear and co-ordinated private sector offer to Landlord Developers through innovative use of S106 monies, however, this should not be to the detriment of affordable housing being created.

Question 3 – Do you have any other comments about the Council's draft Housing Support Provision & Homelessness Strategy?

Answer

MHA's additional comments are:

- There is no mention of the Renting Homes Act and the impact that this will have on the private rented sector by giving tenants greater security and potentially reducing homelessness. On the other hand it may force private landlords to leave the sector thus reducing the amount of PRS available. –
- See earlier comment about social housing developments being exempt from the phosphate issue and social housing developments being allowed to proceed.
- There doesn't appear to be any analysis of hidden homelessness but its referred to in the definition of homelessness in the document. The number of households presenting to statutory homeless services are unlikely to reflect the issues facing Monmouthshire due to lack of supply and affordability
- Affordability – there's no mention of social housing and the living rent model etc. Could compare that with the PRS analysis.
- Economy/future trends – we couldn't see any mention of the cost of living crisis and the potential impact this will have on homelessness. Increase in temp accommodation is linked to Covid and the Everyone in policy – but demand in temp housing was already on an upward trajectory prior to this.
- Rural homelessness/rough sleeping – brings its own issues but we couldn't see any analysis of rural rough sleeping.
- It might be useful if MCC can gauge/estimate how many people move out of the County due to lack of affordable housing.

We wish to make the following comments in relation to the **Statement of Need document:**

- a) Section 6.4.3 – is the reduction in referrals to GDAS due to the pandemic whereby services were closed and more difficult to access?
- b) Does graph 14 include lets to both Band 2A and Band 2B?

- c) Section 7.5.7.2 – what is the reason for the increase in applicants in Band 5? Are we seeing an influx of applicants wishing to move into the County or more home owners seeking more affordable housing?
- d) Section 7.5.12.2 – the decrease in MHA lets is due to several of our new developments being on hold due to the phosphate issue and an increased proportion of lets going to homeless applicants rather than transfers.
- e) Section 7.5.17.1 – change to 1 to 4 bedrooms.
- f) Section 8.4.5 – Renting Homes Act will give private tenants greater security which may result in a reduction of homeless applications.
- g) Section 9.1.1 – does the 177 units include B&B? If not, your numbers of households in TA would indicate you have voids.
- h) Section 9.1.4 – does “duty to accommodate” still apply and if yes, do you know when this requirement will be lifted?
- i) Section 9.1.5 – waiting time in temporary accommodation – how much of this can be attributed to homeless applicants not bidding on suitable properties or limiting their choice to areas where there is low turnover.
- j) Section 10.2.4 – there is no mention of the shared housing project and the difficulties the support provider is having trying to source suitable applicants (also omitted from Table 35).
- k) Section 10.2.6 – no mention of dads Can Cymru which is funded by MCC Social Services, MHA and the Ministry of Justice.
- l) Section 10.3.4.2 – we agree that there is a significant gap in the support provision for applicants with high and intensive support needs. This will undoubtedly impact on their ability to maintain general needs housing as floating support is insufficient.
- m) Section 10.3.5.8 – provision needs to be made to support clients with high and intensive support needs, which should include the provision of specialist supported housing projects and planned move-on accommodation.