

# Housing strategy 2019-22

March 2019

## Foreword

The Luton Housing Strategy 2019-22 marks our commitment to leading the way in providing good quality homes for people on all incomes.

Housing is an essential part of our inclusive growth strategy so that Luton is a good place to live and thrive. We've seen significant progress over the last three years with substantial investment in Luton through the Luton Investment Framework (LIF) which sits at the heart of this strategy.

Luton is regenerating and growing, and we recognise the challenge of making good quality housing accessible and affordable for a diverse and dynamic population.

Some of our recent housing achievements are highlighted in the strategy, such as how:

- We've eliminated the use of bed and breakfast accommodation for homeless households, with a shift to leased homes and more stable accommodation.
- Our enforcement activity is transforming the private rented sector and tackling rogue landlords.
- We're investing in improvements to our homes to make them and our estates attractive places to live.
- Our repairs and maintenance division, BTS, invested over £11 m per year in investment in our stock, and have started building new homes and has a 97% approval rating from our residents.
- Our tenant participation activity has been growing so that we can be closer to our communities and adapt our services to respond.

We're becoming more active in tackling housing issues directly through our own development activities but we also rely on good partnerships to ensure that this strategy is delivered.

We'll continue to nurture and grow our relationships with housing providers, third sector partners, and statutory bodies such as Luton Clinical Commissioning Group (CCG) in order to realise our growing ambitions.

**Tom Shaw, Executive Member for Housing**

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## Our vision

Reflecting the aspirations of the Luton Investment Framework (LIF), Luton will be a vibrant and ambitious town which offers good quality housing for residents in homes and communities which support wellbeing, integration and opportunity.

To achieve this, we will focus on four themes:

### Right Homes, More Homes

We work with a wide range of partners to secure the delivery of the right mix of homes to meet Luton's needs and will achieve at least 3500 new homes by 2022 of which 700 will be affordable.

### Reducing Homelessness

We actively prevent homelessness and provide pathways into appropriate housing and support for people who are homeless or at risk of homelessness.

### Good Quality Homes and Places

Luton residents are proud of their homes and neighbourhoods and improvement of poor quality homes is helping the most vulnerable households.

### Supporting Wellbeing

The right housing options are in place so that people in Luton can live well by feeling included and supported to live independent lives.

## Executive summary

Luton is a dynamic and diverse town which is growing and improving. Housing is essential to our wider vision for investment, economic development and wellbeing.

A high quality, balanced, housing market supports Luton's thriving local economy and vibrant cultural life. So we want to offer a range of homes to people across the housing market. We work to deliver the low cost rented homes which are needed by local people on lower incomes and to ensure that all rented homes have high standards.

With house prices which are more affordable than surrounding areas, we create opportunities to get onto the housing ladder through shared ownership in partnership with housing associations, and through the construction of smaller homes for first time buyers.

We're supporting an increasing aspirational offer of larger homes, so that families can stay and maintain roots in the town. Delivering the right balance is key to the town's success and sits at the heart of our housing strategy.

Our housing challenges include:

- reducing homelessness and rough sleeping
- getting more homes built to meet local needs
- improving Luton as a place to live
- ensuring that people with differing needs can live well

We have limited land within the borough for new homes and we need to maximise this by building the right range of homes for our current need and future aspirations.

Luton has seen housing costs rise significantly over the last two years. Higher house prices and rents have made it more difficult for some people to afford a suitable home. Incomes are rising in Luton but there are areas of deprivation and clear evidence of housing pressures such as overcrowding and homelessness which impact on wellbeing.

Our population is changing fast and we have a high proportion of young people and a growing older population too. Matching housing to the specific needs of our ethnically diverse and ageing population is a core ambition of our strategy.

Our housing strategy sets out the issues and what we plan to do to deliver the quality homes and housing services our residents need.

We set out ambitious targets for new housebuilding and the council is an active part of the local housing market, building a mixture of high quality homes for sale and to rent.

We expect 3,500 homes to be built in Luton by 2022, of which at least 700 will be affordable homes provided by the council or its partners, responding to the new opportunities created through council housing finance.

We'll measure our success by feedback from residents about their experience of living in Luton and from key performance indicators such as the:

- number of households in temporary accommodation
- investment in improvements to homes across the borough

Partnerships will be central to our delivery of services and capital projects. We work positively both across the council and with external partners from the business, voluntary and statutory sectors. Many of our ambitions will be met through both local and sub regional partnerships.

By 2022, there will be a greater range of affordable and aspirational homes in Luton, in neighbourhoods which are quality places to live. Homes will meet the variety of specialist needs which exist and be warm and safe so everyone can have a good quality of life.

#### **Our recent achievements**

- Ended the use of bed and breakfast accommodation for homeless households and saved over £4m in cost
- Adopted a new Local Plan
- Refreshed our tenant engagement activity
- Completed phase one of Marsh Farm regeneration with shops and affordable homes
- 97% satisfaction levels with our repairs service, BTS
- Established a housing company, Foxhall Homes
- Tackled rogue landlords and poor quality private sector homes through licensing schemes

Read about our headline strategic ambitions next...

## Right Homes, More Homes

1. We'll support the delivery of 3500 new homes by 2022 - at least 700 will be affordable homes.
2. We'll be a significant local developer, completing over 400 homes by 2022.
3. We'll work with developers to build more of the right homes for Luton – larger family homes, homes for older people and high quality homes.
4. We'll work strategically with partners on wider growth opportunities which deliver transformational growth.

## Reducing homelessness

1. We'll reduce rough sleeping by 50% over two years.
2. We'll reduce the number of households in temporary accommodation by 100 per year and reduce our use of nightly rate accommodation to zero by 2020.
3. We'll work with partners to deliver specialist support for homeless people including a Housing First scheme and a review of supported accommodation.
4. We'll improve our processing time for homelessness applications to help people move on more quickly.

## Good quality homes and places

1. We'll commission a housing condition survey to inform our activity in improving private sector housing conditions
2. We'll reduce fuel poverty by 25% over three years.
3. We'll build new homes to high quality standards and manage our estates well.
4. We'll secure external funding

## Supporting wellbeing

1. We'll work in partnership across the council and with others to deliver the homes and services which meet specialist needs including people affected by domestic violence and mental illness, children leaving care and migrants without recourse to public funds.
2. We'll deliver services, adaptations and new homes which meet the needs of disabled and older people.
3. We'll support wider initiatives such as Transforming Care which provide housing options for people with learning disabilities.

## Delivery approach

The substantial action plan linked to this strategy will be monitored by Housing Strategy staff, and progress tracked via relevant working groups and partnership boards.

## Introduction

### Strategic context: Luton Investment Framework (LIF) and Corporate Plan

The LIF, launched in 2016, underpins our ambitions to deliver sustainable growth and opportunities for our town. With the LIF on course to exceed our target of £1.5bn of inward investment over the next two decades, we have a clear focus and determination that the benefits of this programme will be felt by the whole community.

Combined with the fact that we are now home to the UK's fifth largest airport, alongside major businesses in the aviation and engineering sectors, there is a growing confidence that Luton is the ideal place to live, work and invest.

Our LIF strategic priorities are:

1. building economic growth and prosperity
2. enhancing skills and education
3. improving health and wellbeing
4. developing quality homes and infrastructure
5. supporting safe, strong and cohesive communities

Alongside the LIF, we've successfully rebranded our organisation, forming our new mission statement, a renewed vision and fresh strategic priorities which are already contributing to a transformation of Luton as a place, both in reality and in the perceptions of our residents.

Our Corporate Plan sets out our organisational direction across all our services and identifies the how we best target our resources to improve.

Already, significant improvements have been made. Luton has seen:

- the fastest private sector job growth
- the largest increase in real wages
- the highest number of new enterprises anywhere in the country

Life expectancy is rising, our schools delivered the best key stage 2 improvements in the country for Maths in 2017 and our Prevent and counter extremism agendas were rated as outstanding by the Home Office in 2018.

### Overview of Luton

Luton is a vibrant, modern and diverse town in the East of England. Thirty miles north of London, and at the centre of the Oxford-Cambridge strategic growth corridor, the town has excellent transport links by road, rail and air.

London Luton Airport is the fifth largest airport in the UK today, with over 15 million passengers annually. Luton is situated by the M1 motorway, just 10 miles from the M25 and is 22 minutes from London by train.

Luton is a vibrant, modern and super diverse town. With a population of around 214,700 people, it is more densely populated than many London boroughs<sup>1</sup>. Luton is the third youngest town or city in the UK, with 26.6 per cent of 0 to 17 year-olds accounting for the population in Luton, compared to 21.1 per cent nationally<sup>2</sup>.

Around 55 per cent of the town's population are from non-White British origins including large communities of Asian, African, Caribbean, Irish and Eastern European communities<sup>3</sup>. There are over 130 languages and dialects spoken and significant religious groups including:

- Christians
- Muslims
- Hindus
- Sikhs
- Jews
- Buddhists

Recent research into population movements<sup>4</sup>, found a high level of movement in and out of the borough. There is also a high birth rate. This is significant for the delivery of council services and across the wider public sector particularly the NHS.

It is estimated that approximately 50 to 60 per cent of the current population were either not born or not living in Luton at the time of the 2011 Census.

Our Stronger Communities strategy sets out how the council will act with the wider community to promote cohesion, equality and inclusion in the town.

The population of Luton increased from 203,400 in 2011 to 216,800 in 2016<sup>5</sup> in this time, international migration has grown and the population of Luton has become more diverse. Internal migration is showing an increase of people moving from North London boroughs to Luton, but the highest number is from Central Bedfordshire.

Between 2011 and 2016:

- 43,000 people moved to Luton from elsewhere in the UK and 53,000 people left
- 19,000 international migrants arrived in Luton and 6,000 left
- there were 18,000 births and 7,000 deaths

Population turnover is greatest in South, Farley and High Town wards.

Biscot and Dallow wards have the highest birth rates.

Luton has a younger population than the rest of England and the Eastern Region, with 22% of the population under 15, compared to 18% regionally and nationally.

The over 65 age group represents 12% of the Luton population compared with 16% nationally and 18 % regionally.

Age demographics in Luton 2011:

- 65 plus - 12%
- under 15 - 22%
- 15 to 64 - 66%

There is now a recognition that Luton is one of a few 'super-diverse' places. The town is ethnically diverse, with approximately 55% of the population being of black and minority ethnic (BME) origin, with significant Pakistani, Bangladeshi, Indian, Eastern European and African Caribbean communities.

In recent years the diversity of the population has increased. There has been a significant shift in the population, primarily driven by those arriving from the eight countries that joined the EU during its enlargement in 2004.

Since then, there have been over 30,000 new National Insurance registrations in Luton by people originating from these eight countries, with more than 75% coming from Poland.

A study by Mayhew Harper Associates showed there are concentrations of new communities of Congolese, Somalis, Ghanaians, Nigerians, Turks and Zimbabweans in Luton<sup>6</sup>.

Foreign students coming to study at the University of Bedfordshire have also contributed to the increased diversity in the town.

This diversity influences the demand for housing and housing services, whilst poor housing and homelessness impacts disproportionately on certain groups.

Our Stronger Communities strategy sets out the role of the council to support community cohesion in the town; housing and neighbourhood management play a role in this. This housing strategy aims to support equality of access to appropriate housing and services.

Ethnic origin in Luton:

- white - 45%
- BME - 55%

## Economic challenges

The LIF is showing signs of success with the town increasingly recognised as a leading place for innovation<sup>7</sup>. Wages are rising and there is significant investment in skills and training. Employment is growing and GVA per head grew by 3% between 2016 and 2017.

However, low incomes remain a concern. Average incomes for those who live in Luton are lower than those who work in Luton.

The borough is ranked as the 59th (out of 326) most deprived local authority. In 2010 Luton was ranked as the 69th most deprived local authority and in 2007 as the 87th.

This indicates that Luton is becoming relatively more deprived in comparison to the other local authorities of England.

Luton has nine output areas in the top ten per cent most deprived areas in the country. Three of these are in Northwell ward, two each in Farley and South ward, and one in Biscot and Dallow wards. Research by the Centre for Research in Social Policy showed that about a third of children in Luton are living in poverty.

## Housing

The affordability, liveability and transport links for Luton have led to an increase in internal migration, with the average house price gaining an extra £41,702 in value in 2016<sup>8</sup>.

Numbers leaving London are at the highest level since 2006 (ONS). This has also impacted on rent levels, affecting homelessness and making it challenging to place homeless families in accommodation.

The relative affordability of Luton compared to other nearby areas and London has created competition for the provision of accommodation for homeless households. This has had wider impacts on Luton including resource challenges for schools, social services and advice services.

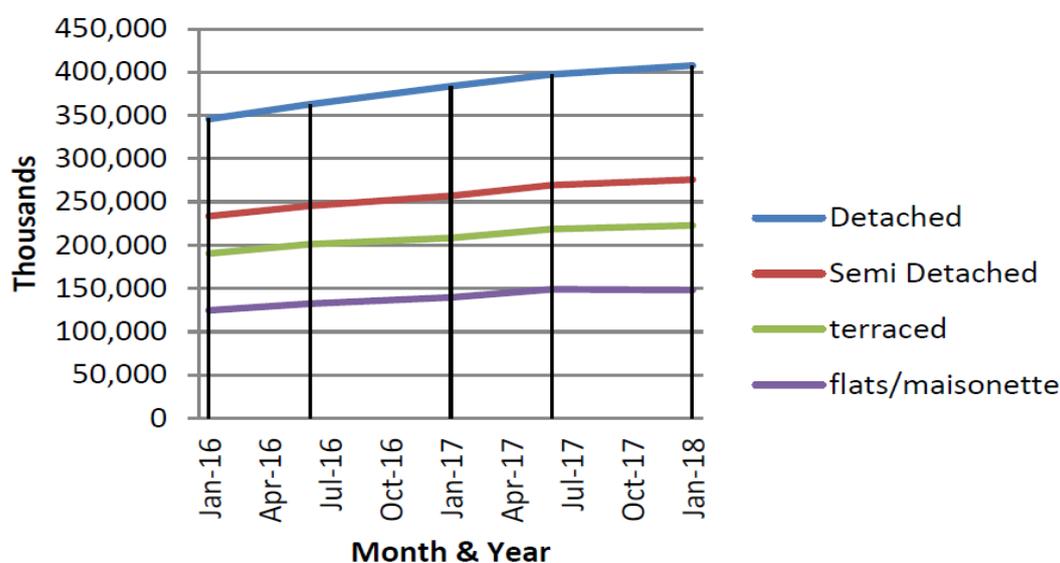
Housing issues impact more widely on other aspects of life. Among families approaching the Flying Start family support service in 2017/18, a quarter was experiencing housing problems, the single largest area of concern for families<sup>9</sup>.

Nationally, overcrowding is more prevalent among minority ethnic groups, particularly Bangladeshi, Pakistani, Black Other and Black African communities<sup>10</sup>.

In Luton, research found that Asian families<sup>11</sup> were more likely to be living in larger household groups, so the accessibility and availability of larger homes is an issue which impacts on some ethnic groups more than others. Provision of larger homes and good space standards within homes are therefore important locally.

We recently adopted a Key Worker Housing Strategy which supports target professions including teaching and social work. Housing affordability and availability are crucial to support some of the priority services the council provides.

The average house price in Luton at £239,582 recently exceeded the national UK house price which is £232,797 although it is below the average for the east (£292,107) and south east (£329,264)<sup>12</sup>.

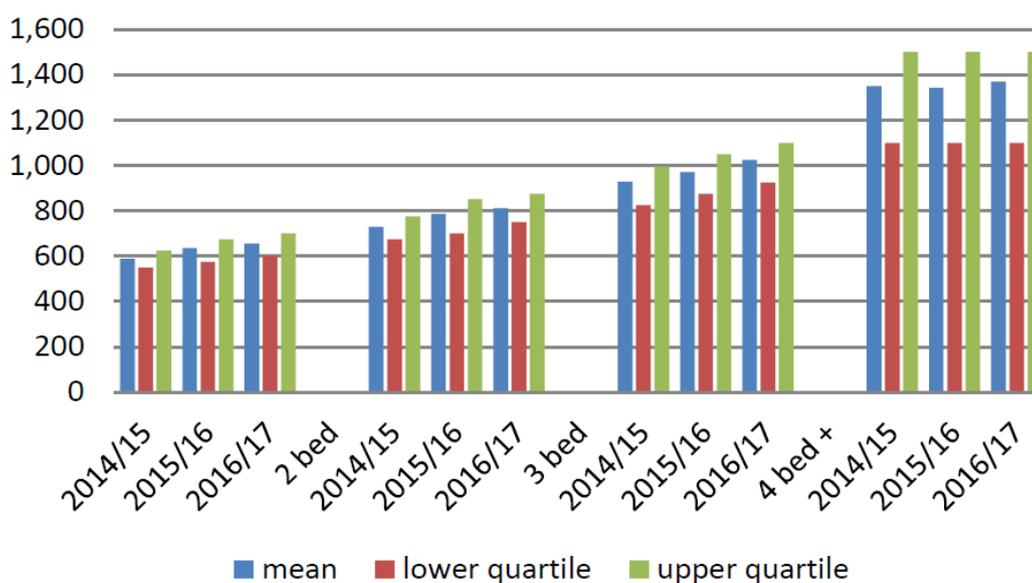


**House price increases Jan 2016 to Jan 2018** <sup>13</sup>

We can see from the graph, that since 2016, house prices in Luton have increased significantly and the bigger properties have shown a bigger increase compared to the smaller units such as terrace and flats.

Detached properties are higher in resale price than the other property sizes. The growth has been gradual and it shows that Luton is a place that people are moving into, possibly attracted by lower prices than surrounding areas.

## Rents for Luton



Rent prices from 2014 to 2017 <sup>14</sup>

Rents for Luton as of 2014 to 2017 have shown a steady increase for all properties. Many people cannot afford to rent in the private sector, as LHA rates are based on historic 30th percentile rates which have not kept pace with actual 30th percentile rents.

Meanwhile, many landlords charge rents at average to upper quartile rates, therefore making it difficult for many people to live in private rented accommodation.

Our analysis of local costs (in the housing ladder diagram on page 14) shows that Local Housing Allowance (LHA) costs lag behind 30th percentile costs – creating a gap of over £50 per week for one bedroom properties, and over £30 per week for two bedroom properties.

## Home ownership in Luton<sup>15</sup>

Home ownership has remained predominant. 61% still own a property in Luton in comparison to the other forms of housing. Shared ownership is a growing tenure which provides a more affordable option for residents of Luton.

## Social and affordable rented

Social and affordable rented housing has remained consistent at 16% since 2001 to 2011 as the census information shows.

## Private rented

There has been an increase in private renters to 22% which has overtaken the social and affordable rented market as many people look for alternative housing in the private sector.<sup>15</sup>

## The Strategic Housing Market Assessment (SHMA)<sup>16</sup>

The SHMA was introduced in 2010. The evidence from these documents helps to inform policy making at local and regional levels and it shows the housing requirements in a given area.

It provides evidence on the tenure and size of mix of housing required which includes market, intermediate and social rented housing.

Luton and Central Bedfordshire councils have worked together for many years to commission ORS (Opinion Resources Services) to carry out this research to support Local Plan development.

The most recent SHMA update for Luton was published in 2016. It calculated the need for housing in the borough of Luton, as follows:

	<b>Dwellings</b>	<b>%</b>
Market housing	10,600	59.5
Affordable housing/rent	7,200	40.5
All dwellings	17,800	100

The size mix of homes required was identified as follows:

	<b>Required by 2013</b>	<b>Delivered to 2016</b>	<b>% deliver 2011-16</b>
1 bedroom	420	917	218
2 bedroom	3880	675	17
3 bedroom	10910	255	2
4 bedroom	2590	274	10
All dwellings	17,800	2121	12

These figures demonstrate the oversupply of one bedroomed homes and the undersupply of larger family homes. There is a clear need to deliver larger homes in the town to address this imbalance.

## National policy changes

There have been several legislative and policy changes in the last few years which have changed the operating environment for housing.

## Welfare reform and benefit cap

The full rollout of Universal Credit to Luton in the later part of 2018 has implications for many households which could increase rent arrears and create financial challenges. Modelling indicates a likely 19,000 claims which will be affected, of which 8,000 will move to Universal Credit.

We've been working cross departmentally and in partnership with other organisations to prepare for Universal Credit, including preparing our own tenants and actively preventing homelessness.

## Homelessness Reduction Act 2017

The act came into force for many local authorities in April 2018, and has emphasised the need for local authorities to provide concise advice and assistance at an earlier stage when customers approach the council for assistance with housing.

## A reduction of local authority funding

Local authorities are under pressure to transform service delivery, generate additional income and respond to reductions in central government funding.

Luton's Medium Term Financial Plan has helped us to maintain a comparatively advantageous position despite being the sixth worst affected unitary authority in terms of central government cuts. However, the financial impacts of rising homelessness and use of temporary accommodation has led to significant costs to council tax payers through the General Fund.

## Housing Revenue Account changes

From 2015 to 2019, social rents have been reducing by 1% per year. This impacted significantly on social landlords' capacity to develop, including Luton Council. A new rent settlement from 2019 will allow additional income to be channelled into new homes.

Government limits to borrowing in the Housing Revenue Account which covers council housing have limited our ability to build new affordable homes as Luton Council is at its borrowing headroom limit.

However, an opportunity to bid for additional borrowing permissions was opened in 2018, and a bid made for around £15 million and further details are awaited regarding the lifting of the borrowing cap, announced by the Prime Minister in October 2018.

Further policy impacts on the Housing Revenue Account, such as the High Value Levy, introduced in the 2016 Housing & Planning Act have subsequently been cancelled.

There has been a recent consultation on the use of Right To Buy receipts which could make this a more flexible form of funding for new council homes. However, the final arrangements are not known at this time.

## Affordable Housing Programme

The Homes and Communities Agency, now Homes England, has gradually returned to funding affordable rented homes but funding is reduced compared to previous investment programmes. The opportunity to bid for funding, potentially in conjunction with Right To Buy receipts, is something that Luton Council will consider in order to increase our development capacity.

## Affordability statement

### Luton housing ladder<sup>17</sup>

Analysis of local housing costs and income levels allows us to plot affordability in Luton and clarify what is genuinely affordable for households in different income brackets.

The [affordability ladder](#) on page 13 shows weekly costs of different tenures of housing at one, two and three bedroom sizes. It also shows what would be considered affordable on local incomes, as reported by the Annual Survey of Hours and Earnings (ASHE) for incomes in Luton, taking 35% of gross full-time income as the maximum that a household should pay for housing.

The information in this chart will be updated annually to track the affordability of homes in Luton.

The diagram demonstrates how private renting is increasingly unaffordable. People with incomes in the bottom half in Luton would not be able to afford a family sized property of two bedrooms and above in the private rented sector.

For most, housing benefit and the housing element of Universal Credit does not bridge the gap to the actual cost of lower 30% rents. Local Housing Allowance (LHA) rates are well below actual rental costs.

For households needing three bedroom accommodation, the ladder shows that they would need to be in the top 40% of incomes to afford the cheapest private rent and in the top 25% of incomes to afford to buy a lower quartile property on the open market.

For many local families therefore, only affordable housing options provided through social landlords provide a realistic long term home at a manageable price.

Social rented homes are demonstrably more affordable and most Affordable Rent homes are also within reach. New council homes are capped at LHA rates to retain affordability.

The role that Living Rents could play has been a subject of discussion with various methodologies suggested and active Living Rent programmes already rolled out in London.

As an illustration, the Shelter methodology of 30% of 30th percentile earnings would give a Living Rent of £126.36, whilst the Labour Green Paper and London Living Rent typical rent of 35% of median income would give a rent of £175.63.

The figures also demonstrate the significant potential for shared ownership to play a role in offering stable and affordable housing for lower income groups.

At a relatively low equity level of 40%, shared ownership (Homebuy) compares well to private renting or renting at Affordable Rents, which means that for households in the bottom 30% of incomes could afford a two bedroom property, assuming that they could provide a 10% deposit on their 40% share and access mortgage finance.

The updated National Planning Policy Framework (NPPF), published in 2018, indicates that sites including affordable housing should incorporate 10% for low cost home ownership, unless this significantly prejudices the ability to meet the needs of specific groups, and in other specified circumstances for example in Build to Rent schemes.

In Luton the current Local Plan policy requires only 20% affordable housing on sites with a gain of 11 dwellings. If 10% of these sites are provided as low cost home ownership, this would mean a 50/50 split between affordable rented and ownership tenures.

However, our SHMA indicates that the split should be 72% for affordable rents and 28% for low cost home ownership. A standard 10% provision of low cost home ownership would therefore prejudice the ability to meet wider affordable housing needs, particularly for households to whom the council owes a duty and where the private rented sector is demonstrably prohibitively expensive.

We're committed to enabling and providing homes which are affordable to local households. This means supporting a supply of homes at price points to meet differing needs and which creates sustainable housing options for working households who are unable to access family sized private accommodation.

We'll use the information to guide our own programme and to press for more affordable options within planning agreements. We'll also continue to monitor and challenge the growing gap between LHA rates and actual rents.

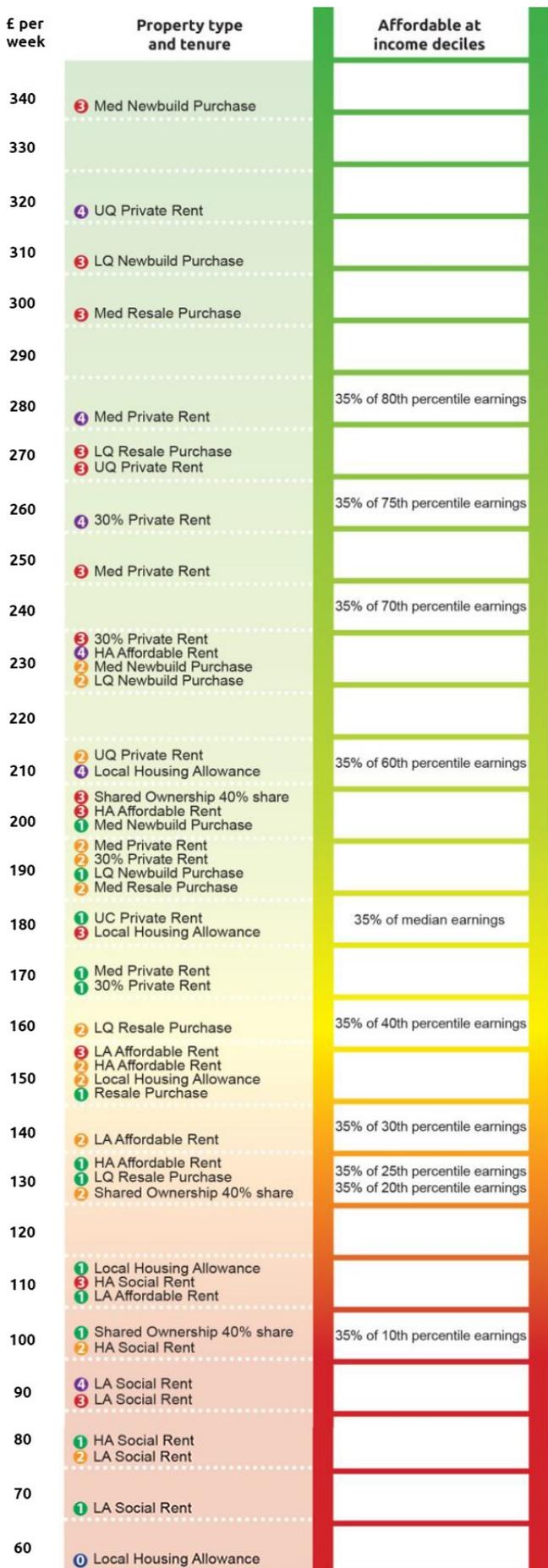
Our approach to affordable housing provision is therefore be summarised here.

1. We'll deliver ourselves, and enable others to deliver, a range of affordable housing across the town to meet the significant need for stable, affordable accommodation, especially at larger house sizes.
2. Affordable rented homes are in greatest demand and should be capped at LHA levels to be truly affordable to lower income households. Affordable housing providers will be expected to demonstrate how their homes can meet this requirement.
3. There is a growing role for low cost home ownership, primarily shared ownership as this is the most accessible product for lower income households. However, we'll continue to

stipulate, in line with the SHMA, that shared ownership makes up no more than 28% of the 20% affordable housing requirement in planning agreements, or equivalent to 5.6% of a site, rather than the 10% recommended in the NPPF. This may be amended on certain sites depending on scale, property types and viability.

4. Our updated supplementary planning document on affordable housing, and our revision of the Local Plan will reflect these priorities.

# Affordability ladder



**Key**  
 ② - Number of bedrooms  
 30% - Lowest 30% of private rents  
 LQ - Lower quartile  
 Med - Median (average)  
 UQ - Upper quartile  
 HA - Housing association  
 LA - Local authority

The housing affordability ladder shows the costs of different types of homes and how this compares to incomes for Luton residents. Housing costs are expressed as cost per week. Affordability is shown for each 10 per cent of local income levels.

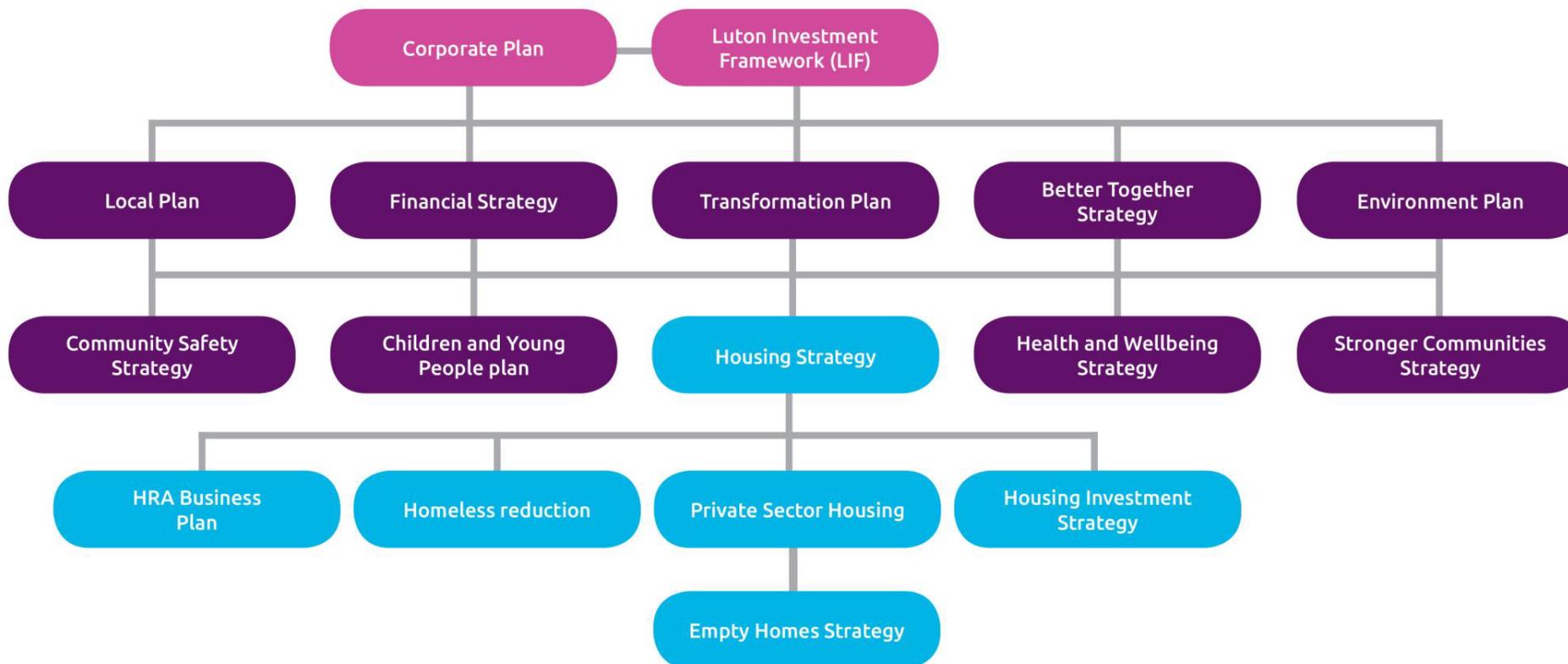
For example it would be affordable to buy a lower quartile priced two bedroom home if the household was in the 40th percentile of income and above. At this income range, most affordable and social rent is also affordable but not a lower priced one bedroom home in the private rented sector.

Sources of data are:

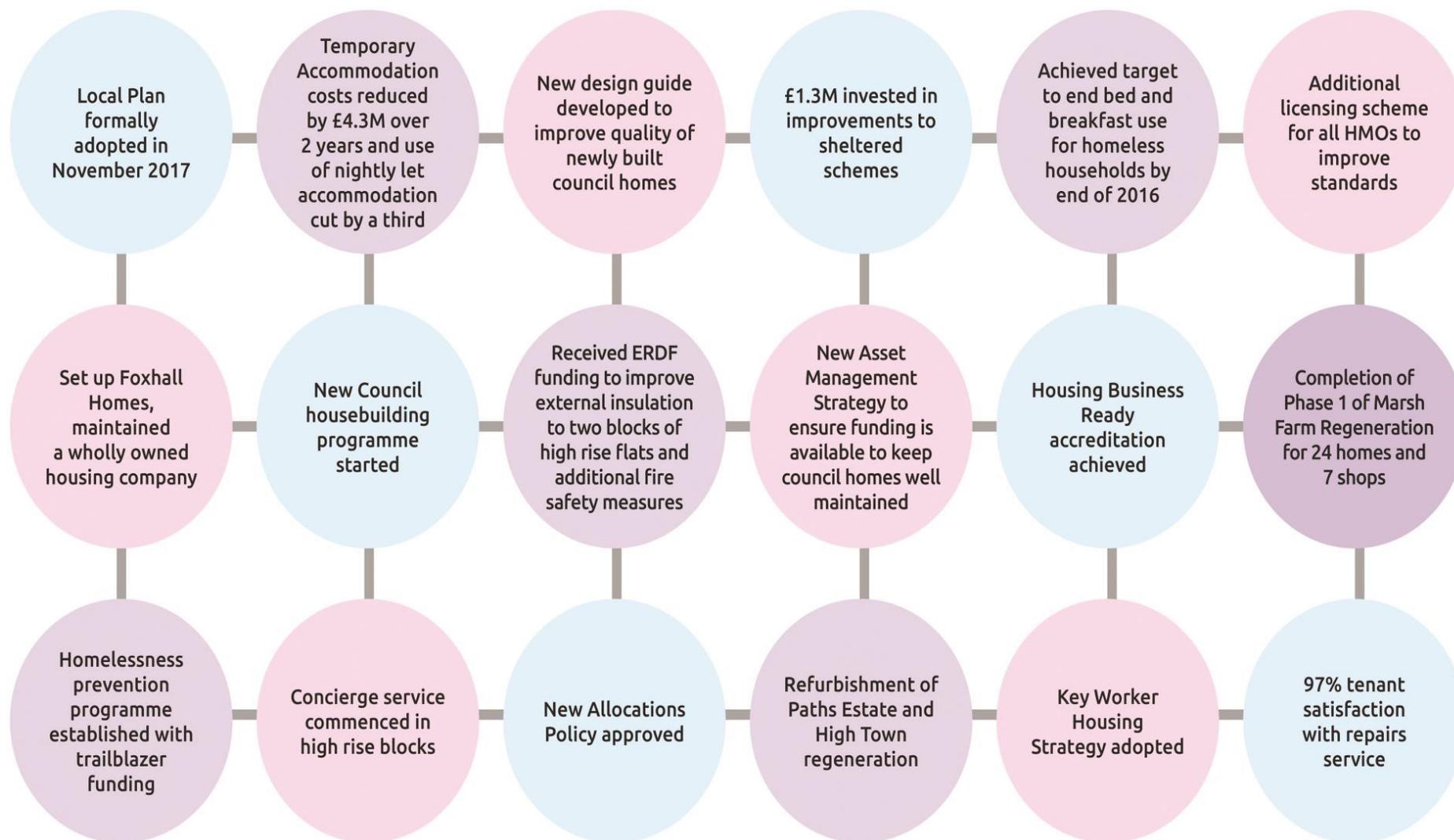
- hometrack for housing association and private sector rents, shared ownership costs and new build and resale open market costs; shared ownership costs include both mortgage and rental costs per week.
- local authority information for council rents, Annual Survey of Hours and Earnings (ASHE) for incomes in Luton

## Housing strategy family tree

The following diagram places the housing strategy in context within wider corporate and local strategies.



## Recent achievements



## Right Homes, More Homes

We work with a wide range of partners to secure the delivery of the right mix of homes to meet Luton's needs and will achieve at least 3,500 new homes by 2022 of which 700 will be affordable.

### Overview and evidence

Luton needs affordable, good quality homes for rent and to buy. They must be in safe and harmonious communities and meet local needs.

The LIF includes a number of strategic sites and a target to deliver the remaining 5700 homes from our local plan within timescale.

Our Local Plan 2011-31 was adopted in 2017. It includes provision for 8,500 homes from the 17,800 identified as objectively assessed need for the borough.

This leaves 9,300 homes outstanding. We'll be working with neighbouring authorities in the broader Luton housing market area to support the delivery of those additional homes.

In addition, we recognise the strategic location of Luton within the Oxford-Cambridge Arc area and continue to co-operate with other local authorities in that growth area to support transformative housing growth projects.

Delivery rates in Luton have been above target in the last two years, in part as a result of office to residential conversions.

Evidence from the Strategic Housing Land Availability Assessment SHLAA<sup>18</sup> and Housing Flows Reconciliation data has outlined the delivery of housing from 2011-18.

Year	Delivery
2011-12	490
2012-13	351
2013-14	147
2014-15	415
2015-16	624
2016-17	798
2017-18	873
<b>Total</b>	<b>3,698</b>

Over the past three years, 487 affordable homes have been developed; primarily by housing associations, although we've also begun to develop new council homes.

Much of the housing growth in recent years has been for smaller homes. This has exacerbated an undersupply of larger and family homes, and homes across the price spectrum. Ensuring the delivery of the right mix of homes, both in terms of property type and affordability, is a key ambition of this housing strategy.

The range of affordable housing delivered under this strategy will primarily include Affordable Rent and Shared Ownership homes. However, we will use our analysis from the Housing Ladder (page 14) to influence the type of affordable homes which are prioritised.

## Partnership working

After an assessment in 2017 by the Housing Finance Institute, we achieved Housing Business Ready Accreditation in recognition of our strategic focus on growth.



Working together to build the homes we need

We work with a wide range of partners to enable and promote housing delivery and the provision of affordable homes. We have active liaison arrangements with:

- housing associations and the third sector
- providers of temporary accommodation
- landowners and developers of sites in the town

We'll be strengthening our relationships with organisations that can deliver additional homes for Luton, and exploring formal partnerships for housebuilding using new borrowing capacity.

## One Public Estate

We are an active partner in the One Public Estate programme, working with other public land holders in the town to bring forward sites and co-location of services. We have attracted funding towards land remediation, feasibility and regeneration projects.

## Homes England

Our relationship with Homes England encompasses strategic growth, grant and loan finance and market engagement. We support registered provider bids for funding in Luton to enable additional affordable homes and also have the capacity to apply for funding for our own development projects.

## Self-build homes

We hold a self-build register, whereby potential self-builders can register their interest in developing their own homes. In the last 12 months the register has grown from one to seven expressions of interest.

We'll support individuals and community led organisations to develop additional housing through publicising potential sites, consultation on planning issues and brokering local relationships to support new schemes.

## Recent changes

Housing delivery is significantly impacted by confidence in the local housing market. Following the introduction of the LIF and adoption of the Local Plan, values and delivery certainty for sites in Luton have improved.

We've become more proactive in housing delivery with the establishment of a new housing company, Foxhall Homes, and additional council housebuilding including a major redevelopment at Marsh Farm. We will continue to maximise our ability to bring forward new homes of all tenures to support housing growth in the town.

Foxhall Homes is a development company wholly owned by Luton Council. Funding is provided from the council's prudential borrowing capacity and the company generates a return to the General Fund, whilst developing high quality homes and a mix of outright sale and affordable homes. The business case for the first six schemes on council owned land has been developed and first scheme is on site. Further schemes will be added as feasibility studies are completed.

The Housing Revenue Account (HRA) business plan also provides funding for more affordable council homes on a range of sites, supported by receipts from Right To Buy sales. Initial development is on council land with additional land purchase required from 2021.

Our council housing management service is integral to our ability to develop more homes as efficiencies in our operational costs currently generate additional income to support new housebuilding.

We'll seek all opportunities to maximise our ability to develop more council homes including use of cross subsidy from mixed tenure developments, and additional HRA borrowing as details emerge. Our commissioning priorities for new council homes are set out in appendix 1 to ensure that council housing is meeting our full range of needs.



New homes and shops at Marsh Farm

## Best use of stock

In addition to securing new homes, it's essential to get the best from the homes and buildings in the town to meet housing needs. This applies to our own stock as well as other housing in Luton.

We've developed an offer to council tenants who are looking to downsize into smaller accommodation. We have a focus on the provision of age-appropriate accommodation and surrounding services which will help to create more movement in the housing market and free up family sized homes.

To maximise the availability of council accommodation for those who are waiting, we strive to recover homes which are illegally sublet and minimise void periods.

We offer discretionary grants to overcrowded households who own their homes, to create loft extensions. We aim to secure good space standards within new homes and build our own homes to Nationally Described Space Standards.

Our Aids and Adaptations service also ensures that existing homes are fit for purpose for those who live in them.

We estimate that there were 427 homes in Luton in October 2018 which had been empty for at least six months. Empty homes<sup>19</sup> have always been a part of Luton's housing policy, and we aim to bring 20 homes per year back into use through liaison with owners and use of local government powers such as compulsory purchase and empty dwelling management orders. The current Empty Homes Strategy is being updated.

A strategic issue for the town is the existence of unused and underused blocks which were built for student accommodation. Some of these centrally located buildings are in need of repurposing and a partnership solution is required.

## Joined up ambitions

Our ambition for Right Homes, More Homes align with other council priorities around bringing forward the quality of homes we need and the housing which supports the local economy and broader wellbeing.

A growing development programme also supports our commercial ambitions through generating business revenue for BTS which constructs new council housing and by supporting Foxhall Homes business plan.

Our Key Worker Housing Strategy provides brokerage services to match suitable properties to priority public sector employees including education and social care. We're committed to supporting pathways into new homes and anticipate targeting shared ownership homes for this cohort.

We work with other partners such as the CCG to ensure that homes support wider strategic objectives for public health and independence. More detail on this strand of work is in [section 8 - supporting wellbeing](#).

## Priorities and actions

- We'll continue to press for delivery on all major sites identified in the LIF to support economic growth and regeneration in the town.
- We'll be an active developer, delivering at least 400 homes via our housing company and council house building programme as part of a total delivery of 3,500 homes by 2022.
- We'll secure the delivery of at least 700 affordable homes by 2022.
- We'll strengthen our wider partnerships to support access to land, development finance and skills to maximise housebuilding in Luton and consider the potential for specific joint ventures as appropriate.
- We'll implement a policy for shared ownership homes which helps the council to deliver additional affordable homes and meet the needs of a wider range of households including key workers.
- We'll work with developers and partners to support more of the larger homes that the town needs.
- We'll update our supplementary planning guidance on affordable housing to reflect our new local plan in order to secure an appropriate mix of homes on development sites.
- We'll advocate for and seek to provide age-appropriate accommodation which helps to free up family sized homes of all tenures.
- We'll maximise all funding opportunities and strategic growth discussions to deliver homes which meet the wider housing needs of the Luton housing market area.
- We'll make the best use of homes through providing opportunities to downsize in council homes.
- We'll refresh our Empty Homes strategy and continue to bring homes into use at a rate of 20 per year.
- We'll develop our offer to self-builders to support these schemes.

## Risks and mitigations

Key risks in terms of the wider housing market are broadly outside of our control. These include:

- economic conditions
- market confidence
- availability of finance for purchase and development of homes

However, the LIF and investment in local skills, employment pathways and infrastructure would help to mitigate some of these issues and keep Luton as a place which continues to attract external investors.

Our ability to negotiate affordable housing within development sites is closely linked to site viability so a dip in values or significant rise in construction cost (for example as a result of leaving the EU) could limit our ability to enforce local plan targets.

Other risks include the loss of skilled labour for construction projects, through:

- a low uptake of young people entering the sector
- more older, skilled, workers retiring
- loss of migrant labour especially from EU countries

Our ability to meet broader housing needs for Luton residents also depends on provision in local plans of neighbouring authorities so it's essential to grow our positive working relationships.

This will also facilitate opportunities arising from wider strategic growth initiatives.

## Reducing homelessness

**We actively prevent homelessness and provide pathways into appropriate housing and support for people who are homeless or at risk of homelessness.**

### Overview and evidence

The effect of homelessness can extend beyond the devastating loss of accommodation and impact individuals for years. We recognise it is often related to complex issues that hinder financial, education, social wellbeing and create health inequality.

Through early intervention and prevention and proactive solutions we expect to halve the levels of homelessness and rough sleeping in Luton.

Already we have ceased the use of bed and breakfast accommodation, moving homeless households into more appropriate accommodation.

Homelessness remains a major problem in the town however, and Luton has over twice the number of people living on the streets than in any other town in the East of England according to homeless charity Shelter.

The [Homelessness Prevention Strategy 2016–21](#) (HPS) (updated 2018) is the first shared homelessness strategy for Luton Council and Luton CCG.

The need to respond to homelessness in a multi-agency coordinated way is now much greater. We intend to support our residents as early as possible to ensure they are enabled to help themselves in finding appropriate solutions to prevent homelessness.

Regular dialogue between statutory and third sector partners has developed from the HPS which has facilitated additional projects and funding bids to tackle homelessness issues in the town.

### Homelessness in Luton – key facts<sup>20</sup>

- The numbers of homeless applications in Luton has increased by 65 per cent between 2014 and 2017. Applications fell in 2013-14 and have gone back up again.
- The numbers accepted as being in priority need in Luton have reduced by 10% between 2014 and 2017, falling from 439 to 391 households in that time.
- The main reason for homelessness in 2017-18 is the end of an assured shorthold tenancy, which accounted for 98 cases in 2017-18. The increasing gap between Local Housing Allowance and actual rents is exacerbating this problem.
- Luton has been successful in the number of cases of homeless prevention, with an increase from 119 cases 27
- in 2014-15 to 876 cases in 2016-17 and 801 in 2017-18 with the majority of the interventions keeping people in their home.
- Two thirds of homeless cases are female with dependent children being the most frequent reason for priority need.
- The black ethnic group are over represented in homeless applications. This trend is the same in all comparator regions.

### Recent changes

The key change has been the introduction of the [Homelessness Reduction Act](#). The act introduces stronger prevention and relief duty for eligible households regardless of priority need status.

The extension of the definition of threatened with homelessness from 28 to 56 days gives local authorities a more realistic period to carry out prevention work.

The number of households in nightly lets has been reduced from 336 to 265 between January and June 2018, a reduction of 20%.

Number of frontline homeless preventions has risen from 61 to 560 cases over three years.

The time taken to make a decision on homeless applications has reduced so that the number of people waiting over 33 days for a decision has fallen from 200 to 12 over the last two years.

A successful bid for a Rough Sleepers Initiative was recently awarded by the Ministry of Housing, Communities and Local Government (MHCLG). This funding of £310,940 will assist in reducing the number of rough sleepers from 87 to 44 in the forthcoming year.

A successful bid for the development of a Housing First project in Luton was awarded £210,00 from improved Better Care Fund (iBCF). This project will support 20 homeless individuals with complex needs in accommodation through allocated council stock.

## Joined up ambition

Homelessness and vulnerable housing has an impact on health so our work to reduce homelessness supports our strategic ambitions on Public Health and children and families.

In particular our Health Inequalities Action Plan sets targets to address homelessness and poor housing.

We worked with Luton Clinical Commissioning Group to set out a five-year strategy which aims to reduce levels of homelessness and the human cost of homelessness across the borough. A multi-agency group supports the ongoing implementation of this strategy<sup>21</sup>.

Because homelessness impacts disproportionately on women and black people in Luton, activities to tackle homelessness also supports our wider work on community cohesion, equalities and community engagement.

Engagement activities with primary care and community organisations demonstrated that reducing homelessness was a high priority for Luton.

## Priorities and actions

### Homelessness reduction

- We'll support our implementation of the Homelessness Reduction Act with the introduction of new software and focus on homelessness prevention.
- We'll reduce rough sleeping by 50% over two years and work with key partners to tackle entrenched rough sleeping and prevent more people from becoming rough sleepers.
- We'll maintain and develop effective reconnection services back to home countries and cities for those without a local connection.
- We'll review supported housing services to prevent repeat homelessness and rough sleeping amongst people with mental and complex health needs.
- We'll ensure that local public and voluntary sector services prioritise homelessness prevention when designing and commissioning services for vulnerable individuals and families.
- We'll reduce homelessness costs by a minimum of £2m between 2018 and 2020.

### Improving temporary accommodation outcomes

- We'll expand our Temporary Accommodation Purchasing Scheme to provide an additional 20 homes by 2020 to grow our portfolio to 80 homes.
- We'll improve the quality of temporary accommodation by working closely with our private sector property owners and leasehold providers.
- We'll support the introduction of supported temporary accommodation offering higher support for those with complex needs.
- We'll eliminate our long term use of nightly lets to zero by 2020.
- We'll reduce the number of households in temporary accommodation by 100 per year.
- We'll ensure that residents of temporary accommodation are benefitting from the skills, and

training support available via the Luton Investment Framework and career pathfinder team.

- We'll meet our income collection target of 93% for temporary accommodation.
- We'll continue to lobby for increased LHA rates to reflect Luton housing market and limit the council's exposure to temporary accommodation costs.
- We'll reduce time in temporary accommodation by improving our processing time for homelessness applications and supporting people to move out into independent accommodation.

### Partnership

- We'll continue to build on partnership working with charities, third sector, statutory and faith organisations to address homelessness challenges and attract investment for through a variety of projects and initiatives, taking up all opportunities to support sustainable prevention of homelessness and routes out of homelessness.
- We'll work with women's organisations to improve emergency housing and move on options for victims of violence and exploitation.
- We'll work with partners on a Homelessness Complex Needs Panel to work with households that have complex needs and seek funding opportunities for Housing First and other projects.
- We'll develop jointly with third sector organisations a 'Move On' strategy which will offer long term support.
- We'll bid to be part of the Making Every Adult Matter network coordinated through Homeless Link.

### Risks and mitigations

There are many drivers of homelessness in Luton but affordability and accessibility of the private rented sector in particular is a challenge.

Our ability to prevent homelessness, and respond to it, is hampered by:

- rising rents
- short term tenancies
- low local incomes

Hence, a major risk for our ambitions to reduce homelessness is any economic shock which impacts on incomes without reducing housing costs, and the separate issue of rising housing costs.

In addition the growing gap between actual rents and Local Housing Allowance places households on low incomes and many working households at greater risk of homelessness.

Our LIF is the key mechanism to mitigate against low income and precarious employment in the town and support more high skilled stable jobs.

Many of our projects to reduce homelessness and support homeless people are funded through government and external funding. When these funding streams come to an end, the sustainability of services particularly to rough sleepers is at risk.

Success in delivery of more affordable housing in Luton will also help to reduce time in temporary accommodation and create more opportunities for stable housing options.

## Quality Homes and Places

**Luton residents are proud of their homes and neighbourhoods and improvement of poor quality homes is helping the most vulnerable households.**

### Overview and evidence

Across Luton, the quality of homes and neighbourhoods impacts on health, safety and life chances for our residents.



A quality town centre is important to resident satisfaction

Although most residents are satisfied with the town, where dissatisfaction exists, the condition of neighbourhoods is a key reason.

Through the LIF, we're working to improve quality of place and change perceptions of residents and visitors to Luton. Housing and neighbourhood quality are both key to achieving the ambitions of the LIF.

The Housing Strategy supports the Local Plan 2011-31 in terms of creating a good quality place, for example through Policy LLP27 which provides guidance regarding balancing green spaces with development in the town.

Our most recent information on private housing quality is in the Housing Condition Survey from 2009 which identified that privately owned homes in Luton were better than the England average, and that poor conditions were concentrated in central areas<sup>22</sup>.

Luton has had a higher than average private rented sector which has grown in the last 10 years to 23%<sup>23</sup>; nearly a quarter of homes. The quality of privately rented homes is therefore a high priority locally.

The council itself owns one in ten homes in the town and we're committed to investment in council housing stock, to maintain high quality affordable homes and neighbourhoods.

The standard of our housing management and maintenance is a key success factor in creating good quality places.

A major consideration in housing quality is thermal comfort and fuel poverty. Fuel poverty has been falling but still affects an estimated one in eleven of households<sup>24</sup> and impacts on both physical and mental health.

### Key facts

- According to latest available data, 32%<sup>25</sup> of private homes fail the decent homes standards. For council homes this figure is lower than 1%<sup>26</sup>, compared to a national average of 5%.
- 11.8% of households experienced fuel poverty in 2016<sup>27</sup>
- 20% of people are dissatisfied with Luton as a place to live, with over a quarter of those citing quality of place reasons<sup>28</sup>.

Information collected in 2017 from enforcement teams shows that the wards of Biscot, Dallow, Farley, Hightown and South are particularly affected by issues such as:

- noise
- crime
- fly tipping
- poor housing conditions

These are the four wards with the highest proportion of privately rented homes.

Local engagement highlighted that the quality of homes in the private rented sector was a particular concern for family workers and health partners as well as residents of the town.

Neighbourhood issues such as inappropriate parking, community safety and exploitation of vulnerable people were raised by residents and third sector groups.

### Recent changes

We have a strong focus on enforcement and housing quality has recently been incorporated in a broader approach to community enforcement. Our private sector housing team has been proactive in bringing rogue landlords to task, having a dedicated Rogue Landlord team.

In addition to serving statutory notices we have succeeded prosecuting in 19 cases, the largest fine of which amounted to over £70,000, relating to over 30 homes since the Rogue Landlord Project began in June 2015. Our selective licensing scheme is impacting on standards in the private rented sector.

Our 30 year HRA business plan has been developed with a focus on investment. In the first five years of the business plan we have allocated £124m investment to maintain and improve our council homes, as well as funding to transform Marsh Farm and build new high quality homes.



New council homes at Sefton Close, completed 2017

We're implementing projects to improve neighbourhoods on our estates including:

- parking enforcement
- new cleaning contracts
- concierge services

We've installed 52 boilers and carried out 32 heating works to 84 homes of people who are vulnerable and in need of affordable warmth over the past two years (2016-18).

We've attracted £105,000 over two years iBCF funding for an Energy Doctor scheme which will support vulnerable people with heating advice and access to Healthy Heating grants. This follows up to £2m inward investment secured through ECO initiatives since 2011.

We have delivered over 150 measures in low income households, covering small repairs, garden maintenance and home security.

Our recent research into the housing needs of older residents identified a requirement to improve advice and guidance for older homeowners to maintain their homes in good and safe condition and we are actively working with the CCG to target frailer households with support and information.

Our wholly owned housing company, Foxhall Homes, is bringing high quality family homes to surplus land sites, which contribute to the quality of place in Luton.

### **Joined up ambitions**

The health impacts of poor housing are well understood and for this reason, our Joint Strategic Needs Assessment (JSNA) identifies improvements to housing quality, especially in the private rented sector, as a priority.

Addressing poor housing is also incorporated into the Luton Health Inequalities Strategic Plan.

Initiatives to support affordable warmth are also central to our Public Health approach, with targets including the improvement of all homes in Luton especially private rented sector homes.

Our Corporate Energy Strategy seeks to:

- reduce CO2 emissions
- support greener initiatives
- improve our performance in reducing energy use

Domestic energy use is a part of this strategy which drives projects in Photovoltaic energy generation, insulation and energy efficiency installations.

We own one in ten properties in the town and have planned a significant investment in our homes. This includes the regeneration of some areas such as High Town and Marsh Farm to make broader neighbourhood improvements, including a new community room hub in Marsh Farm.

## Priorities and actions

- Commission an updated housing condition survey which specifically identifies conditions in the private rented sector to improve the targeting of our work to improve housing quality.
- Review our Housing Assistance policy to clarify our commitment to quality homes and wellbeing.
- Reduce levels of fuel poverty by 25% over three years.
- Provide services to vulnerable homeowners who need help to maintain their own home by relaunching handyman services and better targeted advice.
- Establish the Energy Doctor scheme and support over 250 clients by 2020 with affordable warmth and wellbeing initiatives.
- Build strategic partnerships with health organisations, installers and funders to increase our impact in tackling fuel poverty, and improving housing conditions, demonstrated by increases in EPC ratings across the town.
- Seek all opportunities to maximise external investment in low energy initiatives.
- Commission new homes built to good quality through both Foxhall Homes and new council housing with a minimum of 400 homes completed by 2022.
- Invest in council homes to ensure that all homes reach EPC Band D by 2020 and Band C by 2025.
- We'll implement a new tenancy agreement for council tenants by 2019/20 setting out rights and responsibilities to support good neighbourhood management.
- Continue to improve estate management for council homes, based on feedback from our tenants, including new contracts for cleaning and grounds maintenance.
- Capture improvements in the private rented sector to demonstrate effectiveness of our

improvement activities such as licensing.

- Deliver tenancy sustainment initiatives which support vulnerable tenants at risk of hoarding, self-neglect and cuckooing, and minimise the impacts on wider neighbourhoods.

## Risks and mitigations

Financial resources are a primary risk for our grant programmes as our private sector grants are discretionary. The focus on attracting inward investment will help to mitigate against any loss of public funding.

However, we note that funding programmes for energy works have often been through EU programmes such as European Regional Development Funding. It's not clear at this point how these would be replaced after the UK leaves the EU.

In order to ensure that eligible households take up services which are available, we will work with community partners and embed a communications plan to target hard to reach and vulnerable households.

## Supporting Wellbeing

**The right housing options are in place so that people in Luton can live well by feeling included and supported to live independent lives.**

### Overview and evidence

Housing's essential role in supporting health and wellbeing is well evidenced and recognised by Luton Health and Wellbeing Board. The board has identified a focus on housing and homelessness in its Health and Wellbeing Strategy and these issues are also reflected in our JSNA.

Overarching themes include:

- promoting healthy lifestyles
- reducing health inequalities and poverty
- supporting people to meet health needs through housing

Broader work across Luton Council including our Health Inequalities Strategic Plan also aims to address the health impacts of deprivation, many of which are housing related.

This section of the housing strategy includes information, priorities and actions relating to ten different groups which may require specific housing responses. We recognise that many people will be affected by several of the specific issues identified.

As an example, ex-military personnel are often affected by mental illness or substance misuse, and by other vulnerabilities including physical disability or offending behaviour. The overlap between different groups in this sustainment.

As Luton Council and Luton CCG continue to align their work, the role of housing in supporting health and wellbeing is crucial to the delivery of the Sustainability and Transformation Programme and wellbeing aspects of the LIF.

### Children, looked after children and care leavers

Luton is a young town with a high proportion of residents under 15. The council's children's services has a focus on:

- looked after children (LAC)
- 16 to 25-year olds living with a disability
- asylum seekers aged 16 to 18 years old

As at November 2017, there were 350 looked after children in Luton and we take our role as corporate parent seriously. For example we recently changed our housing allocations policy to:

- give greater priority to young people leaving care
- give access to larger homes for fostering families

Good quality housing options for care leavers are very important to ensure good outcomes and life chances. At present, staff provide support in the following areas to all successful transition from care to adulthood:

- developing independence
- money skills,
- education
- training and employment options

Challenges currently exist in identifying appropriate accommodation for care leavers where hostels are inappropriate. We're also seeking to support 52 care leavers from hostel accommodation to other independent accommodation.

### **Domestic violence and abuse**

Tackling domestic violence and abuse is a priority for us. We're looking at new ways of reducing domestic violence and abuse and its effects on families in Luton and recently committed to the [Chartered Institute of Housing's Make A Stand campaign](#).

Under this commitment we seek to respond to domestic abuse which affects our residents or staff. Victims of abuse require a secure and consistent pathway to flee domestic abuse into refuge and onto secure accommodation as well as options to stay safely in their existing homes.

Domestic violence accounts for around a quarter of all recorded crimes and is one of the leading causes of homelessness for women nationally including nearly half of all repeat homelessness applications<sup>29</sup>.

Nationally, the number of people fleeing domestic violence and making homeless applications has risen in actual terms, although the percentage of acceptances due to domestic violence has decreased<sup>30</sup>. Violence and abuse is a factor which leads to women sleeping rough and is also present for rough sleepers.

Aspects which impact on abuse and the routes out of it include of culture, language, family structures, and racism and in some instances the insecure immigration status of abuse victims.

In 2017, Luton Women's Aid received 625 calls for support. 78% of which came from women who were experiencing current domestic violence which had been present for an average of five years. One in twenty women had more than one perpetrator. 197 women with 231 children received face to face support.

### **HIV+ and other chronic conditions**

The east of England is one of the regions with the highest prevalence (19%)<sup>31</sup> of new HIV diagnoses outside of London. Rates of HIV infection in Luton at 4.6% are over twice the national average of 2%. The communities most affected are Black African men and gay men who make up around two thirds and one third respectively of local cases.

Because of the stigma associated with HIV, many people affected are also suffering from mental health problems and discrimination which can make for chaotic lifestyles.

HIV medication has improved significantly and helps to prolong life, although over time this also comes with sideeffects such as brittle bones and mobility difficulties. Appropriate housing solutions will reflect these needs as well as supporting a stable and healthy home environment.

Luton has one of the highest rates of tuberculosis (TB) in the east of England, generally in excess of 20 cases per 100,000 population. However, TB rates dropped to 2016<sup>32</sup>. People with TB often require supported housing options when leaving hospital in order to stabilise and manage their condition. Lack of stable housing can lead to further emergency admissions.

## Learning disabilities and autism

There are currently estimated to be around 800 adults in Luton recorded by their GP as having a learning disability, and there is a core group of 200 to 300 known people who require care and support. Luton has a number of supported housing schemes providing for this client group and the longer term need for these is being reviewed.

However, the true picture of all those with learning disabilities is much larger; there were over 3,370<sup>33</sup> people with a learning disability in Luton in 2017 and this is estimated to increase to 3,870 by the year 2035. In addition there is a hidden cohort of people with learning disabilities living at home with ageing parents.

This group of people is getting older and requiring more help as they progress into old age. People with learning disabilities are increasingly seeking personalised options, including sharing a home with a partner or spouse and housing options need to adjust to facilitate this. Most of this housing will be general needs with support rather than bespoke housing.

We're currently working with Luton CCG on a strategy for people with learning disabilities. This strategy will assess the needs, including accommodation and support needs, and develop commissioning priorities for specialist accommodation.

Actions from this strategy including recommendations on assistive technology, housing options and shared living will be progressed during the life of this housing strategy. Early drafts of the Learning Disabilities and Autism Strategy identify the need to commission additional supported living and community services and increase housing options for people with learning disabilities.

Within the Transforming Care programme we are working with partners in Bedfordshire and Milton Keynes. Sourcing appropriate housing is a crucial part of this work stream and close working is therefore required to ensure a good outcome for individual service users with complex needs.

The NHS Midlands and East region has produced a housing plan specifically for the Transforming Care Programme which identifies a requirement for 98 units of accommodation by 2023 in Luton. A key cohort is young adults returning to Luton from out-of-borough school placements.

## Mental health

Good mental health underpins our physical health and wellbeing and is fundamental to how we live our lives through relationships, work, leisure, and in achieving our full potential. Mental health and wellbeing is influenced by many underlying factors, and there is evidence to connect poor and unaffordable housing with poor mental health<sup>34</sup>.

Luton has existing partnerships which connect housing and mental health organisations and partnership working is crucial to good housing outcomes for people with mental ill health.

People in marginalised groups are at greater risk of mental health issues including:

- black, Asian and minority ethnic (BME) people
- lesbian, gay, bisexual and transgender (LGBT) people
- disabled people
- people who have had contact with the criminal justice system (ex-offenders)

Mental ill health is a major factor in rough sleeping and our rough sleeper initiatives include mental health support to ensure that people can move off the streets.

Nationally, rates of schizophrenia are:

- times higher in black Caribbean people
- 4.7 in black Africans
- 2.4 times higher in Asian groups

Black populations are most likely to experience post-traumatic stress disorder, suicide attempts, psychotic disorders and drug dependency.

Mental ill health is also a factor for other people such as victims of abuse, ex-offenders, care leavers and people with learning, sensory or physical disabilities.

Isolation and loneliness is increasingly recognised as a major factor in mental and physical wellbeing. Good housing, safe neighbourhoods and a sense of community has a crucial role to play in keeping people connected and well.

There are currently estimated to be between 3,000 and 4,000<sup>35</sup> people receiving mental health services in Luton. According to the PANSI estimates, between 22,872 and 23,971 Luton people have some sort of mental health problem and between 9,559 and 10,036 have two or more psychiatric disorders<sup>36</sup>. Others will be affected but undiagnosed.

Luton has a wealth of charity and third sector organisations with an interest in mental health whose strengths and specialisms should be harnessed to improve the wellbeing of people with specific mental health needs.

## Migrants

Migrant destitution in England is rising, and for migrants who find themselves destitute and with no recourse to public funds (NRPF) there are limited services available. Mainstream services struggle to provide effective support for those outside of the welfare state, yet destitute migrants remain extremely vulnerable.

Without accommodation, migrants exposed to rough sleeping are in danger of worsening physical and mental health, and an increased exposure to substance misuse. For destitute migrants, the lack of accommodation is even more challenging as they do not have access to benefits. This leaves them at greater risk of exploitation and/or trafficking.

Access to basic humanitarian and subsistence needs such as toiletries, cash, travel, food and clothing is also a crucial support mechanism for ensuring destitute migrants are able to survive

day to day. Around two thirds of rough sleepers in Luton are thought to be destitute migrants with no recourse to public funds, primarily from Eastern Europe.

Within Luton, a project run by NOAH Enterprises and funded via MHCLG, helps destitute migrants to access health care, reducing public health risks; to overcome barriers to employment; to access financial services via a credit union and to secure long term accommodation.

The NOAH Controlling Migration project also links with the NOAH Street Drinkers Outreach project to meet the needs of rough sleeping migrants.

## Offending behaviour

Tackling gang activity and offending behaviour is a crucial part of improving quality of life in Luton. Where this activity is related to place, there is a role for effective housing management and support to limit the impacts of people becoming involved in criminal behaviour.

For those who have been imprisoned, too many leave custody without a job, training, and/or a place to live; this can lead to mental health issues and re-offending. As a matter of good practice, statutory and voluntary services should engage with a prisoner's housing needs at the earliest opportunity.

There's evidence that helping offenders to secure suitable housing before the point of release and creating opportunities for specialist support alongside this is crucial to break the cycle of offending.

Data provided by HM Prison and Probation Service for Bedfordshire in June 2018 showed:

- approximately 80 individuals to be released from prison in next 12 months, 70% of which were in Luton
- insufficient housing and support available to ex-offenders to support rehabilitation and manage risk effectively
- specific locations required for certain offenders for example away from schools and childcare settings

## Older people

Although Luton has a lower than average population of older people, the number is growing and there is also evidence of people becoming frailer at an earlier age in the town<sup>37</sup>.

Luton Council commissioned research in 2017 to review the medium terms housing needs of older and frail people in Luton. The research looked at current provision of specialist accommodation and services, the pattern of demand and need in the town and options to remodel or develop existing assets to meet arising need.

Most older people prefer to stay at home as long as possible but require better access to advice and support to enable independent living. However, the provision of aspirational retirement living options can help to encourage moves to age-appropriate accommodation which frees up family housing across tenure.

Our research identified that Luton has a lower provision of older person's accommodation than comparable boroughs and there is a need for additional age-appropriate and sheltered accommodation as follows<sup>38</sup>:

Date	Age exclusive	Sheltered	Extra care	Residential care beds
2020	30	104	24	55
2025	81	282	66	148
2030	134	468	109	245

**Table showing need for additional age-appropriate and sheltered accommodation**

The report notes, however, that these numbers would reduce if more people were able to remain independent at home.

The wards with greatest need for new accommodation are:

- Bramingham
- Round Green
- Leagrave
- Challney
- Crawley

There was a clear demand for improved information, advice and guidance services, including the potential for a community navigator model which identifies key members of a community to share knowledge and signposting. Older people and their families especially need access to good advice on staying independent at home, adaptations, assistive technology and financial advice.

All the council's existing sheltered schemes were reviewed in order to identify potential development opportunities, as well as some additional sites which might be appropriate for targeted older persons' accommodation.

We anticipate a doubling in the number of people in Luton with dementia from about 1,800 in 2014 to 3,600 in 2040<sup>39</sup>. There is evidence that dementia is more prevalent in African Caribbean and UK South Asian communities. Luton's Dementia Strategy seeks to make Luton a Dementia Friendly town.

### **Physical and sensory disabilities<sup>40</sup>**

Physical disabilities are also increasing in number. In 2017, there were approximately 12,500 people with a physical disability. By 2035 this will increase to 14,600.

- Individuals with Physical difficulties faced difficulty when being rehoused and often spend time in unsuitable accommodation.
- There is need for developers to provide housing for people in wheelchairs and built to mobility standards (Cat 2 and 3 building regulations).

We've produced the Luton Housing Design Brief that incorporates accessible homes for all. We also support households with disabilities through disabled facilities grants and adaptations funding within council homes.

There are small numbers of people with sensory disabilities, known to the council services. There are:

- 45 people known to having a visual impairment
- 9 with a hearing impairment
- 4 people are deaf
- 3 people are dual diagnosis

People with visual and hearing impairments can benefit from support, sensitive housing design and assistive technology to live independently.

## Priorities and actions

The types of services and accommodation required are summarised in this table:

<b>Client type</b>	<b>Sign-posting/advice</b>	<b>Support to stay at home</b>	<b>Access to housing</b>	<b>New specialist housing</b>	<b>Low level support at home</b>	<b>Intensive support at home</b>
Children, LAC, care leavers	Yes		Yes		Yes	
Domestic violence	Yes	Yes	Yes	Yes	Yes	
Ex-offenders	Yes		Yes		Yes	
HIV+ and chronic conditions	Yes	Yes	Yes		Yes	
Learning disabilities	Yes		Yes	Yes	Yes	Yes
Mental health	Yes	Yes	Yes		Yes	Yes
Migrants	Yes		Yes		Yes	
Older people	Yes	Yes	Yes	Yes	Yes	Yes
Physical and sensory disabilities	Yes	Yes	Yes	Yes	Yes	Yes

In addition to the actions identified in this section, other actions across the strategy will support wellbeing of local residents. For example, the review of our Housing Assistance Policy will also cover adaptations assistance which supports both children and adults with physical disabilities or frailty.

### **Children, looked after children (LAC) and care leavers**

We will:

- reduce our use of hostels for young people leaving care
- develop more suitable housing options for LAC and young asylum seekers
- support foster carers in Luton through appropriate home extensions and access to larger homes to allow local fostering
- work with partners to bring forward supported lodging and shared lives housing options
- continue to return children who are currently placed outside of Luton back into the borough, developing specialist accommodation where necessary
- work with third sector partners to make move on accommodation available for young people

### **Domestic violence and abuse**

We will:

- work with partners to support people, where appropriate, to stay safely in their homes rather than having to move due to violence, and to return home after a refuge stay if possible
- continue to develop referral networks between our Housing Needs team and support providers to improve the pathway into support for victims of domestic abuse. Information about refuge spaces will be shared to ensure that people are helped wherever possible
- review the need for supported temporary accommodation and make this available to victims of domestic abuse where appropriate
- review our tenancy management and encourage other landlords to do the same, to challenge perpetrators living in our homes and make both our permanent and temporary accommodation safe for residents
- develop a Domestic Violence and Housing Strategy with partners which will include an approach to safe move on accommodation options

### **HIV+ and chronic Conditions**

We will:

- consider establishing a HIV+ champion to take an overview on our services to this cohort of people and especially in regard to supporting good mental health and access to wider housing and support services
- incorporate data from this cohort into our needs assessment for accessible housing due to the increased prevalence of mobility problems

- incorporate people with conditions such as TB into our service planning for supported housing solutions and supported temporary accommodation

## Learning disabilities and autism

We will:

- help people stay close to family and community
- meet our commitments within the Transforming Care Programme and facilitate access to appropriate housing for Transforming Care clients and other people with learning disabilities and autism as identified in the forthcoming Learning Disabilities & Autism Strategy
- be an active partner in learning disabilities forums and groups to build working relationships
- as identified in the forthcoming Learning Disabilities and Autism Strategy, we will seek opportunities to meet the housing aspirations of people with learning disabilities and autism by supporting access to:
  - mainstream housing where relevant
  - provision of shared accommodation options
  - shared lives
  - provision of new accommodation
- adopt the Learning Disabilities Plan
- make six homes available at our Marsh Farm development for people with learning disabilities

## Mental health

We will:

- participate in multi-agency approaches to support mental health for all, including children, through good quality housing and homelessness services
- incorporate consideration of mental health into our activities around vulnerable groups

## Migrants

We will:

- continue to work with partners to address homeless migrants, and seek additional funding to address accommodation and support needs
- encourage our staff and partners to train to identify languages and offer appropriate housing advice

## Offending Behaviour

We will work:

- with partners to help people who are entering the criminal justice system to retain their housing where possible, including where they are a council tenant
- with third sector partners to seek funding to provide proactive housing advice ahead of release to ensure an address when leaving prison
- with NACRO and other partners to source additional housing for ex-offenders.
- in partnership to reduce reoffending by ensuring that ex-offenders are not excluded from pathways to housing and can access appropriate housing and resettlement support to maintain a stable and successful life

## Older people

We will:

- develop proactive services which support independence such as rapid access to adaptations, assistive technology and financial advice
- promote age-appropriate accommodation, built to good design, care ready and in age-exclusive blocks. This may form part of a wider mixed use scheme
- remodel and relaunch our handyperson service to support independence at home
- work with partners including health partners to expand our advice offer and work with community gatekeepers to support older people making positive choices to stay well at home and avoid loneliness
- initiate conversations with developers about including age-exclusive accommodation within wider development schemes
- include age-appropriate homes within our HRA development programme as part of our commissioning priorities and identify sites which could deliver our own age-appropriate and extra care
- identify a site for extra care provision and work with partners including health and social care organisations to commission a new scheme

## Physical and sensory disabilities

We will:

- increase the number of wheelchair standard dwellings which we build to 10% of our rolling HRA Programme and build to minimum accessible standards across our programme
- develop our assistive technology offer to help people live independently
- continue to take up all adaptations funding to provide adaptations for people with disabilities and align this programme with schemes to facilitate hospital discharge and avoid hospital admittance

- protect Housing Revenue Account funding for adaptations in council homes to support independent living
- ensure that sensory disabilities are reflected in our approach to aids, adaptations and design for people with broader physical disabilities

## Risks and mitigations

Housing solutions which underpin wellbeing and health are highly personalised and related to many wider priorities. There are risks associated with a high dependence on partnership solutions for these client groups.

Conversely this partnership working is also a strength as it maximises the capacity and resources of any individual organisation.

## Equalities statement

### Housing Strategy 2019-22 – equality analysis

#### Equality analysis details

- **Proposed policy:** Housing Strategy 2019 to 22
- **Equality analysis:** Claire Astbury, Head of Housing Strategy & Development
- **Strategic Director:** Patrick Odling–Smee, Service Director Housing
- **Department:** Customer and Commercial
- **Date of review:** July 2020

#### Overview of service user and key stakeholders consulted

- **Services users and stakeholders:** key users of the department or service: internal departments of the council, strategic partners such as third sector organisations
- **Key stakeholder involved in the strategy:** internal and external stakeholder including tenants panel, service users groups

## Brief description of strategy

### Introduction

The council's new housing strategy to 2020 is a cross-tenure housing strategy covering all forms of housing in the borough, including private, housing association and council housing. It includes the provision of both new housing and existing housing, and also the housing needs of the borough.

The housing strategy sets out our long-term ambitions for the future of housing in the borough. We want our strategy to be about more than just bricks and mortar. We want:

- the strategy to demonstrate the strong connections between housing and other services which are important to improving people's day to day lives

- housing in Luton to contribute to delivering jobs and growth, and helping to make the borough a healthier place

The strategy sets the vision, commitments and objectives.

To deliver its objectives, we will review progress on a regular basis.

### The purpose of the Equality Impact Analysis

Housing issues affect all residents in Luton. The strategy recognises there are certain groups who:

- are less able to access housing of good quality, appropriate housing on the open market
- may struggle to sustain a successful tenancy

The strategy focusses on how to increase the general supply of housing and also how to help those groups unable to meet their needs on the open market by targeting resources and services to create more affordable homes, make the best use of the stock available and intervene before crisis.

The strategy aims to have a positive impact on households/individuals from protected characteristic groups, especially those who may have particular issues accessing and maintaining tenancies/homes. This section therefore concentrates on identifying the particular issues different groups are more likely to experience.

### Evidence base

In writing this impact assessment, quantitative data from a range of sources has been considered, which forms part of the evidence base underpinning our strategy:

- Business Intelligence Department, Luton Council – 2017 Mid-Year Population Estimate July 2018
- Luton & Central Bedfordshire Strategic Housing Market Assessment Update – Report Findings Summer 2015
- 2011 Census
- The Growth and Changing Complexion of Luton’s Population, Mayhew Harper Associates 2011
- Housing Allocations Policy Review 28th Dec 2017, Luton Council
- Cordis Bright Research 2018

### Key data

A summary of key population data for Luton is set out below.

Year	Luton population	Annual change	Growth %	UK population	UK change	UK growth %
2013	207,400			64,105,700		

2014	210,200	2,800	1.4	64,596,800	491,100	0.8
2015	213,600	3,400	1.6	65,110,000	513,200	0.8
2016	215,900	2,300	1.1	65,648,100	538,100	0.8
2017	214,700	-1,200	-0.6	66,040,200	392,100	0.6
2012-16		7,300	3.5		1,934,500	3.0

**Luton and UK mid- year population estimates 2013-17**

**Source: Office for National Statistics**

<b>Age</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>	<b>Population male %</b>	<b>Population female %</b>
0 to 4	9,300	8,600	17,700	8.3	6.0
5 to 9	8,700	8,300	17,000	7.9	6.2
10 to 14	7,500	6,900	14,400	6.7	5.7
15 to 19	6,500	6,400	12,900	6.0	5.6
20 to 24	6,900	6,700	13,600	6.3	6.4
25 to 29	9,000	8,100	17,100	8.0	6.9
30 to 34	9,900	8,900	18,900	8.8	6.7
35 to 39	8,600	7,900	16,500	7.7	6.5
40 to 44	7,100	6,700	13,700	6.4	6.1
45 to 49	6,700	6,600	13,300	6.2	6.9
50 to 54	6,400	6,500	13,000	6.1	7.1
55 to 59	5,600	5,500	11,200	5.2	6.3
60 to 64	4,400	4,500	8,900	4.1	5.4
65 to 69	3,600	3,800	7,500	3.5	5.3
70 to 74	2,900	3,200	6,100	2.8	4.7
75 to 79	2,300	2,700	5,000	2.3	3.3
80 to 84	1,900	2,200	4,100	1.9	2.5
85 to 89	1,000	1,500	2,400	1.1	1.5
90 and over	400	800	1,200	0.6	0.9

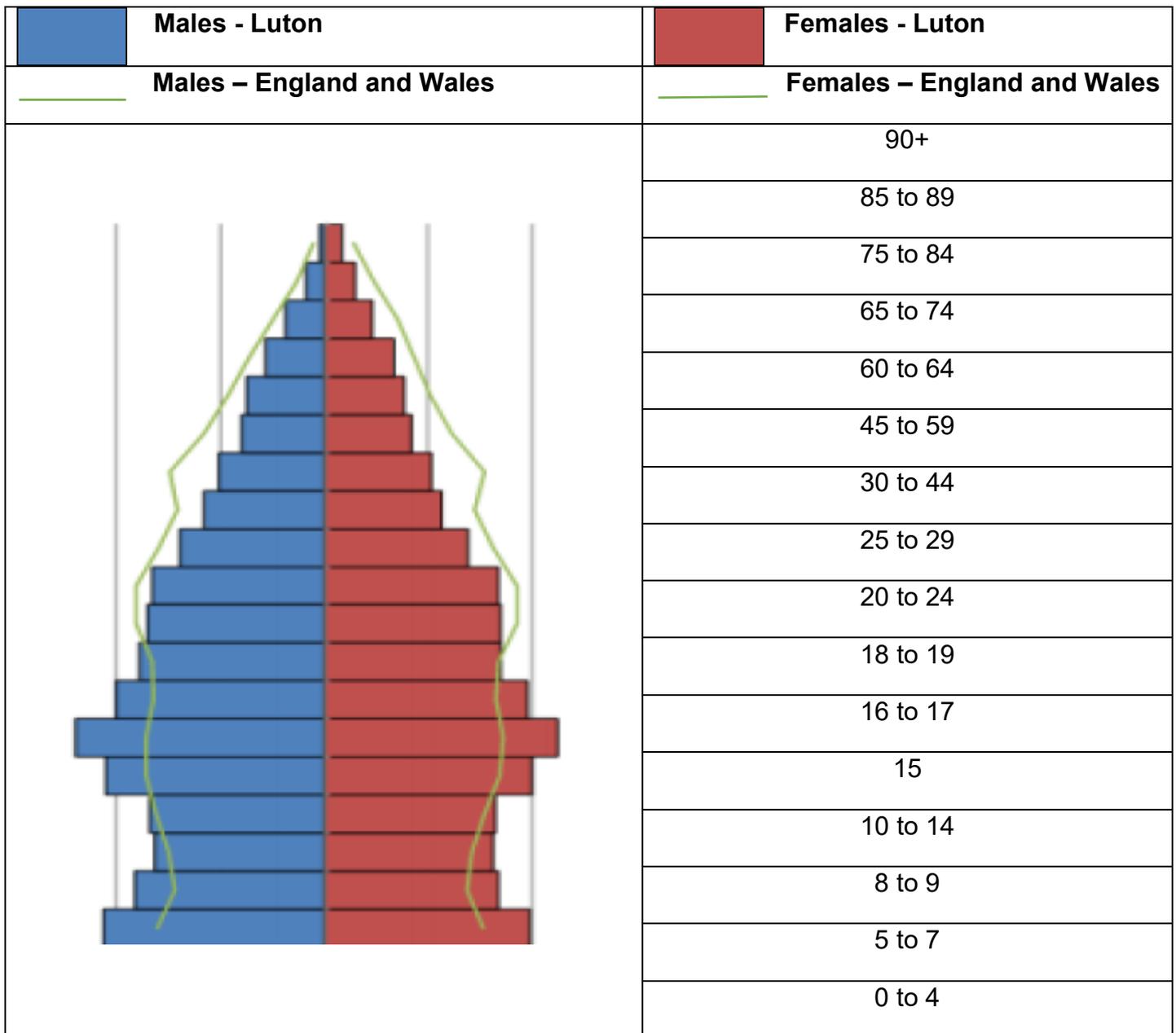
<b>Total</b>	<b>108,900</b>	<b>105,800</b>	<b>214,700</b>		
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**Luton population by age group 2017**  
**Source: Office for National Statistics**

## 2011 census – Luton borough profile

<b>Age</b>	<b>Number - Luton</b>	<b>% Luton</b>	<b>% east of England</b>	<b>% England and Wales</b>	<b>% change 2001-11</b>
0 to 4	16,592	8.2	6.2	6.2	24.9
5 to 7	8,809	4.3	3.4	3.4	9.4
8 to 9	5,412	2.7	2.2	2.2	-1.0
10 to 14	13,221	6.5	5.9	5.8	-4.7
15	2,732	1.3	1.3	1.2	3.1
16 to 17	5,425	2.7	2.5	2.5	3.1
18 to 19	5,404	2.7	2.3	2.6	7.6
20 to 24	16,621	8.2	6.0	6.8	12.7
25 to 29	18,812	9.3	6.2	6.8	38.6
30 to 44	43,926	21.6	20.2	20.5	3.8
45 to 59	34,030	16.7	19.8	19.4	13.0
60 to 64	8,346	4.1	6.4	6.0	6.0
65 to 74	12,644	6.2	9.1	8.7	-0.8
75 to 84	8,440	4.2	6.0	5.6	20.3
85 to 89	1,877	0.9	1.6	1.5	16.8
90+	920	0.5	0.8	0.8	20.1

**Resident population, age and ethnicity**  
**% change figures are between 2001 and 2011 census for Luton only**



Ethnicity – all residents	Number – Luton	% Luton	% east of England	% England and Wales
White: English/Welsh/Scottish/N.Irish/British	90,530	44.6	85.3	80.5
White: Irish	6,126	3.0	1.0	0.9
White: Gypsy or Irish traveller	198	0.1	0.1	0.1
White Other white	14,225	7.0	4.5	4.4
Mixed/multiple: White and black Caribbean	3,831	1.9	0.6	0.8
Mixed/multiple: White and black African	915	0.5	0.3	0.3

Mixed/multiple: White and Asian	1,805	0.9	0.6	0.6
Mixed/multiple: Other mixed	1,730	0.9	0.5	0.5
Asian/Asian British: Indian	10,625	5.2	1.5	2.5
Asian/Asian British: Pakistani	29,353	14.4	1.1	2.0
Asian/Asian British: Bangladeshi	13,606	6.7	0.6	0.8
Asian/Asian British: Chinese	1,497	0.7	0.6	0.7
Asian/Asian British: Other Asian	5,871	2.9	1.0	1.5
Black: African	9,169	4.5	1.2	1.8
Black: Caribbean	8,177	4.0	0.6	1.1
Black: Other black	2,563	1.3	0.2	0.5
Other ethnic group: Arab	1,646	0.8	0.2	0.4
Other ethnic group: Other	1,334	0.7	0.3	0.6

European origin	0 to 19	20 to 64	65+	Age N/A	Total	% of total	% living in households on benefits
Irish	601	1,366	351	105	2,422	39.4	24.8
Former Yugoslavia and Albania	69	110	4	4	187	3.0	40.8
Eastern European	346	840	42	124	1,353	22.0	23.4
Other European (not specified)	601	1,268	134	134	2,191	35.6	24.7
<b>Total</b>	<b>1,618</b>	<b>3,575</b>	<b>367</b>	<b>367</b>	<b>6,154</b>	<b>100.0</b>	<b>24.9</b>

**Population breakdown by age and sub-group in the Other European community, including percentages living in households on means tested benefits**

## Data collection from Housing Needs department at Luton Council

At December 2017, there were 12,833 households as registered for housing register.

Ethnicity of main applicant	% of applications	2011 Census data for the population of Luton (%)
White British / other white	45	47.6
Asian / British Asian	25	29.2
Black / black British	174	9.8
Mixed		4.2

The table below show that Asian British households require larger sized accommodation in comparison to other ethnic households.

The table below shows the relationship between lettings to ethnic groupings vs property size

Ethnic group	No of lets	% of lets
Asian / British Asian	70	10
Black / black British	126	17
White / other white	405	55
European / Eastern	28	4
Mixed	35	5
Arab / Chinese / Other	15	2
N/A	53	7

**Studio and one bedroom lets – April 2014 to March 2017**

**Total lets – 732**

Ethnic group	No of lets	% of lets
Asian / British Asian	76	37
Black / black British	28	13
White / other white	68	33
European / Eastern	12	6
Mixed	7	3
Arab / Chinese / Other	8	4

N/A	6	4
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**Three, four and five bedroom lets – April 2014 to March 2017  
Total lets – 205**

## Summary of impacts on protected characteristic groups

This section considers the potential impacts (positive and negative) on:

- groups with 'protected characteristics'
- the equality information on which this analysis is based
- any mitigating actions to be taken

## Age

Where this is referred to, it refers to a person belonging to a particular age (eg 32 year olds) or range of ages (eg 18 to 30-year olds).

### Potential impacts (positive and negative) of proposed strategy

We'll be seeking to increase the range of housing, housing options and support for older people to enable them to stay in their own homes for as long as possible, and as an alternative to residential care.

This will include increasing the supply of extra care sheltered housing specialist sheltered housing which provides support and care in the same premises, while enabling older people to retain their independence. We'll also develop more cross tenure housing options where there is evidence of demand.

We'll also provide high quality homes and tailored support to enable downsizers to move, many of whom will be older people. This will free up much needed larger homes for younger families, many of whom are experiencing overcrowding.

Many of the benefits of an 'age friendly' housing strategy, such as more integrated communities, better designed homes and neighbourhoods, benefit everyone, whatever their age group, and not just older people.

There is, however, a slight risk that focusing on age-friendly housing if solely looking at the needs of older people, may overlook some specific needs of younger populations, likely to be young families with children, or vulnerable groups.

This strategy acknowledges the needs of families specifically in 'improving housing quality', through encouraging private landlords to offer greater security, certainty and stability for their tenants, especially families with children.

We believe that our strategy overall will help people across all age bands.

More detail is provided in section 6: priority issues for equalities.

## **Equality information on which above analysis is based**

Luton is projected to experience an increase in the number of people aged 65+ and aged 85+. Set against this, Luton has a below average supply of elderly-focussed accommodation sheltered or extra care sheltered housing.

Luton has one the highest populations of young people compared to London and nationally.

## **Mitigating actions to be taken**

We'll monitor the implementation of key actions in our housing strategy through the council plan, alongside any relevant action plan.

During implementation, it will be key to:

- balance the needs of the ageing population against the demographic churn and continued population growth across all age bands
- assess how younger groups and children will be impacted by the individual new housing developments and housing projects that will derive from this strategy

Specific work programmes, such as the development of new homes, are subject to detailed programmes of resident engagement and reports to Cabinet, which will include equality assessments.

## **Disability**

A person has a disability if he or she has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

## **Possible impacts (positive and negative) of proposed policy/decision/business plan**

Through the new housing strategy we'll increase the supply of wheelchair housing and other specialist and adapted housing for those with disabilities.

We'll also ensure that all new housing is built to Lifetime Homes standards, easily adaptable as households' needs change over time.

Poor quality housing is known to affect both physical and mental health. As well as building new homes to high quality standards we also have a programme of improvement works to our own housing stock.

While we've achieved the decent home standard by the housing strategy is more ambitious for the quality standards to be achieved for our housing in future, such as improvements in energy efficiency measures which will in turn help to combat fuel poverty. This will have positive health benefits for those with disabilities and chronic illnesses.

Additionally through the new housing strategy we'll develop our housing services to be 'more than a landlord'. That will include 'going the extra mile' for our residents including providing more individualised advice and support to our vulnerable tenants and residents.

However it's our belief that for most residents, the best route to health and wellbeing is through employment, and the strategy is designed to strengthen links between housing and relevant services that can assist in this goal.

There is a small risk that focus on age-friendly developments may overlook the needs of particular groups, such as those with learning disabilities. We've highlighted and addressed this in the housing strategy and we will be including housing support for people with learning disabilities and other vulnerable groups by:

- connecting them to relevant services
- contributing to helping them to live independent lives

### **Equality information on which above analysis is based**

The number of older people with mobility difficulties is projected to increase by 17% between 2012 and 2020.

The number of working age people with serious physical disabilities is projected to increase by 23% over the same period, from 3,620 to 4,446. Current unmet wheelchair housing need stands at 543 households.

### **Mitigating actions to be taken**

At this stage, we do not know how many disabled people (physically, with learning disabilities, or both) and people with chronic illnesses will be affected by housing developments. Implementation of the strategy will need to ensure a consistent approach for these groups.

We'll monitor the implementation of key actions in our housing strategy ultimately through the council plan, alongside relevant action plans. Specific work streams, such as the development of new homes, are subject to detailed programmes of resident engagement and reports to Cabinet, which will include equality assessments.

## **Gender reassignment**

### **Possible impacts (positive and negative) of proposed policy/decision/business plan**

People in the process of gender reassignment can face discrimination in local communities. Providing more, and better quality housing will benefit all communities in Luton, irrespective of their gender, which will be positive for this group.

The strategy can work towards linking with community organisations that seek to support people undergoing gender reassignment, and towards reducing prejudice and stigma in the community.

### **Equality information on which above analysis is based**

We do not know at this stage how many people will be affected, as prevalence of gender dysphoria is uncertain. A hate crime report by Galop (2013) shows only 50 recorded transphobic crimes in London, however, many will go unreported.

### **Mitigating actions to be taken**

The impact of the housing strategy on transgender people is likely to be low; the strategy encourages linked services, helping the affected group to access services.

Therefore, we do not expect mitigating action to be required at this stage of research. However, the needs of an ageing LGBT population will need to be considered.

## Marriage and civil partnership

### Possible impacts (positive and negative) of proposed policy/decision/business plan

Providing more, and better quality housing will benefit all communities in Luton, irrespective of their relationship status.

Same-sex couples may be discriminated against in the private rented sector and in some local communities, the housing strategy will work towards supporting all residents regardless of their marital status to access support and services, which can help to reduce discrimination in the community.

### Mitigating actions to be taken

None at this stage

## Families with children

### Possible impacts (positive and negative) of proposed strategy

The housing strategy seeks to support families, and this includes support during paternity and maternity also supports this group by giving children the best start in life. We therefore expect there to be a positive impact on this group.

### Equality information on which above analysis is based

There is evidence that housing quality, including overcrowding, can have detrimental impact on maternal and child health during pregnancy and the new-born.

### Mitigating actions to be taken

None at this stage.

## Race

Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

### Possible impacts (positive and negative) of proposed strategy

Policies to increase the supply of family sized homes and encourage downsizing by under-occupiers will benefit overcrowded households, amongst whom black and minority ethnic households (BME) are over-represented.

Luton has the one of highest number of overcrowded households in England and Wales (2011 census).

### Equality information on which above analysis is based

There is evidence that overcrowding in the BME communities can have a negative impact to family health and wellbeing.

### Mitigating actions to be taken

Key actions include:

- provision of larger home of all tenures
- effective responses to hate crime through housing and neighbourhood management
- review of equalities statements for specific housing services

More detail is provided in section 6: priority issues for equalities.

## Religion and belief

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (eg Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

### Possible impacts (positive and negative) of proposed strategy

We expect the housing strategy to have a positive impact on religion and belief, as providing more and better quality housing will benefit all communities in Luton, irrespective of their religion or belief status.

Luton's hate crime strategy seeks to address harassment and crime on religious or belief grounds and applies to all our tenures in Luton with emphasis on our council tenants.

### Equality information on which above analysis is based

Luton has a very ethnically diverse population with variations in tenure.

## Sex

A man or a woman.

### Possible impacts (positive and negative) of proposed strategy

The housing strategy aims to increase the supply of housing across all tenures which will benefit both genders.

While women-headed households are likely to earn less over the duration of their lifetimes, the housing strategy includes measures for the provision of housing for those on a range of incomes.

Women as the main predominant main carers of children and vulnerable adults tend to be over represented statistically as homeless and therefore owed 'reasonable preference' under the terms of section 167 Housing Act 1996 and are protected by the homelessness legislation.

Homelessness single men are above the national average in Luton this will also be addressed through housing options and pathways.

### Equality information on which above analysis is based

No specific data available

### Mitigating actions to be taken

None at this stage.

## Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

### Possible impacts (positive and negative) of strategy

Providing more and better quality housing will benefit all communities in Luton, irrespective of their sexual orientation. There may be additional issues around the needs of the ageing LGBT population, especially those living with HIV

As the housing strategy is age-friendly, implementation will consider the needs of this population.

### Equality information on which above analysis is based

For evidence on an ageing LGBT population and those living with HIV/AIDS, please see Luton Terrence Higgins Trust.

### Mitigating actions to be taken

The national average for individuals affected by HIV stands at 4.7%, the national average being 2.4%, this needs further investigation as appropriate adapted housing needs to be developed to cater for the health needs for individuals in the future.

## Human rights

There are 16 rights in the Human Rights Act. Each one is called an article. They're all taken from the European Convention on Human Rights. The articles are:

- the right to life
- freedom from torture, inhuman and degrading treatment
- freedom from forced labour
- right to liberty
- fair trial
- retrospective penalties
- privacy
- freedom of conscience
- freedom of expression
- freedom of assembly
- marriage and family
- freedom from discrimination
- first protocol

### Possible impacts (positive and negative) of proposed strategy

We don't expect the housing strategy to have an impact on human rights.

## Priority issues for equalities considerations

### Age

Luton has a relatively young population compared to London and nationally Luton is a young town with a high proportion of residents under 15.

However, population growth will also continue to increase demand for housing and support for older people.

The analysis of demographic and demand data undertaken suggests that there are a number of wards in the borough with particularly high housing and support needs, particularly in the north west, north and south-central wards of the borough:

- Bramingham
- Leagrave
- Challney
- Round Green
- Crawley

These areas would be priorities for the development of housing and support services (Cordis Bright Research).

It's clear that a priority for older people's priorities is to be supported in their own homes, and this continues to be where the majority older people live - 78% of older people in Luton and 90% nationally (Cordis Bright Research).

The number of older people with mobility difficulties is projected to increase, while the majority of older people with mobility issues would like to stay in their homes.

We also recognise that the number of multi-generational households are above the national average in Luton which stands at 4.2% and the national average being 1.9% (Cordis Bright 2018).

There is a current unmet need for wheelchair / adapted properties which will be addressed through Luton Housing Design Standards and the building of Life Time Homes and our Downsizing project.

### Ethnicity

Luton has a very ethnically diverse population.

Luton has seen several waves of immigration. In the early part of the 20th century, there was internal migration of Irish and Scottish people to the town. These were followed by Afro-Caribbean and Asian immigrants. More recently immigrants from other European Union countries have made Luton their home.

As a result of this Luton has a diverse ethnic mix, with a significant population of Asian descent, mainly Pakistani 29,353 (14.4%) and Bangladeshi 13,606 (6.7%).

<b>Ethnic group</b>	<b>Population</b>	<b>%</b>
White	111,079	54.6
Mixed	8,281	4.1
Asian or Asian British	60,952	30.0
Black or black British	19,909	9.8
Other ethnic group	2,980	1.5
<b>Total</b>	<b>203,201</b>	<b>100</b>

### **Luton ethnicity: 2011 Census**

There's a wide variation in household size amongst different ethnic groups – with Asian households being larger than average.

There have been significant shifts in the ethnic composition of Luton since the last Census including:

- general increases in the Asian population from 33,600 to 50,200
- the black population increasing from 11,700 to 19,800
- a decline in the white and 'other' population from 139,000 to 132,000

There's evidence of high turnover of population with estimates that between 50% and 75% of the population in 2016 would not have lived in Luton or not have been born at the time of the 2011 Census.

In addition we have new communities from eastern and southern Europe and also people from various African countries. These populations' changes need to be taken into account. This reinforces the perception that Luton is now becoming more diverse both culturally and ethnically.

The needs of these particular groups have been addressed through a number of joint ambitions as illustrated in the housing strategy.

## **Appendix 1: Action plan**

### **Right Homes, More Homes**

<b>Commitment:</b>	<b>We'll continue to press for delivery on all major sites identified in the Luton Investment Framework (LIF) to support economic growth and regeneration in the town.</b>
Actions:	Liaise with developers and partners to support the build out of strategic sites
Lead person/dept:	Housing strategy & Development team
Resources/partners:	Major developers, registered providers

Milestones/targets:	<ul style="list-style-type: none"> <li>• 2,225 homes by 2020 as identified in LIF</li> <li>• 3,500 homes by 2022</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• LIF</li> <li>• Local Plan</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Economic climate</li> <li>• Market forces</li> </ul>

<b>Commitment:</b>	<b>We'll be an active developer, delivering at least 400 homes via our housing company and council house building programme as part of a total delivery of 3,500 homes by 2022.</b>
Actions:	<ul style="list-style-type: none"> <li>• Establish pipeline of sites</li> <li>• Bid for additional HRA headroom</li> <li>• Streamline development processes</li> </ul>
Lead person/dept:	Housing strategy & Development team Foxhall Homes
Resources/partners:	<ul style="list-style-type: none"> <li>• Land and funding for Foxhall investment</li> <li>• £24M budget for HRA investment, to be reviewed in light of HRA borrowing changes</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• 230 homes through Foxhall Homes by 2022</li> <li>• 170 Homes through HRA by 2022</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• Foxhall Homes business plan</li> <li>• HRA</li> <li>• HIP</li> <li>• Local Plan</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Economic climate</li> <li>• Market forces</li> <li>• Government funding criteria</li> </ul>

<b>Commitment:</b>	<b>We'll secure the delivery of 700 affordable homes by 2022.</b>
Actions:	<ul style="list-style-type: none"> <li>• Seek to achieve affordable housing on development sites in accordance with Local Plan and support them to start on site</li> <li>• Purchase sites and land for future affordable development</li> </ul>
Lead person/dept:	Housing strategy & Development team

Resources/partners:	Housing associations developers
Milestones/targets:	Anticipated housing delivery by 2022: <ul style="list-style-type: none"> <li>• HRA – 170</li> <li>• Foxhall – 70</li> <li>• housing associations – 460 homes</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• Housing associations</li> <li>• Private developers</li> <li>• HRA</li> <li>• Foxhall Homes</li> <li>• Local Plan</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Economic climate</li> <li>• Market forces</li> <li>• Government funding criteria</li> </ul>

<b>Commitment:</b>	<b>We'll strengthen our wider partnerships to support access to land, development finance and skills to maximise housebuilding in Luton and consider the potential for specific joint ventures as appropriate.</b>
Actions:	<ul style="list-style-type: none"> <li>• Review council owned land to support affordable housing delivery and commence land purchase.</li> <li>• Seek opportunities for partnership with investors and developers utilising HRA borrowing headroom.</li> <li>• Work with housing associations who have available funding to deliver affordable housing outside of planning agreements.</li> <li>• Explore opportunities for partnership regarding accelerated construction methods to increase housebuilding output.</li> <li>• Work with relevant partners to find new uses for surplus student accommodation.</li> </ul>
Lead person/dept:	Housing strategy & Development team
Resources/partners:	<ul style="list-style-type: none"> <li>• Finance</li> <li>• Partners</li> <li>• Housing associations</li> <li>• Property and Construction services</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Land purchasing programme established by 2020</li> </ul>

	<ul style="list-style-type: none"> <li>• Seek formal partnerships to accelerate delivery</li> <li>• Build relationships with housing providers</li> <li>• Bring a MMC offer to delivery by 2022</li> <li>• Audit blocks by July 2019 and work to repurpose empty blocks by 2022</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• HRA business plan</li> <li>• Foxhall Homes business plan</li> <li>• Local Plan</li> <li>• LIF</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Economic climate</li> <li>• Market forces</li> <li>• Government funding criteria</li> </ul>

<b>Commitment:</b>	<b>We'll implement a policy for shared ownership homes which helps us to deliver additional affordable homes and meet the needs of a wider range of households, including key workers.</b>
Actions:	<ul style="list-style-type: none"> <li>• Introduce shared ownership policy in advance of delivery of new council shared ownership homes</li> <li>• Support the delivery of more family sized homes for shared ownership which meet the needs of lower income households</li> <li>• Support access to shared ownership for key workers</li> </ul>
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Strategy &amp; Development</li> <li>• Housing Operations</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing Operations team</li> <li>• Developers</li> <li>• Housing associations</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Finalise policy by April 2019</li> <li>• Increase proportion of family sized shared ownership to 60% of delivery by 2022.</li> </ul>
Links to other strategies:	HRA business plan
Risks:	Lack of capacity and resource if new shared ownership homes do not come forward

<b>Commitment:</b>	<b>We'll work with developers and partners to support more of the</b>
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	<b>larger homes that the town needs.</b>
Actions:	<ul style="list-style-type: none"> <li>• Support planning colleagues to influence the house types of homes on new developments</li> <li>• Implement nationally described space standards (NDSS) for new council homes and encourage others to deliver at NDSS</li> </ul>
Lead person/dept:	Housing strategy & Development team
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing strategy &amp; Development team planners</li> <li>• Housing associations</li> <li>• Private developers</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• 10% of HRA homes to be 4 bedroom and larger</li> <li>• Private sites to better match SHMA requirements with year on year improvement</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• HRA business plan</li> <li>• Foxhall Homes business plan</li> <li>• Local Plan</li> <li>• LIF</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Economic climate</li> <li>• Market forces</li> <li>• Government funding criteria</li> </ul>

<b>Commitment:</b>	<b>We'll update our supplementary planning guidance on affordable housing to reflect our new local plan in order to secure an appropriate mix of homes on development sites.</b>
Actions:	Draft and consult on a new SPD to secure on-site affordable housing and establish a transparent policy for commuted sums
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing strategy &amp; Development team</li> <li>• Planning team</li> </ul>
Resources/partners:	Planning
Milestones/targets:	SPD to be consulted on by March 2019 with adoption by September 2019
Links to other strategies:	<ul style="list-style-type: none"> <li>• Local Plan</li> <li>• Planning obligations</li> </ul>
Risks:	Officer time

<b>Commitment:</b>	<b>We'll advocate for and seek to provide age-appropriate accommodation which helps to free up family sized homes of all tenures.</b>
Actions:	<ul style="list-style-type: none"> <li>• We'll include age appropriate accommodation in our own programme</li> <li>• We'll collaborate on a market position statement to encourage private investment in age appropriate housing</li> </ul>
Lead person/dept:	Housing strategy & Development team
Resources/partners:	<ul style="list-style-type: none"> <li>• Planning</li> <li>• Housing Operations</li> <li>• Housing Needs</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• MPS drafted for consultation by May 2019 and adopted by July 2019</li> <li>• Two sites to include age appropriate accommodation by 2022</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• LIF</li> <li>• Local Plan</li> <li>• Allocations policy</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Market forces</li> <li>• Officer time</li> <li>• Availability of sites</li> </ul>

<b>Commitment:</b>	<b>We'll maximise all funding opportunities and strategic growth discussions to deliver homes which meet the wider housing needs of the Luton housing market area.</b>
Actions:	<ul style="list-style-type: none"> <li>• Bid for Homes England grants if possible and any other funding that becomes available to deliver our housing needs</li> <li>• Collaborate with neighbouring authorities on growth bids in the Oxford-Cambridge Arc</li> </ul>
Lead person/dept:	Housing strategy & Development team
Resources/partners:	<ul style="list-style-type: none"> <li>• Planning</li> <li>• Finance</li> </ul>
Milestones/targets:	Successful multi-partner growth bid by 2020
Links to other strategies:	<ul style="list-style-type: none"> <li>• LIF</li> <li>• Local Plan</li> </ul>

	<ul style="list-style-type: none"> <li>• HRA business plan</li> <li>• Foxhall Homes</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Officer time</li> <li>• Market forces</li> <li>• Economic opportunities</li> </ul>

<b>Commitment:</b>	<b>We'll make the best use of homes through providing opportunities to downsize in council homes.</b>
Actions:	Offer support to tenants who want to downsize their accommodation.
Lead person/dept:	Housing Operations
Resources/partners:	<ul style="list-style-type: none"> <li>• Third sector organisations</li> <li>• Customer services</li> </ul>
Milestones/targets:	Facilitate 50 moves per year
Links to other strategies:	HRA business plan
Risks:	Lack of alternative housing options

<b>Commitment:</b>	<b>We'll refresh our Empty Homes strategy and continue to bring homes into use at a rate of 20 per year.</b>
Actions:	Updated empty homes strategy to be developed
Lead person/dept:	Private Sector Housing / Empty Homes Officer
Resources/partners:	Legal
Milestones/targets:	Empty Homes Strategy to be completed by June 2019
Links to other strategies:	Empty Homes strategy
Risks:	Officer time

<b>Commitment:</b>	<b>We'll develop our offer to self-builders to support these schemes.</b>
Actions:	Provide those on the self-build register with information about planning and sites
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Strategy and Development team</li> <li>• Planning Policy team</li> </ul>
Resources/partners:	Planning policy

Milestones/targets:	Communications package in place by February 2019 with regular updates in place
Links to other strategies:	Local Plan
Risks:	Officer time

## Reducing homelessness

<b>Commitment:</b>	<b>We'll support our implementation of the Homelessness Reduction Act (HRA) with the introduction of new software, and focus on homelessness prevention and personal housing plans.</b>
Actions:	<ul style="list-style-type: none"> <li>• Target families and individuals vulnerable to homelessness through rollout of Universal Credit</li> <li>• Up to date / daily info on refuge places available</li> <li>• Update info for supported housing spaces on daily basis</li> <li>• Investigate the high number of homeless applications from the Afro Caribbean community</li> <li>• Undertake Equality Analysis of Prevention Service</li> </ul>
Lead person/dept:	Housing Needs
Resources/partners:	<ul style="list-style-type: none"> <li>• Customer Services</li> <li>• Third sector organisations through housing strategy forum</li> <li>• Mental health and housing forum panel meetings</li> <li>• Action Against Poverty / Business Intelligence team</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Incorporate homelessness prevention in UC processes by April 2019</li> <li>• Daily refuge information available by 2019</li> <li>• Review of homelessness completed by 2019</li> <li>• Equality analysis undertaken as part of IIA</li> </ul>
Links to other strategies:	Homeless Prevention Strategy 2016-21
Risks:	<ul style="list-style-type: none"> <li>• IT availability and funding requirements</li> <li>• Current Integrated Prevention team trailblazer funding ends in March 2019</li> <li>• HRA funding ends March 2020</li> <li>• Alternative funding or growth funding will need to be identified</li> </ul>

<b>Commitment:</b>	<b>We'll reduce rough sleeping by 50% over two years and work with key partners to ensure that no-one new sleeps rough for a second night.</b>
Actions:	<ul style="list-style-type: none"> <li>• MHCLG funding stream</li> <li>• To closely monitor projects and targets achieved on a regular basis. Developing Single Persons Needs Panel</li> <li>• Developing a Complex Needs Panel</li> <li>• Ensure all partners and the public are updated on winter/severe weather protocols and StreetLink to prevent risk from rough sleeping</li> </ul>
Lead person/dept:	Housing Needs
Resources/partners:	<ul style="list-style-type: none"> <li>• Third sector organisations through housing strategy forum</li> <li>• Mental health and housing forum panel meetings</li> <li>• Action Against Poverty</li> <li>• Funding from MHCLG</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Panels established by April 2019-20</li> <li>• Rough sleeping reduced by: <ul style="list-style-type: none"> <li>○ Nov 2018 – 25%</li> <li>○ April 2019 – 25%</li> <li>○ April 2020 – 25%</li> <li>○ April 2021 – 25%</li> </ul> </li> </ul>
Links to other strategies:	Homeless prevention strategy / No second night out
Risks:	<ul style="list-style-type: none"> <li>• Officer time</li> <li>• Voluntary sector capacity</li> <li>• Rough Sleeper Partnership funding and Controlling Migration funding ends in 2019</li> <li>• New bid for CMF has been submitted</li> </ul>

<b>Commitment:</b>	<b>We'll maintain and develop effective reconnection services back to home countries and cities for those without a local connection.</b>
Actions:	<ul style="list-style-type: none"> <li>• Council lead audit</li> <li>• Identifying gaps so to secure future funding</li> <li>• Develop protocols and signposting for this cohort</li> <li>• Develop a forum with partners for migrant support using the</li> </ul>

	Homeless Link toolkit, or access existing forums
Lead person/dept:	Housing Needs
Resources/partners:	NOAH
Milestones/targets:	<ul style="list-style-type: none"> <li>• Audit ongoing to April 2020</li> <li>• Protocols established with partners via a forum by 2019</li> </ul>
Links to other strategies:	Homeless prevention strategy
Risks:	<ul style="list-style-type: none"> <li>• Controlling Migration funding ends in 2019</li> <li>• New bid for CMF has been submitted to provide dedicated funds for reconnection services, flights and travel costs</li> </ul>

<b>Commitment:</b>	<b>We'll review supported housing services to prevent repeat homelessness and rough sleeping amongst people with mental and complex health needs.</b>
Actions:	<ul style="list-style-type: none"> <li>• Undertake a piece of work with providers around appropriate supported housing eg second stage hostels at manageable rents within LHA</li> <li>• Identify need/gaps for cohort/vulnerable individuals with supported housing needs including substance misuse</li> <li>• Identify funding streams to fund the development of supported housing working closely with stakeholders and bid writers</li> </ul>
Lead person/dept:	Housing Needs
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing strategy forum</li> <li>• Luton CCG</li> <li>• Temporary accommodation teams</li> <li>• Third sector agencies</li> <li>• LEX team</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Review supported housing by January 2020</li> <li>• Identify new requirements by January 2020</li> <li>• Ongoing review of funding streams and bids</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• Homeless prevention strategy</li> <li>• No second night out</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Officer time</li> <li>• Funding availability is dependent on Public Health and risk of service closure</li> </ul>

<b>Commitment:</b>	<b>We'll ensure that local public and voluntary sector services prioritise homelessness prevention when designing and commissioning services for vulnerable individuals and families.</b>
Actions:	<ul style="list-style-type: none"> <li>• Identify need and encourage joint project working through Making Every Adult Matter project or similar avenues which support capacity in the third sector</li> <li>• Identify and develop services that are culturally appropriate and accessible to all</li> <li>• Revisit commissioning priorities and re-evaluate services that are funded</li> </ul>
Lead person/dept:	Housing Needs
Resources/partners:	<ul style="list-style-type: none"> <li>• Public Health</li> <li>• Commissioning team</li> <li>• Procurement</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Liaison with partners on quarterly basis</li> <li>• Review services and commissioning arrangements by 2020</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• Homeless prevention strategy</li> <li>• Housing First</li> <li>• Public Health</li> <li>• Commissioning team</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Officer time</li> <li>• Partner involvement</li> <li>• Meeting funding criteria</li> </ul>

<b>Commitment:</b>	<b>We'll reduce homelessness costs by at least £2m between 2018 and 2020.</b>
Actions:	<ul style="list-style-type: none"> <li>• Improved prevention activity to prevent homelessness</li> <li>• Faster processing of applications</li> <li>• Pathways out of temporary accommodation</li> </ul>
Lead person/dept:	Housing Needs
Resources/partners:	Finance team
Milestones/targets:	£1m saving by 2019 and £2m by 2020

Links to other strategies:	Homeless prevention strategy
Risks:	<ul style="list-style-type: none"> <li>• Officer time</li> <li>• Lack of resources relating to loss of external funding which supports Integrated Prevention team</li> </ul>

<b>Commitment:</b>	<b>We'll expand our temporary accommodation purchasing scheme to provide an additional 20 homeless prevention strategy homes by 2020 to grow our portfolio to 80 homes</b>
Actions:	Seek opportunities to buy appropriate homes and bring into temporary accommodation
Lead person/dept:	Housing Needs
Resources/partners:	<ul style="list-style-type: none"> <li>• Property and Construction services</li> <li>• Legal services</li> </ul>
Milestones/targets:	Ten additional homes by 2019 and 20 by 2020
Links to other strategies:	Homeless prevention strategy
Risks:	Lack of available accommodation

<b>Commitment:</b>	<b>We'll improve the quality of temporary accommodation by working closely with our private sector property owners and leasehold providers.</b>
Actions:	<ul style="list-style-type: none"> <li>• Build links with ethical landlords who can offer long term stable rents</li> <li>• Set up a private lettings agency</li> <li>• Investigate vacant properties in the town centre which could be used for temporary accommodation</li> </ul>
Lead person/dept:	Housing Needs
Resources/partners:	<ul style="list-style-type: none"> <li>• Luton Lets</li> <li>• Rent team</li> <li>• Private landlords</li> <li>• Enforcement</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Attract 80 new homes per year each year</li> <li>• New lettings agency running by December 2019</li> <li>• Ongoing review of vacant property</li> </ul>

Links to other strategies:	<ul style="list-style-type: none"> <li>• Homeless prevention atrategy</li> <li>• Private sector housing strategy</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Officer time</li> <li>• Lack of good quality properties</li> <li>• Competition locally or from other areas for suitable homes</li> </ul>

<b>Commitment:</b>	<b>We will support the introduction of supported temporary accommodation offering higher support for those with complex needs.</b>
Actions:	<ul style="list-style-type: none"> <li>• Development of complex needs protocol</li> <li>• Development of complex needs index</li> <li>• Development of supported temporary accommodation</li> </ul>
Lead person/dept:	Housing Needs
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing associations</li> <li>• Supported providers</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Protocol and complex needs index drafted by Sept 2019</li> <li>• Priorities for supported temporary accommodation identified by April 2019</li> </ul>
Links to other strategies:	Homeless prevention strategy
Risks:	<ul style="list-style-type: none"> <li>• Officer time</li> <li>• Lack of supported housing providers</li> <li>• Non-skilled supported workers providing service</li> </ul>

<b>Commitment:</b>	<b>We'll eliminate our long term use of nightly lets by 2020.</b>
Actions:	Expand portfolio of leased and owned accommodation to reduce nightly lets
Lead person/dept:	Housing Needs
Resources/partners:	Property and Construction services
Milestones/targets:	<ul style="list-style-type: none"> <li>• 50 households in nightly lets at April 2019</li> <li>• Zero use of nightly lets over six weeks from 2019-20</li> </ul>
Links to other strategies:	Homeless prevention strategy
Risks:	Economic and market conditions

<b>Commitment:</b>	<b>We'll reduce the number of households in temporary accommodation by 100 per year.</b>
Actions:	<ul style="list-style-type: none"> <li>• Working with partners we will source appropriate housing</li> <li>• We'll build new council homes to create new lettings</li> <li>• Support skills and career support in temporary accommodation to facilitate move on</li> </ul>
Lead person/dept:	Housing Needs Pathfinder team
Resources/partners:	<ul style="list-style-type: none"> <li>• Third sector</li> <li>• Housing Strategy &amp; Development</li> <li>• Housing providers</li> <li>• Luton Lets</li> <li>• LIF team</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• 1,300 maximum at April 2019</li> <li>• 1,200 maximum by April 2020</li> <li>• 1,100 maximum by April 2021</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• Homelessness prevention strategy</li> <li>• Housing Investment Plan</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Pathfinder team funded to March 2019</li> <li>• Future Invest To Save bid may be required to continue service</li> <li>• Availability of affordable accommodation</li> <li>• Increases in homelessness applications</li> </ul>

<b>Commitment:</b>	<b>We'll ensure that residents of temporary accommodation are benefitting from the skills and training support available via the Luton Investment Framework and Career Pathfinder team.</b>
Actions:	<ul style="list-style-type: none"> <li>• Skills assessment forms to be developed with LIF team to create career pathways for TA residents</li> <li>• Develop financial advice surgeries for housing pathways</li> <li>• Create volunteering and work experience opportunities</li> </ul>
Lead person/dept:	Housing Needs
Resources/partners:	<ul style="list-style-type: none"> <li>• LIF</li> <li>• Community Development</li> </ul>

Milestones/targets:	<ul style="list-style-type: none"> <li>• Assessment forms in use by April 2019 date</li> <li>• Financial surgeries to trial by April 2019 date and roll out across TA by August 2019</li> <li>• Framework for volunteering and work experience in place by April 2020-21 with residents taking up opportunities by 2022</li> </ul>
Links to other strategies:	LIF
Risks:	<ul style="list-style-type: none"> <li>• Lack of opportunities</li> <li>• Low skilled jobs</li> </ul>

<b>Commitment:</b>	<b>We'll meet our income collection target of 93% for temporary accommodation.</b>
Actions:	Weekly monitoring of all accounts to escalate outstanding benefit assessments
Lead person/dept:	Housing Operations
Resources/partners:	Housing Needs
Milestones/targets:	Housing Needs
Links to other strategies:	<ul style="list-style-type: none"> <li>• HRA business plan</li> <li>• Financial Plan</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Welfare reform changes</li> <li>• Staff shortages</li> </ul>

<b>Commitment:</b>	<b>We'll continue to lobby for increased LHA rates to reflect Luton housing market and limit the council's exposure to temporary accommodation costs.</b>
Actions:	Use liaison opportunities with government and influencers to make the case for a raised LHA level
Lead person/dept:	Director of Customer & Commercial
Resources/partners:	Housing Strategy & Development Business Intelligence team
Milestones/targets:	Ongoing, with aim to achieve approval from DWP within one year
Links to other strategies:	Homelessness prevention strategy
Risks:	Government policy

<b>Commitment:</b>	<b>We'll reduce time in temporary accommodation by improving our processing time for homelessness applications and supporting people to move out into independent accommodation.</b>
Actions:	<ul style="list-style-type: none"> <li>• Develop protocols and housing pathways to assist households to move on</li> <li>• Processing time for homelessness applications to reduce</li> <li>• Seek funding with partners for a housing pathway service for temporary accommodation residents</li> </ul>
Lead person/dept:	Housing Operations
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing Needs</li> <li>• Hostels</li> <li>• Voluntary agencies</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Protocols are ongoing</li> <li>• Average processing time to reduce to be in line with statutory requirements</li> <li>• Ongoing funding opportunities to be explored</li> </ul>
Links to other strategies:	Homeless prevention strategy
Risks:	<ul style="list-style-type: none"> <li>• Officer time</li> <li>• Staffing capacity access to better processes</li> <li>• More 'move on' accommodation options</li> </ul>

<b>Commitment:</b>	<b>We'll continue to build on partnership working to address homelessness challenges and attract investment through a variety of projects and initiatives, taking up all opportunities to support sustainable prevention of homelessness and routes out of homelessness.</b>
Actions:	<ul style="list-style-type: none"> <li>• Undertake research on the needs of residents facing homelessness</li> <li>• Identify gaps in services which can be the focus of funding bids</li> <li>• Be a regular partner in relevant local forums including Luton Action Against Poverty and Third Sector Networking</li> </ul>
Lead person/dept:	Housing Needs
Resources/partners:	<ul style="list-style-type: none"> <li>• Voluntary agencies</li> <li>• Business Intelligence</li> </ul>
Milestones/targets:	Research to be completed by April 2020

Links to other strategies:	Homeless prevention strategy
Risks:	<ul style="list-style-type: none"> <li>• Officer time</li> <li>• Adequate funding for a variety of projects and starting new initiatives</li> </ul>

<b>Commitment:</b>	<b>We'll work with women's organisations to improve emergency housing and move on options for victims of violence and exploitation.</b>
Actions:	<ul style="list-style-type: none"> <li>• Develop and establish domestic violence protocols</li> <li>• Establish safe places for out of hours services</li> <li>• Develop housing pathways for women experiencing violence and their families</li> <li>• Attract funding for specialist culturally sensitive housing services for women experiencing violence</li> <li>• Hold/facilitate annual Luton domestic violence conference</li> </ul>
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing strategy and development</li> <li>• Housing Needs</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Women's agencies</li> <li>• Community Safety</li> <li>• Housing Operations</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Protocol in place by June 2019</li> <li>• Safe house commissioned by 2020</li> <li>• Housing Pathways included in wider projects by Dec 2019 (refer to increased LHA rates, page 66)</li> <li>• First conference to be held by April 2020</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• Homeless prevention strategy</li> <li>• Community safety strategy</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Lack of funding,</li> <li>• Poor coordination of voluntary agencies</li> <li>• Availability of funding</li> <li>• Changes to benefits</li> </ul>

<b>Commitment:</b>	<b>We'll work with partners on a Homelessness Complex Needs Panel to work with households that have complex needs, and</b>
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	<b>seek funding opportunities for Housing First and other projects.</b>
Actions:	Audit existing panels and identify specific requirements eg MARAC, mental health and housing panel
Lead person/dept:	Housing Needs
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing strategy and development</li> <li>• Housing First</li> <li>• MARAC</li> <li>• JAP</li> <li>• Public Health</li> <li>• Mental health providers</li> <li>• Resolutions</li> </ul>
Milestones/targets:	Review complete by September 2019
Links to other strategies:	<ul style="list-style-type: none"> <li>• Homeless prevention strategy</li> <li>• Housing First project</li> </ul>
Risks:	IBCF funding for Housing First ends in 2020, additional projects currently unfunded.

<b>Commitment:</b>	<b>Develop jointly with third sector organisations a 'Move On' strategy which will offer long term support.</b>
Actions:	<ul style="list-style-type: none"> <li>• Identify needs of cohorts and develop a move on strategy based on individual needs</li> <li>• Share protocols with homelessness partners</li> </ul>
Lead person/dept:	<ul style="list-style-type: none"> <li>• Homelessness team</li> <li>• Housing associations</li> <li>• Hostel providers</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing Operations</li> <li>• Third sector partners</li> <li>• MHCLG funding</li> </ul>
Milestones/targets:	Draft Move On strategy developed by December 2019
Links to other strategies:	Homeless prevention strategy
Risks:	<ul style="list-style-type: none"> <li>• Support from Rough Sleeper Initiative funding ends in 2020</li> <li>• Bids submitted for rapid rehousing pathway via MHCLG</li> </ul>

	<ul style="list-style-type: none"> <li>• Lack of suitable move on accommodation, officer time</li> </ul>
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<b>Commitment:</b>	<b>We'll bid to be part of the Making Every Adult Matter network coordinated through Homeless Link.</b>
Actions:	Develop coordinated approach jointly with Homeless Link – enabling better partnership working
Lead person/dept:	Housing strategy and development
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing Needs</li> <li>• Third sector</li> </ul>
Milestones/targets:	Establish MEAM membership by July 2020
Links to other strategies:	Making Every Adult Matter
Risks:	Not working well or lack of understanding of their roles with MEAM and Homeless Link.

### Quality homes and neighbourhoods

<b>Commitment:</b>	<b>Commission an updated housing condition survey which specifically identifies conditions in the private rented sector to improve the targeting of our work to improve housing quality.</b>
Actions:	<ul style="list-style-type: none"> <li>• Identify funding for a survey</li> <li>• Scope the survey</li> <li>• Commission the survey</li> </ul>
Lead person/dept:	Private Sector Housing Enforcement
Resources/partners:	<ul style="list-style-type: none"> <li>• Enforcement team</li> <li>• Revenue funding</li> </ul>
Milestones/targets:	Commission survey by March 2020 with results by September 2020
Links to other strategies:	Luton Private Sector Renewal Strategy 2010-15
Risks:	<ul style="list-style-type: none"> <li>• Officer time</li> <li>• Lack of funding - currently unfunded</li> </ul>

<b>Commitment:</b>	<b>Review our Housing Assistance policy to clarify our commitment to quality homes and wellbeing.</b>
Actions:	<ul style="list-style-type: none"> <li>• Update Housing Assistance policy to clarify property investment and improve value for money</li> <li>• Update the discretionary grants policy to reflect stock condition</li> </ul>

	survey
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Strategy and Development team</li> <li>• Housing Needs/Grants team</li> </ul>
Resources/partners:	Staff time
Milestones/targets:	First update and consultation by July 2019 and further update following condition survey in April 2021
Links to other strategies:	<ul style="list-style-type: none"> <li>• Luton Private Sector Renewal Strategy 2010-15</li> <li>• Improving and moving forward</li> </ul>
Risks:	Officer time

<b>Commitment:</b>	<b>Reduce levels of fuel poverty by 25% over three years.</b>
Actions:	<ul style="list-style-type: none"> <li>• Provision of healthy heating grants scheme</li> <li>• Roll out solar panel/battery storage scheme and create a framework for further projects</li> <li>• Seek out and secure external funding for energy efficiency work</li> <li>• Support new council tenants with energy efficiency information at sign up</li> <li>• Support residents with prepayment meters and high cost tariffs to switch providers and access better deals</li> </ul>
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Strategy and Development team</li> <li>• Energy Doctor</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing Operations</li> <li>• Third sector</li> <li>• Referral agencies</li> <li>• Health partners</li> <li>• Energy companies</li> <li>• Installers</li> <li>• Council funding</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Year 1 reduce by 10%</li> <li>• Year 2 15%</li> <li>• Year 3 25%</li> <li>• Regular bids for available funding</li> <li>• Develop information for tenants by July 2019</li> </ul>

	<ul style="list-style-type: none"> <li>• Support 75 households a year</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• Poverty Needs Assessment 2018</li> <li>• Public Health Strategy</li> <li>• Energy Action Plan</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Capacity</li> <li>• Resources and officer time</li> <li>• Ability to attract external funding</li> <li>• Monitoring arrangements and definitions</li> </ul>

<b>Commitment:</b>	<b>Provide services to vulnerable homeowners who need help to maintain their own home by relaunching handyperson services and better targeted advice.</b>
Actions:	Identify clear budget and eligibility criteria by June 2019
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Strategy and Development</li> <li>• Housing Needs team</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Staff time</li> <li>• Revenue funding</li> <li>• Third sector partners and contractors</li> </ul>
Milestones/targets:	New scheme launched by June 2019, 50 clients a year supported
Links to other strategies:	<ul style="list-style-type: none"> <li>• Affordable warmth strategy</li> <li>• Energy Action Plan</li> <li>• Falls prevention plan</li> </ul>
Risks:	Currently unfunded – identifying and maintaining sufficient funding for the scheme

<b>Commitment:</b>	<b>Establish the Energy Doctor scheme and support over 250 clients by 2020 with affordable warmth and wellbeing initiatives.</b>
Actions:	<ul style="list-style-type: none"> <li>• Scheme set up in 2018-19 and funding secured beyond 2020</li> <li>• Improve community information on energy efficiency and switching which is accessible to all</li> </ul>
Lead person/dept:	Housing Strategy and Development team
Resources/partners:	<ul style="list-style-type: none"> <li>• iBCF funding</li> <li>• Other funding streams</li> </ul>

	<ul style="list-style-type: none"> <li>Referral partners</li> </ul>
Milestones/targets:	250 clients supported by 2020
Links to other strategies:	<ul style="list-style-type: none"> <li>Affordable warmth strategy</li> <li>Energy action plan</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>Resources</li> <li>Recruitment delays</li> </ul>

<b>Commitment:</b>	<b>Build strategic partnerships with health organisations, installers and funders to increase our impact in tackling fuel poverty and improving housing conditions, demonstrated by increases in EPC ratings across the town.</b>
Actions:	<ul style="list-style-type: none"> <li>Build working relationship with Public Health for fuel poverty action plan</li> <li>Develop at least five active partnerships to support vulnerable households with referral arrangements</li> <li>Pursue funding opportunities and make bids for funding Monitor EPC scores across Luton</li> </ul>
Lead person/dept:	Housing Strategy & Development team
Resources/partners:	<ul style="list-style-type: none"> <li>Public Health</li> <li>Health partners</li> <li>Healthwatch</li> <li>Social care</li> <li>Adult care</li> <li>Children services</li> <li>Energy providers</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>At least one successful funding bid per year focussed on energy improvements</li> <li>Average EPC across Luton raised by one rating by 2022</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>Affordable Warmth scheme/strategy</li> <li>Poverty strategy</li> <li>Energy Action Plan</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>Officer time</li> <li>Working with partners</li> <li>Access to funding for EPC analysis</li> </ul>

<b>Commitment:</b>	<b>Seek all opportunities to maximise external investment in low energy initiatives.</b>
Actions:	Funding bids submitted for all relevant bidding opportunities
Lead person/dept:	Housing Strategy & Development team
Resources/partners:	Energy providers and installers
Milestones/targets:	At least one successful funding bid per year focussed on energy improvements
Links to other strategies:	<ul style="list-style-type: none"> <li>• Affordable Warmth Scheme/Strategy</li> <li>• Poverty Strategy</li> <li>• Energy Action Plan</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Insufficient funding opportunities</li> <li>• Loss of EU funding</li> <li>• Luton ineligible for funding opportunities</li> </ul>

<b>Commitment:</b>	<b>Commission new homes built to good quality through both Foxhall Homes and new Council housing with a minimum of 400 homes completed by 2022.</b>
Actions:	<ul style="list-style-type: none"> <li>• Design guide rolled out for HRA homes</li> <li>• Incorporate affordable housing designs into Foxhall Homes wherever possible</li> </ul>
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Strategy &amp; Development team</li> <li>• Foxhall Homes</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Planning</li> <li>• Legal</li> <li>• Property &amp; Construction Services</li> </ul>
Milestones/targets:	Design guide in place by April 2019 for all new HRA homes and incorporated into Foxhall schemes by 2021
Links to other strategies:	<ul style="list-style-type: none"> <li>• Local Plan</li> <li>• Foxhall Homes business plan</li> <li>• HRA business plan</li> </ul>
Risks:	Departments not working together to ensure good quality

<b>Commitment:</b>	<b>Invest in council homes to ensure that all homes reach EPC Band D by 2020 and Band C by 2025.</b>
Actions:	Decent Homes investment as per HRA business plan, particularly insulation works
Lead person/dept:	BTS
Resources/partners:	<ul style="list-style-type: none"> <li>• HRA capital funding</li> <li>• ERDF funding</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• All council homes at band D by 2020</li> <li>• Band C by 2025</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• Affordable Warmth Scheme/Strategy</li> <li>• Poverty</li> <li>• Local Plan</li> <li>• Housing business plan</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Officer time</li> <li>• Resources</li> <li>• Tenants refusing certain works</li> </ul>

<b>Commitment:</b>	<b>We'll implement a new tenancy agreement for council tenants by 2019/20 setting out rights and responsibilities to support good neighbourhood management.</b>
Actions:	New tenancy agreement in place incorporating clear guidance on responsibilities for maintaining good quality home and garden
Lead person/dept:	Housing Operations
Resources/partners:	<ul style="list-style-type: none"> <li>• Legal services</li> <li>• Tenant and resident groups</li> </ul>
Milestones/targets:	Implemented for all tenancies by March 2020
Links to other strategies:	
Risks:	Delays due to consultation and legal work

<b>Commitment:</b>	<b>Continue to improve estate management for council homes, based on feedback from our tenants, including new contracts for cleaning and grounds maintenance.</b>
Actions:	Estate management services reviewed to focus on quality of place

Lead person/dept:	Housing Operations
Resources/partners:	Contractors BTS Procurement HRA funding
Milestones/targets:	Concierge service established by 2019 Tenant involvement in new contract arrangements New tenancy agreement rolled out in 2019-20 Improved tenant satisfaction score in 2019
Links to other strategies:	Housing business plan LIF
Risks:	Resources Cost increases

<b>Commitment:</b>	<b>Capture improvements in the private rented sector to demonstrate effectiveness of our improvement activities such as licensing</b>
Actions:	<ul style="list-style-type: none"> <li>• Review the private sector stock condition survey and keep refreshed annually to track progress</li> <li>• Maximise use of enforcement services to raise the standard of private sector homes and neighbourhoods</li> </ul>
Lead person/dept:	Enforcement team
Resources/partners:	<ul style="list-style-type: none"> <li>• Staff time</li> <li>• Legal</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Refresh survey in 2021 and 2022</li> <li>• Track enforcement activity and regularly publicise successful prosecutions</li> </ul>
Links to other strategies:	Private sector housing strategy
Risks:	<ul style="list-style-type: none"> <li>• Stock condition research currently unfunded</li> <li>• Staff time</li> <li>• Sufficient resources to tackle worst conditions</li> </ul>

<b>Commitment:</b>	<b>Deliver tenancy sustainment initiatives which support vulnerable tenants at risk of hoarding, self-neglect and cuckooing, and minimise the impacts on wider neighbourhoods</b>
Actions:	<ul style="list-style-type: none"> <li>• Support services for vulnerable tenants set up</li> <li>• Improved targeting of tenant audits to identify vulnerable tenants</li> <li>• Work with residents to establish more local Tenants &amp; Residents Associations</li> </ul>
Lead person/dept:	Housing Operations
Resources/partners:	<ul style="list-style-type: none"> <li>• iBCF funding</li> <li>• Staff time</li> <li>• Police</li> <li>• Community safety partnerships</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• iBCF funding</li> <li>• Staff time</li> <li>• Police</li> <li>• Community safety partnerships</li> </ul>
Links to other strategies:	Tenancy management policies
Risks:	Staff capacity

## Supporting health and wellbeing

<b>Commitment:</b>	<b>We'll reduce our use of hostels for young people leaving care</b>
Actions:	Range of housing options developed and made available to reduce hostel use
Lead person/dept:	<ul style="list-style-type: none"> <li>• 16+ team</li> <li>• Adult social care</li> </ul>
Resources/partners:	Housing Needs
Milestones/targets:	Eliminate hostel use for care leavers and under 19s by 2021
Links to other strategies:	<ul style="list-style-type: none"> <li>• JSNA</li> <li>• Children and Young People Plan</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Lack of housing</li> <li>• Funding requirements</li> </ul>

<b>Commitment:</b>	<b>We'll develop more suitable housing options for looked after children and young asylum seekers</b>
Actions:	Range of appropriate housing options made available with necessary support
Lead person/dept:	<ul style="list-style-type: none"> <li>• Adult social care</li> <li>• 16+ team</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing Needs</li> <li>• Housing Operations</li> </ul>
Milestones/targets:	Identify housing pathways with support by September 2019
Links to other strategies:	<ul style="list-style-type: none"> <li>• Sustainable community strategy</li> <li>• LIF</li> <li>• JSNA</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Lack of housing options</li> <li>• Lack of outreach support</li> </ul>

<b>Commitment:</b>	<b>We'll support foster carers in Luton through appropriate home extensions and access to larger homes to allow local fostering</b>
Actions:	Review housing assistance policy to support local fostering options
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Needs</li> <li>• Children's Services</li> </ul>
Resources/partners:	Capital programme
Milestones/targets:	<ul style="list-style-type: none"> <li>• Policy reviewed by September 2019</li> <li>• Up to two foster families supported per year</li> </ul>
Links to other strategies:	Children and Young People Plan
Risks:	<ul style="list-style-type: none"> <li>• Staff capacity</li> <li>• Funding limitations</li> <li>• Lack of take-up</li> </ul>

<b>Commitment:</b>	<b>We'll work with partners to bring forward supported lodging and shared lives housing options</b>
Actions:	<ul style="list-style-type: none"> <li>• Supported lodging scheme established</li> <li>• Shared Lives scheme established</li> </ul>

Lead person/dept:	<ul style="list-style-type: none"> <li>• Adult commissioning</li> <li>• 16+ team</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing Strategy &amp; Development team</li> <li>• Housing Operations</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Supported lodging and Shared Lives set up by 2020</li> <li>• Ten placements per year across schemes</li> </ul>
Links to other strategies:	Children and Young People Plan
Risks:	<ul style="list-style-type: none"> <li>• Staff capacity</li> <li>• Lack of volunteers,</li> <li>• Lack of suitable homes</li> <li>• Lack of funding</li> </ul>

<b>Commitment:</b>	<b>We'll continue to return children who are currently placed out of Luton back into the borough, developing specialist accommodation where necessary</b>
Actions:	<ul style="list-style-type: none"> <li>• Identify need for specialist accommodation</li> <li>• Work with partners to deliver appropriate housing options</li> </ul>
Lead person/dept:	<ul style="list-style-type: none"> <li>• Children's services</li> <li>• 16+ team</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing Strategy and Development team</li> <li>• Housing providers</li> <li>• Capital funding</li> </ul>
Milestones/targets:	50% reduction in out of borough placements by 2021
Links to other strategies:	<ul style="list-style-type: none"> <li>• JSNA</li> <li>• Health and wellbeing strategy</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Staff capacity</li> <li>• Lack of appropriate homes and sites</li> <li>• Lack of capital funding</li> <li>• Unable to source delivery partners</li> </ul>

<b>Commitment:</b>	<b>We will work with third sector partners to make move on accommodation available for young people.</b>
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Actions:	<ul style="list-style-type: none"> <li>• Tenancy Support officers deliver outreach to young tenants</li> <li>• Move on strategy agreed with third sector partners</li> </ul>
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Needs</li> <li>• Housing Operations</li> </ul>
Resources/partners:	Third sector partners
Milestones/targets:	Achieve as part of Move on Strategy by December 2019
Links to other strategies:	<ul style="list-style-type: none"> <li>• Homelessness prevention strategy</li> <li>• Health and wellbeing strategy</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Lack of move on accommodation</li> <li>• High housing costs</li> </ul>

<b>Commitment:</b>	<b>We'll work with partners to support people, where appropriate, to stay safely in their homes rather than having to move due to violence, and to return home after a refuge stay if possible</b>
Actions:	<ul style="list-style-type: none"> <li>• Review domestic abuse policies and protocols with partner agencies</li> <li>• Review role of assistive technology in supporting and protecting people affected by abuse</li> </ul>
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Operations</li> <li>• Housing Needs</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Police</li> <li>• Community safety</li> <li>• Third sector partners</li> </ul>
Milestones/targets:	Policies and protocols updated by June 2019
Links to other strategies:	<ul style="list-style-type: none"> <li>• Homelessness prevention strategy</li> <li>• Stronger Community strategy</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Staff capacity</li> <li>• Joint working arrangements</li> </ul>

<b>Commitment:</b>	<b>We'll continue to develop referral networks between our Housing Needs team and support providers to improve the pathway into support for victims of domestic abuse. Information about refuge spaces will be shared to ensure that people are helped wherever possible.</b>
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Actions:	<ul style="list-style-type: none"> <li>• Develop and establish protocols jointly with partners</li> <li>• Share information regularly regarding refuge places</li> <li>• Establish safe temporary accommodation for victims of domestic violence</li> </ul>
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Needs</li> <li>• Housing Operations</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Third sector partners</li> <li>• External funding</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Protocols in place by June 2019</li> <li>• Refuge availability information by end 2019</li> <li>• Safe house commissioned in 2020</li> </ul>
Links to other strategies:	Homelessness prevention strategy
Risks:	<ul style="list-style-type: none"> <li>• Staff capacity</li> <li>• Funding and accommodation availability</li> <li>• Welfare changes impacting supported housing</li> </ul>

<b>Commitment:</b>	<b>We'll review the need for supported temporary accommodation and make this available to victims of domestic abuse where appropriate.</b>
Actions:	Locate appropriate properties for families escaping domestic abuse
Lead person/dept:	Housing Needs
Resources/partners:	Housing Operations
Milestones/targets:	Initial review completed by December 2019
Links to other strategies:	Homelessness reduction strategy
Risks:	<ul style="list-style-type: none"> <li>• Lack of staff capacity</li> <li>• Suitable accommodation</li> </ul>

<b>Commitment:</b>	<b>We'll review our tenancy management and encourage other landlords to do the same, to challenge perpetrators living in our homes and make both permanent and temporary accommodation safe for residents.</b>
Actions:	Review housing management policies around domestic abuse in line with Make A Stand pledges

	Promote a joint working approach to other landlords in the borough
Lead person/dept:	Housing Operations
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing Strategy &amp; Development team</li> <li>• Housing associations</li> <li>• Health partners</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Housing review completed by June 2019</li> <li>• Work with housing associations throughout 2019</li> </ul>
Links to other strategies:	Make A Stand pledge
Risks:	Lack of support from other providers

<b>Commitment:</b>	<b>We'll develop a domestic violence and housing strategy with partners which will include an approach to safe move on accommodation options.</b>
Actions:	<ul style="list-style-type: none"> <li>• Review management policies around domestic abuse in line with Make A Stand pledges</li> <li>• Promote a joint working approach to other landlords in the borough</li> </ul>
Lead person/dept:	Housing Operations
Resources/partners:	<ul style="list-style-type: none"> <li>• Housing Strategy &amp; Development team</li> <li>• Housing associations</li> <li>• Health Partners</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Review completed by June 2019</li> <li>• Work with housing associations throughout 2019</li> </ul>
Links to other strategies:	Make A Stand pledge
Risks:	Lack of support from other providers

<b>Commitment:</b>	<b>We'll consider establishing a HIV+ champion to take an overview on our services to this cohort of people and especially in regard to supporting good mental health and access to wider housing and support services.</b>
Actions:	<ul style="list-style-type: none"> <li>• Establish a HIV+ champion who can understand specific requirements of cases</li> <li>• Joint working established so that the council manage cases for people with chaotic lives</li> </ul>

Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Needs</li> <li>• Customer Services</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Terence Higgins Trust</li> <li>• Third sector partners</li> <li>• Health partners</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• HIV+ Champion in place by April 2019</li> <li>• Staff training within council by September 2019</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• JSNA</li> <li>• Health and wellbeing strategy</li> </ul>
Risks:	Chaotic lifestyles can make situations difficult to deal with

<b>Commitment:</b>	<b>We'll incorporate data from this cohort into our needs assessment for accessible housing due to the increased prevalence of mobility problems.</b>
Actions:	Encourage developers, including ourselves, to build more mobility standard and stair free homes for people with HIV+ mobility problems
Lead person/dept:	Housing Strategy & Development team
Resources/partners:	<ul style="list-style-type: none"> <li>• Adult care commissioning</li> <li>• Developers</li> <li>• Planning</li> </ul>
Milestones/targets:	5% target for all homes to mobility or stair free standards
Links to other strategies:	<ul style="list-style-type: none"> <li>• JSNA</li> <li>• Health and wellbeing strategy</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Developers do not bring homes forward</li> <li>• Inappropriate build standards</li> </ul>

<b>Commitment:</b>	<b>We'll incorporate people with conditions such as TB into our service planning for supported housing solutions and supported temporary accommodation.</b>
Actions:	Review need for specialist housing for people with illnesses such as TB to help stabilise health conditions
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Strategy &amp; Development team</li> <li>• Public Health</li> </ul>

Resources/partners:	<ul style="list-style-type: none"> <li>• Adult care commissioning</li> <li>• Health partners</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Review carried out by July 2019</li> <li>• Any identified need followed up by July 2020</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• Health and wellbeing strategy</li> <li>• Homelessness prevention strategy</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Lack of funding for suitable accommodation</li> <li>• Lack of partners to deliver</li> </ul>

<b>Commitment:</b>	<b>We'll help people with learning disabilities and autism stay close to family and community.</b>
Actions:	<ul style="list-style-type: none"> <li>• Establish housing pathways for this cohort to enable independent living in Luton including access to social housing</li> <li>• Produce advice and guidance for distribution</li> </ul>
Lead person/dept:	<ul style="list-style-type: none"> <li>• Community Learning Disabilities team</li> <li>• Housing Strategy &amp; Development team</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• Public Health</li> <li>• Housing Needs</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Advice produced using some co-creation by December 2019</li> <li>• Embedded with advice and services by March 2020</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• JSNA</li> <li>• Health and wellbeing strategy</li> <li>• Learning disabilities strategy 2019</li> <li>• Transforming Care programme</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Staff capacity</li> <li>• Availability of partners</li> <li>• Housing sites for development</li> </ul>

<b>Commitment:</b>	<b>We'll meet our commitments within the Transforming Care programme and facilitate access to appropriate housing for Transforming Care clients and other people with learning disabilities and autism, as identified in the forthcoming learning disabilities strategy.</b>
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Actions:	<ul style="list-style-type: none"> <li>• We'll be an active partner within Transforming Care and support the housing pathways of specific clients</li> <li>• Develop a small number of bespoke properties to assist with the housing needs of people with learning disabilities and autism, based on information from learning disability strategy</li> </ul>
Lead person/dept:	<ul style="list-style-type: none"> <li>• Housing Strategy &amp; Development team</li> <li>• Adult care commissioning</li> </ul>
Resources/partners:	<ul style="list-style-type: none"> <li>• CCG</li> <li>• Public Health</li> <li>• Housing Developers</li> </ul>
Milestones/targets:	<ul style="list-style-type: none"> <li>• Identify scale of needs by June 2019</li> <li>• Respond to TCP clients on an ongoing basis</li> <li>• Work with partners to get scheme in development by September 2020</li> </ul>
Links to other strategies:	<ul style="list-style-type: none"> <li>• JSNA</li> <li>• Health and wellbeing strategy</li> <li>• Learning disabilities strategy</li> <li>• Transforming Care</li> <li>• Housing strategy for BLMK</li> </ul>
Risks:	<ul style="list-style-type: none"> <li>• Appropriate data becoming available</li> <li>• Lack of suitable development partners</li> <li>• Funding</li> <li>• Land availability</li> </ul>

<b>Commitment:</b>	<b>We'll be an active partner in learning disabilities forums and groups to build working relationships.</b>
Actions:	To attend and participate in learning disability forum and housing sub-group to establish needs and good working relationships
Lead person/dept:	Housing Strategy & Development team
Resources/partners:	<ul style="list-style-type: none"> <li>• Community Learning Disabilities team</li> <li>• Adult Commissioning team</li> </ul>
Milestones/targets:	Regular attendance at forum and sub-group meetings
Links to other strategies:	<ul style="list-style-type: none"> <li>• JSNA</li> <li>• Learning disabilities strategy</li> </ul>

Risks:	Lack of staff capacity
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Links to other strategies:	

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## Footnotes

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