# **CARLISLE CITY COUNCIL**

Report to:-	Carlisle City Council		
Date of Meeting:-	6th March 2012	Agenda Item No:-	18
Public			
Title:-	HOUSING STRATEGY & A	CTION PLAN 2012	-2016
Report of:-	THE DIRECTOR OF COMM	UNITY ENGAGEME	NT
Report reference:-	CD26/12		
Summary:-			
This report presents th	ne Housing Strategy 2012 – 16 for d	elivery.	
Recommendation:-			
That members of Full consultation.	Council approve the revised Housing	g Strategy 2012 – 16	following
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Note: in compliance with section 100d of the Local Government (Access to Information) Act 1985 the report has been prepared in part from the following papers: None

#### **BACKGROUND INFORMATION**

- 1.1 This Housing Strategy will provide the principles for housing development in Carlisle for the period 2012 16. It supersedes the previous strategy which covered the period 2005 to 2010. It is a key document identifying the housing needs, challenges and solutions to be taken forward for the Carlisle district area.
- 1.2 The Strategy Vision which includes our vision, priorities and key actions is presented in the corporate format at Appendix 1. This was brought to Executive on 31<sup>st</sup> October 2011 and approved to go forward for further consultation.
- 1.3 The Housing Strategy 2012-16 was revised taking into account;
  - Comments received through the consultation period
  - Feedback from representatives attending the Local Strategic Partnership (LSP)
     event on the 22<sup>nd</sup> November 2011 The Future of Housing and Development in
     Carlisle
  - The Government's published Housing Strategy Laying the Foundations: A
     Housing Strategy for England

## 2 CONSULTATION

2.1 Consultation to Date.

The Housing Strategy has been developed through the Carlisle Strategic Housing Partnership (CSHP). The CSHP is a partnership body with representation from key partners including:

- Registered Providers (Riverside, Impact, Two Castles, Home)
- Private Sector Developers (Lovell's, Story Homes)
- NHS Cumbria
- Cumbria County Council.
- Interest Groups (National landlords Association, CALC, Cumbria rural Housing Trust)

A stakeholder event was held on 10<sup>th</sup> October 2011 to look at the draft Housing Demand Study report which has fed into the Housing Strategy. The event was attended by representatives of key partner agencies including Registered Providers (RP's) – Riverside / Home / Two Castles, private sector developers – Lovell's and

Story Homes, parish councils, University of Cumbria, Cumbria County Council and National Landlords Association.

The Strategy Vision has been consulted upon for a six week period during September and October 2011. The document has been available on the Council website. To date no comments have been fed back.

Community Overview and Scrutiny Panel – The Housing Strategy 2012-16 was taken to the meeting held on 24<sup>th</sup> November 2011.

Local Strategic Partnership Event – On the 22<sup>nd</sup> November 2011, Carlisle City Council hosted a meeting of the Local Strategic Partnership, on '*The Future of Housing and Development in Carlisle*'. Approximately 60 representatives attended the event, from a number of statutory, voluntary, private sector and community groups. The City Council's Directors for Community Engagement and Economic Development gave a presentation on the Housing Needs & Demand Study (HNDS), Housing Strategy and the Local Development framework (LDF). Representatives then split into six working groups, with discussions focusing on the housing and development challenges facing Carlisle, and whether, in its current form, Carlisle's Housing Strategy effectively set out how these challenges could be overcome.

Following the event a review of the Housing Strategy was undertaken taking on board the feedback provided by the six working groups at the event, feedback provided through formal consultation on the Strategy and the Government's National Housing Strategy (which was published in November 2011). A document highlighting the comments from the event and feedback from the Council was sent to the representatives in January, who had attended the event – this is attached as Appendix 2.

Carlisle Housing Partnership – The revised Housing Strategy was taken to the three sub groups of the Carlisle Strategic Housing Partnership in January 2012 for approval.

The Housing Strategy 2012 – 16 report was taken to Executive on the 31/10/11, Community Overview and Scrutiny panel on 24/11/11 and Executive on 13/2/12.

## 3 RECOMMENDATIONS

3.1 That members of Full Council approve the revised Housing Strategy 2012-16 following consultation.

# 4 REASONS FOR RECOMMENDATIONS

4.1 To enable the Housing Strategy 2012 – 16 to be taken forward.

#### 5 IMPLICATIONS

- Staffing/Resources The Housing Strategy and key areas of work identified under the Action Plan to be delivered will be within available resources.
- Financial The delivery of the Housing Strategy 2012-16 will be delivered within the financial resources that are built into the Medium Term Financial Plan and budget for 2012/13.
- Legal The Housing Strategy is part of the Budget & Policy Framework reserved to Council by Article 4 of the Constitution. It thus requires approval by Full Council after due process.
- Corporate The Housing Strategy is a corporate document.
- Risk Management The risk management processes within Carlisle City Council is a key part to the implementation of actions under this strategy.
- Environmental The Housing Strategy and key areas of work identified under the Action Plan impact on the built and wider environment.
- Crime and Disorder The Housing Strategy impacts on the lives of a number of customers and residents in the Carlisle district whose will be perpetrators or victims of crime.
- Impact on Customers The Housing Strategy and key areas of work identified under the Action Plan impact significantly on a number of customers and residents in the Carlisle district.
- Equality and Diversity –

# Impact assessments

# Does the change have an impact on the following?

Equality Impact Screening	Impact Yes/No?	Is the impact positive or negative?
Does the policy/service impact on the following?	Yes	Positive
Age	Yes	Positive
Disability	Yes	Positive
Race	Yes	Positive
Gender/ Transgender	Yes	Positive
Sexual Orientation	Yes	Positive
Religion or belief	Yes	Positive
Human Rights	Yes	Positive
Health inequalities	Yes	Positive
Rurality	Yes	Positive

f you consider there is either no impact or no negative impact, please give reasons:		
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If an equality Impact is necessary, please contact the P&P team.

Our vision & values	environment with skilled people and international	storic, dynamic and successful University City, creati connections in a stunning location.' cess affordable, safe and warm housing, and the su	
Broad challenges	Carlisle faces the following broad challenges:  1. Demographic changes in our district.  2. Changes in government policy and fundir  3. Changes in Carlisle's housing market, an	ng models. d developments in the local, regional and national ed	conomy.
Our Strategic Housing Priorities	Balancing the Housing Market	Decent and Healthy Homes	Supporting Vulnerable People
Our challenges	<ol> <li>Supporting the City's growth agenda through housing delivery.</li> <li>Responding to affordable housing shortages, particularly:         <ul> <li>in rural areas</li> <li>for older people</li> <li>for families.</li> </ul> </li> <li>Overcoming a range of barriers to affordable housing delivery, including:         <ul> <li>reduced central government funding.</li> <li>less market housing developments, meaning reduced affordable provision through section 106 agreements.</li> <li>a lack of available, suitable land.</li> <li>a negative perception of affordable housing.</li> </ul> </li> <li>Overcoming a range of barriers to accessing and staying in housing, including:         <ul> <li>those trying to access home ownership for the first time</li> <li>the introduction of fixed term Affordable Rent tenures, which could reduce tenancy length and cost tenants more.</li> </ul> </li> </ol>	<ol> <li>Supporting the sustainable growth of our private rented sector, where rapid expansion has led to:         <ul> <li>a rise in housing complaints</li> <li>an increased number of Houses in Multiple Occupancy (HMOs).</li> <li>an increase in anti-social behaviour.</li> </ul> </li> <li>Helping our growing older people population to stay in their homes for longer.</li> <li>Tackling empty properties with reduced resources available for renovation or enforcement.</li> <li>Reducing levels of fuel poverty to improve housing and health standards.</li> <li>Making sure of sufficient and suitable accommodation for local university students.</li> <li>Assessing and responding to the needs of our Gypsy and Traveller communities.</li> </ol>	<ol> <li>Responding to our ageing population, with care of vulnerable older people shifting to their homes.</li> <li>Responding to the changes in Welfare reform and the effects within the current economic climate.</li> <li>Meeting the challenges of an increased demand on our services with reduced resources.</li> <li>Responding to increased expectation, choice and control over how services are provided to communities and individuals through the personalisation agenda.</li> <li>Making sure that partnership working and shared priorities are maintained through a changing, competitive market.</li> <li>Better targeting of support to vulnerable people.</li> </ol>
Cumbrian Housing Priorities	Create and use opportunities to support affordable housing growth.	Improve the quality of the private rented sector.	Deliver appropriate housing and support services to meet the needs of all.
Our key actions: owned and delivered through the Carlisle Housing Partnership	<ol> <li>Deliver a sustainable mix of market and affordable housing.</li> <li>Identify innovative ways of funding and delivering affordable housing.</li> <li>Play an active role in bringing forward more land for housing development.</li> <li>Work closely with local communities to address their housing needs and preferences, and support community-based development initiatives</li> <li>Prioritise the delivery of affordable housing in rural areas, housing for older people (including extra care) and family-sized housing.</li> <li>Develop a strategic approach to letting and accessing housing in our district.</li> <li>Reduce under and over occupation of affordable homes.</li> </ol>	<ol> <li>Work together to improve standards in the private rented sector.</li> <li>Work innovatively to bring more empty properties back into use.</li> <li>Work in partnership to reduce anti-social behaviour.</li> <li>Work to reduce fuel poverty, including implementing the Cumbria Warm Homes (CWH) project across Carlisle.</li> <li>Develop new ways of providing enough disabled adaptations, while integrating services more closely with Health &amp; Social Care.</li> <li>Continue to assess the needs of the Gypsy and Traveller community and, if necessary, identify suitable land.</li> </ol>	<ol> <li>Work together to review the City Council's Homelessness Strategy.</li> <li>Make sure there is adequate support and appropriate (including temporary) accommodation to meet the needs of vulnerable groups.</li> <li>Reduce pressure on our services by developing innovative prevention solutions, including those focused on reducing worklessness and poverty.</li> <li>Actively work to reduce social isolation amongst older people.</li> <li>Improve access to our services for vulnerable people from hard-to-reach social groups.</li> <li>Co-ordinate and support the delivery of front line services through the Shaddon Gateway Resource Centre.</li> <li>Help vulnerable groups adjust to impact of Welfare reform.</li> </ol>

We will use a wide range of information to measure the performance of our housing strategy and action plan.

Every three months, the following key performance indicators will be presented to our Executive through the Corporate Performance Monitoring System:

- number of households living in temporary accommodation: performance in 2010-11 was 28; target for 2011-12 is 34.
- number of homeless people assisted into re-housing: performance in 2010-11 was 28; target for 2011-12 is 34.
- number of empty homes brought back into use: performance in 2010-11 was 155; target for 2011-12 is 100.
- number of affordable homes delivered: performance in 2010-11 was 162; target for 2011-12 is 71.

We have a range of other key performance indicators that will be used to measure the performance of our action plan. These are available on request. Our performance against our action plan will be reported to the Overview & Scrutiny Panel twice a year. Our strategy and action plan will be reviewed each year to link to our corporate planning process.

# <u>Summary of feedback from the Local Strategic Partnership meeting on</u> <u>'The Future of Housing and Development in Carlisle'</u>

On the 22<sup>nd</sup> November 2011, Carlisle City Council hosted a meeting of the Local Strategic Partnership, on 'The Future of Housing and Development in Carlisle'. Approximately 60 representatives attended the event, from a number of statutory, voluntary, private sector and community groups. The City Council's Assistant Directors for Community Engagement and Economic Development gave a presentation on the Housing Needs & Demand Study (HNDS), Housing Strategy and the Local Development framework (LDF). Representatives then split into six working groups, with discussions focusing on the housing and development challenges facing Carlisle, and whether, in its current form, Carlisle's Housing Strategy effectively set out how these challenges could be overcome.

In the table below contains a summarised version of the feedback provided by the six working groups at the event, as well as feedback provided through formal consultation on the Strategy. In the third column, the City Council sets out its response to this feedback. The event coincided with the publication of the government's National Housing Strategy. New initiatives and announcements made by the national Strategy are in italics within the feedback below.

Area	Feedback	Response and Corresponding Actions in the Housing Strategy and LDF
Supporting the City Council's growth agenda through housing delivery.	Housing Numbers: There is a clear need to retain and attract residents to Carlisle. It was widely agreed that supply of housing is not matching demand. In terms of housing numbers, there were two main schools of thought —  1) The area is desperate for more housing. The City Council should allocate more land to housing and increase the City Council housing target to 600+  2) Housing development should be more measured, and numbers should be more cautious.	Allocation of land and housing targets will be done through the LDF process. Further consultation on housing targets as part of the Council's preferred option will be undertaken in 2012. This will have to consider the polarised views and evidence in the LDF.
	How will the Council control and meet supply in the interim period whilst the LDF is in its development stages?	An interim policy will be developed to guide development until the Core Strategy is adopted.
	The relationship between housing and economic growth: What comes first – housing, or employment? Within the LDF and the Housing Strategy, clearer links needs to be made between development and employment in the City.	The Core Strategy evidence uses consistent scenarios for employment growth to determine the housing requirements. This consistent information will ensure that policies are linked.
	It is easier to build houses near employment by piecemeal development in small phases, rather than try to get a large employment site nearer housing.	Noted, however we need to ensure Carlisle develops in a sustainable manner.
	<ul> <li>We need to drive up incomes and aim for a higher wage economy – what is the City Council doing to bring jobs to the area?</li> <li>❖ This requires an improvement in local education standards, and the retention of the 4000-6000 students from the University of Cumbria</li> <li>❖ A lack of Executive homes in the area makes it hard to attract workers and grow businesses.</li> </ul>	The City Council works with the University to strengthen the offer of Carlisle to new students and improve their experience thus encouraging them to stay. We recognise the need to develop economic, housing and employment partnerships to ensure that jobs are available.
	Do we consider Brampton and Longtown in isolation as stand-alone settlements, or merely as satellites of Carlisle? There is too much focus on key service centres. Housing should be targeted across rural areas.	Brampton and Longtown do not operate in isolation as they have key linkages with the rural areas. New plans for rural areas will be developed through the core strategy to guide future development

	It is considered that the document would benefit from drawing greater linkages to the importance of economic growth and infrastructure. These elements are all essential to sustainable and balanced growth and are closely interlinked. Infrastructure is essential to delivery of housing. It is considered that acknowledging these linkages in more detail would be beneficial to the robustness of this document.  There are other factors that are important in delivering economic growth to the area;	The City Council works with partners to ensure new infrastructure is developed where necessary. The updated Housing Strategy Action Plan will include more explicit reference to the importance of infrastructure.  Some of this work lies outside the remit of the LDF or Housing Strategy.
Overcoming a range of barriers to housing delivery	Eg. developing wide-spread broadband, which requires private sector investment.  Planning Policies can be restrictive:  The LDF process is taking too long, and the local plan places restrictions on housing developments; for example planning boundaries in rural areas stop people doing what is needed to be make communities sustainable. Some s106 agreements are constraining affordable housing delivery, with planning obligations making some schemes unviable	There are statutory processes to follow when going through the LDF process. We are looking at where opportunities can be created through an interim policy to address some of these concerns.  To address a range of s106 issues, the City Council has set up an internal working group.
	<ul> <li>What can be done?</li> <li>❖ The national Housing Strategy suggests local authorities should reconsider s106 agreements that date before April 2010, if they are preventing schemes coming forward.</li> <li>❖ Pre-planning application advice with officers is good and needs to continue.</li> <li>❖ Relax restrictions on converting sites into housing.</li> <li>❖ Officers should work with partners to identify land that can be brought forward for development quickly.</li> </ul>	The need to ensure that s106s are viable is an action within the Housing Strategy and Action Plan (Balancing the Housing Market, under Key Action 1).
	Construction costs are preventing more housing coming forward:  What can be done?  Developers retaining the freehold of the land would reduce the impact of land costs.  Alternative constructive methods should be encouraged.  Government Housing Strategy promotes Self-build, with £30 million available for short-term repayable loans for custom build housing.	It is important to encourage a range of different housing delivery. Encouraging self-build will be better reflected in the Housing Strategy and Action Plan (Balancing the Housing Market, under Key Action 1).

There is a shortage of land/land is too expensive or unviable:

Prices associated with building on brownfield land are too high. Landbanking by both landowners and some developers, due to perceived low land values is creating a shortage of land.

What can be done?

- Public bodies should release land at less than best value to facilitate affordable housing delivery.
- We need to enforce stricter time limits on land allocation/planning permissions, to encourage land to come forward.
- Look at allowing open market housing on rural exception sites to enable an element of affordable housing to come forward.
- More public and private land needs to be released to support housing delivery.
- The national Housing Strategy introduced Get Britain Building Investment fund: £400m aimed at house builders to help them begin or complete construction of projects that have planning permission but stalled because they are no longer economically viable.

Neither the Housing Strategy nor the LDF can prevent landbanking. The City Council can reallocate land if it does not come forward for development.

Bringing land forward is identified as a priority within the Housing Strategy & Action Plan Balancing the Housing Market, Key Action 3).

Developers across Carlisle and Cumbria have been encouraged to identify appropriate schemes which may benefit from Get Britain Building Investment.

There is a lack of funding available to develop affordable housing:

Coupled with reduced funding, local rents are relatively low which reduces the viability of local affordable housing schemes.

What can be done?

- Encouraging and delivering more market housing is the most effective way to provide more affordable housing.
- The Housing Strategy does not mention the New Homes Bonus.
- ❖ PFI models should be considered, and good practice identified (where RPs, LAs and private investors have worked together on smaller/larger mixed scale development).
- The national Housing Strategy highlights new Right-to-Buy discounts, with sales funding further affordable housing developments.

The Housing Strategy and Action Plan acknowledge the need to identify further funding streams for affordable housing. (Balancing the Housing Market, Key Action 2). Through the Housing Market group, we will continue to look at new ways of funding affordable housing in Carlisle. The City Council will shortly be considering how it will be utilising future allocations of the New Homes Bonus.

It is important to encourage new sustainable housing development, and to ensure that s106 negotiations are based on robust housing market data (Balancing the Housing Market, Key Action 1).

Regarding the government's Right-to-Buy announcements, more guidance will be published shortly, which should further explain the government's plans for housing association

# Partners reported that their market and affordable housing schemes have been derailed or delayed by local opposition:

#### What can be done?

- There is a need to consult with local people, but care needs to be taken to ensure that such a consultation does not become centred on 'pro-housing' and 'anti-housing' stances.
- ❖ A shift in emphasis is required to change perceptions of housing.
- RPs have customer profiles that can be used to inform new housing schemes/policies.
- ❖ Parish Councils can help 'sell' message we need to support & educate parish councils and members on local issues, to break down political barriers, and get away from 'yes we need housing in the city, but not on my door step'.

properties.

The need to consult with local people is acknowledged in the Housing Strategy and Action Plan, as is the need to engage with parish councils and other members of the community over housing issues to change perceptions and to facilitate sustainable housing delivery (Balancing the Housing Market, under Key Action 4).

The Localism Agenda needs better acknowledgement and reflection in the Strategy.

The changing government agenda including the Localism Bill, Neighbourhood Planning and the draft National Planning Policy Framework needs to be referred to in the Housing Strategy. The strategy needs to reflect more what the communities can achieve and how Carlisle City Council can give communities support.

Explain why community led housing can be worthwhile - local focus / engagement increases good will and confidence in affordable housing / sense of belonging; community organisations can bring sites forwards that might not otherwise become available; can unlock empty homes lease & renovate opportunities; partnership working; can create safeguards against Right to Buy and alternatives to 'affordable rents' and ensure shared ownership is locally affordable; lead to development of skills / other projects / wider regeneration / more than housing.

The Housing Strategy and Action Plan will be updated to better reflect the localism agenda, and to acknowledge more of a developmental role for community based organisations such as community land trusts.

City Council officers, such as the Rural Support Officer, will be working with local communities to support the localism agenda, such as the delivery of a neighbourhood plan.

The revised version of the Action Plan will better reflect the benefits and advantages of community-led housing (Balancing the Housing Market, under Key Action 4).

#### What can be done?

- Communities should be consulted on New Homes Bonus
- Community-land trusts should be supported, along with other forms of community-led housing.

housing shortages  Overcoming barriers to accessing and staying in housing	There is little need for general needs one bedroom flats, contrary to what the HNDS sets out.  Discounted sale affordable properties are preferable to shared ownership properties at the moment, as mortgages are easier to access and more popular with first time buyers.  We need to work together to develop innovative ways of dealing with the problems first-time buyers are facing in securing finance:  Lack of savings is a real issue.	The HNDS is not the only evidence base that the City Council will use when considering policies and priorities.  Attitudes towards shared ownership products differ across RPs. The importance of the provision of discounted sale affordable housing is set out in the Housing Strategy and Action Plan (Balancing the Housing Market, under Key Action 6).  Our HNDS established that lack of savings is a massive issue in preventing access to homeownership. Work to tackle this issue is set
	problems first-time buyers are facing in securing finance:	massive issue in preventing access to

DECENT AND HEALTHY HOMES		
Area	Feedback	Response and Corresponding Actions in the Housing Strategy and LDF
Supporting the private rented sector	Improving the quality of the private rented sector is important.	The importance of ensuring and supporting sustainability in Carlisle's private rented sector is identified in the Housing Strategy and Action Plan (Decent and Healthy Homes, Key Action 1).
	How does the City Council control the number of private sector landlords operating in an unscrupulous manner and the higher turnover of tenancies in the private rented sector?	The City Council carries out proactive housing inspections of licensed and unlicensable HMOs in the district. The City Council also runs a Landlord Accreditation Scheme, in order to ensure standards are maintained in the private rented sector, which reduce complaints and turnover.
	How can the City Council encourage take up of LHA recipients to private sector landlords? Can the planners control the number of HMOs been set up in an area?  Do we need more student accommodation? This should free up HMO properties.	The City Council is limited in its ability to encourage private sector landlords to take on LHA recipients. However, other Councils have set up a reference service for private sector landlords, and the City Council will explore the viability of developing a similar service.  Two developments, currently in the planning system, will develop a large number of student units, should they be built. It is difficult to ascertain student need currently as it is difficult to predict future enrolment of students at colleges/universities in the area.
Tackling empty properties	The City Council should be looking to do more to tackle empty properties, including those above shops:  ❖ RP's can contribute.  ❖ £100 million available in latest round.  ❖ The Council could use s106 money to bring back empty properties into use.  ❖ The Government's Housing Strategy announces that a further £50 million will be available to tackle areas which have the most acute concentration of empty homes – to be match funded by local organisations.	The work the City Council and its partners are undertaking in order to bring back empty properties into use is set out in the Housing Strategy and Action Plan (Decent and Healthy Homes, under Key Action 2). The City Council and Eden District Council also have a joint Empty Homes Strategy, which sets out in more details our policies towards empty homes.

Reducing levels of fuel poverty	We need to ensure healthy urban planning, fuel efficiency and energy efficiency. Public health can engage with people and Councils.	We have set out the ways in which we intend to work to reduce fuel poverty in the Housing Strategy and Action Plan (Decent and Healthy Homes, under Key Action 5).
Tackling anti- social behaviour	Government's Housing Strategy announces that Home Office to publish formal response following consultation on proposals for faster, more flexible and effective powers to tackle anti-social behaviour. DCLG have also recently carried out a consultation.	The importance of tackling anti-social behaviour in our Housing Market is set out in the Housing Strategy and Action Plan (Decent and Healthy Homes, Key Action 3). However, it will need updating in light of any subsequent publications by the Home Office.

# SUPPORTING VULNERABLE PEOPLE

Area	Feedback	Response and Corresponding Actions in the Housing Strategy and LDF
Responding to our ageing population	The Government's Housing Strategy introduces the concept of a 'new deal' for older people's housing to enable them to make informed choices about their housing and care in later life.	The criticality of meeting the needs of our ageing population is acknowledged throughout the  Housing Strategy and Action Plan.
	<ul> <li>We must meet the needs of our ageing population through supporting the delivery of 'Homes for Life', Extra Care Units, supported housing, fit for purpose care homes and adaptations.</li> <li>The HNDS underestimates the amount of specialist housing required.</li> <li>Private sector needs engaging more, regarding assisted living schemes and older persons schemes to rent.</li> <li>The Government's Housing Strategy promotes initiatives like 'HomeShare' which match people needing low levels of support with people who provide such support in return for receiving accommodation</li> </ul>	The importance of delivering more 'Homes for Life' will be made more explicit in the updated Housing Action Plan.
	Facilitate family and social support for older people, through for example, community centres and village halls.	The importance of working to reduce social isolation amongst older people is an action in the Housing Strategy and Action Plan (Supporting Vulnerable People, Key Action 4).
	Support rural communities by ensuring older people can stay in the same area when downsizing.	Delivering rural housing and housing for older people is prioritised under the Housing Strategy and Action Plan (Balancing the Housing Market, Key Action 5).
Responding to changes in welfare reform	The City Council, working in partnership with other organisations such as Registered Providers, should do more to signpost relevant organisations, especially those affected by LHA changes.	The importance of effective signposting has now been reflected better in the updated Housing  Strategy and Action Plan (Supporting Vulnerable People, under Key Action 7).
Meeting the challenges of an increased demand on our	For some vulnerable people, the delivery of new housing is relatively irrelevant, as many of our most vulnerable people are unable to afford or maintain tenancies in affordable housing, be it rented or intermediate. This needs to be better reflected in the Housing Strategy. One way of doing this is to increase the employability of vulnerable people	The Carlisle Homeless Improvement Partnership (CHIP) group works to help vulnerable people hold down tenancies, and their work will be better reflected in the updated Housing Strategy and Action Plan.

services		
	The national Housing Strategy announces a £400m investment, over 4 years, to prevent homelessness and tackle rough sleeping and the establishment of a cross-government ministerial working group to address the causes of homelessness.	The ministerial working group is due to publish a national homeless strategy in Spring 2012. More information is required on where the £400 million is coming from.
	It is considered that this section and the action plan would benefit from providing explicit reference to homeless 16/17 year olds in respect of challenges and actions and flowing from this. These are an important group and it is considered very important that their needs are picked up within the Housing Strategy. In September 2011, 74 young people looked after in Cumbria aged 16 or over who will soon be leaving care, and last year 54, 16 or 17 year olds in Cumbria left care and who are considered more vulnerable and at greater risk of becoming homeless. Over 140 young people aged 16 or 17 came to the attention of the agencies as "homeless" in the year to June 2011.	The Housing Strategy and Action Plan acknowledges the need to provide sufficient temporary accommodation to a wide-range of vulnerable people. This includes homeless 16/17 year olds. The updated Action Plan will include a more explicit reference to this group, and utilise the evidence provided.