### **HOUSING PLAN 2012-2017**



#### INTRODUCTION

Good quality housing in thriving communities is essential to achieving Plymouth's Vision.

'To be one of Europe's finest, most vibrant waterfront cities, where an outstanding quality of life is enjoyed by everyone'

The Housing Plan 2012 - 2017 sets out how partners across the city can work towards this city vision for its homes and communities over the next five years. It replaces five current separate strategies, and together with clear action focused delivery plans, will also meet the City Council's statutory strategy requirements.

Our current Housing Strategy 2008-11 has delivered real improvements for Plymouth's residents, achieving funding to improve 15,500 existing former council homes through stock transfer, and delivering record numbers of affordable homes, attracting over £100m of inward investment to the city. It is now out of date and we need to focus on what we can achieve in a very different environment.

Plymouth is a city of ambition and opportunity with a proven track record of delivery. As the economic and cultural centre for the far South West, it offers a good quality of life for the majority that live and work here. But it is also a place where some residents are disadvantaged and don't have equal access to a home that they can afford in an attractive environment. Good housing is necessary to help people and their families thrive and contribute to the city's economy. Our current housing 'offer' to both current and prospective residents is varied in quality, location and value.

While the city sits in one of the most attractive and affluent parts of the UK, its economic and social make up are distinctly different to its neighbours and most of the South West. It experiences symptoms of higher than average UK rates of homelessness, and vulnerable people with wide health inequalities and worklessness. These appear to be rooted in the particular local economy and its housing market, and the city includes a number of areas within the nation's locations of highest deprivation, often combined with poor housing conditions.

#### In Summary

In comparison with the UK and much of the South West, Plymouth has relatively:

- Lower levels of owner occupation and higher levels of private rented and social rented homes.
- More older privately owned or rented properties in poor standard or failings basic tests.
- Higher concentrations of poorly maintained and fuel inefficient private housing occupied by older and vulnerable, low income households.
- More poor standard social rented homes needing renewal and regeneration in mono tenure estates.
- Higher numbers of larger families with complex needs, impacting negatively on their communities.
- High social and financial exclusion in a low waged economy, with significant worklessness.
- Less affordable homes than much of the UK because of the low wage base.
- Significant demand for privately rented homes, and those in multiple occupation from both students and local people.
- Marked differences in house prices to buy or rent from one part of Plymouth to another.

But some issues are similarly experienced by most across the rest of the country; people in Plymouth are feeling the effects of the economic downturn, with public resources reduced and with constrained development and limited access to mortgage finance. Household budgets are being squeezed with fuel, food and housing costs rising.

Our challenges ahead are significant. Our responses need to be equally innovative, robust and focused.

The Council and its partners need to harness solutions and investment that will address these issues, supporting those who miss out on opportunities, and equally driving transformational change to deliver our growth plans for the city. We do not have the option of an 'either or' approach. Addressing the causes of market imbalances by delivering growth and regeneration, and simultaneously equipping people with information, skills and services to help them secure better homes and environments should be our twin track ambitions.

National housing policy is radically changing with the Localism Act introducing new and changed duties for councils, and new flexible tenancies with different and higher rental levels. This is coupled with proposals of Welfare Reform which we estimate may impact adversely on the options and incomes of around 6000 residents.

The government's first National Housing Strategy 'Laying the Foundations' was published recently and we will evaluate which initiatives are relevant for Plymouth. Consequently this plan has been developed to be flexible enough to respond to new housing policy drivers.

This Plan has four key housing themes each containing four priority objectives through which we aim to address the wider housing needs of the city. Each theme reflects on the evidence base on the issues we need to tackle.

It has been developed by multi agency, cross sector engagement and task and finish groups to ensure it is complementary to other strategies and plans for the city. Each group considered a range of options and opportunities before narrowing down to four key objectives. Should the Council adopt a single 'Plymouth Plan', the key priorities and focus of this plan can be easily assimilated in its development.

Before finalising the Plan we further sought the views of residents, partners and other stakeholders. There was broad overall agreement with the strategic direction and key priority objectives. Many consultees made positive suggestions, some of which have been incorporated into the Plan, and others will inform the development of the delivery plans which will set out how we will achieve our objectives and ambitions.

There is no point in developing objectives without a clear focus on delivery. Therefore we have a delivery plan for each theme, setting out the actions required for focused partnership work to ensure success. They are designed to be flexible, to respond to changing circumstances with measurable milestones and actions. Delivery will be monitored both by the Council and relevant Plymouth Partnership boards.

#### THEMED PRIORITIES

At the core of the plan we have four key themes which set out strategic objectives that work towards the shared city and Council vision and priorities:

City Priorities	Housing Plan Themes
Deliver Growth	Growing the city
Raise Aspirations	Housing Choices – Smarter Solutions
Reduce Inequality	Better homes – Healthy Lives
Provide Value for Communities	Successful Communities

#### Our Key Housing Plan themes are:

- **Growing the City** Contributing to the economic prosperity, physical regeneration and growth of the city.
- Better Homes, Healthy Lives Making homes safer, healthier and accessible.
- Housing Choice, Smarter Solutions Increasing choice, tackling inequalities and preventing homelessness.
- Successful Communities Making neighbourhoods safer, healthier, cleaner, cohesive and more prosperous.

# The Housing Plan captures the city's housing ambition and sets out priority objectives for developing, improving and investing in people's homes, neighbourhoods and communities up to 2017. The plan demonstrates:

- Without new and improved housing supply of the right type and tenure, the economic and physical regeneration of our city will be constrained.
- Different solutions are needed in the current housing market, and we need to explore how each part of the city's housing market can 'up its game' to improve the city's housing offer for all, with support for the most vulnerable.
- Improving housing standards to provide safe, secure, well designed, accessible and energy efficient homes can improve the health and wellbeing of all residents, and will, over time reduce health inequalities.
- Access to good quality housing, at a price people can afford, will reduce inequality and provide the right environment in which children can thrive, get the best out of their education, and help adults get back into work.
- Successful communities are achieved by working with residents to create a strong sense of place, where people feel safe, and have increased engagement and satisfaction in where they live.

#### **DELIVERY AND ACCOUNTABILITY**

Our Plan has four themes each with four priority objectives. We are now developing detailed delivery plans, one for each theme, to cover specific, measured and agreed actions to realise the delivery of each objective within this plan, and examples are included within the themed objectives – to show how we will work towards the overarching ambitions set out here. They include an analysis of risk and investment required, and equality impact assessments. All agencies need to work together on these cross cutting actions to make a material difference to people's lives in the city.

If we are to be successful, this plan needs the commitment of all public, private and voluntary agencies across a wide range of interests. They are not the Council's sole responsibility, but the City Council recognises its role in community leadership, and will champion and challenge agencies to deliver the transformational change we need. To ensure accountability we will agree a series of regular reports on progress through the Council and Plymouth 2020, including the Plymouth Growth Board, Health and Well Being Board, Children's Trust, Safer and Stronger.

The plan covers a five year span and some elements will be achieved earlier than this while others, like North Prospect regeneration, will take ten or more years. It will therefore need continuous review to ensure that the Plan stays relevant, appropriate, and responsive to policy changes and opportunities.

Our track record of delivery working across all sectors and with local, regional and national partners should give everyone confidence that we will achieve what we set out to do. Our sincere thanks go out to all agencies that work within Plymouth for their commitment to deliver these significant outcomes.

We will need to be even more innovative and committed to our housing objectives if we are to realise the transformation we seek in the current challenging economic environment.

#### **HOUSING STRATEGY 2008 - 11 DELIVERY OUTCOMES**

Our 2008 - I I Housing Strategy has driven many outcomes and improvements both in existing homes and new provision. Together with our partners the Council has co-ordinated interventions to prevent homelessness, and to give older and disabled people the opportunity to remain in their own home if they wish. It has tackled poor housing standards and management, reduced anti-social behaviour, and supported troubled families with complex needs. Many more homes are fuel efficient, and we have a far wider range of supported housing projects than ever before.

In a difficult housing market we have driven record numbers of new affordable homes and achieved a much better balance of tenures in key regeneration areas, together with significantly more local engagement and pride in neighbourhoods through targeted capacity building work.

The following is a list of some of our joint achievements. All our local partners can feel duly proud of the difference these interventions have made in people's homes and communities.

#### Achievements through the Housing Strategy up to March 2012

Solving the housing problems of 15,500 households through housing stock transfer with £253m of government investment in decent homes and major regeneration through and with Plymouth Community Homes.

Improving housing choices and improving the housing offer through the delivery of 1,259 new affordable homes.

Increasing the supply of new affordable homes by a further 1,000 homes through accessing inward investment of over £100m from the Homes and Communities Agency and match funding from our housing provider partners.

Replacing 383 obsolete homes demolished through Devonport regeneration activity replacing them with high quality homes where people want to live.

Safe housing and support for vulnerable households with the completion of George House in 2011, a new purpose built single homeless hostel, and the development of a new refuge for those fleeing domestic violence.

Meeting the housing and support needs of older people with the opening of Devonport View extra care scheme, adding to a total of 190 units of extra care housing across five city wide schemes.

Making homes healthier and safer through the removal of 576 Category I hazards.

Helping people to live independently in their own homes by adapting 616 homes through Disabled Facilities Grants.

Improving the condition of 188 private sector homes to the Decent Homes Standard.

Improving both standards and management of private rented housing through statutory licensing of 333 Houses in Multiple Occupation.

Providing warmer homes and reduced fuel bills for 770 vulnerable households through the delivery of 5,000 energy efficiency measures, helping to tackle fuel poverty and climate change, and reducing carbon emissions.

Providing good quality homes from previously wasted housing resources by bringing 342 empty homes back into use.

Improving access to quality private rented accommodation through our HouseLet and EasyLet schemes, saving £120k in potential Bed & Breakfast costs each year.

Making neighbourhoods safer, healthier, cleaner, cohesive and more prosperous through exemplary and award winning practice in neighbourhood and locality working in priority neighbourhoods. Securing the Local Government Chronicle National Award for Regeneration for the East End Community Village in March 2008.

Residents in North Prospect, Stonehouse and Efford now feel more satisfied with their neighbourhood and more able to influence decisions compared to the city average through our intervention and support.

Reduced estate based problems for communities by supporting 125 large families with complex problems to stabilise their lives, avoid homelessness and the potential of their children going into care.

Made neighbourhoods safer places to live in through sustained reductions in anti-social behaviour year by year (9%, 14% and 8% consecutively since 2009).

Increasing housing choice and meeting the housing needs of 1207 households last year through Devon Home Choice.

Solved emergency housing crises for residents by preventing over 500 families from becoming homeless last year, and with many more people asking for help, accepted a statutory duty to house a further 286.

Sustained year on year reductions in the levels of statutory homelessness from their 2002/03 level of 1391 to 286 in 2010/11.

Accommodated 525 single homeless people and rough sleepers in The SHIP and The Gates and an average of 183 single homeless people are accommodated in the City's supported accommodation at any one time.

Supported 942 young people to make a successful transition to independent living and prevent homelessness, and supported 102 young people to access supported accommodation projects – with a third of these being under 18 years of age.

Made a positive and practical start in the biggest regeneration project in the South West on the North Prospect estate.

Transformational change in Devonport has been achieved through the completion of 350 new and affordable homes, complementing the exemplary refurbishment of some of Plymouth's most important historic buildings, helping to create a high quality place.

#### **KEY HOUSING CHALLENGES FOR PLYMOUTH**

We have set out how Plymouth is distinct and different from much of the region, and this poses particular problems for the city and its residents. It is also fair to say that the city has an enviable location, with real opportunities and scope for improvement. While some of these issues are not unique, the combination of factors presents us with significant challenges, which require great resolve and commitment to tackle.

Our actions need to tackle underlying causes rather than the symptoms.

#### Plymouth 10 Key Housing Issues

#### The demand for housing that is affordable far outstrips supply:

The Plymouth Strategic Housing Needs Assessment update 2010 estimates the annual need for affordable housing is an additional 1,663 homes, whilst the waiting list for social housing currently stands at over 12,000. Over 3000 households are in priority need, on average there are only 23 lets available every week. This is likely to reduce due to rehousing requirements from our regeneration activity. There are particular difficulties in tackling overcrowding and accommodating larger families who need 4 bedroom or larger homes, as these properties are extremely scarce.

## The challenge of improving the city's housing offer to support economic growth and the regeneration of key areas in Plymouth:

Plymouth is feeling the effects of the economic downturn, the housing market remains flat and development and mortgage funding is restricted. New development to meet local housing needs and demand will be a challenge with capital grant funding for housing reduced, and the move to a new 'affordable rent' funding model. In the private sector, over 30% of existing stock is 'non-decent' and approximately 660 private sector dwellings have stood empty for over 6 months. There are significant issues in the Devonport, North Prospect and Millbay areas in particular.

#### Tackling the significant housing related issues that contribute to child poverty:

Plymouth has high numbers of poor quality, and excessively cold housing of all tenures, together with rising levels of overcrowding and homelessness experienced by families with dependent children – these are all acknowledged risk factors in relation to child poverty.

The Department of Health's 'Plymouth Health Profile 2011' indicates that there are 11,100 children living in poverty

## Enabling Plymouth's older population to remain independent, with minimal social care, for longer:

We have an ageing population with a dramatic 27% increase in the elderly population expected by 2026, and a similar number of households identified with some kind of disability. High demand for extra care housing and other suitable accommodation and the demand for major adaptations vastly outstrips the funding available to carry them out, with resultant impacts on NHS and care costs. There is a significant challenge in relation to poor quality and hazardous housing that increases the likelihood of individuals requiring health and social care, with high numbers of homes identified as being non-decent, excessively cold, having trip and fall hazards, and being in a state of disrepair.

## The poor condition and management of private sector housing that affects the health of residents, and results in higher health and care costs:

Around 30,000 (33%) private sector homes are non-decent with 25,500 occupied by vulnerable residents (in receipt of qualifying benefits). Approximately 19,000 have Category I health and safety hazards, costing the NHS an estimated £3 million per annum, and with the hazard of 'excess cold' alone claiming 140 Excess Winter Deaths in Plymouth in 2009/10. Our ability to tackle poor housing conditions in the private sector has been dramatically reduced by the ending of the Private Sector Renewal Grant.

### Reducing the impact of the recession and welfare reforms on poverty and levels of homelessness:

The downturn in the economic climate combined with a radical package of welfare reforms from 2011 will impact on low income households and vulnerable social groups. It is estimated that 6370 people will receive reduced levels of local housing allowance (housing benefit) as a result of the welfare reforms, but many more will have reductions in income as a result of the overall benefit cap following the migration to Universal Credit. Many of these households may well find themselves in circumstances that trigger the homelessness duty. Many others face the stark choice of moving to cheaper, more affordable accommodation, or using a greater proportion of their household budget to pay their rent.

#### Tackling fuel poverty and the energy efficiency of homes:

It is estimated that nearly 14,000 Plymouth households are living in fuel poverty, with significant challenges in treating the number of homes that can be made energy efficient (12,000 homes require loft insulation and 35,000 cavity wall insulation). Many older homes cannot be treated and householders face a long-term fuel poor future with a high probability of poor health unless they move elsewhere.

## A growing number of households do not qualify for social housing, but are unable to afford market housing:

The housing market is failing many households – housing affordability problems, rigid lending criteria and higher deposits are making it harder for first time buyers to get onto the housing ladder, whilst private rents are too high for those on low incomes. In Plymouth an income of at least £28,000 is required to either purchase a house or afford the average rent for a two bed property. Many of Plymouth's residents simply don't earn enough (the median earnings in Plymouth are currently £23,600). The affordability of housing for those with lower incomes who don't qualify for benefits is also in doubt – with the Government's proposed 'affordable rent' model meaning that social rents will be higher at up to 80% of market rents.

## There are marked inequalities for those living in poor quality housing in deprived neighbourhoods:

A number of the most deprived areas of the city are characterised by health inequalities, social exclusion, worklessness, and financial exclusion as well as a poorer environment. These include the major housing regeneration areas of Stonehouse, North Prospect and Devonport. Tackling worklessness is at the top of the government's policy agenda with a range of new policy initiatives aiming to get more people off benefits and into work or training. This is a significant challenge in these more marginalised, deprived communities, as is dealing with other factors of multiple deprivation.

### **FOUR KEY HOUSING THEMES**

Growing the City

Better Homes - Healthy Lives

Housing Choice - Smarter Solutions

Successful Communities

#### **GROWING THE CITY**

#### Our Growing the City housing theme has four priority objectives;

- Ensure new homes support Plymouth's growth, economic competitiveness and future prosperity,
- Increase the supply, mix and quality of new and affordable homes,
- Deliver the physical regeneration of priority neighbourhoods,
- Bring empty homes back into use.

In this theme we focus on the contribution that new and affordable housing can make to the economic and physical regeneration and growth of the city, creating places that people find attractive and enjoyable to live and work in, increasing both homes and jobs and attracting more people to the city.

#### What are the problems?

The city's commitment to growth and need for regeneration and renewal is what makes Plymouth distinct in the region. New and affordable housing and the regeneration of key areas of the city will contribute to the achievement of Plymouth's prosperity and growth in a cohesive and sustainable fashion. Improving the city's housing offer is important to our desire to help create a balanced housing market that meets the needs and aspirations of all Plymouth's current and future residents; providing for increased economic and population growth.

Plymouth is feeling the effects of the economic downturn, inertia in the housing market and reduced development viability, but we are responsive to the challenges. With the threat of some planned developments not starting, and some stalling, the city's successful Market Recovery Action Plan has supported development momentum in the city. In addition, we attracted extra funding to the city through the government's Kickstart Programme to keep providing homes through the recession.

The housing market is failing many households. Housing affordability problems, rigid lending criteria, restricted mortgage availability and higher deposits are making it harder for first time buyers to get onto the housing ladder. Waiting lists are growing as our identified housing needs far exceeds the supply of housing options. We are working with our partners and exploring new partnerships and investment ideas to find a range of solutions to continue supply and meet the demand for new homes.

The coalition government has announced significant funding and policy changes. The budget for new affordable homes is reduced from £8.4 billion to £4.5 billion for 2011 to 2014, with a new housing product at 80% of market rent levels. This will have an impact on potential housing delivery, and our future plans will need to be shaped accordingly.

Our Local Investment Plan helps shape investment priorities across a comprehensive and wide ranging appraisal of infrastructure and regeneration needs. In the light of the restructure of funding streams we will need to refresh and review this to ensure it aligns our priority project delivery to support growth and regeneration.

We have a good track record in Plymouth as a result of our strong delivery framework and collaborative partnerships. We will be in the strongest possible position to make the most of the recovery in the housing market as it kicks in, but it may need our encouragement and strategic direction.

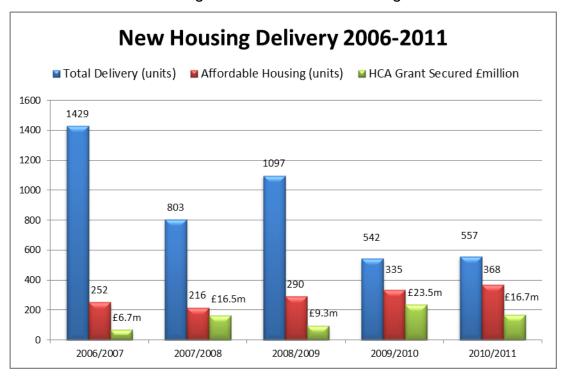
Despite Plymouth having relatively cheaper house prices (compared to the rest of the housing market area and most of the South West), many households are unable to afford their own home. In 2010 full time median annual earnings for Plymouth residents were £23,600, with 20% of

employees earning less that £15,933; housing affordability remains a key issue. An income of over £28,000 is required to be able to either purchase a lower quartile house or afford the average market rent for a two bed property in Plymouth. Indeed the government's new proposed 'affordable rent' tenure at up to 80% of market rents may also challenge those on low incomes.

The city has a growing, ageing and increasingly single population; with 27% identified with some sort of disability and a dramatic 27% projected increase in the elderly population by 2026. The provision of extra care housing, supported housing and lifetime homes will remain a priority to meet identified needs and support independent living.

The Strategic Housing Market Assessment update 2010 estimates the annual need for affordable housing in the city is 1,663, whilst the number of households on the housing register has increased to over 12,000; with over 3,000 identified as in high priority need for housing. Levels of homelessness and households living in temporary accommodation are also increasing at higher rates than most of the South West.

In 2008 the city's construction sector contributed around £256m to the city's Gross Value Added (6.2%); however the sector has been hit relatively harder by the recession. House construction rates are falling from a peak of 1429 in 2006/07 to 557 in 2010/11 reflecting the economic downturn, and lack of development and mortgage finance, and reduced confidence in developers. Lower rates of house building will constrain our economic growth.



Local economic indicators show that in 2009 almost 22% of households were defined as workless, above the UK rate of 19%, with the unemployment claimant rate of 4.0% in January 2012, remaining well above the rates experienced in the years leading up to the recession. The number of FTEs jobs increased by 1.1% per annum (total net growth 11,000) between 1999 and 2009, in line with the UK average growth rate, but Plymouth's productivity has been relatively weak over past ten years, falling substantially against national average.

Public subsidy through housing grant has significantly taken a larger share of new homes delivered in recent years, supporting our track record of improved affordable housing delivery.

However, the financial landscape has changed. Government funding through the Homes and Communities to invest in the delivery of new affordable homes and regeneration will be significantly less over the coming years.

#### Potential solutions

Through the Local Investment Plan we have an investment focus in our defined spatial priority areas, balanced with the 'strategic opportunism' of delivery on smaller infill sites across the city. We cannot afford to do everything so we will need to prioritise to make the biggest housing and economic impact.

New models of investment will be required, and we will need to maximise funding from other sources including use of public assets and land to kick start and maintain delivery with significantly less grant or with no grant at all. We will need to work differently with housing providers to ensure greater value for money, whilst maintaining good quality and design.

Despite the slowdown in the housing market, physical regeneration activity in Devonport, Millbay and North Prospect needs to continue ensuring new homes to rent and buy to create a better balanced housing market. This complements wider regeneration activity in the most disadvantaged communities which has led to a cleaner, safer, greener environment, creating places where people want to live, and businesses want to stay or invest.

There remains a shortage of affordable housing to rent and buy to meet our increasing housing needs and support economic growth. The market remains sluggish. There is a need for infrastructure investment to facilitate the agreed growth areas.

We will engage with the Heart of the South West Local Enterprise Partnership to ensure new and improved housing helps underpin the success and prosperity of our businesses and communities.

We have a strong track record in bringing existing empty homes back into use, and we will need to redouble our efforts maximising the new funding pot announced by the government recently.

An update of the housing needs assessment is planned for 2012, to ensure we have a robust and contemporary understanding of the city's current housing markets and the impact of the sub regional housing market. This will help ensure that we focus and guide investment decisions appropriately in new and improved housing to increase the supply, mix and quality required to meet our housing needs.

We need to take a wider consideration of different forms of tenure, including a serious attempt to develop further expansion of good quality, well managed private rented homes by larger developers and providers to maximise economies of scale in management. In the absence of confidence to build properties to buy, this will stimulate delivery to help meet demand and retain flexibility for future tenure changes.

#### **Priority Objectives**

The Plymouth Housing Plan 2012-17 Growing the city		
Contributes to city priorities	<b>Deliver growth</b> - Develop Plymouth as a thriving growth centre by creating the conditions for investment in quality new homes, jobs and infrastructure <b>Raise aspirations</b> - Promote Plymouth and encourage people to aim higher and take a pride in the city	
Housing focus	We will focus on the contribution that new and re-used housing can make to the economic and physical regeneration and growth of the city, creating places that people find attractive and enjoyable to live and work in, increasing both homes and jobs and attracting more people to the city	
Priority Objective I	Ensure new homes support Plymouth's growth, economic competitiveness and future prosperity	

	Ensure new and affordable housing supports economic growth
	Help to improve development viability and delivery
	Use the Growth Fund to support housing delivery priorities
	Support growth marketing and attract investment for housing
Priority Objective 2	Increase the supply, mix and quality of new and affordable homes
	Exploring different forms of affordable tenures and the new affordable rent model to maximise investment into the city
	Use the Council's and other publically owned assets to support housing delivery
	Ensure new homes meet high quality design standards and achieve Lifetime Homes standards
	Improve our understanding of the city's and sub-regional housing markets to target investment and meet needs
Priority Objective 3	Deliver the regeneration of priority neighbourhoods
	Support delivery for the first and future phases of the regeneration of North Prospect
	Continue the regeneration of Devonport, supporting the delivery of the Area Action Plan
	Support progress for the regeneration of Millbay
Priority Objective 4	Bring empty homes back into use
	Provide a range of support packages to prevent properties remaining empty in the long term
	Develop and deliver a full range of enforcement packages

#### BETTER HOMES, HEALTHY LIVES

#### Our Better Homes, Healthy Lives theme has four priority objectives;

- Target interventions to improve the standard of private sector housing,
- Improve the management of private sector housing,
- Adapt housing, so that older and disabled people can live independently in their own homes,
- Improve the energy efficiency of homes.

We will focus on improving health, reducing health inequalities and supporting independent living, by tackling poor quality, energy inefficient and poorly managed homes in our existing housing stock across the city

#### What are the problems?

Most of the city's housing stock is in the private sector. We have significantly lower than average levels of home ownership but greater amounts of private rented housing. As of 2010, the balance of Plymouth's housing mix was as follows:

Tenure	Dwellings	Plymouth %	England %
Owner Occupied	67,793	60.3	67.4
Privately Rented	22,065	19.6	15.6
Social Housing	22,619	20.1	17.0
Total	112,477	100.0	100.0

Plymouth's private sector stock is older than the national average with a far higher proportion of medium / large terraced houses (31% compared with 19% nationally). Around 50% of private rented stock is pre 1919 (compared with 40% nationally) and predominates in inner-central neighbourhoods with older, terraced housing.

#### **Housing Conditions**

The age, condition and tenure of our housing stock presents a number of challenges we need to address, particularly recognising the impact of poor housing on health and child poverty.

Our successful stock transfer has secured the investment required to ensure that the majority of all social rented housing will achieve the Decent Homes standard by 2015, with the exception of the North Prospect regeneration project which runs over 10 years. The Council will be monitoring the delivery of this as one of the key promises to tenants. However, our poor standard private sector housing stock has no resource solution identified currently, and while the overall standards are not significantly different to the national average, Plymouth has different factors within the sector as set out below.

- There are 25,500 private sector dwellings occupied by vulnerable residents (in receipt of qualifying benefits)
- There are 29,930 'non decent' private sector dwellings (33.3%), of which 9,500 dwellings are occupied by vulnerable residents
- 18,800 private sector dwellings have Category I health and safety hazards (20.9%), failings are 'excess cold', poor 'thermal comfort', trips and falls and disrepair

- Of the 29,930 private sector dwellings, the estimated investment repair cost to achieve decent homes is £170 million
- There are an estimated 6,000 private Houses in Multiple Occupation (HMO) across the city, of which around 750 are licensable
- The Department of Health's 'Plymouth Health Profile 2011' indicates that there are 11,100 children living in poverty in the city

Housing conditions in Plymouth are worst in the private rented sector, as illustrated below:

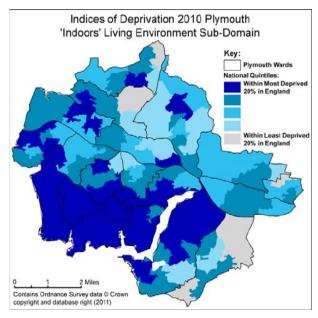
Tenure	Non Decent %	Category I Hazard %	Disrepair %	Thermal Comfort %	SAP	Fuel Poverty %
Owner Occupied	32	19.3	8.5	13	52	12.9
Privately Rented	37.2	26.1	19	20.1	50	18.4
Social Housing	24.8	11.5	4.4	10.2	53	13.5

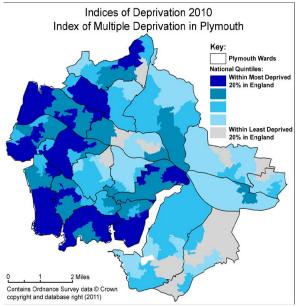
The most common Category I Hazard failure across the private sector is excess cold followed by falls on stairs and falls on the level, contributing to the poor health and well-being of residents and generating significant NHS and care costs.

There is an urgent need to improve housing conditions across the private sector, but notably private rented housing, which has the worst conditions across all sectors, as illustrated below:

- 8,208 non decent private rented dwellings.
- 5,758 private rented dwellings with Category I Hazards.
- 4,192 private rented dwellings with disrepair (Decent Homes Standard).
- 4,435 private rented dwellings failing thermal comfort (Decent Homes Standard).
- 4,060 private rented dwellings (households) in fuel poverty.

There is a clear link in Plymouth between the areas of worst housing condition, deprivation and greatest health inequalities as illustrated by the following maps taken from the Index of Multiple Deprivation 2010. At its extreme, there is around a 14 year gap in life expectancy between neighbourhoods at the bottom (Devonport) and top of the spectrum (Widewell). Poor housing and environments contribute to these health inequalities.





('Indoors' living environment relates to housing in poor condition, and without central heating)

The quality and condition of the city's homes has a material effect on people's health. It has been estimated that Category I health and safety 'hazards' in homes in England are costing the NHS in excess of £600m a year. For Plymouth this is estimated at around £3m p.a. with potentially I40 excess winter deaths in 2009 attributed to poor housing conditions, mostly poor or inadequate heating. (Based on the BRE's 'Real Cost of Housing' 2010 analysis). In addition, high levels of overcrowding of families in poor housing in the city means that children in these homes have no or limited safe, warm or quiet spaces to do their homework, thus potentially limiting their ability to thrive or to attain the standards they might otherwise have reached.

The role of the private sector in meeting housing demand is increasing as access to owner occupation for first time buyers is reduced. This will be more acute with government proposals to discharge councils' homeless duties through use of the private rented sector.

#### **Adaptations**

With persistently high demand for major adaptations for people with disabilities, it is clear that much of our housing is inflexible and not accessible for many elderly or disabled people. There are long waiting times for adaptations though limited resources. Under these circumstances, people will have less choice to live independently in their own home. In 2010/11, the Council achieved 187 major adaptations to private homes. Despite there being substantial reductions in overall funding, average costs of work have been reduced and by the end of January 2012, 150 major adaptations had been achieved. However, meeting demand will not be sustainable in the future without additional funding. This issue will be heightened by an ageing population, potentially increasing pressure on social care, and at worst will mean people will not be able to remain living independently in their homes.

#### **Energy Efficiency**

Plymouth is committed to reducing emissions of Carbon Dioxide (CO2) whilst making the city more resilient to climate change. Our home energy activity will focus on targeted assistance to the most vulnerable households and the least energy efficient homes. The challenges are significant as there are around 12,000 homes that require loft insulation and 35,000 that require cavity wall insulation. In addition there are some 39,000 'hard to treat' properties that are either of solid wall construction or do not have mains gas. All of these homes are energy inefficient and are wasting heat, energy, carbon and money.

It is estimated that there are nearly 14,000 households living in fuel poverty in 2010, many of these people live in older homes and face a long-term fuel-poor future with a high probability of poor health unless we can either improve hard-to-treat homes or enable fuel poor householders to move into more energy efficient housing.

#### Housing management standards and HMO's

Standards of management are variable across the city. In 2010/11 the Council resolved 668 complaints about disrepair or poor conditions in the private rented sector. Most were resolved quickly by advice and support to landlords, but nearly 382 needed an inspection and a request to remedy defects. Only three incidents required formal notices, and the Council achieved two successful prosecutions during the year. By the end of January 2012, the Council has seen an increase in complaints compared with the previous year, having already received 605 complaints and with 587 resolved.

Our partnership with The Private Sector Forum supports private landlords and their representatives to improve housing management standards, and is leading to a commitment to work towards voluntary accreditation. We must focus and target interventions to support landlords to meet the increased demands and challenges that the sector will experience through the housing market changes now underway.

Students occupy significant numbers of Houses in Multiple Occupation. Meanwhile, the University has a strategy to provide alternative accommodation through purpose built halls of residence. In the interim, competition for this resource is acute, and will increase with planned government benefit changes for people under 35 years of age who are unable to fund their own housing costs in this sector. This could potentially affect 800 people.

#### **Possible Solutions**

We must invest in making existing homes decent and energy efficient. Our plans for improving private sector housing will reduce health inequalities, and the causes of child poverty. We also need to help people to live independently in their own homes, reduce fuel poverty, and develop a robust and well managed rented sector to meet housing demand. Our priority focus will be on this sector.

Our top performing landlords set the standard for others to follow. It is essential to build upon the achievements we have made if we are to ensure we can direct resources into the sector to assist people in housing need. Voluntary accreditation and training provide one approach. Where landlords fall below an acceptable standard, the Council will use its regulatory powers robustly to ensure the reputation of this sector is maintained.

The ending of Private Sector Renewal Grant funding from April 2011 has placed extreme pressures on the Council's programme of private sector housing improvement work. We need to make the best use of resources available, target what we have to those in most acute need, and where possible develop alternative means of delivering improvements.

We need to press ahead with our project to tackle hard to treat properties in the west of the city, utilising European funding and energy company resources. We will clearly focus on maximising input from the Green Deal, when it is clear what is on offer, and work should start now to explore how this can be of use.

#### **Priority objectives**

The Plymouth Housing Plan 2012-17 Better Homes, Healthy Lives		
Contributes to city priorities	<b>Reduce inequality</b> – Reduce the inequality gap, particularly in health, between communities.	
	Raise aspirations - Promote Plymouth and encourage people to aim higher and take a pride in the city.	
Housing focus	We will focus on improving health, reducing health inequalities and supporting independent living by tackling poor quality, energy inefficient and poorly managed homes in our existing housing stock across the city.	
Priority Objective I	Target intervention and resources to improve the standard of private sector housing	
	Improve the health and safety of residents by removing Category I Health &	

	Safety Hazards.
	Monitoring the delivery on Registered Providers' stock, to meet the decent homes standard by 2015.
	Increase our understanding of specific housing conditions in Plymouth to target investment and our actions to best effect.
Priority Objective 2	Improve the management of private sector housing
	Encourage and support the development of high standards of management in both the private and social rented sector .
	Support private landlords to secure improvements in meeting their statutory responsibilities and in achieving a thriving and responsive private rented sector.
	Support the development of voluntary accreditation to achieve the standards of the best across all providers.
Priority Objective 3	Adapt housing so that older and disabled people can live independently in their own homes
	independently in their own homes  Target major adaptations to those in most need and capture outcomes for
	Improve the timely access to major adaptations, removing duplication and
	Independently in their own homes  Target major adaptations to those in most need and capture outcomes for customers and service improvement.  Improve the timely access to major adaptations, removing duplication and ensuring consistency in assessment of need.  Develop the means of funding and purchasing major adaptations to achieve
Priority Objective 3	Target major adaptations to those in most need and capture outcomes for customers and service improvement.  Improve the timely access to major adaptations, removing duplication and ensuring consistency in assessment of need.  Develop the means of funding and purchasing major adaptations to achieve best value.
Priority Objective 3	Independently in their own homes  Target major adaptations to those in most need and capture outcomes for customers and service improvement.  Improve the timely access to major adaptations, removing duplication and ensuring consistency in assessment of need.  Develop the means of funding and purchasing major adaptations to achieve best value.  Improve the energy efficiency of homes  Target energy efficiency measures to the most vulnerable in the least energy

#### HOUSING CHOICE, SMARTER SOLUTIONS

#### Our Housing Choices, Better Solutions theme has four priority objectives:

- Prevent homelessness.
- End rough sleeping.
- Promote access to a range of accommodation options.
- Address the wider causes and impacts of homelessness.

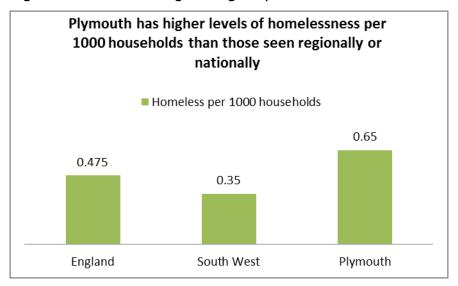
We will focus on reducing homelessness and rough sleeping, and increasing access to good quality, supported and independent housing choices for all of Plymouth's residents that need them, including advice and support to the most vulnerable.

#### What are the problems?

There are a number of worrying national trends in homelessness/rough sleeping and helping people to access accommodation, many of which are amplified in Plymouth:

- Latest household projections suggest that demand for housing will continue to grow strongly.
- The level of housing supply is currently insufficient to meet the projected demand.
- Homelessness is rising after a long period of declining numbers. The single clearest reason for this rise is the growing numbers accepted as homeless following loss of private tenancies.

These trends are more acute in Plymouth with higher levels of homelessness than both the regional or national average during the period 2010/11.

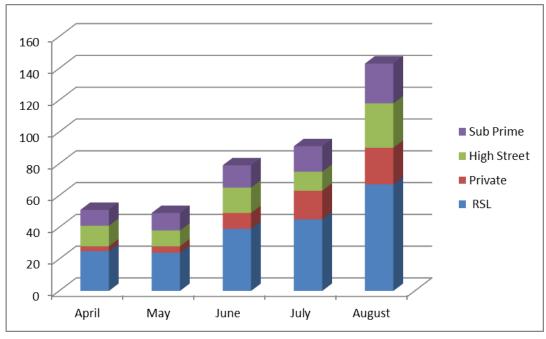


In addition, many more people are homeless than those reflected in the official statistics and there are particular concerns in Plymouth with regards to 'single non-priority' homeless who are at risk of rough sleeping or sofa surfing, and who access the city's supported housing provision.

Though the city has successfully targeted homelessness and levels of rough sleeping (achieving year on year reductions since 2002) the upturn in Plymouth is caused by a number of factors:

- Demand far exceeds the available supply of social housing with house-building not keeping pace with demand. In August, 2011, the total number of households applying for social housing numbered 12,163 with 3,222 (26%) of these being in priority bands A, B or C.
- Sustained and targeted homelessness prevention initiatives resulted in a sharp decline in statutory homelessness from 2003 – 2009, but homelessness has recently begun to rise. In

- 2010/11 more homelessness decisions were made (up 7% from the previous year), and more people accepted as a result (up 5% since 09/10).
- The number of households accommodated in temporary accommodation has increased, with the figure rocketing to 106 in February 2012 compared with an average of 73 over 2010/11.
- Levels of homeless families with dependent children have risen with an average of 86 children living with their families in temporary accommodation (rising from an average of 78 in the previous year).
- There have been significant increases in levels of statutory homeless of single people, particularly in relation to mental illness/disability (acceptances rose from 17 in 2009/10 to 27 in 2010/11 an increase of 58%), and physical disability (rising from 24 in 2009/10 to 30 in 2010/11 an increase of 25%).
- There is an upward trend in numbers of people sleeping rough, reversing trends observed to 2010/11. In the June August quarter of 2011 the average numbers of rough sleepers seen was 20, compared to 5 in 2010/11 (an increase of 300%).
- Many applicants to social housing are currently overcrowded (1931 households in total), some seriously, with very few larger houses available to let 9 approximately 6 per month across Devon). Overcrowding is a well-established risk factor for child poverty and ill health.
- The housing register has highlighted a significant number of large families in poverty (i.e. on a household income of £20k or less) who are overcrowded (255 families with a 4 or more bed-need seeking properties through Devon Home Choice in September, 2011), but due to the limited availability of larger properties, are unlikely to be housed through the register.
- Levels of repossession actions are rising across the board (home owners, social tenants and private rented tenants) there are currently an average of 92 repossession actions heard in court every month, and of particular concern (given the increasing reliance on the private rented sector as a viable housing options) are the increasing levels of private sector landlords taking repossession action.



Increases in repossession actions between April and August 2011.

Plymouth has one defined Gypsy and Traveller site (13 pitches) and planning permission for a 10-pitch site. There is a defined need for an additional 40 permanent Gypsy and Traveller pitches, 15 transit and four show guild pitches. We are experiencing a significant increase in unauthorised encampments which cause problems for both Gypsies and the resident community, underlining the need for authorised sites.

Despite the success of homelessness prevention initiatives, patterns and causes of homelessness in Plymouth stubbornly persist. Homelessness disproportionately impacts on children and young people (over half of all those who approach in housing need). Most often, these young people and families have been evicted by their parents or family or have suffered from relationships breaking down.

Plymouth now faces a number of critical challenges to enabling some of Plymouth's most vulnerable people to access and sustain affordable housing:

- The lagged impacts of the post-2007 economic recession and rising unemployment that can affect homelessness both directly (via higher levels of mortgage or rent arrears) and indirectly (through pressures on family and household relationships).
- Challenging housing market conditions that make home ownership and private rents less affordable, resulting in a demand for social housing that cannot be met with current supply.
- Welfare, housing and other social policy reforms including welfare and housing benefit reforms, the localism agenda that affects allocation policies, security of tenure and rent levels in social housing, and the removal of the ring-fence on Supporting People grant funded projects that feature so heavily in homelessness prevention activity.

#### **Potential Solutions**

In shaping the city's response to these challenges, there is an opportunity to increase effectiveness by addressing a number of fundamental and cross-cutting issues in a more cohesive way by:

- Developing a more integrated approach to homelessness with commissioners from health, adult social care, children and young people's services involved in resolving the causes of homelessness.
- Working with social landlords to ensure that rents remain affordable whilst accepting that they need to maximise rental income to fund building to increase the supply of new social housing.
- Ensuring that we work in partnership with housing associations to consider and implement changes proposed in the Localism Bill, to ensure that social housing is able to respond to local needs such as overcrowding and under occupation, as well as being available for those on very low incomes.
- Exploring how the provision described in the Localism Bill, to utilise private rented housing to house those that are owed a homelessness duty, can impact positively on Plymouth with potential to relieve pressure on valuable social housing resources.
- Developing sound partnership with the city's private rented sector landlords to ensure that the most vulnerable people have access to good quality, well managed private rented accommodation.
- Focusing our activity on preventing homelessness from occurring, working closely with our voluntary sector partners to sustain people in their accommodation by delivering advice and support at the earliest opportunity.

Tackling housing need, homelessness and support issues lie at the heart of addressing inequality and this Plan represents an integrated, partnership approach to the complex issues that cause

homelessness, and to secure new solutions to ensuring the availability of affordable housing options for some of the city's most vulnerable residents.

### **Priority Objectives**

The Plymouth Housing Plan 2012-17		
Housing Choices,	Smarter Solutions	
Contributes to city priorities	Reduce inequality – Reduce the inequality gap, particularly in health, between communities.	
	<b>Provide value for communities</b> – Work together to maximise resources to benefit customers and make internal efficiencies.	
Housing focus	We will, through better choices and smarter solutions, focus on reducing the incidence of homelessness and rough sleeping, while increasing access to good quality, supported and independent housing choices for all Plymouth residents needing them, with advice and support for the most vulnerable.	
Priority Objective I	Prevent homelessness	
	Work to mitigate any negative impacts of welfare reforms on Plymouth's residents.	
	Improve the quality of advice provision across the city with partners.	
	Implement and maintain initiatives aimed at preventing homelessness caused by the recession.	
	Provide targeted early intervention services.	
Priority Objective 2	End rough sleeping	
	Work with the most entrenched rough sleepers to find suitable housing solutions.	
	Develop new ways of working to tackle the causes and consequences of rough sleeping and monitor their effectiveness.	
Priority Objective 3	Promote access to a range of accommodation options	
	Ensure provision of supported housing to meet the needs of the most vulnerable.	
	Develop a Tenancy Strategy to make best use of social/affordable housing reducing overcrowding and under-occupation.	
	Make best use of the current housing stock, including private rented housing options.	
	Work with partners to ensure adequate pitch provision is made for Gypsy's and Travellers.	

Priority Objective 4	Address the wider causes and impact of homelessness		
	Tackle access barriers to employment, training and education initiatives for homeless people.		
	Tackle barriers to accessing health care for homeless people.		
	Support people through life transitions e.g. leaving care or discharge from hospital, prison and the armed services.		
	Support projects tackling financial exclusion and building financial confidence.		

#### SUCCESSFUL COMMUNITIES

#### Our Successful Communities theme has four priority objectives:

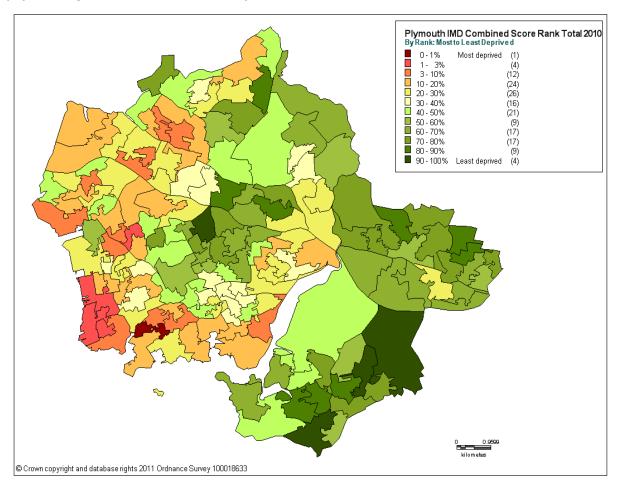
- Effectively engage residents in priority neighbourhoods.
- Tackle inequality in priority neighbourhoods.
- Support our local communities through major regeneration.
- Tackle anti-social behaviour, targeted harassment, and reduce significant harm from ASB.

To create successful communities we will focus on maintaining effective partnerships and building capacity within our neighbourhoods to achieve community cohesion, strong engagement and increased satisfaction, tackle anti-social behaviour and support families with complex needs.

#### What are the problems?

While much of the city provides a good quality of life for all residents, there are areas where the Council and its partners have invested energy in physical and social regeneration, and this need is still clearly necessary in key locations in order to address community issues and raise personal aspirations.

Plymouth has a greater number of disadvantaged neighbourhoods than much of the south west, as defined by the national Index of Multiple Deprivation (IMD 2010). There are clearly identified inequalities between neighbourhoods in the city, with the most deprived mainly found in the north west and south west, as can be seen from the map below. Some of these areas correlate to major physical regeneration work in the city.



**HOUSING PLAN 2012-2017** 

There are 160 Lower Super Output Areas (LSOA) with a combined population of 255,564. 41 LSOA's in Plymouth fall within the top 20% most deprived in England. There are 5 LSOA's in the most deprived 3%, home to 7,458 residents. Devonport and North Prospect have LSOA's in the 1-3% most deprived, and Stonehouse includes the city's most deprived LSOA, falling within the 0-1% most deprived nationally. The domains used in the Index of Multiple Deprivation 2010 are income, employment, health deprivation and disability, education, skills and training, barriers to housing and services, crime and living environment.

Measurement of quality of life indicators through the Place Survey 2008/9 showed a strong correlation between lower quality of life and localities which included the most deprived neighbourhoods. In comparison with its family group of 27 unitary authorities, Plymouth as a city was in the bottom quartile for people from different backgrounds getting on well together (69.9%), people influencing decisions (22%), fair treatment by local services (68.2%), and the third quartile for general satisfaction with local area (79.1%).

Plymouth has a well- established and effective focus on multi agency problem solving in relation to tackling anti-social behaviour. Over the last three years ASB has reduced by 9%, 14% and 8% respectively. However, demand for action remains constant.

There are also an estimated 750 larger families with multiple and complex needs in Plymouth. The government estimates the cost of such families to be £81,000-£350 000 per year, each, to the public purse.

iQuanta (a Home Office tool for monitoring a wide range of top-level indicators of policing performance against other areas and national and local targets) indicators show that there are relatively low levels of harassment and targeted harassment, with a rate of 0.765 per 1,000 population compared to an average of 0.937/1,000 population. However, for racially and religiously aggravated offences we compare unfavourably, with a rate of 1.020/1,000 population compared to a family average of 0.791/1,000.

Plymouth therefore has a number of neighbourhoods in the city where residents face multiple factors of deprivation, and may have complex needs. They may feel neighbourhood facilities and services are inadequate, community infrastructure is low, and that currently they have little influence.

The five neighbourhoods the Council has supported through neighbourhood regeneration are all within the top seven most deprived, as defined by the IMD 2010. Multi-agency ASB and family intervention work is focused on hot spots in neighbourhoods determined by statistical data, partners reports or referrals, and often correlates with areas of multiple deprivation also.

#### **Possible Solutions**

It is clear that if we are to realise our aim of developing strong, cohesive communities in clean and safe areas where people choose to live and are satisfied to live, we must continue our efforts with partners focused on our priority neighbourhoods, including those with major regeneration schemes. The Localism Bill may offer further potential to local people who wish to engage in controlling and resolving local issues.

Local people identify most closely with their own neighbourhood, and local conditions have a large influence on people's feeling of well-being, quality of life and aspirations. Attractive neighbourhoods that are well designed and managed, and support integrated communities, offer opportunities both for individuals and the wider economic and social prosperity of Plymouth. Therefore our regeneration priorities are critical in achieving transformational change of the whole city. Some areas of work to address this are set out below:

 We need to make sure partners are linking objectives, intelligence and resources to be effective in place shaping, creating a strong and successful community. To do this we need to

- ensure there is a shared vision between stakeholders, including residents, and effective joined up partnership work.
- We need collectively to support partners involved in employment projects, enterprise initiatives and financial exclusion to engage those not readily accessing existing services and help provide a progression route to economic activity.
- We need to work with an increasing number of partners to address health inequalities. Working intensively with families with complex needs will ensure whole families can be supported in making changes to address any physical, mental/emotional or sexual health concerns.
- It is essential that both existing and newly created neighbourhoods have a well developed and well maintained infrastructure, including physical, social and green factors, where facilities are appropriate to meet the needs of the neighbourhood, communities are cohesive, and residents are empowered to influence local decision making and to develop and deliver their own neighbourhood activities and projects.
- We need to continue to drive down incidences of ASB across all tenures whilst partners adapt to current financial constraints, changes in structures, practices, and new tools and powers.
- Our BME community currently stands at about 6%, consisting of relatively small numbers of a variety of different ethnic groups. However, over the next few years we expect this to increase and there is potential for increased levels of ASB and racist incidents, compounded by the economic climate. There are also an estimated 6,000 migrant workers in Plymouth, predominantly eastern Europeans. Reports of ASB suggest work is necessary to increase awareness of social norms, and promote cohesion within communities.
- The Plymouth Family Intervention Project for families with multiple and complex needs, has achieved high levels of savings for the city through targeted interventions, contributing to reducing anti-social behaviour, reducing the threat of homelessness, worklessness, child poverty and reoffending, but currently it does not have a sustainable funding base for the future. There is an opportunity to explore pooling budgets with partner agencies and ensuring linkages with locality working as a means of providing a long term sustainable funding solution.
- Vulnerable single adults often fall through the net of local services with needs that do not meet eligibility criteria for mental health or social work intervention, but who cause a great deal of anti-social behaviour in communities or are most vulnerable to being targeted and made victims. We need to identify and support repeat and/or vulnerable victims.

There are complex issues impacting on communities, families and individuals which present many challenges, including getting access to and retaining a home in an area people want to live. Tackling bricks and mortar regeneration alone will not resolve the problems set out above. Therefore our approach should be to co-ordinate our efforts in priority neighbourhoods and major regeneration projects, so that neighbourhood issues are dealt with, and families and individuals can contribute positively to their communities, neighbourhoods and the city of Plymouth.

### **Priority Objectives**

TI DI CALLE : DI 2010 17			
The Plymouth Housing Plan 2012-17			
Successful Communities			
Contributes to city priorities	<b>Reduce inequality</b> – Reduce the inequality gap, particularly in health, between communities.		
	<b>Raise aspirations</b> - Promote Plymouth and encourage people to aim higher and take a pride in the city.		
Housing focus	To create successful communities we will focus on maintaining effective partnerships and building capacity within our neighbourhoods to achieve community cohesion, strong engagement and increased satisfaction, tackle anti-social behaviour, targeted harassment and support families with complex needs.		
Priority Objective I	Effectively engage with residents and partners in priority neighbourhoods		
	Strengthen the ability of communities to improve their own neighbourhoods.		
	Proactively promote tolerance within communities, whilst building resilience to ASB and harassment.		
	Engage partners and residents in working together effectively to address local issues.		
Priority Objective 2	Tackling inequality in priority neighbourhoods		
	Work with communities and partners to remove barriers to economic activity.		
	Encourage healthier lifestyles.		
Priority Objective 3	Support our local communities through major regeneration.		
	Assist communities and partners to participate in the development and coordination of clear delivery structures.		
	Support communities through step-changes associated with major regeneration.		
	Support both existing and new resident communities that emerge through regeneration.		
Priority Objective 4	Tackle anti-social behaviour, targeted harassment and reduce significant harm from ASB.		
	To drive down incidences of ASB and targeted harassment through improved partnership work.		
	Develop an integrated approach for dealing with families with multiple and complex needs, and secure sustainable funding sources.		
	Develop a process for identifying and supporting vulnerable or repeat victims.		