

**West Dunbartonshire Council**  
**Local Housing Strategy 2017 – 2022**

**Consultation Summary and Scottish Government Feedback Report**  
**December 2016**

**1. Introduction**

- 1.1 Local Authorities have a statutory duty to involve, consult and engage with as wide a range of their residents as possible and, in particular reference to this strategy, the Housing (Scotland) Act 2001 requires that they consult on the preparation of the Local Housing Strategy.
- 1.2 The Consultation took place within the framework of the Council's *Consultation Toolkit for Housing and Community Safety Services* which outlines the Council's commitment to go beyond the statutory requirements on consulting our service users<sup>1</sup>.
- 1.3 A range of media was employed in engaging with people during the consultation period including Facebook, Twitter, the local press, the Council's website and the Council's Housing News quarterly periodical.

**2. Citizens' Panel**

- 2.1 A Citizens' Panel consultation was carried out in November 2015 and reported in December 2015. This representative survey of panel members recorded 858 returns (68%). The survey results indicated only a very small sampling error of +/- 3.3%, giving support to the robustness of the survey.
- 2.2 The survey gave a background to the Local Housing Strategy and asked three questions on broad aspects of the forthcoming plan.
- 2.3 Key findings from the survey were:

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<sup>1</sup> [Consultation Toolkit for Housing and Community Safety Services WDC](#)

- The Council should continue to give high priority to its housing estates (96%)
- More affordable housing is needed in West Dunbartonshire (91%)
- Support for more private housing in West Dunbartonshire was more muted at 49%
- High levels of support were demonstrated for the proposed themes of the new LHS especially for *Housing Need and Demand: Ensuring people have access to affordable housing* and *Promoting Good Quality Housing: Residents of all tenures live in good quality housing* (both 99%).<sup>2</sup>

### 3. Consultative Draft

- 3.1 A Consultative Draft LHS was drawn up in July 2016 and was widely circulated. The formal consultation period on the Draft LHS took place over August and September 2016. Over 100 individuals and organisations were sent the draft for comment and the consultation was widely advertised on various media including Facebook, Twitter, the local press, the Council’s website and the Council’s *Housing News* quarterly periodical, which is issued to more than 10,000 Council tenants.
- 3.2 To facilitate engagement in the consultation process, the Draft LHS was accompanied by a more accessible Summary Document which incorporated a survey monkey questionnaire.
- 3.3 Comments made were considered and a number of amendments were made to the draft being presented to Council. A summary of the comments made and our response is contained in the table at Appendix 1.

### 4. Consultative Events

- 4.1 Consultative presentations and discussions on the draft LHS took place as listed below. Participants at the events were encouraged to respond to the consultation either through the survey monkey or by letter/e-mail. The events were as follows:

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<sup>2</sup> The Citizens’ Panel Report can be found here:  
[http://www.wdcp.org.uk/media/206697/2015\\_libraries\\_and\\_cultural\\_services\\_etc\\_survey\\_final.pdf](http://www.wdcp.org.uk/media/206697/2015_libraries_and_cultural_services_etc_survey_final.pdf)

- West Dunbartonshire Tenants and Residents Organisation (WDTRO), the umbrella group for our 15 registered TROs. An introductory session was held on 23rd June 2016 on the LHS preparation, followed by one on the 25<sup>th</sup> August 2016 presenting a draft of the strategy.
- WDC Elected Members on 11<sup>th</sup> May 2016.
- Housing Providers Forum, the meeting which brings together the Council, RSLs operating in West Dunbartonshire and the housing investment division of the Scottish Government on 29<sup>th</sup> August 2016.
- Homelessness and Housing Access Forum, the partnership group involved in this area of work, on 01<sup>st</sup> September 2016. This Forum is attended by a wide variety groups involved in working around homelessness and housing support including: Alternatives, Blue Triangle HA, Women’s Aid, Action for Children, Home from Home, CAB, Clydebank Independent Resource Centre, and Y–Sort It. The lack of bespoke supported accommodation for young people with “risky” behaviour was an issue raised at the presentation to this form. It is intended that the upcoming review of the supported accommodation model will take this into consideration.
- West Dunbartonshire Equalities Forum, 21<sup>st</sup> September 2016: The WDEF was identified as a key equality focus of the consultation over the LHS preparation. This quarterly forum is regularly attended by BME Groups, disabled people, persons representing the views of younger people (for example Y Sort It, who cascaded the survey out to all of their contacts), LGBT people and WDCVS. Officers involved in the Syrian Vulnerable Persons Relocation work also attend the WDEF.
- West Dunbartonshire Access Panel, the group working to address access issues in the built environment improving social inclusion for disabled people and access in the broadest sense, on 29<sup>th</sup> September 2016. The meeting resulted in a request for more AP input into policy development on the forthcoming Allocation Policy, in particular in respect of houses with aids and adaptations. This is being followed up in the course of the Allocations Policy review. The importance of accessible housing and conditions in the private rented were issues also raised.

## 5. Scottish Government Feedback

- 5.1 The SG/Peer Review feedback letter and accompanying Review Criteria Template was received on 30<sup>th</sup> November 2016, The comments made were in the main fairly favourable and highlighted the following particular areas of strength and areas for improvement:

### Areas of Strength

- Homelessness – The document provides a clear focus on the prevention of homelessness and consolidation of the housing options approach. The Council has developed a temporary accommodation modelling tool to look at the stock of temporary and supported accommodation. The model will ensure the Council has the appropriate type and supply of temporary and supported accommodation and the outcome of the model will influence the forthcoming Homelessness Strategy which is to be commended.
- Equalities – References are made throughout the Draft Strategy to key equalities groups as appropriate with good work highlighted in particular in relation to ex-offenders and people in prison. The equality outcome on Gypsy Travellers is a positive step with cross local authority evidence underpinning this work stream.
- Housing Need and Demand – The Draft Strategy clearly sets out the role of specific tenures alongside the strategic direction for housing investment which is informed by the HNDA evidence base. While the Strategy could benefit from more commentary around the locations investment will be focused in West Dunbartonshire overall the complex theme of housing need and demand is set out in simple terms making the document easy to read and understandable.

### Areas of Improvement

- Private Rented Sector – The Draft Strategy states that private renting within the authority has more than doubled since 2008/09 and given national discussions on improved security for tenants and rent controls the PRS will be an area for particular scrutiny over the period of the LHS. However discussion around the sector is

limited and further information would strengthen the LHS. In particular the LHS could be strengthened by a specific section on the supply and quality of the PRS including landlord registration and HMO licensing. Actions under the theme of promoting good quality housing are focused on council housing and energy efficiency and could benefit from being balanced with the addition of specific actions in relation to the PRS.

- 5.2 In a departure from the process employed in the previous LHS round, the review took place at the consultative draft stage and comprised comments provided by Scottish Government Policy teams, the Glasgow and Clyde Area Team and a Local Authority peer reviewer.
- 5.3 The comments made in the feedback relate to the consultative draft of the LHS and a number of the issues raised, for example around town centre regeneration and improving standards in the Private Rented Sector, have been more fully addressed in the published version of the LHS.
- 5.4 The feedback does not make comment on the action plan due to its current broad nature but suggests that the finalised action plan should be outcome based to better monitor progress on delivery.
- 5.5 The comments made in the peer review will be evaluated and where appropriate will be captured in the forthcoming fuller version of the action plan.
- 5.6 The Scottish Government/Peer Review letter and Review Criteria Template can be found at Appendix 2.

## **6. Survey Monkey**

- 6.1 A Survey Monkey questionnaire was carried out in August / September 2016. The survey was attached to a summary of the LHS and contained 19 LHS related and a further 9 service monitoring questions. A total of 25 responses were received (see Appendix 3 – Survey Monkey Results).

## 6.2 Notable findings of the survey included:

- More than 95% felt the purpose of the Strategy had been clearly set out.
- More than 80% considered that enough opportunities had been given for people to comment on the draft.
- 78% agreed that the five key themes outlined in the draft LHS remained appropriate.
- 87% agreed that it remained important to have a focus on regeneration of housing estates.
- There was fairly strong to strong support (70 – 91%) for the key actions listed under each theme.
- More than 80% found the monitoring and evaluation framework to be clear.
- A range of comments were made in response to the open-ended questions posed. For example, some respondents suggested making changes to the areas listed as priority Housing Regeneration Areas and consequently Whitecrook has now been included.

6.3 There was a low return from the equalities monitoring element of the survey and further consideration needs to be given on how best to track this area.

## 7. Comments Summary

7.1 The Consultation Responses Log Summary Table attached to this paper (Appendix 1) outlines the comments made from the various strands of the consultation exercise. Notable themes from the consultation included:

- Strong support was expressed for the regeneration of housing estates and for the provision of more affordable housing.
- Support for more private housing was more muted with only around half the respondents agreeing that more private housing was needed in West Dunbartonshire.
- Knowledge of housing need in the private sector was more limited than that for the social sector and this was considered to be an area for development.
- Owner engagement in mixed tenure estates was an issue with some concerns expressed over improvement projects not proceeding due to lack of owner buy-in.

- Conditions in the growing private rented sector were a matter of concern with the perception that fuel poverty and energy efficiency may be particular problems in this tenure.
- Improving physical access to housing was considered to be important.

## **8. Evaluation of Consultation Process**

- 8.1** It is considered that some of the consultation elements worked better than others. Presentation events either wholly devoted to the LHS or as part of a wider agenda, worked well, with those attending having the opportunity to discuss issues directly with the staff present. Engaging with younger people remains an area identified for development.
- 8.2** A number of consultation exercises were taking place around the time of that for the LHS and it is proposed that a joint evaluation/lessons learned exercise will take place to help inform future consultations.

## **9. Next Steps**

- 9.1** A detailed Action Plan which will be drawn up and monitored through the Council's Covalent performance management system.
- 9.2** Progress on the delivery of the LHS actions will also be assessed through:
- A monthly performance report to the Council's Housing Management Team.
  - An annual report to the Housing and Communities Committee.
  - An annual presentation to the West Dunbartonshire Tenants and Residents Organisation.
  - An annual report to the Community Planning West Dunbartonshire Management Board on Single Outcome Agreement related issues.
  - Performance arrangements put in place in respect of the Health and Social Care Partnership Strategic Plan.
  - Housing Association liaison at the quarterly Housing Providers Forum.

For further information, contact  
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Appendix 1 – LHS Consultation Responses Log November 2016

Appendix 2 – Scottish Government/Peer Review Feedback letter and template  
dated 30 November 2016

Appendix 3 – LHS Survey Monkey Results September 2016



# Appendix 1

## Consultation Response Log with Actions Taken

## Appendix 1: LHS Consultation Response Log – November 2016<sup>3</sup>

Date	Response From	Response	Comments/Actions for final LHS Draft/Future Development
10/08/2016	Moira Clark via email	<p>p24 – Consultation LHS or LDP?</p> <p>Para 5.4 – Delete sentence starting ‘it is assumed that....’ (Social rented covered above, this para refers to land requirement not housing supply targets)</p> <p>p29 - 2nd para doesn’t read right</p> <p>p32 – 1<sup>st</sup> para doesn’t read right 39 homes in Clydebank HST is 80 pa</p> <p>p77 - The allocation of the extension site will be reviewed in LDP2 . Does the LHS have a view on the future of this site?</p> <p>Glossary HNDA - not really interchangeable with HNSS LDP - take out reference to Local Plan cos it makes it sound like it is the same document? Or just say formerly known as the Local Plan rather than WD Local Plan?</p>	<p>Wording of corrections /amendments agreed with Planning and incorporated into new version.</p> <p>Para 9.3 of the LHS clarifies the position with regards the Gypsy/Travellers site and notes the recommendation of the Glasgow, Clyde Valley and Ayrshire authorities that more robust monitoring of the housing circumstances of the G/T community should take place including the reinstatement of the bi-annual count.</p>
11/08/2016	Sue Harris via email	<p>Thanks for sending in the draft EQIA, which as you state should be completed alongside the LHS as it is progressed. The EQIA process should flag up areas of concern to be addressed in the LHS and I note that you have identified some areas where more research is needed, including LGBT, trans</p>	<p>Amendments discussed with Ric Rea, Equalities Officer and revised EQIA appended to final document.</p>

<sup>3</sup> Excludes Survey Monkey Results/Comments.

		<p>You also flag disability as an area that requires more research and consideration and this is a key requirement for the LHS. The revised guidance encourages local authorities to look at the 'needs arising' from an illness, disability or mental health problem so that it is the need that is the focus not the individual's condition. Needs arising from a range of conditions can often be the same and can be addressed through specialist provision. The EQIA states that you will obtain more information on disability through the application process, allocation of aids and repairs etc. and suggests that the focus is on the social rented sector. It would be good to understand how you intend to increase your knowledge of need in the private housing sector and what other evidence bases you intend to use.</p> <p>Consultation appears to focus on the WDEF and therefore it would be helpful to understand who they are and who they represent. Are there any gaps or other representative groups that should be included in the consultation? Does your citizens panel reflect the population make up of West Dunbartonshire? If it does, this will allow individuals to input to the equality agenda. This additional information would strengthen the EQIA.</p> <p>With regard to the LHS, it should clearly reference the EQIA and include a link to the document. Any actions identified through the EQIA process should be reflected in the LHS action plan.</p>	<p>The revised EQIA acknowledges that there remain gaps in knowledge especially around the private sector. It notes that a review of the Scheme of Assistance will be carried out to ensure efficiency and fairness across protected characteristics.</p> <p>More detail provided on the composition of the WDEF and confirmation given on the representativeness of the WD Citizens' Panel.</p>
11/08/16	Ricardo Rea via email	<p>Some initial thoughts in response to the Scottish Governments points.....</p> <p>WDEF Regular attendance by BME groups, disabled people, persons representing the views of younger people (e.g. Y Sort It, who</p>	<p>These comments have been incorporated into the EQIA – see above. Also note commitment to improved monitoring.</p>

		<p>cascaded the survey out to all of their contacts) and LGBT people, and WDCVS. Officers involved in the Syrian Vulnerable Persons Relocation work also attend WDEF.</p> <p>The online survey was sent to the extended WDEF mailing list which includes;-</p> <p>WD mental health forum  Brain injuries experience group  Churches together  Muslim Education Association  Seniors forum  Carers of West Dunbartonshire  Minority Ethnic women’s association</p> <p>Everyone on the mailing list has been invited along to the September session</p> <p>The improved equalities monitoring (applications, allocations and repairs),being developed covers ALL protected groups and will help this is relevant to the question</p> <p>‘The EQIA states that you will obtain more information on disability through the application process, allocation of aids and repairs etc. and suggests that the focus is on the social rented sector’</p> <p>The Citizens Panel is weighted to be as representative as possible diversity of the WD area.</p>	
16/08/2016	Stefan Kristmanns via email	Think we should have something in the LHS about the private sector and the role of the LA to help ensure works are carried out,	Reference to reappraisal of more effective use of existing powers inserted. Key actions have been identified in this area notably: <ul style="list-style-type: none"> <li>• Continue to engage with owners in mixed</li> </ul>

		This is a bigger issue in Renfrewshire but we should recognise the new powers introduced by the 2014 Act and have some sort of response to this	tenure blocks at an early stage to increase participation in improvement programmes and promote support via grant funding or payback schemes
19/08/2016	Ricardo rea via email	<p>I have suggested some revised wording</p> <p><b>Equality and Inclusion</b>  The development of the strategy has been underpinned by West Dunbartonshire Council’s commitment to promoting and sustaining equality and inclusion, and equality and diversity principles. In particular, the Council is committed to fulfilling the three key elements of the general equality duty as defined in the Equality Act 20101:</p> <ul style="list-style-type: none"> <li>• Eliminating discrimination, harassment and victimisation</li> <li>• Advancing equality of opportunity between people who share a protected characteristic and persons who do not share it</li> <li>• Fostering good relations between people who share a protected characteristic and those who do not share it.</li> </ul> <p>This strategy was informed by an Equality Impact Assessment within the context of the <a href="#">Council’s Equalities Mainstreaming Report and its Equality Outcomes 2013 – 2017</a></p> <p>During the drafting of the strategy we have taken account of the Councils Equalities Outcome of Greater participation and Involvement of people from underrepresented Groups in influencing Decision Making in the Area, by consulting directly with members of the West Dunbartonshire Equality Forum, made up of community equality groups (and Public Organisations). This consultative process feed into the EIA and into the final text of the LHS.</p> <p>We have also taken account of two other Council Equality Outcomes on;</p> <ul style="list-style-type: none"> <li>- Reducing Hate Incidents In West Dunbartonshire (see section 8)</li> </ul>	<p>This rewording has been agreed and the Equality and Inclusion statement and sits immediately behind the Convenor’s foreword to the document.</p>

		<p>- Better Meeting The Accommodation Needs Of Gypsy/Travellers (see section 9)</p> <p>EIAs will be carried out on any policy developments arising from the strategy, and evidence gathered, during the creation of the LHS will be used to inform them. The Council has embarked on work to wide and deepen its equality monitoring on housing applications, allocations and repairs, which will improve our evidence base for EIA processes and policy formulation and review.</p> <p><b>Section 8 Safety</b> Our housing service is part of a much broader holistic partnership with other related housing organisations, community safety and Anti Social Behaviour Services (ASB) which all have a key role in providing safe and sustainable communities. Add ‘The partners also recognise their role in fostering good relations between our communities.’ Can we work in some reference to the Council’s Equality Outcome of reducing Hate Incidents in West Dunbartonshire?</p> <p><b>8.4</b> Do we want to make any reference to the SLA between the Council and DDWA and Clydebank Women’s Aid</p> <p><b>Section 9 Gypsy Travellers</b> Might we be able to strengthen this by referring to improved performance on the Scottish Housing regulators indicator (ref Stefan) on satisfaction with sites?</p> <p><b>9.5 rename to ‘Syrian Vulnerable Persons Relocation’</b> West Dunbartonshire Council is a participant in the Syrian</p>	<p>Key Theme 4: Sustainable and Supportive Communities Para 8.1 has been amended accordingly.</p> <p>The LHS is a high level document and now notes the intention to strengthen working arrangements with the local Women’s Aid groups but not appropriate to provide more detail.</p> <p>Agreed to rename as <i>Asylum Seekers and Refugees</i> and expand the wording here.</p>
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		Vulnerable Persons Relocation Scheme; strong partnership working on the this scheme has contributed to fostering good relations and equality of opportunity, and the lessons learned will inform not just further relocations, but wider work with all communities in West Dunbartonshire.	
24/08/2016	Moira Clark via email	<p>I've had a look at Renfrewshire stuff and think WDC draft LHS compares well.</p> <p>I agree that our housing need and demand section is clearer and easily linked back to HNDA/SPD as it should be.</p> <p>I think you captured the affordable housing policy issue ok by linking it to LDP. Last sentence before para 5.3 could end.....'as long as HSTs can be met'</p> <p>The only thing that perhaps we might emphasise more is increasing diversity/choice in terms of tenure, types, sizes etc to provide a more graduated market. But not sure what actions/evidence we could point to show that we are doing this.</p>	It was considered that the housing land supply issues were covered sufficiently for the purposes of the LHS (although it is acknowledged that the planned increase in affordable housing will put strains on land resources).
25/08/2016	WDTRO Presentation	Main points were around the MHBH agenda (positive) and in relation to engaging owners to ensure proposed improvements can proceed.	WDTRO comments were generally favourable; the Council has undertaken to present an annual update on progress to the WDTRO.
29/08/2016	Feedback via HPF	<p>Main points/comments made re LHS at yesterday's meeting</p> <ul style="list-style-type: none"> <li>• Some parts too "Council-centric". What about the RSLs' contribution?</li> <li>• Does the Council need more powers to deal with PRS issues? There was a discussion around failings in PRS.</li> </ul>	<p>The document throughout recognises the key role of partners in the delivery of the strategy and notes that the Council continues to welcome ideas to assist in this task. Request for a good practice example for inclusion in LHS received no response.</p> <p>PRS failings highlighted more. Section included on WDC's involvement in the <i>Under One Roof</i> on-line</p>

		<ul style="list-style-type: none"> <li>• What constitutes “affordability”, especially in new build? It was suggested that the premium on SR new build rent was often now in the region of 30% - equating with the PRS. Should the proposed rent levels have a bearing on the consideration of projects for the SHIP? Caryn McD pointed out that proposed rents were part of the SG appraisal process and that some projects in the past had been rejected on this count.</li> <li>• Tenancy Sustainment features as an issue for the strategy, but there is no quantitative data.</li> <li>• Aren’t the new build aspirations too low even though meeting the HNDA requirements from the SDP?</li> <li>• The envisaged role for housing providers in addressing the changing demographic is not clearly enough spelled out.</li> </ul>	<p>resource for owners in common properties. One of the 10 overarching success points reads:</p> <ul style="list-style-type: none"> <li>• Adopt a more holistic approach to improving standards in the Private Rented Sector.</li> </ul> <p>Agreed key action:</p> <ul style="list-style-type: none"> <li>• Carry out an update of the 2014 Affordability Study.</li> </ul> <p>Sustainment data is not included within the narrative of the LHS but is readily available elsewhere and reported regularly via Section 5 meetings.</p> <p>The More Homes West Dunbartonshire initiative spells out an ambitious agenda for the delivery of affordable housing over the period of the plan. Availability of resources, both land and financial, will be critical to delivery.</p> <p>The changing demographic is a key driver of the strategy and in particular in its links with the HSCP Strategic Plan through the Housing Contribution Statement.</p>
01/09/2016	Homelessness and Housing Access Forum Presentation	Principal area of concern was around lack of dedicated accommodation for young people with challenging/risky behaviour.	Agreed to review the requirement for this type of housing through of the forthcoming review of supported accommodation forming part of the



		Constituent members to be encouraged to make representations through Survey Monkey or other means.	Homelessness Strategy review.
02/09/2016	Marnie Ritchie via email	I have had a look at the draft and I do think more could be said on page 16 about interventions in our town centres such as Alexandria to encourage new housing development. Also in this section on page 44 regarding Empty Homes there needs to be more focus on how we can encourage empty properties back into use within town centres. Please see attached <a href="#">Scot Govt document on page 4 ref Town Centre Living</a> . Also worth mentioning the <a href="#">Scottish Government's Regeneration Strategy from 2011</a> which sets out how significant housing is to regeneration (page 31 – see attached) This document is still relevant. Finally I think more could be made of how new housing developments contribute towards place-making and better neighbourhoods. I'd be happy to meet to discuss further in more detail.	A paragraph has been added at 4.4 on the valuable role played by town centres in our communities and our support for their revitalisation.
15/09/16	Ross Gillan – Shelter	<p><u><i>West Dunbartonshire Local Housing Strategy</i></u></p> <p>Dear LHS Team,</p> <p>The Scottish Empty Homes Partnership welcomes the opportunity to respond to West Dunbartonshire Council's consultation on your draft Local Housing Strategy 2016-21.</p> <p>The Partnership's focus is specifically around how private sector empty homes work can play a role in achieving the priorities to be addressed locally through the Strategy.</p> <p>There are over 27,000 long term private sector empty homes across Scotland. Work on empty homes can achieve positive outcomes with regards to:</p> <ul style="list-style-type: none"> <li>- Housing supply</li> <li>- Community regeneration/town centre renewal</li> </ul>	The Council notes Shelter's supportive comments in respect of the work being done through the Empty Homes Partnership.

		<ul style="list-style-type: none"> <li>- Sustaining rural communities</li> <li>- Restoring confidence in local property markets</li> <li>- Discouraging anti-social behaviour (due to fire/vandalism/fly-tipping of empty properties)</li> <li>- Climate change and sustainability</li> </ul> <p>Firstly, the partnership would like to welcome the strategies recognition of the role that empty homes work has and can contribute to the areas housing concerns. We agree completely about the roles and improvements that empty homes work can achieve. Therefore, in response to the prompting questions throughout the strategy, this report will suggest ways in how empty homes works can be used to achieve the desired aims.</p> <p><u><i>Housing Need and Demand</i></u></p> <p>Firstly, in response to the first key theme discussed, the partnership welcomes the fact that the strategy under the empty works section recognitions the role that can be played by bringing empty homes back into use. A suggested strategy that could be used to achieve this that we wish to point out is; encouraging the council to view bringing empty homes back into use not only as a method of providing more housing options for inhabitants, but rather that these homes can populate the market and bring the cost of housing down. In other words, it may not matter that some empty homes that are brought back onto the market are expensive, as it will only increase the supply problem of providing affordable housing. It is suggested that the council include their empty homes targets as part of the numbers of social and private rented sector houses they wish to create, in order to ensure there is logistic plans to deal with the supply problem in housing which is leading to unaffordable houses.</p>	<p>The Strategy envisages a greater and more strategic role for Empty Homes in addressing the housing supply issues in West Dunbartonshire as part of the <i>More Homes</i> initiative. (see Para 5.9) We will continue to work with Shelter in progressing this area and in developing the forthcoming Homelessness Strategy.</p>
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		<p><u>Promoting Good Quality Housing</u></p> <p>The second area the partnership wishes to offer advice on empty homes strategy is in relation to how empty homes work can provide good quality housing. For instance, the partnership believes it is worth considering extending the planned contact with tenants and home owners which aims to explain the importance and priority of completing energy efficient work, to empty home owners. This is because it would see empty homes work become part of a holistic approach to encourage homes in all types of occupancy to become energy efficient. Which of course which will improve the standards of the housing stock in the area.</p> <p>Finally, the partnership would like to recommend that the council, if not already done so, should apply for the empty homes loan fund from the Scottish government. This will increase the ability of the empty homes officer to help with financial and practical assistance. On top of this, it will assist with one of the concerns raised in the report which notes efforts must be made to find funding to ensure homes are energy efficient. This would help as the loans could be offered to empty home owners at point of renovation to make their home more energy efficient.</p>	<p>Energy efficiency information is included as part of the suite of information leaflets that are available to empty homes owners. They are signposted in these leaflets to energy efficiency schemes that could potentially not only save them money any tenants they may house also.</p> <p>The Council did apply for the empty homes loan fund and was successful with the bid. This money is available to any home owner wishing to bring their home up to a lettable standard to rent out for affordable housing or to any owner wanting to refurbish the property and then to sell on for affordable housing.</p>
16/09/16	Wheatley Group via email	Please find attached <a href="#">Wheatley Group's response</a> to the draft housing strategy	The Council welcomes the detailed comments made by the Wheatley Group on the draft LHS. Generally the response is supportive of the direction of the strategy. Hopefully the fuller explanation of the MHBH agenda in the final version and the forthcoming Action Plan will address the comments made about lack of detail in these areas. We note the examples cited of good practice around various service areas within the Wheatley Group and these

			will form part of the discussion at our WDC/WG bi-monthly liaison meetings alongside other aspects of joint work in the delivery of the LHS.
21/09/16	West Dunbartonshire Equalities Forum Presentation	Draft LHS generally well received. Members of the group were encouraged to respond to the survey.	The WDEF will be a key consultee in monitoring progress on EQIA related actions.
29/09/16	West Dunbartonshire Access Forum presentation	Housing accessibility and a request for more AP involvement in policy proposals in relation to adapted houses featured in the discussion. Concern also expressed over accessibility outwith the social rented sector, particularly in private rented stock. The AP undertook to submit a Survey Monkey response.	Accessibility agreed as a key feature for new social housing. Concerns over the PRS were shared and will feed into consultations in this are going forward. Further discussion to take place with the AP over the ongoing Allocation Policy Review.

# Appendix 2

Scottish Government / Peer Review  
Feedback Letter and Template  
November 2016

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Mr Peter Barry  
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30 November 2016

Dear Peter

### **The Review of Local Housing Strategy 2017-22**

Thank you for submitting your draft Local Housing Strategy (LHS) for the period 2017 to 2022 for peer review. The review process is now complete with comments provided by Scottish Government Policy Teams, the Glasgow and Clyde Area Team, and Nicola Sandford from East Lothian Council.

This letter follows the verbal feedback provided to Jamie Dockery in October 2016 and confirms the main points which were discussed. As stated during our discussion this feedback highlights what the reviewers considered were the particular strengths of the Draft LHS and the main areas for improvement. The accompanying template includes comments that were made. When the final LHS is submitted to Ministers we would ask that you include with it a letter that clearly states how the main areas for improvement, identified through the peer review process, have been or will be addressed.

### **Areas of Strength**

- **Homelessness** – The document provides a clear focus on the prevention of homelessness and consolidation of the housing options approach. The Council has developed a temporary accommodation modelling tool to look at the stock of temporary and supported accommodation. The model will ensure the Council has the appropriate type and supply of temporary and supported accommodation and the outcome of the model will influence the forthcoming Homelessness Strategy which is to be commended.
- **Equalities** - References are made throughout the Draft Strategy to key equalities groups as appropriate with good work highlighted in particular in relation to ex-

offenders and people in prison. The equality outcome on Gypsy Travellers is a positive step with cross local authority evidence underpinning this work stream.

- **Housing Need and Demand** – The Draft Strategy clearly sets out the role of specific tenures alongside the strategic direction for housing investment which is informed by the HNDA evidence base. While the Strategy could benefit from more commentary around the locations investment will be focused in West Dunbartonshire overall the complex theme of housing need and demand is set out in simple terms making the document easy to read and understandable.

### Areas of Improvement

- **Private Rented Sector** – The Draft Strategy states that private renting within the authority has more than doubled since 2008/09 and given national discussions on improved security for tenants and rent controls the PRS will be an area for particular scrutiny over the period of the LHS. However discussion around the sector is limited and further information would strengthen the LHS. In particular the LHS could be strengthened by a specific section on the supply and quality of the PRS including landlord registration and HMO licensing. Actions under the theme of promoting good quality housing are focused on council housing and energy efficiency and could benefit from being balanced with the addition of specific actions in relation to the PRS.

We hope that you find these comments useful.

Yours sincerely

Anne-Marie Thomson  
Glasgow and Clyde Area Team Manager

## Appendix 2: Local Housing Strategy – Review Criteria Template West Dunbartonshire

Criteria	Comment
<p><b>Equalities</b></p> <ul style="list-style-type: none"> <li>• Equality Statement reflecting Equality Act 2010</li> <li>• Equality Impact Assessment – completed and reflected in LHS</li> </ul>	<p>The Equality Statement is set out within a link to the ‘Equality Mainstreaming Report and Equality Outcomes’ document on p3 which covers the requirements of the Act. The LHS sets out a clear Council commitment to fulfilling key elements of the Equality Act 2010.</p> <p>An EQIA is to be carried out within the context of the Council’s Equalities Mainstreaming Report and Equality Outcomes 2013-17 and subsequent assessments carried out on any policy developments arising from the LHS. It is generally accepted that an EQIA is undertaken early in the LHS development process in order that this can shape the LHS and given this, it might be helpful to include reference to any EQIAs undertaken on specific work-streams that inform the LHS i.e. EQIA on HNDA or SHIP.</p> <p>References are made throughout the LHS to key equalities groups as appropriate with good work highlighted in particular in relation to ex-offenders and people in prison. The equality outcome on Gypsy Travellers is a positive step, with a cross local authority evidence base underpinning this work stream.</p>
<p><b>Local Context</b></p> <ul style="list-style-type: none"> <li>• Background to local authority area, location, urban/rural split, population etc.</li> <li>• Summary of progress made on outcomes set in earlier LHS</li> <li>• Explanation of process chosen (e.g. option appraisal) to agree approach to address identified priorities</li> </ul>	<p>The LHS could be strengthened by the inclusion of a section in the introduction chapter, setting out the background to the local area. While there is a link provided to the Single Outcome Agreement and this provides a description of the area, it would be helpful to set the scene for the LHS itself. Statistics are provided further on in the document in relation to population, housing stock, incomes etc and there is some commentary around regeneration areas, although a short summary at the outset would be helpful.</p>



	<p>A summary of what was achieved in the previous five years covered by the LHS is clearly set out in a link on p5. Further information on the successes of the previous LHS is set out throughout the document ie council house building on p32 and particular needs housing on p74/75.</p>
<p><b>Consultation</b> Evidence of:</p> <ul style="list-style-type: none"> <li>• Wide range of engagement methods</li> <li>• Inclusive process</li> <li>• Influence</li> </ul>	<p>The period of consultation is lengthy, lasting from November 2015 to October 2016 and a Citizens’ Panel survey was carried out in November 2015 which included the proposed priorities of the LHS. While the LHS refers to a wide range of social media outlets, local press and presentation used as part of the consultation process and this is to be commended, it is not clear how priorities and approaches were agreed ie whether an options appraisal has been carried out to agree draft actions, underpinning key priorities.</p> <p>The period of consultation is lengthy, lasting from November 2015 to October 2016 and the use of a wide range of social media outlets, local press and presentation are noted, prior to the consultative draft LHS and corresponding summary document, which is to be commended.</p> <p>It would be helpful for the final LHS to show how comments received through the formal consultation have influenced the document. It would also be helpful to provide some commentary around the approach taken by the Council to ensuring an inclusive process ie engaging with harder to reach groups.</p>
<p><b>Community Planning</b></p> <ul style="list-style-type: none"> <li>• Evidence of clear links between Single Outcome Agreement (SOA) priorities and LHS outcomes</li> </ul>	<p>Chapter 2 states that the LHS is set within and contributes to a wider strategic policy framework including the SOA. The SOA sets out an outcome ‘improved quality and availability of housing’ which links to the themes in the LHS although the LHS would be strengthened by the inclusion of outcomes, to improve alignment between the LHS with the SOA.</p>
<p><b>Development Plans</b></p> <ul style="list-style-type: none"> <li>• Evidence of Alignment with plans supporting the strategic aims set out in the LHS.</li> </ul>	<p>An explanation of the alignment of the LHS with Development Plans is set out early on in the document with more detailed information provided later on in relation to the HNDA. The LHS states that the LDP provides the land use planning context; with SDP housing estimate outputs used to inform Housing Supply Targets for both the LHS and LDP.</p>

<p><b>Housing Supply</b></p> <ul style="list-style-type: none"> <li>• Clear summary of key findings from HNDA</li> <li>• Housing Supply Target calculation clearly articulated</li> <li>• Clear vision for the future of housing across all tenures based on national priorities</li> <li>• Role that specific tenures are likely to play, both now and over the longer term.</li> <li>• Clear strategic direction for housing investment</li> </ul>	<p>The Housing Supply Target calculation is clearly articulated with an explanation of how HNDA figures are translated into HSTs and those factors considered when setting HSTs. This is then translated into the Housing Land Requirement.</p> <p>The LHS states that it supports the delivery of the national housing policies of the Scottish Government, in particular Homes Fit for the 21st century and the Joint Housing Delivery Plan. The LHS highlights that West Dunbartonshire Council is an active participant in the Joint Housing Delivery Planning Group. The LHS sets out a clear vision for housing across all tenures linked as appropriate to national priorities and also regional priorities i.e. City Deal.</p> <p>The LHS clearly sets out the role of specific tenures both now and in the future alongside the strategic direction for housing investment, informed by the HNDA evidence base, although the LHS could benefit from more commentary around the locations where investment will be focused in West Dunbartonshire.</p> <p>The LHS provides clear strategic direction for housing investment in relation to affordable housing, empty homes and regeneration initiatives.</p>
<p><b>Sustainable Places</b></p> <ul style="list-style-type: none"> <li>• Clear approach to supporting development and maintenance of sustainable communities through the delivery of good quality, sustainable housing.</li> </ul>	<p>The LHS recognises the wider approach required in order to support sustainable communities (key theme 4) to an extent, with a focus on tenancy sustainment, local lettings planning, area regeneration and environmental improvement and anti-social behaviour / links with criminal justice. This could be improved by a focus on place-making, with clear links to town-centres and the ‘town centre first principle’, economic strategy, health and wellbeing etc. p15 mentions regeneration areas and the importance of linking proposals to a wider social and economic outcomes and this area of the document could be expanded upon in Chapter 8.</p> <p>Links between sustainable communities and empty homes are set out on p46.</p>

<p><b>Regeneration &amp; Town Centres</b></p> <ul style="list-style-type: none"> <li>• Explain nature and function of town centres within local authority area</li> <li>• Set out opportunities for supporting town centre living to contribute to meeting local housing need and demand and how these will be prioritised for effective delivery.</li> </ul>	<p>The LHS states that regeneration priorities will be considered in light of new SIMD data, however there is no mention of opportunities to support town centre living to meet housing need and demand or the 'town centre first' principle. Using the link provided on p8 to the West Dunbartonshire Economic Development Strategy, it is evident that work is ongoing in relation to Clydebank, Dumbarton and Alexandria town centres and housing links to this could be more explicit in the document.</p>
<p><b>Rural Housing</b></p> <ul style="list-style-type: none"> <li>• Set out any distinctive issues in addressing housing and housing related services within a rural context.</li> </ul>	<p>The LHS does not set out any distinctive issues in addressing housing and housing related services in a rural context, but this is to be expected given that 99% of the population of West Dunbartonshire live in urban areas with only 1% in accessible rural.</p>
<p><b>Empty Homes</b></p> <ul style="list-style-type: none"> <li>• Show how empty properties could play a part in increasing housing supply and explain future actions to bring empty properties back into use.</li> <li>• Show how income from council tax is used to boost housing supply levels.</li> <li>• Set out approach to CPOs in tackling the issue of empty properties</li> </ul>	<p>The LHS sets out a proactive approach to addressing the issue of empty homes, employing an Empty Homes Officer and also having a specific Empty Homes Strategy, which is to be commended.</p> <p>The EHO works closely with Environmental Health and Council Tax to bring empty properties back into use. The LHS states a net benefit of circa £123k was raised from Council Tax for the HRA.</p> <p>The LHS states 'the Council considers there is scope for more frequent use of enforcement measures and CPOs although is reluctant to carry out works notices due to concerns over recouping the money' which is consistent with the approach of many Councils.</p>
<p><b>Self-Build/Custom Build</b></p> <ul style="list-style-type: none"> <li>• If appropriate, be clear on local approach, with existing policy or other information clearly referenced.</li> </ul>	<p>The LHS does not set out an approach to self-build / custom build. We would encourage you to look at opportunities to promote self and custom build in your area.</p>

### Preventing & Addressing Homelessness

- Clear focus on prevention and the consolidation of the Housing Options approach.
- Explain the support provision that is in place or being considered, to help those homeless and at threat of homelessness.
- Show how the requirements of the Housing Support Duty are being addressed:  
[www.scotland.gov.uk/Resource/0042/00423606.pdf](http://www.scotland.gov.uk/Resource/0042/00423606.pdf).
- Clear links to Scottish Social Housing Charter outcomes:  
[www.scottishhousingregulator.gov.uk/what-we-do/how-we-regulate/scottish-socialhousing-charter](http://www.scottishhousingregulator.gov.uk/what-we-do/how-we-regulate/scottish-socialhousing-charter).
- As appropriate, link LHS actions to those of Housing Options Hubs, referring to good practice as appropriate.

The LHS states that West Dunbartonshire Council continues to provide a separate Homelessness Strategy, with a Strategy currently available for 2013-16 and work on a further Strategy underway. It is evident that this Strategy has a clear focus on prevention with the first of four strategic aims being to ‘prevent homelessness occurring in West Dunbartonshire’.

The Strategy also supports the consolidation of the housing options approach with the third strategic aim being to ‘improve the range of housing options available in West Dunbartonshire and ensure a sustainable housing solution’. The LHS states that in relation to housing options ‘For the Council it is a service priority’. It is clear from the LHS that the approach to housing options is a clear strength of the Council and this is to be commended.

The LHS clearly explains the support provision that is in place, with a description of the approach taken to carrying out housing support assessments and an in-house housing support service provided to any household that requires this. The Council has over 200 temporary furnished flats and its own supported accommodation project which is to be extended.

The LHS also sets out the support provision being considered. The LHS states the Council has developed a temporary accommodation modelling tool to look at the stock of temporary and supported accommodation against who is homeless in the area. The model takes into account the type of households who are homeless, ages of applicants, gender, support needs etc. The model is due to be updated this year to include a more in-depth look at future provision in light of welfare reform. The model will ensure the Council has the appropriate type and supply of temporary and supported accommodation and the outcome from the model will influence the forthcoming Homelessness Strategy. The approach of the LHS to housing support provision is again to be commended.

The Council has also commenced the safe as houses project designed to help people with a substance misuse problem, introduced the subletting of houses of tenants who are in prison which prevents homelessness upon liberation and has increased use of the PRS with the introduction of Home Finder.

The relevant outcomes of the Housing Charter are met by West Dunbartonshire Council and examples of some of the LHS activities have been listed under the outcomes to illustrate this:

Outcomes 7, 8 and 9: Housing options

- As set out above, delivery of a comprehensive housing options service is a key priority for West Dunbartonshire Council and the approach to housing options is to be commended.

Outcome 10: Access to social housing

The LHS sets out a strong approach towards the provision of housing options and support to prevent homelessness, with temporary and permanent accommodation provided to homeless people as required.

Outcome 11: Tenancy sustainment

The LHS states that West Dunbartonshire Council and its local RSLs have developed a Common Approach to Tenancy Sustainment focused on:

making better use of existing housing stock; developing local lettings planning; improving housing advice and housing options; reducing void houses and associated rent loss; maximising rent collection levels and reducing rent arrears; improving the environment through legislative fixed penalty notice; area regeneration and environmental improvement and reshaping access to housing services.

	<p>Outcome 12: Homeless people</p> <ul style="list-style-type: none"> <li>• The Council promotes prevention and early intervention and temporary accommodation and supported accommodation are provided as required</li> <li>• The Council has increased use of the PRS with the introduction of Home Finder.</li> </ul> <p>While it is clear from the LHS that the delivery of housing options is a service priority and the LHS states the Council has committed to this in a number of housing, homelessness and related strategies and action plans, it could be more explicit as to how LHS actions link to those of Housing Options HUBS. One action in the LHS is ‘We will introduce a new housing options approach to ease access to suitable accommodation for West Dunbartonshire households’. It is assumed that this will cover some of the detail of the HUBS, while further detail will be set out in the Homelessness Strategy which includes aim 3 ‘To improve the range of housing options available in West Dunbartonshire and ensure a sustainable housing solution’.</p>
<p><b>Temporary &amp; Supported Accommodation – Impact of Welfare Reform</b></p> <ul style="list-style-type: none"> <li>• Show consideration of accommodation needs for people under 35, (shared room rate revision).</li> <li>• Show impact of Welfare Reform on the provision of temporary and supported accommodation.</li> <li>• Clear strategy in place for future use of any hostel provision.</li> </ul>	<p>The LHS states that the forthcoming Homelessness Strategy will give further consideration to the impact of shared room rates, implications for households under age 35 and what potential action can be taken to assist.</p> <p>West Dunbartonshire Council have developed a Temporary Accommodation Modelling tool that is used to look at the stock of temporary and supported accommodation against who is homeless in the area, which is to be welcomed.</p> <p>The LHS acknowledges that Welfare Reform is a key challenge and it is critical that the Council works in partnership with internal and external partners to mitigate the changes. The LHS sets out the difficulties of Welfare Reform for homeless households in West Dunbartonshire and impact upon the provision of temporary and supported accommodation. The LHS states that the forthcoming Homelessness Strategy will set out the significant changes that will be required to ensure the continuing viability of temporary and supported accommodation.</p>

	<p>The LHS states that an assessment has been carried out which shows a requirement to increase supplies of supported and supervised hostel provision to more effectively meet the needs of homeless people, both as a response to Welfare Reforms and to improve outcomes.</p>
<p><b>Specialist Provision</b> As a minimum, Specialist Provision should look to address the needs of:</p> <ul style="list-style-type: none"> <li>• Older people</li> <li>• People with a physical disability</li> <li>• People with a mental health condition</li> <li>• People with a learning disability</li> <li>• Young people – e.g. students</li> <li>• People leaving supported accommodation – e.g. offenders, looked after children</li> <li>• People needing supported accommodation – e.g. People fleeing domestic abuse/at risk families, homeless</li> <li>• Ethnic minorities – e.g. migrants, asylum seekers, refugees, Gypsy/Travellers</li> </ul> <p>• Show current need for specialist provision (accommodation &amp; services) and the predicted requirement over the next 5 years. How is need currently being met and what more is planned to meet future need?</p> <p><b>Specialist Provision &amp; Independent Living</b></p> <ul style="list-style-type: none"> <li>• Clearly show what action is required to ensure independent living is supported.</li> <li>• Set out strategy for supporting the integration of</li> </ul>	<p>The groups listed here are all covered well (the approach to ex-prisoners and reducing re-offending is particularly strong) with the exception of people with a mental health condition and people with a learning disability (covered in part through the homelessness theme).</p> <p>A review of older people’s housing models, need and demand has been completed and the findings of this report have informed the approach to meeting the housing needs of older people. Identification of the needs of other groups is less explicit, although it is assumed much of this will be set out in the HNDA and used to inform future planning to meet need, with the first of three underlying principles of the LHS being ‘forward planning – future proofing housing and housing support to take account of how people’s social and physical needs change’. The link between specialist provision and the key points that were found in the Clydeplan HNDA could be significantly clearer and should be strengthened.</p> <p>With regard to current and future need, the LHS provides some detail on supported accommodation and wheelchair accessible housing which has already been completed but there is no mention of future targets or plans. It would also be helpful to show the predicted requirement for specialist provision.</p> <p>The Council’s Strategic Plan sets out 5 priorities including ‘improve care for and promote independence with older people’. The LHS mentions supported accommodation, specialist housing projects and the development of new models of care at home i.e. extra care housing in conjunction with 3rd Sector</p>

<p>health, social care and housing, to allow people to remain in their own homes, through provision of care/support packages, aids/adaptations, providing clear links to other relevant strategies as appropriate.</p> <ul style="list-style-type: none"> <li>• Clearly show the services that are provided across all tenures, in relation to care/support services, handy person services/care &amp; repair and the use of Telecare and Telehealth.</li> <li>• Show how planning will help deliver future specialist provision with clear links to the Integration of Health and Social Care agenda and the Housing Contribution Statement.</li> <li>• Provide an indication of the current and future need for residential/care homes spaces when independent living is no longer a viable option.</li> <li>• Provide information on how the better use of adaptations and adapted properties are helping to address need and keep people in their own homes. Provide evidence on local initiatives (including adaptations) that supports the prevention agenda and allows people to leave hospital and return home as early as possible.</li> </ul>	<p>and local Housing Associations developing housing with care options for all care groups.</p> <p>The LHS sets out a strategy for supporting the integration of health, social care and housing with the HCS acting as a bridge between the LHS and Strategic Plan, underpinned by a JSNA and a review of older people’s housing models, need and demand.</p> <p>The LHS makes reference to a Care and Repair service but not to tele/care/tele-health.</p> <p>The LHS states that ‘the HSCP Strategic Plan provides an overview of the health and social care needs of the West Dunbartonshire population pooled from deeper background sources (i.e. its joint strategic needs assessment). As part of the approach to commissioning through the HSCP’s Commissioning Consortium, the Council’s Housing Section and the HSCP have developed an evidence base in respect of the health and social care needs of the West Dunbartonshire population – and this fills the gaps in HNDA information. Together, these documents form the basis of the commissioning and procurement approaches moving forward’. The LHS also states that a review of older people’s housing models, need and demand has been completed and the findings of this report have informed the approach to meeting the housing needs of older people. This approach to evidence collation and planning (the first of three underlying principles of the LHS is ‘forward planning – future proofing housing and housing support to take account of how people’s social and physical needs change’) evidences that planning will help deliver future specialist provision, with clear links between the LHS, HCS and integration agenda.</p> <p>It is assumed that the above evidence bases will provide an indication of the current and future need for residential / care home spaces for when independent living is no longer a viable option, although this is not explicit in the LHS.</p>
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	<p>The HSCP Strategic Plan highlights ‘ensure rapid access to assessment, and provision of aids and adaptations’ as an area where housing and the HSCP will work together. The delivery of a partnership approach is anticipated to contribute to reduced waits for OT assessment and equipment and adaptations. The LHS states that in 2016/17, £906,000 will be spent providing aids and adaptations to assist people to remain in their own homes. The Council will carry out aids and adaptations to approximately 400 properties of its own housing stock during 2015/16 from £656,000 of the budget. A further 130 major adaptations will be carried out to private sector homes from £250,000 of the budget.</p> <p>The LHS does not specifically mention initiatives designed to allow people to leave hospital and return home as early as possible, although it does mention a number of housing and housing support initiatives that supports the prevention agenda generally.</p>
<p><b>Gypsy/Travellers</b></p> <ul style="list-style-type: none"> <li>• Provide an assessment of the current level of site/pitch provision and show if the current provision is adequate.</li> <li>• Provide an assessment of whether current sites/pitches are of an acceptable standard and of the right type.</li> </ul>	<p>In 2013 the Council agreed an equality outcome on better meeting the accommodation needs of Gypsy Travellers which is to be commended.</p> <p>The LHS does not provide an assessment of the current level of provision and whether this is adequate, although a Gypsy Traveller LHS evidence review is referenced and it is assumed this includes an assessment of need and accommodation provision (the reference does not provide a link to the document and this would be helpful).</p> <p>There has been increased engagement with residents and planned improvements carried out.</p>
<p><b>Travelling Showpeople</b></p> <ul style="list-style-type: none"> <li>• LHS to identified current and future need for appropriate sites, as set out in the Development Plan.</li> </ul>	<p>The LHS states there are typically between 3 and 6 licence applications per annum for funfair/circuses and show sites do not create issues for show people or local residents.</p>

<p><b>Private Rented Sector</b></p> <ul style="list-style-type: none"> <li>• Explain extent and location of the sector and any current issues.</li> <li>• Set out strategy for addressing issues regarding supply and quality.</li> <li>• Show the powers/products that are being used to help households and landlords.</li> <li>• Are outcomes and actions robust and sufficient to tackle the issues identified?</li> </ul>	<p>The LHS sets out some information on the sector stating it has more than doubled since 2008/09 and given national discussions on improved security for tenants and rent controls, the PRS will be an area for particular scrutiny over the period of the LHS. However discussion around the sector is limited and further information would considerably strengthen the LHS.</p> <p>A Private Sector Stock Condition Survey was carried out in 2011 and the LHS states that while this is now out of date, the key issue continues to be energy efficiency for the private sector which it is assumed is the key issue for the PRS. The LHS could be strengthened by a specific section on the supply and quality of the PRS including management ie landlord registration and HMO licensing.</p> <p>Actions under the theme ‘promoting good quality housing’ are focused on Council housing / energy efficiency and could benefit from being balanced with the addition of some specific actions in relation to the private sector and PRS, particularly with the PRS more than doubling in recent years.</p>
<p><b>Fuel Poverty &amp; Climate Change</b></p> <ul style="list-style-type: none"> <li>• Demonstrate clear understanding of national fuel poverty priorities and targets and links between fuel poverty, energy efficiency and climate change.</li> <li>• Show how housing contributes to climate change through house condition, stock characteristics, levels of energy efficiency and set out any improvements needed.</li> </ul> <p>Demonstrate a clear understanding of fuel poverty locally by:</p> <ul style="list-style-type: none"> <li>• defining the extent, location and nature of fuel poverty</li> <li>• explaining the contributing factors that influence levels of fuel poverty</li> </ul>	<p>The LHS demonstrates a clear understanding of links between fuel poverty, energy efficiency and climate change although there is no mention of national fuel poverty priorities and targets.</p> <p>The LHS sets out how housing contributes to climate change, with the domestic sector accounting for 38% of emissions in West Dunbartonshire. The LHS notes that a reduction in gas and electricity consumed in the housing stock will have a positive effect on reducing emissions in the area. The LHS states that this can be achieved in part through increasing the energy efficiency of the building fabric as well as teaching residents how to save energy.</p> <p>The LHS sets out the main contributors to fuel poverty as being household income, fuel costs and the energy efficiency of homes. It sets out the extent of</p>

<ul style="list-style-type: none"> <li>• highlight the root causes of fuel poverty and if appropriate, how these differ from national trends.</li> <li>• Show how all available resources will be used to achieve the maximum contribution for tackling fuel poverty and reducing greenhouse gas emissions; and maximise uptake in the numbers of householders and property owners benefitting from eligible fuel poverty and energy efficiency programmes.</li> <li>• Show what will be done to accelerate the rate of improvement in owner-occupied and PRS, whilst maintaining rates of improvement in the social sector.</li> <li>• Show details of programmes/actions required to meet fuel poverty and climate change targets and set robust local fuel poverty outcomes and targets with indicators to measure progress, making particular reference to the Home Energy Efficiency Programme Scotland: Area Based Schemes (HEEPS:ABS), what the funding will be used for and what it is hoped will be achieved.</li> <li>• Show the implications for housing from any plans for major energy infrastructure, such as district heating.</li> <li>• Show understanding of how climate change may affect the housing stock. Identify threats and opportunities, the vulnerability of different groups to climate risks, and set out and prioritise what needs to be done to manage climate risks.</li> <li>• Show how tackling fuel poverty assists in addressing local issues with BTS housing.</li> </ul>	<p>fuel poverty and extreme fuel poverty in comparison with the national picture. However this section of the LHS could be strengthened considerably by fuel poverty mapping (if available) to show the locations and nature of housing stock most affected.</p> <p>The LHS sets out how housing contributes to climate change, with the domestic sector accounting for 38% of emissions in West Dunbartonshire. The LHS notes that a reduction in gas and electricity consumed in the housing stock will have a positive effect on reducing emissions in the area. The LHS states that this can be achieved in part through increasing the energy efficiency of the building fabric as well as teaching residents how to save energy.</p> <p>There is no mention made as to how to accelerate the rate of improvement in the PRS and owner occupied properties whilst maintaining rates of improvement in the social sector.</p> <p>While the use of HEEPS could be more explicit in the LHS, there is an action to continue to target available funding to improve the energy efficiency of private sector housing supported by Home Energy Efficiency Projects Scotland - Area Based Schemes (incorporates privately owned ex-council or ex-housing association homes)</p> <p>The Council is carrying out a joint feasibility study into district heating installation in multi storey blocks, which is to be commended. The LHS sets out the implications of the installation of district heating i.e. lowering fuel costs to tenants and owners, more efficient heating and contributing to lower carbon consumption, impacting on fuel poverty and the effects of climate change.</p> <p>The LHS outlines a number of areas where housing can make a contribution to addressing climate change.</p>
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	<p>The LHS does not set out the links between tackling fuel poverty and addressing BTS housing</p>
<p><b>House Condition - Private Sector</b></p> <ul style="list-style-type: none"> <li>• <b>BTS Strategy</b> – evidence the extent of BTS housing (numbers, location and type); plans in place to inform and update strategy; how BTS housing will be addressed and repair work enforced in the private sector.</li> <li>• <b>Housing Renewal Area Policy</b> - how will areas be identified and what action will be considered.</li> <li>• <b>Scheme of Assistance</b> – how will the scheme be used to address substandard private housing and implement the BTS strategy.</li> </ul> <p><b>Social Rented Sector (SHQS)</b></p> <ul style="list-style-type: none"> <li>• Show extent to which the 2015 target has been achieved.</li> <li>• Set out proposals for dealing with and funding any non-exempt stock which has not achieved SHQS.</li> <li>• Set out proposals for reviewing exemptions and abeyance (SHQS Guidance).</li> </ul> <p><b>Energy Efficiency Standard</b></p> <ul style="list-style-type: none"> <li>• Detail the measures intended to achieve the required ratings.</li> <li>• Demonstrate how the measures will be funded.</li> <li>• Show progress being made towards the 2020 milestone.</li> </ul>	<p>The LHS states that 1% of owner occupied dwellings are identified as being BTS. There is no mention of a strategy as such, although the LHS sets out an approach to dealing with BTS dwellings – ‘The Private Sector Housing Team and Environmental Health Officers work together to reduce and prevent BTS housing through a combination of information, advice and in some cases financial assistance’.</p> <p>There is no mention of a Housing Renewal Area Policy.</p> <p>The LHS states that over the last five years the Council’s Scheme of Assistance has provided financial assistance and support to owners of just over £3.2m to help them install adaptations, improve the condition of their homes via approved general repairs or participation in HRA capital programme improvements, address substandard and BTS issues.</p> <p>The LHS sets out the extent to which the 2015 target has been achieved, with 87.9% of stock fully meeting the Standard.</p> <p>The LHS sets out an action to ensure the Council’s housing maintains compliance with the Scottish Housing Quality Standard (SHQS) and reduce the number of abeyances.</p> <p>The LHS states that 12.1% were in abeyance or exempt. Detailed proposals are set out for reviewing exemptions and abeyance.</p>

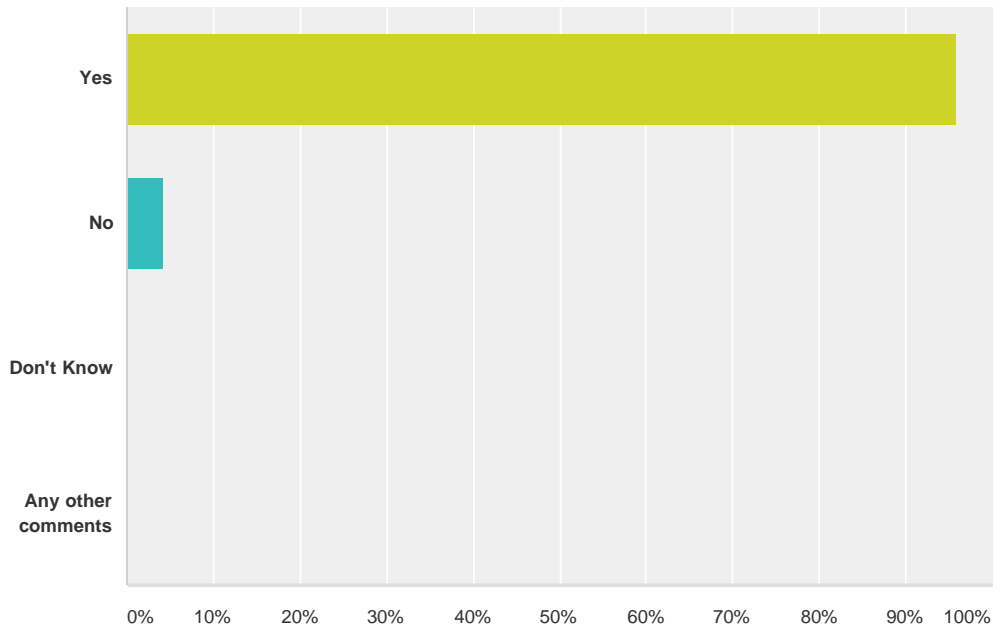
	<p>The LHS states that West Dunbartonshire Council’s ongoing social housing investment strategy is to prioritise the work required to maintain compliance with SHQS and focus appropriate energy improvement measures to those homes that do not meet the required Energy Efficiency rating in order to comply with EESSH. Using the information from the stock condition survey and the recommendations for lifecycle renewal of building elements, appropriate programmes of component renewals are planned to renew and replace elements before they fall below the required standard thus ensuring ongoing compliance. In addition the investment plan prioritises work to meet landlord obligations, health and safety and the Council’s new house build programme.</p> <p>The LHS states the HRA Housing Capital Programme is refreshed annually and approves a five year resource to fund the overall programme, which is worked through the 30 year HRA Business Model.</p> <p>The LHS sets out an action to ensure the Council’s housing complies with the Energy Efficiency Standard for Social Housing (EESSH) by Dec 2020.</p>
<p><b>Action Plan -</b></p> <ul style="list-style-type: none"> <li>• Outcomes</li> <li>• Actions</li> <li>• Baselines</li> <li>• Targets</li> <li>• Named Responsible Persons</li> <li>• Target dates (by)</li> <li>• Milestones</li> <li>• Indicators/Measures</li> </ul>	<p>Comments on the action plan are not considered to be appropriate at this stage, as the document is a consultative draft, seeking to consult on proposed actions. The document clearly sets out proposed key actions at the end of each themed section. The themes could benefit from being set out as ‘outcomes’ as opposed to ‘themes’, which would enable subsequent monitoring of actions to determine the extent to which LHS outcomes have been met.</p>

# Appendix 3

## Survey Monkey Results

1. Q1 Has the Introduction clearly set out the purpose of the Local Housing Strategy

Answered: 24 Skipped: 1

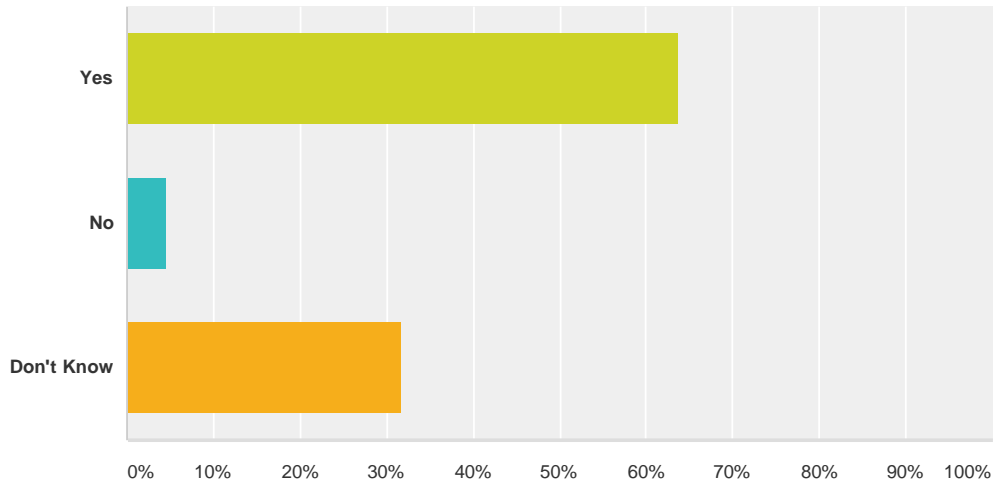


Answer Choices	Responses
Yes	95.83% 23
No	4.17% 1
Don't Know	0.00% 0
Any other comments	0.00% 0
<b>Total</b>	<b>24</b>

#	Any other comments	Date
	There are no responses.	

**2. Q2 Are all the key relevant policies and plans included here?**

Answered: 22 Skipped: 3



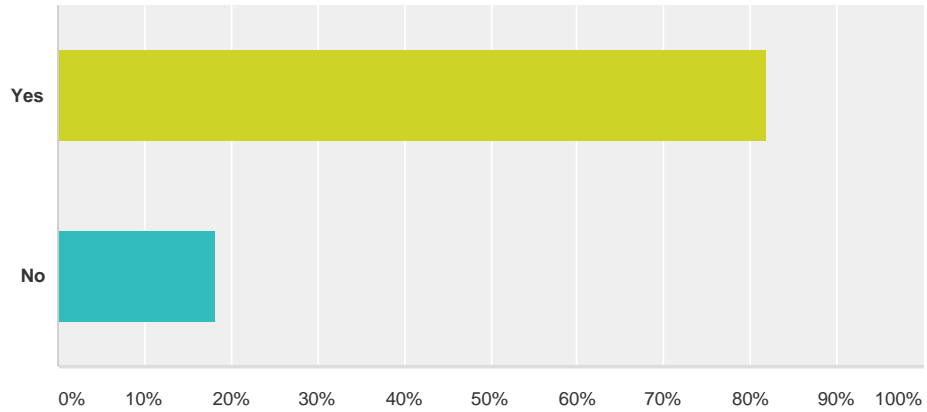
Answer Choices	Responses	
Yes	63.64%	14
No	4.55%	1
Don't Know	31.82%	7
<b>Total</b>		<b>22</b>

#	If No, please list anything else you think should be included	Date
1	I presume they are all included	9/13/2016 10:38 AM



**3. Q3 Do you think we have given enough opportunities for people to comment on the draft LHS?**

Answered: 22 Skipped: 3

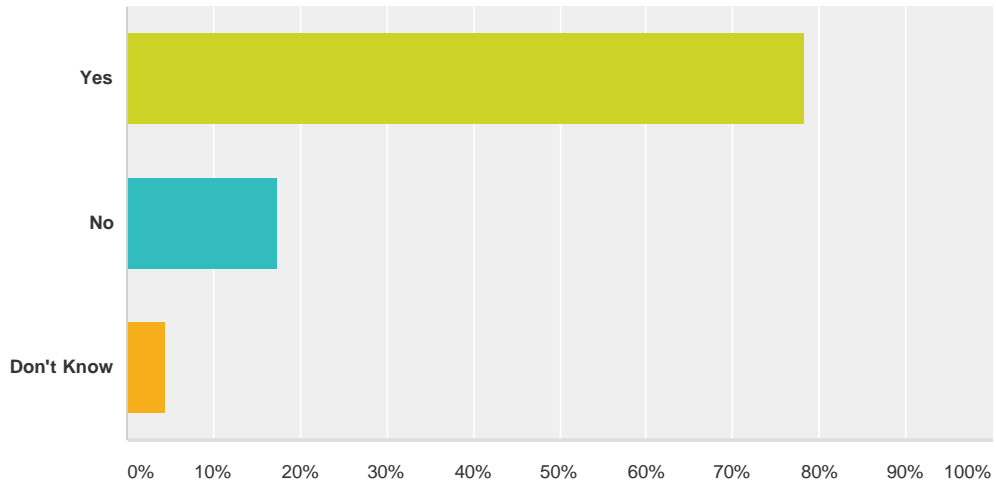


Answer Choices	Responses
Yes	81.82% 18
No	18.18% 4
<b>Total</b>	<b>22</b>

#	If No, can you suggest any other ideas for engagement	Date
1	I feel s someone who works and lives in west dunbartonshire that households should be given this survey to comeplete	8/11/2016 4:19 PM
2	Community Councils should also have been involved, and perhaps a charette event in CE Centres	8/2/2016 8:16 PM

**4. Q4 Do you agree that the five themes remain appropriate?**

Answered: 23 Skipped: 2

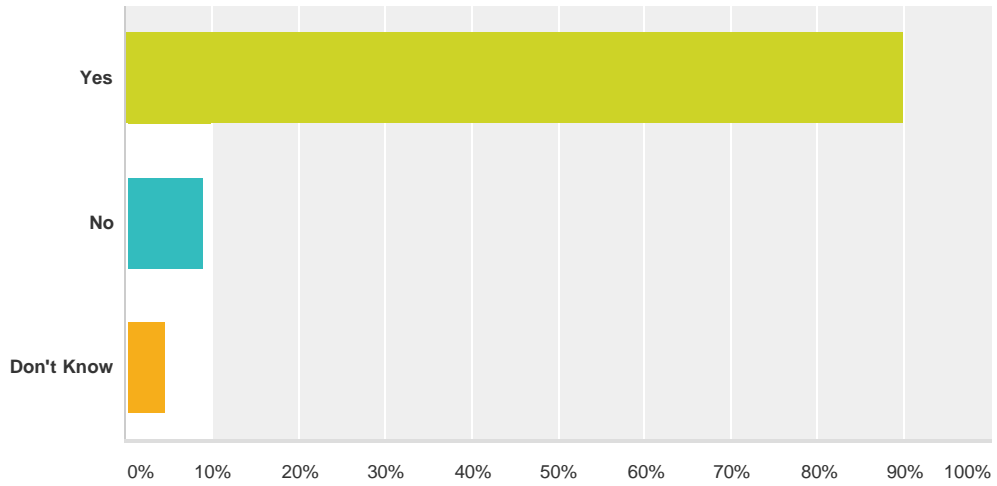


Answer Choices	Responses
Yes	78.26% 18
No	17.39% 4
Don't Know	4.35% 1
<b>Total</b>	<b>23</b>

#	If No, what would be your suggestion?	Date
1	Housing advice, specifically sustaining tenancies could perhaps be expanded upon	9/13/2016 11:12 AM
2	Domestic abuse should be specified	9/13/2016 11:02 AM
3	I also think there are needs to keep its young 'strivers' instead of losing them to areas like Bishopton	8/30/2016 11:06 PM
4	Prevent social housing in new private builds	8/30/2016 10:52 PM

**5. Q5 Do you agree that it remains important to have a focus on regeneration of housing estates?**

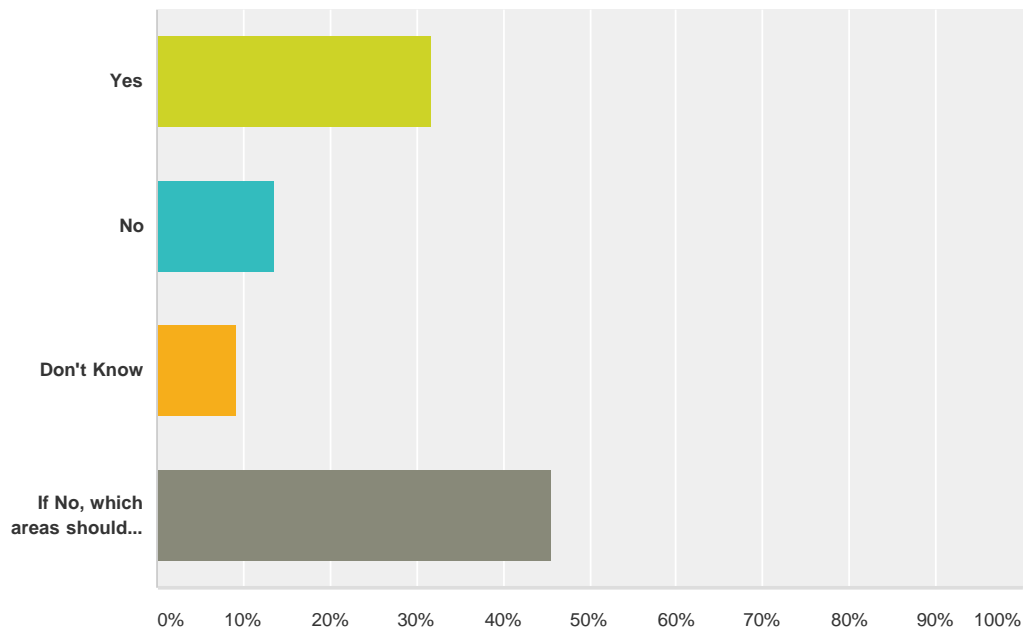
Answered: 23 Skipped: 2



Answer Choices	Responses	
Yes	86.96%	20
No	8.70%	2
Don't Know	4.35%	1
<b>Total</b>		<b>23</b>

**6. Q6 Do you have any other ideas for Housing Regeneration Priority Areas?**

Answered: 22 Skipped: 3

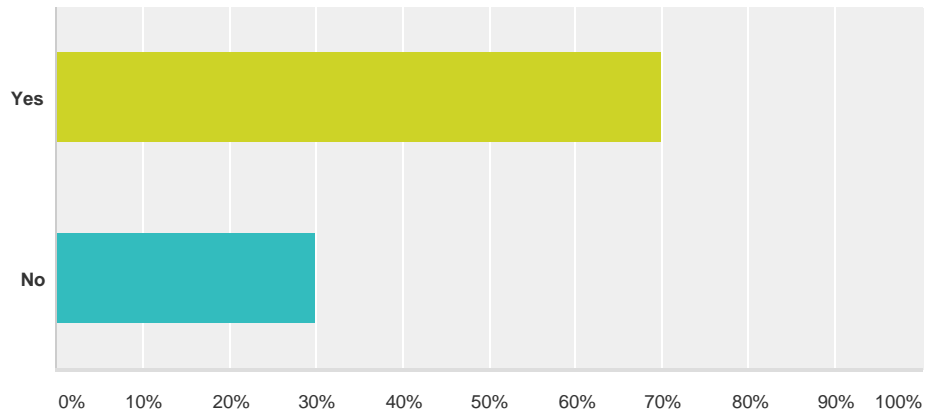


Answer Choices	Responses
Yes	31.82% 7
No	13.64% 3
Don't Know	9.09% 2
If No, which areas should be considered?	45.45% 10
<b>Total</b>	<b>22</b>

#	If No, which areas should be considered?	Date
1	develop thematic priorities rather than area based e.g. ageing population; people with disabilities; re-dressing the balance of provision vs needs	9/16/2016 3:10 PM
2	Radnor Park	9/16/2016 3:08 PM
3	Whitecrook	9/13/2016 11:02 AM
4	Silverton area where a lot of elderly disabled live should also be considered	9/13/2016 10:39 AM
5	Sheltered Housing throughout area upgraded in respect of insulation cladding / fuel efficiency	9/13/2016 10:27 AM
6	Faifley	8/30/2016 11:06 PM
7	Clydebank East your demolishing so could focus on other areas. South Drumry been on as a priority but what got done there?	8/26/2016 10:02 AM
8	What is the revised list ??	8/24/2016 9:40 PM
9	Dalmuir Whitecrook	8/2/2016 8:17 PM
10	Renton	8/2/2016 3:32 PM

7. Q7 Do you think the proposed actions are appropriate?

Answered: 20 Skipped: 5



Answer Choices	Responses	
Yes	70.00%	14
No	30.00%	6
<b>Total</b>		<b>20</b>

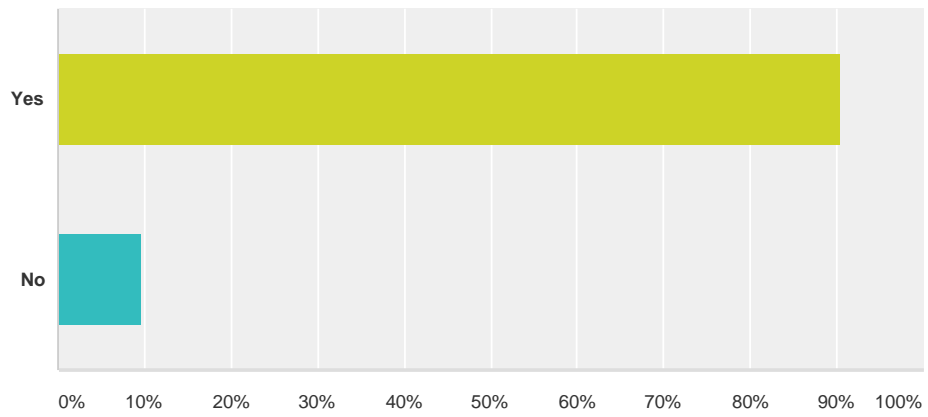
## 8. Q8 Are there other actions we should consider?

Answered: 11 Skipped: 14

#	Responses	Date
1	explore what steps need to be taken to ensure there is a skill-base in the local area to be able to deliver the new supply required (significant shortages of trade operatives are anticipated if nothing proactive done to address this)	9/16/2016 3:31 PM
2	Better governance of PRS	9/16/2016 3:10 PM
3	Exceed the housing supply target for social rented homes	9/13/2016 11:03 AM
4	Monitor all areas for future availability for housing	9/13/2016 10:58 AM
5	Emphasis should be put on supplying social housing, elderly and disabled suitable accommodation. Queens Quay and Harbour mostly private enterprise	9/13/2016 10:40 AM
6	The make up of the 230 new build target is not in keeping with the level of demand shown on page 9. it would be more appropriate were the proportions above reversed	9/13/2016 10:28 AM
7	More sites should be considered	8/30/2016 11:08 PM
8	No	8/30/2016 10:53 PM
9	New homes are great for the few that get them but focus on improving existing stock should have more priority.	8/24/2016 9:42 PM
10	Improve safe, secure housing for young people	8/11/2016 4:27 PM
11	Maximising the delivery of affordable homes	7/22/2016 7:05 AM

9. Q9 Do you think the proposed actions are appropriate?

Answered: 21 Skipped: 4



Answer Choices	Responses	
Yes	90.48%	19
No	9.52%	2
<b>Total</b>		<b>21</b>

**10. Q10** Are there other actions we should consider

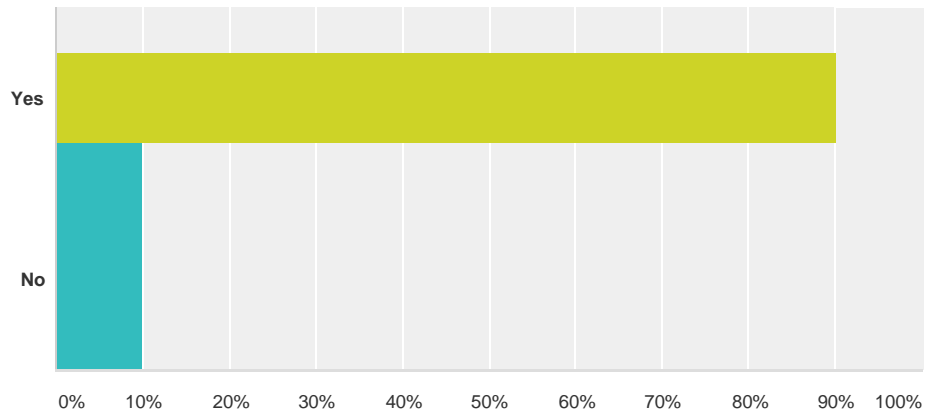
Answered: 6 Skipped: 19

#	Responses	Date
1	The actions of all the housing associations operating in the area should be reflected - not just those of WDC. Reference should be made to EESSH statistics not just SHQS.	9/16/2016 3:35 PM
2	Do temporary flats meet appropriate standards	9/13/2016 11:03 AM
3	None come to mind	9/13/2016 10:58 AM
4	No	8/30/2016 10:53 PM
5	Fuel poverty needs to be prioritised within all Housing spending. EESSH is still a minimum standard and Council should aim for highest level of energy efficiency in all stock not just new build.	8/26/2016 10:05 AM
6	Improve housing for people in poverty and marginalised groups	8/11/2016 4:29 PM



11. Q11 Do you think the proposed actions are appropriate?

Answered: 22 Skipped: 3



Answer Choices	Responses
Yes	90.91% 20
No	9.09% 2
<b>Total</b>	<b>22</b>

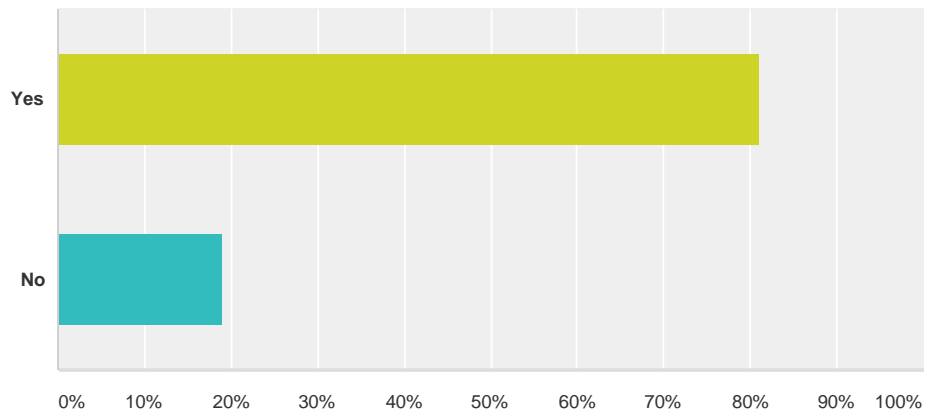
**12. Q12 Are there any other actions we should consider?**

Answered: 8 Skipped: 17

#	Responses	Date
1	To work in partnership with WD RSL's Building on Tenancy Sustainment initiatives with RSL partners	9/19/2016 7:43 PM
2	there should be more detail about timescales for achieving the proposed actions.	9/16/2016 3:37 PM
3	Including women, children and young people affted by domestic abuse	9/13/2016 11:04 AM
4	None come to mind	9/13/2016 10:59 AM
5	No	8/30/2016 10:53 PM
6	Need to ensure we deliver Housing Options sooner rather than later. Spend to save - invest in Housing options and you'll save money in failed tenancies and help tenants sustain their tenancies.	8/26/2016 10:07 AM
7	Accomodation that is safe, secure and meets their needs. There is no bespoke supported accomodation for young people with risky behaviours - they have to share accomodation with adults. Also not all young people flourish in supported accomodation and supported independant flats are desperatley needed to support these young people to have positive outcomes.	8/11/2016 4:38 PM
8	A focus on those leaving care or care experienced young people	8/4/2016 10:09 AM

13. Q13 Do you think the proposed actions are appropriate?

Answered: 21 Skipped: 4



Answer Choices	Responses	
Yes	80.95%	17
No	19.05%	4
<b>Total</b>		<b>21</b>

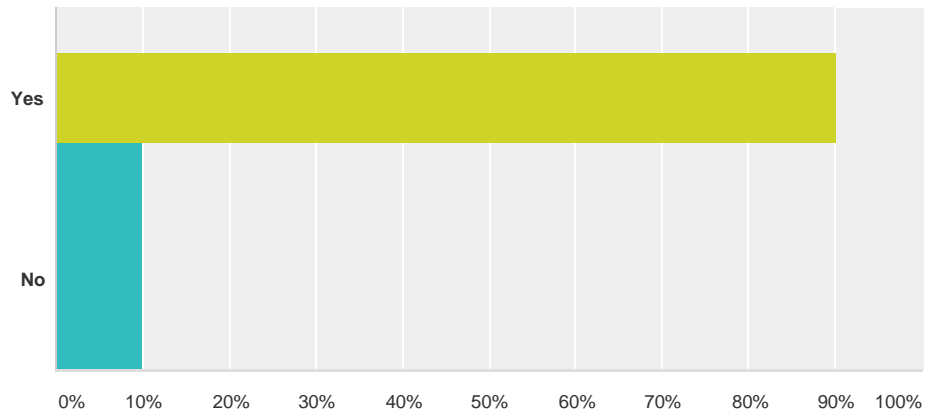
**14. Q14 Are there any other actions we should consider?**

Answered: 6 Skipped: 19

#	Responses	Date
1	Work in partnership with WD RSL's re. joint ASB and tenancy sustainment initiatives Work in partnership with WD RSL's to review bulk uplift/Estate Management strategies to improve overall estates	9/19/2016 7:45 PM
2	This actions should include those being taken by RSLs not just WDC's own internal actions.	9/16/2016 3:40 PM
3	Make sure they are enough resources / finances to ensure any SLAs are effective	9/13/2016 11:05 AM
4	No	9/13/2016 10:59 AM
5	No	8/30/2016 10:53 PM
6	Young people need to be supported more intensively when living indepentantly to prevent breakdown and isolation. Once every 2 weeks is not good enough	8/11/2016 4:40 PM

15. Q15 Do you think the proposed actions are appropriate

Answered: 22 Skipped: 3



Answer Choices	Responses
Yes	90.91% 20
No	9.09% 2
<b>Total</b>	<b>22</b>

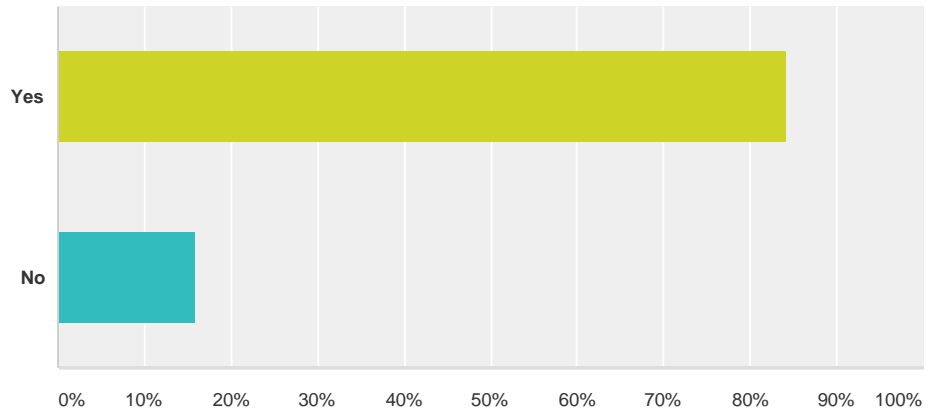
**16. Q16 Are there any other actions we should consider?**

Answered: 5 Skipped: 20

#	Responses	Date
1	Develop a more co-ordinated approach to early identification of needs and delivery of specialist accommodation in new build developments	9/16/2016 3:48 PM
2	Provision of more sheltered housing	9/16/2016 3:15 PM
3	No	9/13/2016 10:59 AM
4	No	8/30/2016 10:54 PM
5	As before we need to look at the housing that is safe and secure for risky young people that is supported by workers to divert yp away from failing in temporary units and tenancies	8/11/2016 4:43 PM

**17. Q17 Is the monitoring and evaluation framework clear enough?**

Answered: 19 Skipped: 6



Answer Choices	Responses
Yes	84.21% 16
No	15.79% 3
<b>Total</b>	<b>19</b>

**18. Q18** Do you wish to suggest any different ways to monitor the delivery of the LHS?

Answered: 4 Skipped: 21

#	Responses	Date
1	No	9/23/2016 11:58 AM
2	No	9/13/2016 10:59 AM
3	No	8/30/2016 10:54 PM
4	More scrutiny fed in locally from TRA meetings	8/2/2016 8:20 PM



**19. Q19** Are there any other comments you wish to make on the Draft Local Housing Strategy?

Answered: 8 Skipped: 17

#	Responses	Date
1	No	9/23/2016 11:58 AM
2	Given Scottish Govt's commitment to increase supply of social rented housing; should social rent output targets not be increased in this LHS?. Section 5.5 refers to Pressured Areas Status: with the ending of RTB this is no longer relevant. Table 8 in section 5.6 should show comparison with national breakdown among tenures and show how the proportion has changed since the last LHS. 5.6 suggests the increase in PRS is an area for scrutiny/action over plan period - this is a bit vague. on page 49 in the first box there is reference to the Housing Regulator's Charter - the Charter is the Scottish Government's. The Charter Indicators are produced by the Regulator. On page 75 5th bullet point refers to WDC's spend on aids & adaptations - the spend by housing associations should be included too.	9/16/2016 4:00 PM
3	Paper version of survey needs layout checked.	9/14/2016 11:52 AM
4	Q.11 - comment "as far as they go"	9/13/2016 11:06 AM
5	No	9/13/2016 10:59 AM
6	A review by the Campaign for Plain English could be useful. Regarding Q. 17 Comment "where is it"?	9/13/2016 10:31 AM
7	More tower blocks needed	8/30/2016 10:54 PM
8	To explore supported accomodation for risky young people where they can live independantly.	8/11/2016 4:44 PM

**20. Q20 What is your postcode?**

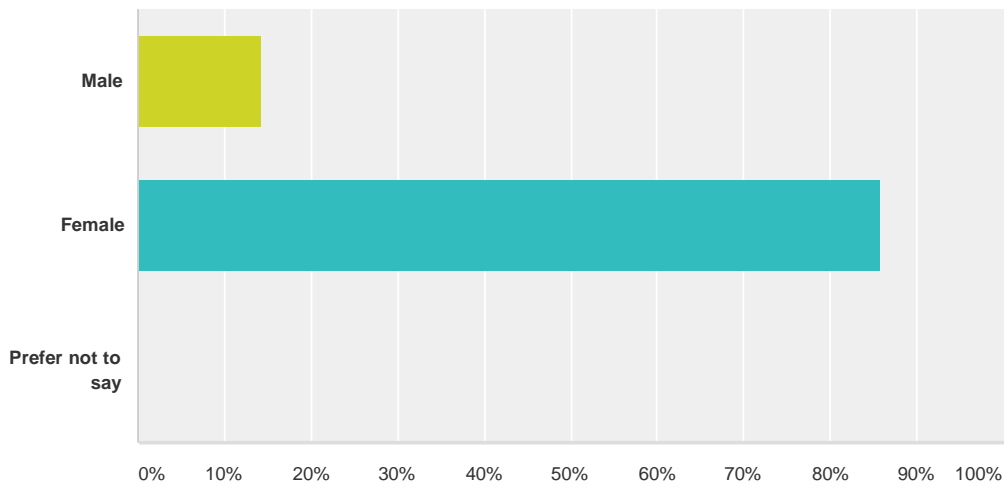
Answered: 4 Skipped: 21

Answer Choices	Responses
G60	0.00% 0
G81	25.00% 1
G82	25.00% 1
G83	50.00% 2
G14	0.00% 0
If you don't know your postcode, name your nearest town/village here:	0.00% 0

#	G60	Date
	There are no responses.	
#	G81	Date
1	3pu	8/24/2016 9:59 PM
#	G82	Date
1	1LL	9/16/2016 4:01 PM
#	G83	Date
1	0JG	9/7/2016 9:29 AM
2	Yes	8/30/2016 10:55 PM
#	G14	Date
	There are no responses.	
#	If you don't know your postcode, name your nearest town/village here:	Date
	There are no responses.	

21. Q21 What is your gender?

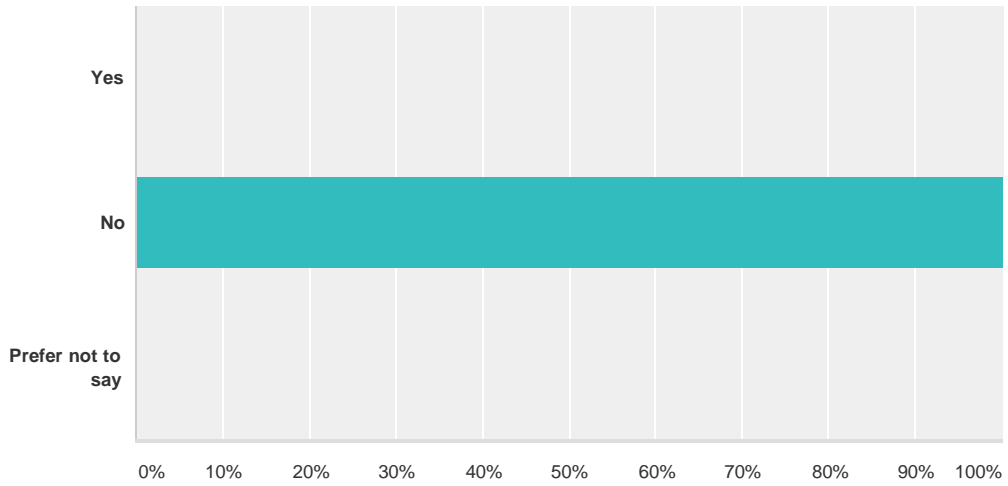
Answered: 7 Skipped: 18



Answer Choices	Responses	
Male	14.29%	1
Female	85.71%	6
Prefer not to say	0.00%	0
<b>Total</b>		<b>7</b>

**22. Q22 Have you ever identified as transgender?**

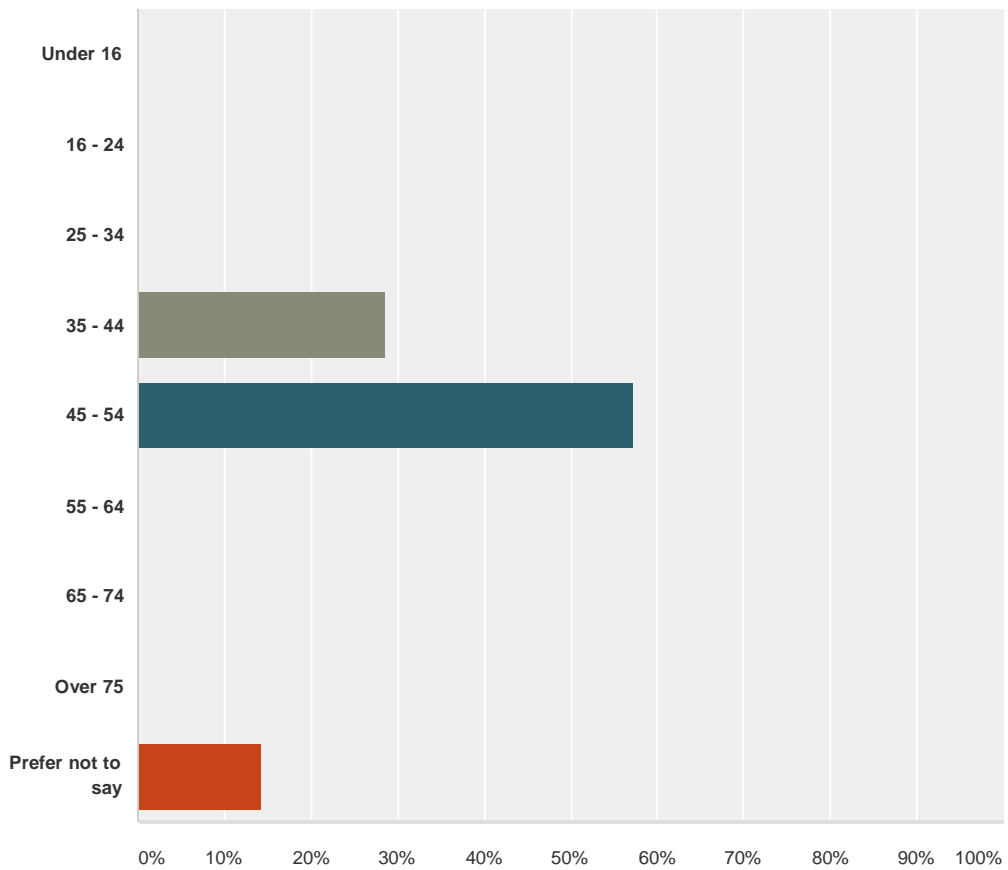
Answered: 7 Skipped: 18



Answer Choices	Responses	
Yes	0.00%	0
No	100.00%	7
Prefer not to say	0.00%	0
<b>Total</b>		<b>7</b>

**23. Q23 What is your age?**

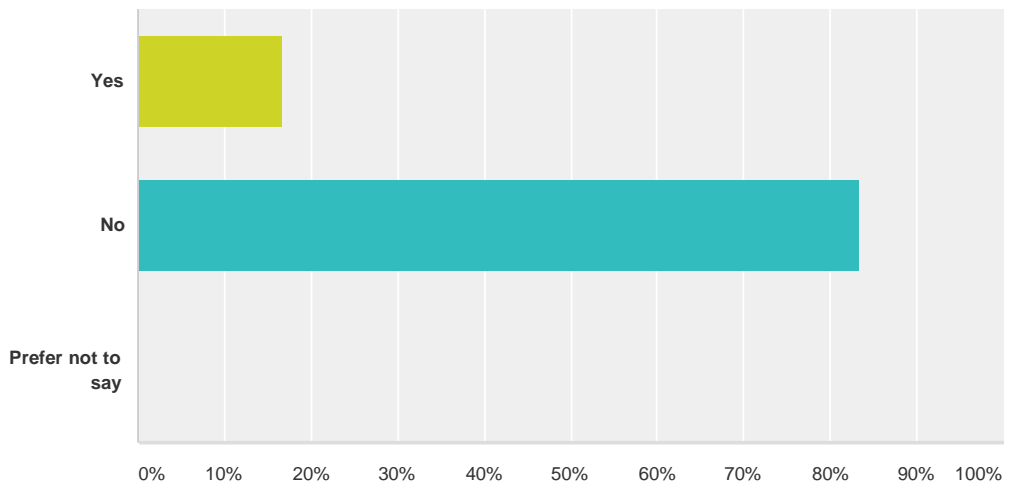
Answered: 7 Skipped: 18



Answer Choices	Responses	Count
Under 16	0.00%	0
16 - 24	0.00%	0
25 - 34	0.00%	0
35 - 44	28.57%	2
45 - 54	57.14%	4
55 - 64	0.00%	0
65 - 74	0.00%	0
Over 75	0.00%	0
Prefer not to say	14.29%	1
<b>Total</b>		<b>7</b>

**24. Q24 Do you consider yourself disabled?**

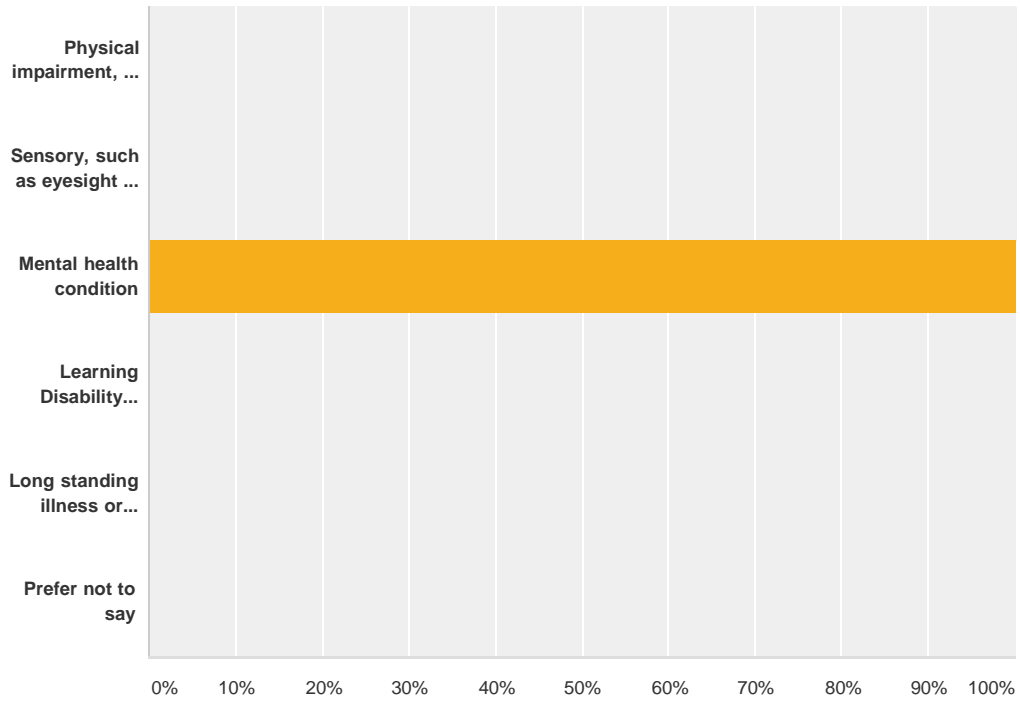
Answered: 6 Skipped: 19



Answer Choices	Responses
Yes	16.67% 1
No	83.33% 5
Prefer not to say	0.00% 0
<b>Total</b>	<b>6</b>

**25. Q25** If yes, please indicate which of the following impairments affect you

Answered: 1 Skipped: 24

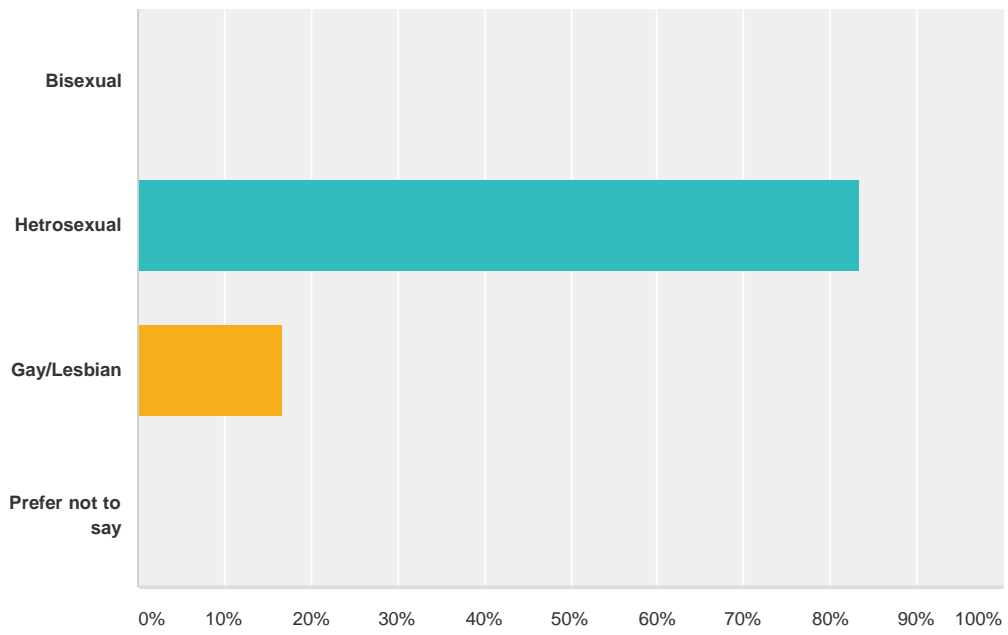


Answer Choices	Responses
Physical impairment, or mobility issues	0.00% 0
Sensory, such as eyesight or hearing	0.00% 0
Mental health condition	100.00% 1
Learning Disability (such as Down's Syndrome or Dyslexia)	0.00% 0
Long standing illness or health condition such as cancer, diabetes or HIV	0.00% 0
Prefer not to say	0.00% 0
<b>Total</b>	<b>1</b>

#	Other (please specify)	Date
	There are no responses.	

**26. Q26 What is your sexual orientation?**

Answered: 6 Skipped: 19

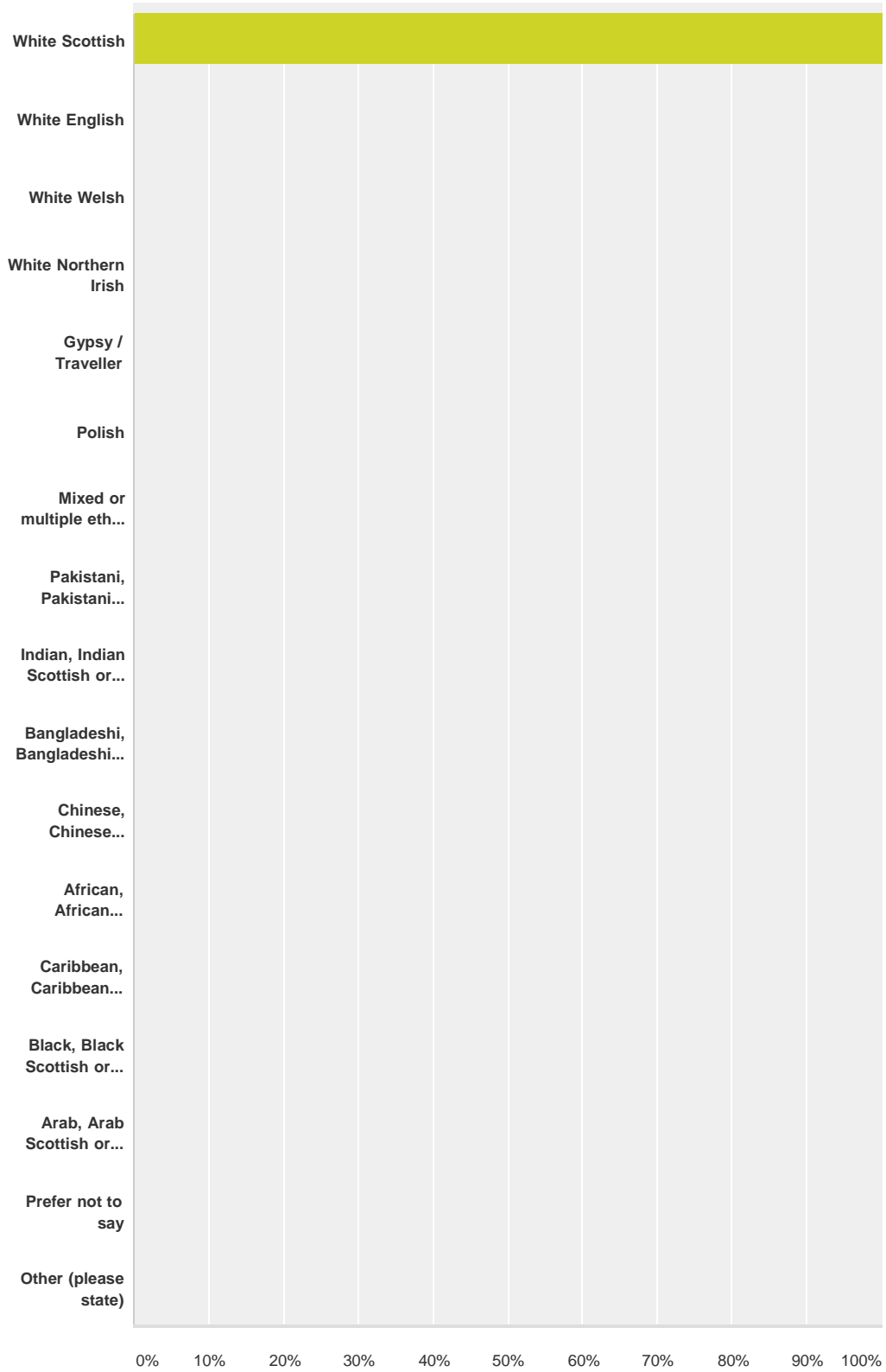


Answer Choices	Responses	
Bisexual	0.00%	0
Hetrosexual	83.33%	5
Gay/Lesbian	16.67%	1
Prefer not to say	0.00%	0
<b>Total</b>		<b>6</b>



**27. Q27 Ethnic and Cultural Origin** Please choose ONE which best describes your ethnic group or background.

Answered: 7 Skipped: 18



Answer Choices	Responses
White Scottish	100.00% 7

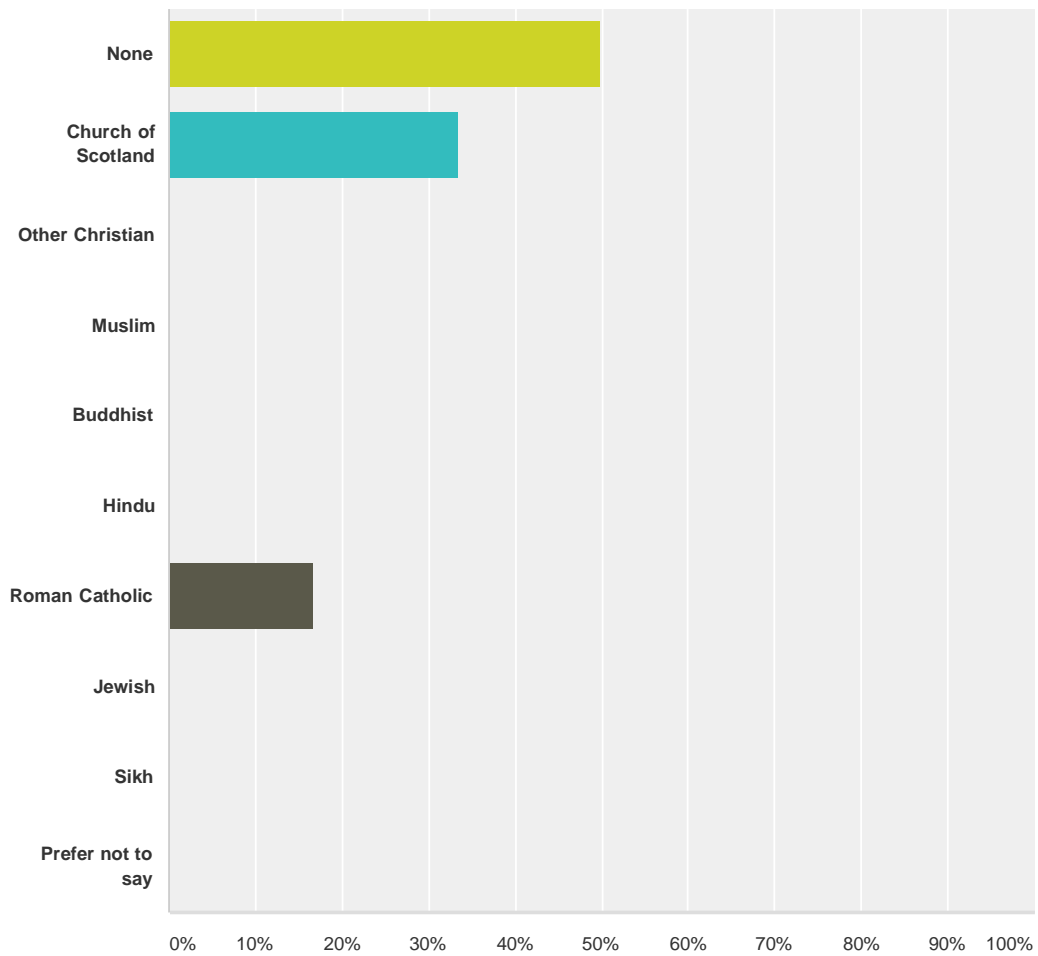
## West Dunbartonshire Local Housing Strategy 2017-2022

White English	0.00%	0
White Welsh	0.00%	0
White Northern Irish	0.00%	0
Gypsy / Traveller	0.00%	0
Polish	0.00%	0
Mixed or multiple ethnic group	0.00%	0
Pakistani, Pakistani Scottish or Pakistani British	0.00%	0
Indian, Indian Scottish or Indian British	0.00%	0
Bangladeshi, Bangladeshi Scottish or Bangladeshi British	0.00%	0
Chinese, Chinese Scottish or Chinese British	0.00%	0
African, African Scottish or African British	0.00%	0
Caribbean, Caribbean Scottish or Caribbean British	0.00%	0
Black, Black Scottish or Black British	0.00%	0
Arab, Arab Scottish or Arab British	0.00%	0
Prefer not to say	0.00%	0
Other (please state)	0.00%	0
<b>Total</b>		<b>7</b>

#	Other (please state)	Date
	There are no responses.	

28. Q28 What is your religion or belief?

Answered: 6 Skipped: 19



Answer Choices	Responses	
None	50.00%	3
Church of Scotland	33.33%	2
Other Christian	0.00%	0
Muslim	0.00%	0
Buddhist	0.00%	0
Hindu	0.00%	0
Roman Catholic	16.67%	1
Jewish	0.00%	0
Sikh	0.00%	0
Prefer not to say	0.00%	0
<b>Total</b>		<b>6</b>

#	Other (please specify)	Date
	There are no responses.	