Housing Strategy
2015-2020
I am very pleased to introduce the Guildford Borough Housing Strategy 2015-20, which sets out our ambitions for housing over the next five years, and how we intend to achieve them.

It is an exciting time for housing in the borough. The economy is picking up both nationally and locally, and the Council is building its own housing again for the first time in nearly 20 years. We are also progressing the Local Plan, which sets out the framework for development across the borough to meet our objectively assessed need for new homes.

Whilst the Local Plan will deal with spatial development for the borough up to 2031, including infrastructure, this housing strategy concentrates on affordable housing and the use and quality of existing homes, with a focus on what can be achieved in the next five years.

I would like to thank all the residents, housing providers and other interested parties who have given valuable input to the consultation for this strategy, both at our housing forum and during the subsequent consultation.

Councillor Sarah Creedy,
Lead Councillor for Housing and Social Welfare
Alternative formats

If you would like this document in a different format such as large print or a different language, please contact:
Housing Advice Services
Telephone: 01483 444244
Email: housingadvice@guildford.gov.uk
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1. Purpose and context

Introduction

The Local Government Act 2003 requires the Council to publish a housing strategy setting out a vision for housing in its area and identify objectives and priorities to meet the current and future housing needs of the local population.

This strategy replaces the interim Housing Strategy Statement published in 2011 and sets out our proposals over the next five years.

Although much has changed in the Planning system, in the economy, and in how affordable housing is funded and delivered, the fundamental issues that our strategy aims to resolve are consistent with those in the interim strategy statement.

Key facts about the Borough

- The borough covers 104 square miles and comprises urban areas in central Guildford and to the west in Ash with several surrounding rural villages
- 89 per cent of the land in the borough is in the Green Belt
- Our population (from the 2011 Census) is 137,183, which is a 6 per cent increase since 2001
- We have 54,500 households
- The population is expected to increase to 150,000 by 2020
- Minority ethnic groups comprise 9 per cent of the population, up from 3.2 per cent in 2001
- The number of those aged 85 or over has increased 21 per cent since 2001
- The main housing tenure is owner occupation, representing 69 per cent of homes. For England the average is 63 per cent
- Private renting has increased by 9 per cent since 2001 and now represents 16 per cent of homes
- There are 6,850 affordable homes in the borough
- We have low levels of unemployment at 4.7 per cent. The national average is 7.9 per cent
- Median workplace earnings are £31,883
- Median resident earnings are £35,635
- There has been a 27.7 per cent increase in working households claiming housing benefit since 2010
- There are 3389 applicants on the housing register; 2461 in the highest priority bands
- Levels of homelessness are low but in 2013/14, 85 single people slept rough in the borough with 303 at risk of doing so.

A detailed overview and statistical profile of the housing need in the borough is set out in appendix 1.
Challenges

• Despite an increase in population and in the number of people waiting for social housing, the number of affordable homes is at a similar level to 2002, because the supply of new build rented homes has barely kept up with the loss of social rented homes under the Right to Buy
• Although the number of affordable homes in the borough is the same as it was ten years ago, the profile of the stock has changed, and the proportion of social rented properties has decreased in favour of shared ownership, intermediate rent and Affordable Rent
• The average house price in the borough is £407,943
• The average price of a terraced house is £287,812
• The average price of a flat is £232,828
• The average house price to average income ratio is 14 to 1
• The average rent for a 2 bedroom house in Guildford is £1,250 per month
• The entry level household earnings to rent privately without housing benefit in Guildford are £39,800.

There are a number of difficulties we face seeking to address housing need in the borough. It remains difficult to get on the housing ladder. Demand for most types and tenures of housing outstrips supply.

Our population is growing and the housing needs of certain groups are becoming more complex. Affordability is an increasing problem, with rents and house prices increasing faster than wages, and welfare reform reducing the amount of help available from the benefits system.

Although housing conditions overall are good, private rented homes are in slightly poorer condition than the public sector stock and energy efficiency needs to improve significantly across all tenures.

The principal challenges we face are:

• Ensuring delivery of enough new homes to meet residents’ needs and support the economy
• Maintaining the quality of the housing stock and minimising the number of empty homes
• Improving energy efficiency
• Supporting the most vulnerable members of our community.

There are, however, also opportunities for the Council to fulfil its strategic housing role presented by the localism agenda and reform of housing finance.

Our Vision

Our vision is that ‘everyone should have a home that meets their needs’.

Most people in the borough are not in housing need or have the ability to meet their own needs, but some are not so fortunate. We do not have the resources or ability to make this vision a reality for everyone, but we can work towards this for many of our residents, particularly those that are vulnerable and most in need. This strategy sets out the areas we believe we need to prioritise so we can make a real difference for our community over the next five years.
Developing the Strategy

This strategy builds on earlier housing strategies and in particular, the Interim Housing Strategy Statement published in 2011, which was published during a time of great change, both nationally and locally, for housing. A new five-year housing strategy was not produced at that time as we were facing considerable change in government policy and direction and the Local Plan was at a very early stage.

Although further change is inevitable, we are now in a better position to set out a housing strategy for the borough and establish our key objectives and priorities.

We developed this strategy in consultation with local stakeholders including housing providers, private landlords, tenants, housing applicants, public bodies, voluntary sector organisations, the faith sector, neighbouring councils and the wider community.

We will monitor the future progress of the strategy and review the actions plans as necessary in the light of changes to government policy or local needs.

Localism Act

The Localism Act 2011 introduced a number of key reforms in relation to housing and planning with the primary objective of decentralising power to local areas. This provided the legislative framework to promote the delivery of the Government’s policy priorities.

National housing strategy

The Government’s housing strategy, published in 2011, set out a clear agenda to boost the economy by stimulating the housing market through building new homes. The strategy sets out a range of measures including the change to funding of affordable housing, requirements in relation to design, quality and improved environmental standards of new and existing homes; making best use of existing stock (including empty homes) and the introduction of fixed term social housing tenancies.

Funding of affordable housing through Affordable Rent

The introduction of the Affordable Rent model to fund new affordable housing has emerged as a key issue since April 2011. This model requires providers of new build affordable housing to charge rents at up to 80 per cent of market rents and use the difference between the ‘social rent’ level and ‘Affordable Rent’ to fund future affordable housing development, in conjunction with much lower levels of grant.

Housing Revenue Account reform

The reform of housing finance with effect from April 2012 represents a core element of the Government’s housing strategy. It ended the complex housing subsidy system by transferring the national housing debt back to the remaining stock holding councils enabling them to retain future rental income from council homes rather than handing a proportion back to the Treasury. Councils now have the opportunity to decide how they wish to use the rental income and, through their business plans, set their own priorities for the future management of their housing stock. It is a key ambition of our own Business Plan to increase the supply of affordable housing, including by directly building council housing.

The National Planning Policy Framework

In 2012, the Government published the National Planning Policy Framework (NPFF), which aimed to reduce the amount of planning guidance and simplify the planning process. The NPFF signalled a shift in emphasis towards a presumption in favour of sustainable development.

The NPFF requires councils to identify the full, objectively assessed need for market and affordable homes in the housing market area and respond positively to wider opportunities for growth. The NPFF makes it clear that it is Government policy that there should be a significant boost in the supply of housing.
The NPPF also sets a definition of affordable housing for planning purposes. This includes social rented, Affordable Rented and intermediate housing provided to eligible households whose needs are not met by the market.

Planning Policy for Traveller Sites came into force at the same time as the NPPF and requires the Council to set pitch targets for travellers and plot targets for travelling show people.

**Welfare reform**
The Government’s commitment to reform the welfare system has significant implications for both tenants and landlords in the private and social housing sector. A range of benefit changes have been introduced over the last four years, to housing benefit regulations and through the Welfare Reform Act 2012. The Act provides for a radical overhaul of the benefit system through the introduction of Universal Credit, a single benefit for people of working age, which will replace existing benefits such as Income Support, Job Seekers Allowance and Housing Benefit.

The implementation of Universal Credit has been delayed and is now expected to roll out in Surrey from early 2016. A number of other changes have taken place since 2011 that affect local residents. This includes the introduction of Local Council Tax Support and new regulations on Housing Benefit. These restrict and reduce the level of funding many households are able to claim, such as lower rates of local housing allowance for private tenants, a cap on the level of benefit for families, and size criteria for the homes of social housing tenants.

**The Green Deal and Energy Company Obligation (ECO)**
The Green Deal is a Government scheme under which up-front funding is available for energy efficiency works, with the cost recouped through the householder’s (reduced) fuel bills. Nationally, take-up for the scheme has been below target.

The Energy Company Obligation placed a requirement on the ‘big six’ energy companies to fund energy efficiency improvements. A proportion of the funding was to be targeted at vulnerable groups and rural locations. In 2014 the Government reduced the target for carbon saving through the ECO scheme. A replacement scheme funded through taxation was launched but the £120 million budget set aside for the scheme until March 2015 was fully spent by July 2014. The Government is considering adding a further £100 million to the budget in early 2015 but this has not yet been confirmed.

The failure of these schemes created further difficulty for those in fuel poverty in Guildford and has the potential to increase pressure on the Council’s assistance schemes.

**Health and social care reform**
Primary Care Trusts (PCTs) were abolished in 2011 and Surrey County Council now has public health responsibilities in the Guildford area. The County Council has established a Health and Wellbeing Board to promote more joined-up commissioning of health and social care and public health services. Good housing is a key determinant of good health and so these reforms need to be taken into account in the delivery of this Housing Strategy.
Local Policies

The Council takes account of the national political and legislative framework and sets out our local priorities based on identified needs and the resources available.

The Corporate Plan

Housing is a corporate priority for the Council. Our Corporate Plan 2013-16 has five fundamental themes:

- Infrastructure
- Economy
- Development
- Sustainability
- Society

The development of this Housing Strategy together with targets for developing new council homes are key actions in the Corporate Plan, as is the implementation of our homelessness strategy. Other actions and priorities are also relevant in connection with the Local Plan, the Economic Strategy, welfare reform and sustainability.

The Corporate Plan may be viewed at: http://www.guildford.gov.uk/corporateplan

The Local Plan

The new Local Plan for Guildford will set out policies and proposals to shape all future development and the use of land in the borough up to 2031. Following extensive consultation, the plan will progress through submission, formal examination and revision before expected adoption in summer 2016.

Local Plan

The draft Local Plan includes the proposed policies in respect of affordable housing delivery in the borough. It proposes development of, as yet, an undetermined number of new homes per year up to 2031 with approximately 40 per cent to be affordable housing. As the Local Plan is still at draft stage, it is subject to change.

The number of homes will be set taking account of the draft Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA) as the Local Plan must also demonstrate that it there is sufficient land supply over the plan period to deliver the homes needed.

Further details of the draft SHMA are included in Appendix 1.

The SHMA can be found at: http://www.guildford.gov.uk/shma

The SHLAA can be found at: http://www.guildford.gov.uk/newlocalplan/landavailabilityassessment

The draft Local Plan can be found at: www.guildfordlocalplan.info
The Economic Strategy
The Council published a new economic strategy in 2013, which covers the period from now until 2031. It sets out the Council’s key priorities. The strategy highlights the need for homes for local workers to support the local economy and for significant investment in infrastructure via the LEP to release land for housing and economic development.

Homelessness Strategy
In July 2013, we adopted a five-year homelessness strategy. This is a key component of our strategic housing function, which complements and supports the wider delivery of this housing strategy.

The homelessness strategy focuses on our approach to service delivery and the prevention of homelessness by targeting help for those who face social exclusion or have greater needs. It sets out our action plans to:

- manage the impact of welfare change
- sustain and create access to suitable accommodation
- tackle single homelessness and rough sleeping
- Improve service delivery, strategic partnerships and communication.

The priorities within the homelessness strategy are based on assessment of local needs and priorities that have been agreed with wider stakeholders many of which are also relevant to this strategy.

The Homelessness Strategy may be viewed at:

Guildford is part of the Enterprise M3 Local Economic Partnership (LEP), which covers 14 local authority areas in mid and north Hampshire and south west Surrey.

In its Strategic Economic Plan, Enterprise M3 recognises the link between housing and the economy and seeks to accelerate the delivery of new homes by up to 25 per cent over the next 10 years.

The latest information from the LEP is available at:
www.enterprisem3.org.uk

The Guildford Economic Strategy can be viewed at:
HRA Business Plan
April 2012 saw the end of the national subsidy system for council housing, and for Guildford, this meant taking on a loan of £193.2 million for our 5,200 homes.

Despite this debt, our tenants are much better off under the new arrangements in that we now retain 100 per cent of our rental income, which after operating costs including servicing the loan leaves 80 per cent to invest in services locally. We were only able to retain just over 50 per cent under the old system. This has enabled us to build new council homes for the first time in over 20 years and to establish a development strategy as part of the HRA business plan. We are charging Affordable Rents on newly built council homes, however we are setting Affordable Rents at a level that we think our tenants can afford, not at the maximum allowable by Government. For more details, see our rents and affordability guidance in Appendix 2.


The Home Energy Conservation Act (HECA) strategy
The Home Energy Conservation Act strategy was published in April 2013. This sets out the energy conservation measures that we think practicable, cost-effective and likely to result in significant improvements in the energy efficiency of residential accommodation in the borough.

The HECA action plan builds on the projects and partnerships that have developed since 2011.
2. Key Achievements

Increasing Supply
Delivery of affordable housing has been particularly difficult over the last five years due to the economic situation, the limited land available, changes in affordable housing finance, fewer Section 106 sites coming forward and delays in making progress on agreed sites. However, in 2012 we benefited from new financial freedoms, which have enabled us to bring forward council-owned sites for direct development. In addition, the upturn in the economy has increased confidence in the housing market and more sites are now under development.

Affordable Housing Delivery
• 232 new affordable homes completed 2008-2011
• 107 new affordable homes completed 2012-14.

Building new council homes
Our Corporate Plan contains a target to deliver at least 80 new council homes by March 2016, with a plan to deliver 150 in the longer term, and we are on track to meet these targets.

In 2013, we successfully achieved Investment Partner Status with the Homes and Communities Agency (HCA) and were allocated £850,000 of grant under the 2011-15 Affordable Homes Programme to assist with the delivery of 34 affordable homes.

New Road, Gomshall:
• 27 homes for Affordable Rent
• 7 x 2 bedroom houses
• 10 x 3 bedroom houses
• 2 x 1 bedroom bungalows
• 4 x 2 bedroom flats
• 4 x 1 bedroom flats

Lakeside Close, Ash:
• 35 homes for Affordable Rent
• 4 x 1 bedroom flats
• 4 x 2 bedroom flats
• 12 x 2 bedroom houses
• 13 x 3 bedroom houses
• 2 x 4 bedroom houses

Infill sites
As part of our review of the Council’s land holdings, we have identified various infill sites. We now have planning consent for four sites. In total the sites could deliver 32 family houses.

Guildford Park Car Park
We are redeveloping the surface car park between the station and the University to provide over 100 homes, at least 50 of which will be affordable homes, as well as a multi-storey car park.

Purchase of development sites
The supply of council-owned land is limited, so when seeking to identify further sites for council housing development we will consider purchase of additional sites.
Development by Registered Providers
Recent developments include the following:

Elgin Gardens:
• 9 flats for shared ownership completed in 2014/15 by Affinity Sutton.

White Hart Court:
• 45 homes (of which 37 are affordable homes, and eight are for private sale) and a new 60 space car park, completed in 2014/15 by A2Dominion. The mix includes:
  • 26 homes for social rent (10 of which are for people with a local connection and one is a wheelchair adapted property to house a disabled child and his family, nominated by the Council’s occupational therapist)
  • 11 homes for shared ownership sale.

Beech Lane:
• 8 houses and 8 flats for Affordable Rent, being built by Mount Green Housing Association.

Meadowlands:
• 8 houses and 6 flats for Social Rent, being built by Affinity Sutton.

Bids under the HCA's 2015-2018 Programme
A substantial proportion of the HCA’s funding for 2015-18 has yet to be allocated. This reflects a new approach from the HCA of only funding schemes with certainty of delivery (generally those schemes with planning permission, land ownership and finance in place).

So far in Guildford, the following have been allocated:
• 62 units for Paragon at Station View
• 9 units for A2Dominion at Foreman Road, Ash
• 24 units for A2Dominion in Walnut Tree Close
• 10 units of Affordable Rent for YMCA’s project to bring empty homes back into use.

Registered Providers (including the Council itself) will be able to apply for grant via ‘Continuous Market Engagement’, that is, bringing schemes forward as and when they have certainty of delivery.

Planning approvals
As at 30 June 2014, there were:
• 141 affordable homes on site
• A further 327 homes with planning approval
• 208 affordable homes at pre-application or application stage.

Empty homes
The number of long term empty homes in the borough has reduced from 597 in 2011 to 470 in 2013. It is expected to reduce even further due to sustained efforts to locate empty properties and persuade owners to implement solutions. Where necessary we will use the full range of enforcement tools at our disposal.

In 2012, we achieved our first successful Empty Dwelling Management (EDMO), which brought back into use a property that had been empty for nearly five years. The house required extensive renovation, costing nearly £80,000, and a family from the Housing Needs Register is now living there.

We have secured funding from the HCA for the BASE project (Building a Sustainable Environment). This is a partnership comprising five councils including Guildford, and Respond (a partnership of Registered Providers of affordable housing). The project aims to deliver 23 affordable homes by 31 March 2015 across the partnership, of which 10 may be in Guildford. Two properties were acquired on seven year leases and are now occupied by families from the Housing Needs Register at affordable rents.

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Improving Existing Housing

Council homes
We have surveyed our stock and have a reliable picture of the overall condition of the stock, together with an investment profile over the next thirty years.

94.6 per cent of council homes meet the decent home standard; only 272 properties do not meet the standard. To meet the decent home standard, a home must meet minimum safety standards for housing, be in a reasonable state of repair and have modern facilities and services.

The Guildford standard has been agreed with tenants. Under this standard:

- 96 per cent of homes have had kitchens upgraded (there were around 200 refusals by residents, for various reasons)
- 97 per cent of homes have had bathrooms upgraded. There were around 160 refusals but that includes adaptations made under disability grant work as the list of properties that meet the replacement criterion for modernisation are passed to Health and Community Services, who then carry out the modernisation work
- 98 per cent of homes now have double glazed windows. The only properties remaining are Locally Listed and listed properties that are currently going through the planning process to obtain consent for their replacement. There is an ongoing focus on measures to increase the energy efficiency of homes.

Home Improvement

The Home Improvement policy continues to deliver assistance to adapt, repair and improve private homes. The policy is comprehensive and offers a wide range of support for owners and tenants. Help is targeted at properties that fail decency standards and people on lower incomes. Help is also available for empty homes, adaptations and renewable energy installations.

The policy was revised on 1 April 2014 but with minor changes to simplify some of the processes. The annual budget to support this work is £600,000.

Since 2011 we have:

- Invested approximately £430,000 each year to adapt private homes
- Invested approximately £170,000 each year to improve and repair private homes
- Secured additional resources £200,000 from private clients, social lenders and social care for adaptations
- Extended the Home Trust Loan scheme and facilitated loans of £15,000
- Introduced initiatives to prevent falls in the home
- Assisted over 1500 households per year through the Home Improvement Agency
- Ensured over 1800 clients are connected to the community alarm service.

Private sector housing

The private sector in Guildford provides housing for the majority of people either as owner occupiers or private tenants. Our objective has been to raise standards to eliminate non-decency and category 1 hazards and improve energy efficiency standards. We have achieved this through our continued development of partnerships, the home improvement policy and housing enforcement policies.
Working with landlords and tenants
The private rented sector has grown significantly over the last 10 years and now stands at 9000 properties, 16 per cent of the total stock. Our efforts have focussed on direct engagement with landlords to promote and encourage the provision of higher standards both in property condition and landlord and tenant behaviour.

Our Homes4U team have developed strong links with private landlords and continue to secure tenancies of properties, which helps to prevent homelessness. There is ongoing support provided to both landlords and tenants to help sustain tenancies. There have been over 1100 placements made to the private rented sector through this scheme over the past 10 years.

We have also supported landlord forums and provided expert advice to increase landlord knowledge.

We have directly intervened to deal with complaints and the licensing of Houses in Multiple Occupation (HMO) and caravan sites.

Since 2011 we have:

- Investigated over 1000 housing complaints in respect of property condition or security of tenure
- Licensed or re-licensed over 160 HMOs
- Introduced an inspection regime and charges for licensing at 30 residential caravan sites
- Established an HMO stakeholder group to raise standards and management of HMO.

Energy Efficiency
We recognise that partnerships offer us the most success to encourage the wider take up of energy efficiency measures. We have built upon our experiences in delivering projects targeting efficiency of homes with an emphasis on vulnerable households. The following projects have assisted 180 households:

- Department of Energy and Climate Change (DECC) Fuel Poverty projects to insulate park homes

These schemes levered in government funding in addition to council and householder contributions. We also enabled Guildford CAB to train staff in energy advice. The second DECC project was carried out in partnership with Hart District Council.

- Department of Health (DoH) Winter Warmth scheme in partnership with Action Surrey, SCC and the other Surrey borough/district councils

This scheme was aimed at reducing fuel poverty. It provided insulation, efficient boilers and smaller measures fitted by our Handyperson.

- Energy efficiency makeovers
We have introduced an annual project to tackle fuel poverty and make homes warmer for elderly and vulnerable people. Energy assessments are carried out by the Handyperson who then fits simple measures such as draught proofing, insulation and lighting improvements. Since the scheme started we have completed 120 makeovers.

• Action Surrey Partnership

In April 2013 we signed an agreement with Action Surrey to deliver a Surrey wide initiative to promote the Government’s Green Deal scheme and to access ECO funds. Since April 2013, we have facilitated 867 measures (for example boiler replacements, cavity insulation or wall insulation).

Housing Association Stock
Housing association stock is regulated by the HCA, and the vast majority of our partners’ stock meets the Decent Homes Standard. Our partners regularly reassess stock condition to ensure it meets the standard.

We have also:

• Secured HCA funding to develop five additional traveller pitches at Ash Bridge due for completion by February 2015
• Worked in partnership with SCC Adult Social Care commissioning to manage reduced funding for housing related support
• Remodelled our sheltered housing to encourage wider involvement from community groups and wider provision of services.

Social and Economic Well-being

Homes for all – specialist housing
Since 2011, we have negotiated four fully wheelchair-accessible properties under Section 106 and on housing association sites, to a specification agreed with Occupational Therapists. We are also providing four bungalows on our own sites with level access and flat-floor showers, that can easily be adapted further as necessary.
Homelessness Strategy
Through the homelessness strategy, we have introduced a range of measures and initiatives to support those in housing need, our own tenants and the more vulnerable groups in our community.

Since 2011 we have:

• Housed 1047 households from the housing register in social rented homes
• Assisted 67 households to buy a shared ownership home
• Prevented 1571 households from becoming homeless
• Provided additional funding to Ash and Guildford Citizens Advice Bureaux for money advice
• Established the ETHOS (Employment, Training, Housing, Opportunities and Support) project, offering direct support to tenants and housing applicants in finding work. We have made links with employers, job clubs and agencies offering support
• Re-commissioned the Homeless Outreach and Support Team to work with rough sleepers and single homeless people, increasing the resources available for the service
• Extended access to rent deposits for single homeless people and couples through the Homes4U scheme as part of the Surrey Wide action plan funded by DCLG.

Current progress in implementing the Homelessness strategy may be viewed at:


Tenancy Strategy
The 2011 Localism Act introduced flexible tenancies to move away from the ‘tenancy for life’ approach and instead provide social housing at a time of need and throughout the time of need, rather than permanently.

We introduced flexible tenancies in January 2013 and offer new tenants a one-year introductory tenancy followed by a five-year flexible tenancy - other than in exceptional circumstances.

Those on flexible tenancies have similar rights to secure tenants, such as the Right to Buy, but on review must continue to meet the criteria for social housing for their tenancy to be renewed. We may also offer alternative housing at the end of the fixed term if their needs have changed, particularly if they occupy a larger home than they need.

We have produced a Tenancy Strategy that sets out the Council’s position regarding flexible tenancies that Registered Providers should take into account when setting their own policies.

The Tenancy Strategy may be viewed at:
**Housing Allocation Scheme**
We have reviewed our Housing Allocation Scheme in the light of the Localism Act flexibilities and introduced a number of minor changes from August 2014. These strengthen the local connection criteria to access social rented housing in the borough and incorporate greater restrictions in respect to finance, property ownership and behaviour.

The Housing Allocation Scheme may be viewed at:
http://www.guildford.gov.uk/media/8674/Allocation-Scheme-August-2014/pdf/Allocation_Scheme_from_1_August_2014.pdf

**Traveller Pitch Allocations Policy**
We have introduced a new allocation policy for Traveller pitches which is more consistent with the Housing Allocation Scheme.

Details of our proposed Gypsy and Traveller Allocations Policy can be found at:
3. Our ambitions

We have identified three key ambitions that we want to achieve over the course of this strategy:

**Ambition 1**
- to increase the delivery of affordable homes

**Ambition 2**
- to make best use of the existing homes and improve housing conditions in the borough

**Ambition 3**
- to improve social and economic well-being

**How we will achieve this?**
We are committed to supporting the delivery of the strategy in our capacity as:

- The largest Registered Provider of social housing in the borough
- An owner of various assets including land
- A provider of a wide range of housing and related services
- A leader in our community.

Although we can offer the leadership to take the strategy forward, this is not enough, and we will only be able to achieve our ambitions through joint work and involvement with our partners and stakeholders across the borough in the public, private and third sectors.

It is therefore important that our partners share and support our ambitions and that there is wider agreement and commitment to their delivery, in particular:

- Registered Providers
- Parish Councils
- Landlords
- Developers
- Landowners
- Adult and Children’s Social Care
- Youth Services
- Clinical Commissioning Groups and health services
- Voluntary sector
- Faith Sector
- Tenants
- Residents
- Neighbourhood groups
- The LEP
- HCA
- DCLG

**Resources**
This strategy will require significant resources at a time when pressures on the Council’s capital and revenue budgets are increasing. The reform of housing finance has given the Council new financial freedom to build new council homes and to continue to fund improvements to the existing stock through the rental surpluses generated as part of its 30-year business plan. In addition, we have made a commitment to make use of HRA housing capital reserves and the receipts from sales under the Right to Buy to support our investment programme. We have very limited capacity to increase borrowing within the HRA due to the presence of the debt cap. However, we do not believe this will have an adverse impact on the ability to deliver new council homes in the medium term.

The Council’s general fund capital programme will continue to fund our private sector home improvement programme and disabled facilities grants. We will also fund feasibility and enabling costs to bring suitable housing sites forward.

We also intend to maximise the potential opportunities for funding via government grant, directly or via the HCA and LEP and to support partner agency bids for funding where appropriate.
**The Right to Buy**
Under the new financial rules set in 2011-12, we are allowed to keep 100 per cent of capital receipts from the sale of council properties via the Right to Buy (RTB), provided they are reinvested in new affordable homes within 3 years. Between 2012 and 2014, we received £4,497,650 in RTB receipts.

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<th>Financial Year</th>
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**New Homes Bonus**
New Homes Bonus (NHB) is a revenue grant provided by the Government and linked to the number of new homes provided in the borough, as well as the number of empty homes brought back into use. A fixed amount is awarded each year and is paid over the following six years. This is not new funding. It replaces a similar funding stream known as Housing Planning and Delivery Grant, as well as some of the funding previously distributed as revenue support grant.

Between 2011-12 and 2014-15 we have received £3.4million in New Homes Bonus. In addition, we have been allocated a further £1.7million for 2015-16. Our medium term projections predict that, based on known completions and hard commitments, our NHB for the period 2016-17 to 2018-19 will be approximately £2million per annum.

**Other external funding**
We intend to maximise the opportunities for leveraging in funding both from grant, and through loans at preferential rates, directly or via funding bodies such as the HCA, Enterprise M3 LEP and EU to support the remediation of brownfield land in preparation for housing delivery. If we are successful in obtaining funding, it will provide up-front resources to enable the development of brownfield sites in the borough such as Slyfield Industrial Estate.
Ambition 1

Increase the delivery of affordable housing

We will:
• Directly build 80 new council homes by 2016 and build or acquire at least 150 within the life of this strategy
• continue to review our assets and land holdings to identify potential for further housing development
• investigate options to increase the supply of affordable homes through a special purpose vehicle or housing company
• Work with housing providers to deliver new affordable homes across the borough
• promote the provision of a range of affordable housing types and tenures of which at least 70 per cent are for rent
• ensure that the mix of new affordable homes is appropriate for the proposed locality taking account of the existing supply and local need
• maximise the proportion of affordable housing on Section 106 sites
• support the delivery of affordable housing on rural exception sites where there is such a need
• seek to maximise the resources available for new affordable homes through the HCA and other funding sources
• ensure that all new affordable homes are high quality with good standards of design and construction.

Building new affordable Council homes

Following the reform of housing finance in April 2012, we took the opportunity presented by the changes to embark upon a new programme of council house building.

We are building new flats and houses and are pursuing other opportunities that will deliver at least 80 new council homes by March 2016, with a plan to deliver 150 in the longer term. This will include exploring options to buy land or acquire properties on Section 106 sites.

The new financial regulations have put a cap on the amount of money councils are allowed to borrow. Due to our ongoing development programme, we have already reached the limit of our borrowing capacity. However, we are able to finance our programme from a combination of reserves and receipts from sales via the Right to Buy. In addition, we were successful in securing permission, via the LEP, to extend our borrowing limit by £360,000 to enable the provision of more affordable homes.

In 2013, we successfully achieved Investment Partner Status with the HCA, and were allocated £850,000 of grant under the 2011-15 Affordable Homes Programme to assist with the delivery of 34 affordable homes. We are currently in discussion with the HCA regarding funding of future schemes in the borough.
Review of Council land holdings
As part of our review of Council land, we looked at all the housing land in our ownership, with a particular focus on garage sites and other miscellaneous pieces of land to assess the potential for infill housing development.

Having assessed over 100 separate sites, various garage and infill sites were identified, with the potential for approximately 30 units in total.

So far, we have gained planning permission for 11 rented houses on three sites, and are in discussion with Planning about 20 units on a further three sites.

The Council’s Asset Development team has been undertaking a review of all land for which residents have been granted a license. Most of this land is used either for gardens or for grazing horses. As part of the review some of the sites were considered to see if they could be used for affordable housing. Most of those evaluated were not suitable because of location or access. Some of the sites have been reserved for further consideration.

The next phase of our review of Council land is to look at housing estates where we own a significant proportion of the housing. We will look at the density of the housing, the condition of the homes, and the potential for land assembly for regeneration. The difficulty with this approach, however, is that the stock in the borough is mainly in a very good condition, in particular our own housing stock, as a result of significant Council investment, therefore regeneration means disposing of a valuable asset. In addition, a large amount of housing which was once owned by the Council is now in private ownership due to the Right to Buy. There are no streets left in the borough which consist entirely of council housing, and in many areas every other property is privately owned. This means that wholesale redevelopment of an area requires the compulsory purchase of many properties. Our first step will be to assess the area with the highest proportion of council housing and look into the Planning and financial aspects of redevelopment. This is unlikely to generate new homes during the life of this strategy but will assist in assessing longer term options.

We are also reviewing our sheltered housing schemes, and in the medium to long term this may provide opportunities for redevelopment of outdated bedsit accommodation.

Our assets/landholdings
Plans showing the Council’s land holdings can be viewed here: http://www.guildford.gov.uk/landandbuildings

Other public sector land
We work in partnership with other public sector organisations to release other public sector land wherever possible. For example we are in discussion with the County Council regarding redevelopment of land next to Guildford Fire Station.

Acquisition of land and property
Our land holdings are limited, and we are looking for opportunities to acquire land in the borough to develop as affordable housing. We have also made offers to purchase Section 106 affordable housing, and will continue to do so, but so far our bids have not been successful.

Housing Company
We intend to research the benefits of setting up a limited company, which would acquire private sector rented accommodation. This would allow us to improve access to the private rented sector, particularly for applicants in receipt of benefits who can have difficulty in obtaining a tenancy. It may also be possible to acquire properties to lease to our housing association partners. These could be used as temporary accommodation for use in an emergency to house applicants assessed as homeless.
Work with housing providers

The main source of delivery of new homes is likely to be via Section 106 planning obligations or in the case of evidenced rural housing need through rural exception sites (see Appendix 4).

The draft Local Plan is yet to be adopted, so at the time of writing it is too early to comment on strategic sites. We may see significant levels of private development in the next few years. Whatever the outcome of the Local Plan, there is a development pipeline of sites which are already under consideration, and we will be relying on our housing association partners being willing and able to invest in and manage these homes.

Twenty-three different housing associations own and manage affordable homes in the borough. Of these, three have developments on site and a further eight are actively seeking development opportunities in the borough.

In recent years, delivery of new homes by housing associations has been relatively low, due to problems with grant funding, finance, and availability of land. However many housing associations are now in a better position, and are either developing sites in their ownership or are in discussion with developers regarding the provision of affordable homes via planning obligations.

When selecting Registered Providers to work with on Section 106 sites, we ask developers to consider the long term management of affordable housing as well as the construction and initial sale or letting of the properties. We aim to ensure that the provider has a local base from which to manage affordable homes in Guildford, because a well-managed property is of benefit not only to the tenants of that property but also to the residents in the surrounding area. This in turn can assist future housing development, because local people are more likely to support a planning application if their experience of affordable housing was of it being well managed by an organisation with a commitment to the area.

Rural exception sites

Rural exception homes can be built on land which otherwise would not be acceptable in planning terms because it is located in the Green Belt. These homes must be secured permanently as affordable housing.

Government policy concerning rural exception housing changed in 2012, and in accordance with the new policy, the draft Local Plan states that we will now consider a minimum number of homes for market sale on rural exception sites. However this will only be permitted when it can be demonstrated that a site would be unviable without the inclusion of some market housing. We will not accept this argument on developments that have paid an inflated price for land for rural exception housing. The draft Local Plan proposes a maximum price of tenfold agricultural value to be paid for rural exception land.

Surrey Community Action employs a Rural Housing Enabler (RHE), whose role is to investigate the need for rural affordable housing and to advise parish councils. The RHE works with parish councils to carry out rural housing needs surveys that assess the level of need for affordable housing for local people. A survey typically involves mailing every resident in a parish. The RHE then analyses the responses and provides details to the local authority of the mix of housing required to meet the identified need. The identified need is based on an assessment of the income and eligibility for affordable housing of individual respondents, rather than a scaled up estimate based on a sample.
If a need for affordable housing is identified, the RHE works with the parish council to identify suitable land in the parish, and if land is identified, assists with the planning process and finding a suitable Registered Provider to develop and manage the affordable housing. In some cases, developers approach the local authority with a potential rural exception site before the parish council has been involved. If a rural housing needs survey has not recently been carried out, the developer is referred to the RHE.

Rural exceptions development is small scale and for local needs. Schemes are normally between 10 and 16 units in size. For details of rural housing needs surveys please see appendix 4.

**Type and mix of affordable housing**

We will promote the provision of a range of affordable housing types and tenures of which at least 70 per cent are for rent. Non-rented tenures such as shared ownership are linked to market prices, which are very high in this borough, so these tenures tend to only cater for a small proportion of the population (those who cannot afford to purchase outright, but who can get a mortgage and afford to purchase a share of an expensive property). Therefore we aim to achieve as high a proportion of possible of rented affordable housing. 70 per cent takes into account the need for development to be viable and the desire for mixed communities, whilst providing the majority of new affordable housing as rented.

We will ensure that the mix of new affordable homes is appropriate for the proposed locality taking account of the existing supply and local need.

Affordable housing provision is likely to include a proportion of homes that are considered of ‘intermediate tenure’. This includes shared ownership or shared equity homes, and homes for intermediate rent.

Shared ownership will continue to be our preferred form of intermediate tenure and we would expect providers to offer the minimum initial share at the lowest viable level (normally between 25 and 30 per cent). Shares in excess of 40 per cent are not likely to be considered affordable. Developers will need to be able to demonstrate that the development is affordable to households on agreed income levels. Developers are also expected to minimise any service charges that will fall on shared owners in addition to rent and mortgage costs.

Other models of intermediate tenure will be considered as appropriate on all sites that come forward. Any development mix will take account of requirements for specialist housing, including housing for older people and those with disabilities. (See pages 38 and 39 of this strategy).

The provision of student housing is outside the scope of affordable housing delivery. The expectation is that the University and other educational establishments will make provision as far as possible for their own housing need or their students access the existing accommodation in the borough. However the impact of student housing is something we continue to monitor, and the standards of houses in multiple occupation and management of private sector student homes will be addressed through our private sector housing policies. (See page 34 of this strategy).

The Government is keen to encourage self-build across the country. Our housing needs survey did not identify a desire for self-build in the borough. Given the limited amount of council land available for housing, we intend to prioritise the provision of affordable homes on our own land, rather than plots for households who can afford to construct a property themselves. We will keep under review Government guidance on self-build and how it should influence our policies.
Quality of new affordable homes

- We will ensure that all new affordable homes are high quality with good standards of design and construction.

Lifetime Homes design standards are aimed at making housing flexible to the changing needs of the occupants. Whilst Registered Providers may currently need affordable housing built to these standards in order to access grant funding, developers are not obliged to build to Lifetime Homes standard by our planning policies. The Government has also announced their intention to replace the Lifetime Homes standard with similar requirements that will be included in new Building Control standards.

Our new council homes are designed to Lifetime Homes standard, however we are considering whether it is appropriate to meet the standard on every property. Whilst the standard ensures flexibility, it can impose design restrictions such as very large downstairs bathrooms which can detract from the living space of families who do not require disabled adaptations, or can require extra floor space which reduces the number of homes that we can provide on a given site. It may be sensible to provide only a proportion of homes with full adaptability, to achieve the best mix overall.

The Council wants to provide good quality, durable homes for its tenants. To help guide the designers appointed for the new build developments we have prepared a design guide. The Council’s preferred specification takes account of the ease and cost of maintenance throughout the building’s life cycle, as well as ease of use by tenants and matters that may affect estate management.

The latest version of the design guide is available on request.

Further information about sustainability and energy efficiency in design is on page 36 of this strategy.

Viability and funding of affordable homes

We seek to maximise the resources available for new affordable homes through the HCA and other funding sources. Viability testing of the Local Plan demonstrates that market-led developments in the borough can in most cases provide 40 per cent affordable housing and still remain viable.

Part of this viability is achieved by the rents that can be charged on affordable homes. We have developed guidance on the affordability of rents within the borough (for more details, please see page 41 regarding social and economic well-being, and our guidance in Appendix 2).

Affordable housing is a key priority for the Council. If developers propose any reduction from a policy-compliant scheme in terms of affordable housing provision on the basis of site viability, we will require detailed evidence which, if necessary, will be tested by an independent valuer. We will not normally consider variations from policy, provision of affordable housing off-site, or payments in lieu, except in abnormal circumstances which do not include viability being affected by an excessive land value.
Ambition 2

To make best use of the existing homes and improve housing conditions in the borough

We will:
- Bring 75 empty homes back into use in the borough over the life of the strategy
- Improve the worst housing conditions in the private sector
- Work with private landlords to ensure the sector meets local needs and demand, and raise standards
  - support the landlords forum
  - promote accreditation for private sector landlords
- Investigate the establishment of a local lettings agency
- Deliver an ongoing programme of improvement to council homes and achieve 99 per cent decent homes within life of the strategy
- Tackle fuel poverty and reduce carbon emissions through energy efficiency measures in homes of all tenures. To promote the home improvement policy in order to raise housing standards
- Implement an accreditation scheme for Houses in Multiple occupation
- Review all licences and the site conditions on park home
- Operate a Handyperson and home improvement agency to assist elderly, disabled and vulnerable clients.

Housing Standards/Condition in the private sector

The most recent survey of housing conditions in the private sector was carried out in 2010.

The key findings of the survey indicated that:

- The level of non-decency is 32.3 per cent (16,000 dwellings), which is below the national average. There is an increase in the number of privately rented properties, and these properties display the poorest housing standards
- There are 7,710 vulnerable households living in the borough, of which 2,450 are in non-decent accommodation
- Approximately 25 per cent of heads of household in non-decent homes are on an income of less than £15,000
- The major hazards are thermal comfort (which reflects the age of the housing stock) and falls on the level or on stairs, which are both new indicators
- It is estimated that there is a potential annual demand for adaptations of 1000 per year.

The responsibility for the maintenance of private properties rests with the owner but there is a need for intervention to assist vulnerable or low income households, private tenants and generally to raise energy efficiency standards. There is some evidence that housing standards are continuing to rise and we will build on this during the course of the strategy and focus on some specific areas that have been identified.
**Home Improvement**

There is £600,000 annually in the Home Improvement Programme to fund:

- mandatory Disabled Facilities Grants
- discretionary Renovation grants to tackle non decency
- grants to bring empty homes back in to use
- subsidised loans where applicants have a contribution to make toward works or are not eligible for grant assistance
- Handyperson work which supports vulnerable individuals to be independent by installing smaller measures.

The majority of this budget goes towards mandatory Disabled Facilities Grants. Demand is expected to continue to grow, based on demographic predictions. However, the means testing of applications will exclude many disabled people and since allowances have not been uprated in line with inflation more people will be excluded from grant assistance.

The wider discretionary programme will target assistance to householders on lower incomes and help to remove hazards or make homes decent. There will be a more active engagement with owners to bring empty homes back in to use for letting to applicants in housing need.

We will continue to work with partners to source external funding for projects to complement and supplement the funding that the Council offers to homeowners.

**Empty homes**

Empty properties must be dealt with because they are a wasted resource and can have a negative effect on the neighbourhood as well as providing affordable accommodation to residents when they are brought back into use.

Making best use of empty properties is central to our housing strategy and we put an Empty Homes Strategy in place in 2011. The action plan has been revised and is incorporated in this strategy. Although the number of empty homes has reduced considerably since October 2007, our efforts will continue to ensure, as far as possible, that this trend continues.

The key elements of the action plan are to:

- develop a comprehensive database so that information becomes more accessible and provides for better monitoring
- work with other councils and housing providers to access funding opportunities through Communities and Local Government or the HCA
- engage with owners to provide advice, grants or loans to encourage properties to be re-occupied or prevent them from becoming vacant
- utilise the full range of enforcement measures on unresponsive owners to bring properties back in to use
- aim to bring 15-20 properties per year back in to use.

There are two main sources for identifying and gaining information on empty homes in the district.

Data Council Tax records indicate the location of an empty property, the length of time empty and the name and address of the person responsible for paying the Council Tax (usually the owner). Limited information is also available on the reason for the property being empty. Some properties, albeit in small numbers, are uninhabitable and may not appear on the Council Tax list.
The Empty Homes database uses the Council’s current Complaint and Grants database, Ocella, primarily through members of the public and Council officers reporting empty properties. Some information is obtained from the Empty Homes website. Empty Homes is an independent charitable organisation who campaign for more empty homes to be brought into use for the benefit of those in housing need www.emptyhomes.com. This information allows us to select the properties where intervention is more likely to be successful, to maximise use of the Council’s resources.

**Bringing empty homes back into use**
There are many different ways we can assist owners and landlords to bring their properties back into use.

Our Homes4U service provides a Deposit Guarantee Scheme and a free tenant finder service to landlords, with a dedicated support service to ensure tenancy success.

If a property requires renovation, we can provide a mixture of grant and loans as appropriate to the individual case, to assist in bringing the property up to the Decent Homes Standard. We offer a free no-obligation visit and schedule of works prepared by a Council Officer. Grants and loans are conditional on the owner letting to Council nominated tenants for a minimum of 5 years.

The Council may also use certain powers in connection with empty homes:

- Where property is adversely affecting amenity of an area, the Council may serve Section 215 Notice (Town and Country Planning Act 1990)
- Where property is dangerous or requires boarding up, the Council may carry out works or require owner to carry out works to make the property safe (Buildings Act 1984)
- Where property is likely to become a danger to public health (Public Health Act 1936), is causing a statutory nuisance (Environmental Protection Act 1990) or where there are pest control issues (Prevention of Damage by Pests Act 1949) the Council may serve notices or carry out works to remedy conditions
- Where a hazard exists at a property that has the potential to result in harm (The Housing Act 2004) the Council may serve notices or carry out works to remedy conditions
- Where a local land charge has been made on a long term empty property (possibly through enforcement action outlined above), the Council can force the sale of the property to a third party.

**Empty Dwelling Management Order (EDMO)**
EDMO is for use where property has been empty for over 2 years for no apparent reason and the owner has refused all reasonable offers of assistance. The property must be in an area of housing need and no prospect of the property becoming occupied under the current owner. The Council would facilitate any capital works needed to allow the property to be leased and used to accommodate people in housing need. An interim EDMO can be obtained relatively quickly and cheaply but the Council needs to assess costs against potential income when applying for a final EDMO.

**Compulsory Purchase Order (CPO)**
Where property is long term empty, in poor condition and in an area of housing need, ultimately for those owners who fail to re-use their property the threat and use of compulsory purchase powers will be considered. This power is most appropriate for property requiring extensive renovation and where EDMO is unlikely to be persuasive or cost-effective.
**The private rented sector**

The private rented sector (PRS) plays an important and increasing role in the provision of housing accommodation. This sector has seen a growth of 30 per cent between census 2001 and 2011 and now exceeds the public sector stock. Property is seen as a reliable investment and it is likely, therefore, that the sector will continue to grow. In Guildford, 16 per cent of homes are now owned by private landlords which is approximately 9000 properties.

There is great diversity in the type of properties available for private renting and equally a wide range of rental levels.

The private rented sector has been a very valuable resource to provide suitable housing for homeless people and those on low incomes, and residents who are unlikely to be offered the scarce supply of social housing. There are some landlords who actively choose to let to tenants on low income and who are in receipt of local housing allowance, and so may not be able to afford a full market rent. These landlords are generally satisfied that having longer-term tenants offsets the lower rent. However, strong demand for rental property at market rates and reductions in the level of local housing allowance payable has meant that some landlords are unwilling to enter this part of the market and existing landlords are withdrawing from it. Future welfare changes including the introduction of Universal Credit are also discouraging landlords from considering benefit recipients.

For the PRS to be suitable for homeless and/or vulnerable people it needs to offer good quality, well located housing, with an appropriate degree of security, and at an affordable price. It needs to be accessible to vulnerable groups, who may be reliant on housing benefit. In addition, it should provide some choice of location and the scope to provide those who want it, with a long term home.

Many tenants will struggle to pay market rents and we need to extend our work with landlords to provide more sustainable and affordable tenancies for people in housing need.

**Local Lettings Agency**

Local letting agencies have a remit to produce sustainable, affordable tenancies. Landlords would actively seek to use the agencies because they would offer probity, reliability and great value for money. Tenants would also be happy to use the agencies because their objective would be to create long-term tenancies that were free from the incentive to maximise profits through high tenancy turnover. Charging landlords for the service meant that it could potentially become self-sustaining.

The Council’s Homes4U service goes some way towards the provision of this type of service for landlords but does not charge for its service or offer a wider range of services such as direct housing management or arranging repairs. Further research will be carried out to assess the viability of extending the role of the Homes4U service as setting up a local lettings agency and the contribution it could make to providing sustainable and affordable lettings within the PRS.
Houses in Multiple Occupation

Houses in Multiple Occupation (HMOs) or shared houses provide flexible accommodation for a range of households within the private rented sector. They comprise a significant part of the private rented market in Guildford.

We carried out a mapping exercise in 2011 to identify the extent of HMOs. This indicated that there were approximately 2521 in the borough, of which 1417 were in the Guildford town wards of Friary and St Nicolas, Westborough and Onslow. Moreover, there are likely to be many more HMOs created in the borough since then, due to the introduction of permitted planning rights in 2010. These rights allow a change of use of a house or flat from being occupied by a single household to a HMO for between two and six people.

The necessity for HMOs is accepted as an inevitable result of the lack of housing, house prices within the town, and the popular and expanding higher education institutions. While there is often an assumption that HMOs in Guildford are lived in by students, this is often not the case.

Many young professionals who are unable to afford to live in the town without sharing occupy HMOs. For some tenants it is the accommodation of choice. Furthermore, the cost of transport from outside the borough can outweigh rental costs so many people who live in HMOs are working in the Guildford area to avoid commuter journeys, or because of the close proximity to the borough’s rail stations.

The expansion of the private rented sector and HMOs in particular has given rise a number of perceived issues which are affecting residents.

They are the impact of having a high concentration of HMOs in parts of the town can contribute to:

- Poor housing standards in HMOs and non-compliance with housing standards
- Poor neighbourhood relations, including antisocial behaviour
- Nuisance from noise, rubbish and parking.

In the early part of 2014 we established an HMO stakeholders’ group to raise standards and management of HMOs. It has now made a number of recommendations for action, and the Council is driving forward with a landlord accreditation scheme.

Licensing of caravans

There are approximately fifty licensed caravan sites in Guildford providing over 350 permanent homes in semi-rural and rural locations.

These residential sites generally have site rules, which limit occupation to people over 50. They provide an affordable housing solution for many people. The site owner is responsible for health and safety but site licensing conditions can be ignored, leaving residents vulnerable.

Additional powers provided by the new licensing regime have provided more enforcement powers and the ability to charge for licensing means that resources can be allocated to a programme of inspections.

They are the impact of having a high concentration of HMOs in parts of the town can contribute to:
Energy Efficiency

Home Energy Conservation
Local authorities are uniquely placed to assess the needs of their areas and local residents and to act as catalysts for change. The Home Energy Conservation Act (HECA) 1995 recognises local council’s ability to use their position to improve the energy efficiency of all residential accommodation in their areas.

The HECA report was reviewed in 2013 and sets out the energy conservation measures that we consider practicable, cost-effective and likely to result in significant improvements in the energy efficiency of residential accommodation in the borough.

The Council’s main priorities are:

• To reduce CO2 emissions per capita through increased use of renewable energy sources, energy efficiency and reduced consumption by 2026
• To provide a good degree of thermal comfort (improved insulation standards and efficient heating) in the 5,100 council homes
• To deliver community events around the borough (for example roadshows and open ecohomes) to raise awareness of energy saving at home and provide information and advice.

Other challenges to be faced over the period of the plan will include:

• Promoting the uptake of energy efficiency through Government schemes like the Green Deal and ECO (energy company obligation)
• Setting higher standards of energy efficiency for new builds and retrofits, and encouraging energy efficiency to be incorporated into the earliest stages of building design
• Providing greater levels of energy security
• The roll out of smart metering
• Tackling fuel poverty and developing proposed minimum energy efficiency standards in the private rented sector.

The most recent statistics indicate that fuel poverty in Guildford is approximately 8.4 per cent. This is a reduction on 2010 figures and also reflects the changes in the Government definition. Rural properties off mains gas have the lowest SAP levels (a measure of energy efficiency) with more than 1 in 4 households likely to be in fuel poverty compared with 1 in 26 with mains gas. Significantly, tenants living in the private rented sector face a higher risk of fuel poverty than the owner occupied or social sector. Our action plan will reflect these areas as priorities.

The Council’s HECA report can be found here:


Recent fuel poverty figures are below:

• Estimated number of properties: 53,917
• Estimated number of households: 4,306
• Proportion of households that are fuel poor: 8.0 per cent.
The Green Deal
The Government’s Green Deal scheme allows householders to access energy saving products and services with little or no up-front installation costs. The Council has partnered with Action Surrey to offer a Green Deal and Energy Saving Advisory service to local private sector residents. This partnership will run until 2018 and provides residents with information and advice on energy saving improvements as well as access to grants through ECO (energy company obligation).

We are joining the Southampton ECO and Green Deal partnership. This framework agreement would allow the Council to secure funding through ECO and procure works to deliver energy efficiency improvements to the housing stock. This will assist us with meeting Government energy efficiency regulations for domestic properties as well as improving the thermal efficiency of our council housing stock, reduce fuel poverty and improve the health and well-being of our tenants.

In the private sector, we are continuing our partnership with Action Surrey to deliver energy efficiency and renewable energy solutions.

This partnership extends to all councils in Surrey including SCC. The business plan to 2018 aims to deliver:

- 1,250 Green Deal Plans
- 1,200 ECO funded energy improvements
- 1,300 privately funded energy improvements (outside of Green Deal finance)
- £11,500,000 worth of local economic activity
- 3 full-time positions and 2 temporary positions
- Save 100,000 lifetime tonnes of CO2
- Save residents over £1 million in energy bills
- Assist at least 1,000 households with occupants over 70 or receipt of benefits (vulnerable) to reduce their fuel bills
- Access all sources of funding to ECO funds.

Energy efficiency in design
New building design should maximise the energy and fabric efficiency of the building and where possible minimise energy demands altogether. An over-riding objective is to provide homes that are affordable to live in.

The following factors will be taken into account in the design of the Council’s own housing stock in order to provide the optimal energy efficiency and energy performance:

- Topography and alignment to the sun and other weather factors
- Fabric efficiency of building materials
- The energy performance of appliances and fittings e.g. windows
- Appropriate installation of renewable energy technologies
- Life cycle energy reduction
- The provision of line drying space which removes the need for a tumble dryer or space for indoor drying (drying rack).

For affordable housing the balance between energy efficiency and renewable energy provision is expected to be skewed towards fabric efficiency which will lead to reduced energy costs during the building life cycle for the occupants of the building.

For existing buildings, opportunities to improve the fabric efficiency and overall energy efficiency will be assessed periodically in line with government regulations and best practice.

Code for Sustainable Homes/building regulations
From April 2014, the Government incorporated the level 3 energy standard in the building regulations. All newly built homes are expected to meet code level 3 of the Code for Sustainable Homes as a minimum in addition to any national and local planning authority standards. The code level required will be reviewed periodically.
Climate Change Adaptation
Scientific consensus on climate change means that it is sensible to take into account the likely impacts of climate change in decisions affecting the welfare of people, and this is especially true of house design and build, which are long term by their nature. Climate change is affecting the systems that drive our climate and weather patterns, and any equilibrium that existed is being disturbed. Consequently, we can expect more random and variable weather, and the projection is for more extremes of weather, for example hotter and colder periods, flash flooding and drought.

Our housing decisions need to provide for greater resilience in our housing stock and will take into account the following factors:

- Flood risk, location in relation to river flood plains will be avoided wherever possible
- Drainage, and the provision of sustainable urban drainage systems in developments of more than one dwelling
- Innovative building design to mitigate risks on the margins of flood plains and where other flood risks are apparent
- Buildings resilient to overheating in summer
- The potential for a green roof which will provide better insulation and rainfall flow rate benefits as well as useable space.

High levels of water efficiency will be included in new build properties. The following aspects will be taken into account and applied wherever possible:

- Water efficient appliances and fittings
- The potential for rainwater harvesting.

New build design will anticipate a greater recovery of materials in the near future and a rapid move to a societal policy of zero waste.

The following factors will be taken into account in the design and operation of properties:

- Future proofing of the design to allow more flexibility of recycling collection
- Optimisation of waste disposal on site e.g. the provision of composting facilities
- Consideration of providing an appropriate area for occupants to grow some of their own food.
Ambition 3

To improve social and economic well-being

We will:
• Implement the homelessness strategy
• Provide guidance on affordability of rents within the borough and seek to achieve the lowest rents viable
• Ensure that new housing developments incorporate specialist housing where appropriate and that an overall target of 10 per cent of new affordable homes are for groups requiring specialist housing
• Consider flexibility in future use of properties when designing council homes
• Work with partners to increase provision of suitable homes for
  • Young people aged 16-25
  • People with learning disabilities
  • Those with complex needs
  • Those who need supported accommodation
• Work with partners to ensure an integrated approach towards providing housing care and support to vulnerable groups and people with specialist housing needs
• Promote independent living through the provision of information, disabled facilities grants, discretionary loans and adaptations of council homes
• Support the implementation of the Later Life Strategy and ensure that older people have choice and a range of housing options that meet their needs and promotes independence
• Increase supply of pitches and plots for travellers.

Homelessness

The Council has a comprehensive Homelessness Strategy (2013-2018). As this strategy already addresses the main issues in respect to the more vulnerable and socially excluded households seeking advice and support in connection with their housing, there is no intention to duplicate the actions incorporated in that strategy here. We may consider if we still need separate strategies in the future, but at present the two strategies are complementary and seek to achieve consistent objectives, although with the housing strategy providing the overall strategic framework for the Council.

The strategy and action plans focus on three key areas:
• Managing the impact of welfare change
• Sustaining and creating access to accommodation
• Tackling rough sleeping and single homelessness.

Homes for all – specialist housing

The Council works with a range of partners to meet such needs. This includes specialist housing providers who work with different client groups, for example:
• Transform
• Riverside (English Churches Housing Group)
• Stonham (part of Home Group)
• Chapter 1
• YMCA Downslink
• Number 5 Night Shelter
• Sunset Homes
• Almshouses such as:
  • Abbots Hospital
  • Stoke Hospital
  • Addison Court

Most of these providers offer additional support for their residents, funded by SCC through the former ‘Supporting People’ grant. The revenue funding for housing related support has changed and is no longer ring-fenced for this purpose and the grant to SCC has reduced in recent years.
SCC now provides revenue funding for supported housing through their commissioning arrangements for Adult Social Care and through Children and Youth Support Services. This has led to reviews of all revenue funding for different types of housing provision across client groups, and wider procurement and commissioning exercises for some services. As a result, there have been reductions in the capacity of some services and greater restrictions upon those who might access such services, with more focus on those where SCC may have a statutory requirement to provide services.

The availability of new revenue funding to develop additional supported housing is likely to be difficult, therefore we need to ensure that we work closely with health and social care commissioners and seek different ways of service delivery to make best use of the available revenue, achieving agreed outcomes.

**Learning disability**

A number of additional supported living projects have been developed in the borough over the past ten years, and we continue to review opportunities for future developments with SCC where there is clear evidence of need and access to appropriate support.

We are planning to build 12 flats next to Guildford Fire Station, with SCC having nomination rights to four of these units, which will be used to house people with learning disabilities who are able to live independently but who require some level of support.

**Older Persons**

The data recently released from the 2011 Census, and the Government’s recent population estimates, forecast that the proportion of older persons in the Borough will increase significantly over the next 15 to 20 years.

We adopted the Later Life Strategy to cover the period 2010-2015, and it is now being reviewed. The strategy sets out the services that support the entire community. In planning for the future, we have taken into account the following factors:

- People are living longer
- The population as a whole is ageing
- The proportion of older elderly (over 85) will increase substantially
- Services need to plan for and change to meet the needs and future expectations of the elderly.

We also provide a range of specific services, which support those in later life. They include transport, housing support, day care and home services. These services support the most vulnerable, improve quality of life and in some instances help extend life expectancy.
The following services contribute specifically to both the Later Life and the Housing Strategy:

• Home Improvement Agency – The agency aims to help 400 elderly, vulnerable or disabled residents remain safe, secure and independent in their own homes each year. We will continue to provide a personalised advice and technical support service.

• The Handyperson service aims to complement this service by assisting 1100 clients each year with minor repairs and adaptations such as grab rails, ramps, plumbing and carpentry works. A winter watch project will start each November from 2014 to prevent falls and to make homes warmer. The service has successfully secured a three year sponsorship deal with Kendall Cars to subsidise the vehicle hire.

• Careline – The community alarm system has undergone a major review and is more streamlined and has relocated from Park Barn to Dray Court. The alarm monitoring element of the service has been outsourced to Chichester District Council but clients continue to receive a service operating 24 hours a day. The key elements of the service are response alarm and monitoring, Telecare and an out of hours visiting service. There are over 1800 clients connected to the alarm service and nearly half with Telecare enhancements. We will continue to develop the service and support residents in their own homes. The alarm monitoring contract is due to be tendered in the latter part of 2015, probably in conjunction with Waverley Borough Council.

The draft Local Plan outlines the intention for housing stock to be flexible to meet the needs of an ageing population and enable people to remain in their own homes for longer should they wish, as well as providing smaller homes in suitable locations to enable people to downsize but remain within their local community. Design issues will be addressed as part of Development Management documents within the Local Plan.

**Extra Care and sheltered housing**

Sheltered housing is specially designed rented accommodation for older people who would like to remain independent, but prefer the added security that sheltered housing offers. There is a range of sheltered housing in the borough provided by the Council, Registered Providers and the voluntary sector.

We provide two Extra Care housing schemes in the borough: Dray Court and Japonica Court. These cater for older people with higher support needs than those in sheltered housing, allowing them to receive the care they need whilst retaining their independence. An on-site social care team are able to provide care and welfare support for up to 24 hours a day where necessary.

The demand for sheltered housing has reduced significantly in recent years despite the aging population and some provision in the borough is hard to let. There are various reasons behind this including changes to community care services enabling people to live independently for longer, changes in lifestyle with a desire for larger kitchens and expectation of a spare room for family members to visit. Therefore older people are less keen to move into sheltered unless they can no longer cope and will accept a smaller home.
The changing needs of older people are recognised and sheltered housing services work closely with local health and social care providers to ensure housing accommodation meets the needs of as many people as possible.

SCC funding reduced in 2011, therefore the Council’s service was restructured and we established a ‘hub and spoke’ model of service delivery linked with the day centres. This has also helped to integrate the existing sheltered schemes with their communities with non-residents enabled to access services at the schemes. We have already reviewed and upgraded our older style sheltered housing and that remaining is a good standard.

We will also work with other housing providers for older people to ensure the range of services and accommodation will continue to meet the needs of older people in the community.

**Alternative housing for older people**

Although sheltered housing may not be the preferred option for many older people, many are still in housing need and under occupy large family homes. This is of concern in the social housing sector as we need such family homes for younger people and does not make best use of the limited stock available.

We offer support and help to older tenants who are willing to downsize and will continue to consider ways in which we can offer more attractive housing options for our older residents including on new developments.

**Young people**

Many young people have difficulty accessing housing, for example people who are estranged from their families or are leaving care. Many such young people have complex needs including issues with substance misuse and anti-social behaviour and offending.

Guildford is better placed than most Surrey Councils in that there is a range of hostels and supported housing services that provide accommodation for this client group. Following changes to the funding arrangements for housing related support, SCC embarked upon a wholesale re-commissioning of accommodation services for young people throughout the county. This was completed in June 2014. This has led to reduced funding for some services in Guildford, and for the service to become more targeted at certain types of young people. For example, the YMCA was originally funded to provide 40 bed spaces at the Y Centre and 13 at Midwey House. The overall number of bed spaces has reduced from 53 to 36 (22 at the Y Centre and 14 at Midwey House). We were involved in these negotiations with SCC and agreed to their proposals but it highlights the future pressure on funding and the potential impact on providers. We continue to work jointly with SCC Children’s Services to ensure that the housing needs of young people continue to be met and consider development opportunities where possible to meet identified needs.
People with disabilities

**Lifetime Homes**
We promote, via housing and planning policy, the building of Lifetime Homes. This involves designing houses so that they can be adapted for the changing needs of families, particularly if a member of the family becomes disabled. Nationally there is a specific set of criteria that must be met to achieve the Lifetime Homes Standard; as well as the benefits for future tenants; this improves the chance of grant funding from the HCA. However, as discussed earlier in this document, we are considering whether it is appropriate for every home to be designed to this standard, particularly when designing new council homes which may not be eligible for grant funding, given that it can result in an initial configuration which does not suit the household who may well occupy the property for many years. This will be addressed through a review of our design guidance. Furthermore, the Government plans to remove their requirement to build to Lifetime Homes, instead incorporating similar requirements within Building Control standards.

**Disabled Facilities Grants**
For information on Disabled Facilities Grants, please see page 31.

Other specialist housing

There are several client groups that may require specialist housing including:

- Those fleeing domestic abuse
- Young parents
- Offenders
- Those with substance misuse issues
- Those with mental health difficulties.

Such groups are more likely to be at risk of homelessness than others and we have a track record of working in partnership to meet such needs. This will continue to be a priority within the Housing and Homelessness strategies.
Travellers

We want there to be enough decent homes in suitable locations for everyone in our community. We wish to see better and sufficient accommodation for Travellers in our borough, promoting integration with other housing, improving social outcomes and opportunities and providing more certainty for the community. We believe that better integration and social cohesion can be achieved by seeking small-scale provision in a number of locations across the borough.

The Traveller Accommodation Assessment carried out in 2012 stated that we need 43 Traveller pitches between June 2012 and 2017. Since June 2012, we have granted permission for 16 new permanent Traveller pitches. There is a remaining need for 27 pitches. In summer 2014 an updated Traveller Strategic Housing Land Availability Assessment (SHLAA) was published, setting out how this can be achieved.

A need has also been identified for six plots for travelling showpeople to be provided between 2012 and 2017.

As with other forms of affordable housing, we aim to provide some new Traveller accommodation directly. We received planning approval for five Traveller pitches at Ash Bridge and were successful in gaining a grant allocation of £432,000 from the HCA.

In addition to the extension of the Ash Bridge caravan site, which will see five permanent pitches completed this year, the draft Local Plan sets out how we will provide for travellers’ accommodation needs through a mix of tenures on small-scale appropriate sites, and also as part of larger strategic sites.

To view the evidence behind the Local Plan approach, please visit: www.guildford.gov.uk/taa and www.guildford.gov.uk/travellershlaa

Monitoring the strategy

The aims identified in this strategy will be monitored via the Council’s Housing Working Party, consisting of officers from Housing Services, Planning Services, Legal Services and Financial Services.

Members, housing providers and other interested parties will be regularly consulted.
4. Action plans

There are a number of actions running through the strategy, and they are summarised on the following pages.

Aims:

1. Increase the delivery of affordable housing

2. Make best use of the existing homes and improve housing conditions in the borough

3. Social and economic wellbeing
<table>
<thead>
<tr>
<th>Action number</th>
<th>Actions</th>
<th>Responsibility</th>
<th>Target date</th>
<th>Outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Maximise opportunities for affordable housing development across the borough. Undertake viability assessments where the full policy requirement for affordable housing is not offered by developers, and ensure that viability challenges are met robustly through expert scrutiny and the percentage of affordable housing on site is maximised in all cases.</td>
<td>Housing Development, Planning, Economic Development.</td>
<td>Ongoing.</td>
<td>Increased supply of affordable housing.</td>
</tr>
<tr>
<td>1.2</td>
<td>Build or acquire at least 150 new council homes within the life of this strategy, 80 of which will be completed by 2016.</td>
<td>Housing Development, Planning, Economic Development.</td>
<td>2016 - 2020.</td>
<td>Increased supply of Council homes for rent.</td>
</tr>
<tr>
<td>1.3</td>
<td>Review our assets and land holdings to identify potential for further housing development.</td>
<td>Housing Development, Planning, Economic Development.</td>
<td>Ongoing.</td>
<td>Review completed and sites or buildings suitable for conversion identified with plans to bring these forward.</td>
</tr>
<tr>
<td>1.4</td>
<td>Work with housing providers to deliver new affordable homes across the borough.</td>
<td>Housing Development, Planning, Economic Development.</td>
<td>Ongoing.</td>
<td>Increased supply of Registered Provider affordable homes for rent and through intermediate tenures.</td>
</tr>
<tr>
<td>1.5</td>
<td>Support the delivery of affordable housing on rural exception sites where there is evidence of such a need.</td>
<td>Housing Development, Planning.</td>
<td>Ongoing.</td>
<td>The amount of affordable housing in rural areas increased, helping to maintain the vitality of villages in the Borough.</td>
</tr>
<tr>
<td>Action number</td>
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<tr>
<td>1.6</td>
<td>Promote the provision of a range of affordable housing types and tenures of which at least 70 per cent are for rent on all developments.</td>
<td>Housing Development, Planning.</td>
<td>Ongoing.</td>
<td>Rented housing is prioritised, and housing needs are met for the full range of applicants on our housing register.</td>
</tr>
<tr>
<td>1.7</td>
<td>Ensure that the mix of new affordable homes on any development is appropriate for the proposed locality taking account of the existing supply and local need.</td>
<td>Housing Development, Planning.</td>
<td>Ongoing.</td>
<td>Negotiations with developers are influenced by available evidence on local needs.</td>
</tr>
<tr>
<td>1.8</td>
<td>Ensure that all new affordable homes are high quality with good standards of design, construction and sustainability.</td>
<td>Housing Development, Planning.</td>
<td>Ongoing.</td>
<td>Good quality housing.</td>
</tr>
<tr>
<td>1.9</td>
<td>Seek to maximise the resources available for new affordable homes through the HCA and other funding sources.</td>
<td>Housing Development.</td>
<td>Ongoing.</td>
<td>Local taxpayers’ money goes further and an ongoing development programme for affordable homes is viable.</td>
</tr>
<tr>
<td>1.10</td>
<td>Identify further Council-owned land for traveller pitch provision, and prepare a planning application.</td>
<td></td>
<td>By 2016.</td>
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</tbody>
</table>
## Aim 2  
Make best use of the existing homes and improve housing conditions in the borough

<table>
<thead>
<tr>
<th>Action number</th>
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<th>Responsibility</th>
<th>Target date</th>
<th>Outcomes</th>
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<tbody>
<tr>
<td>2.1</td>
<td>Bring 75 empty homes back into use in the borough over the life of the strategy.</td>
<td>Private Sector Services.</td>
<td>2020.</td>
<td>Fewer long-term empty properties.</td>
</tr>
<tr>
<td>2.2</td>
<td>Improve the worst housing conditions in the private sector.</td>
<td>Private Sector Services.</td>
<td>Ongoing.</td>
<td>Better quality housing in the private sector.</td>
</tr>
<tr>
<td>2.3</td>
<td>Work with private landlords to ensure the sector meets local needs and demand.</td>
<td>Private Sector Services, Housing Advice.</td>
<td>Ongoing.</td>
<td>Continued good relationships with landlords, maintaining access to the private rented sector for low income households.</td>
</tr>
<tr>
<td>2.4</td>
<td>Support the landlords’ forum.</td>
<td>Private Sector Services, Housing Advice.</td>
<td>Ongoing.</td>
<td>Landlords are aware of their rights and responsibilities, and continue to provide good quality rented housing.</td>
</tr>
<tr>
<td>2.5</td>
<td>Promote accreditation for private sector landlords.</td>
<td>Private Sector Services.</td>
<td>Ongoing.</td>
<td>Scheme in place.</td>
</tr>
<tr>
<td>2.6</td>
<td>Licence HMOs and Caravan sites.</td>
<td></td>
<td>Ongoing.</td>
<td></td>
</tr>
<tr>
<td>2.7</td>
<td>Deliver an ongoing programme of improvement to Council homes and achieve 99 per cent decent homes within life of the strategy.</td>
<td>Housing Management.</td>
<td>2020.</td>
<td>Good quality homes for tenants, and proper management and maintenance of public assets.</td>
</tr>
<tr>
<td>Action number</td>
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<tr>
<td>2.9</td>
<td>Review existing empty homes publicity material and fact sheet. Set up regular mail outs to owners.</td>
<td>Private Sector Services.</td>
<td>March 2015.</td>
<td>Empty properties identified and brought back in to use.</td>
</tr>
<tr>
<td>2.10</td>
<td>Extend, improve and maintain Empty Homes database. Transfer data on to Tascomi and set up reporting mechanisms. Assess opportunities to improve data sharing across different systems.</td>
<td>Private Sector Services.</td>
<td>March 2015.</td>
<td>Empty properties identified and brought back in to use.</td>
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<td></td>
<td></td>
<td>October 2015.</td>
<td></td>
</tr>
<tr>
<td>2.12</td>
<td>Target long-term empty properties where owners have been unwilling to co-operate in bringing the property back into use. Take the appropriate enforcement action including where suitable EDMOs and commence action in line with policy/procedures.</td>
<td>Private Sector Services.</td>
<td>Ongoing.</td>
<td>Empty properties identified and brought back in to use.</td>
</tr>
<tr>
<td>2.13</td>
<td>Liaise with property owners to minimise number of properties that go on to the long-term empty homes list.</td>
<td>Private Sector Services.</td>
<td>Ongoing.</td>
<td>Number of empty homes reduced (with consequent increase in New Homes Bonus).</td>
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<tr>
<td>Action number</td>
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<td>Target date</td>
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<tr>
<td>2.14</td>
<td>Progress partnership working with other Surrey Authorities and agencies and identify areas for which common approaches/procedures can be developed drawing upon the different areas of expertise available amongst SHIP members.</td>
<td>Private Sector Services Action Surrey.</td>
<td>Ongoing.</td>
<td></td>
</tr>
<tr>
<td>2.15</td>
<td>Continue to Establish Internal Focus Group to develop enforcement work.</td>
<td>Private Sector Services.</td>
<td>Ongoing.</td>
<td></td>
</tr>
<tr>
<td>2.16</td>
<td>Provide grant assistance to owners of empty properties where tenancies are offered with nomination rights and LHA rents.</td>
<td>Private Sector Services.</td>
<td>Ongoing.</td>
<td>Empty properties brought back into use.</td>
</tr>
<tr>
<td>2.17</td>
<td>Complete and report on the BASE project in conjunction with the partnership.</td>
<td>Private Sector Services.</td>
<td>Ongoing.</td>
<td></td>
</tr>
<tr>
<td>2.18</td>
<td>Make available a loan facility in conjunction with South Coast Money Line for owners.</td>
<td>Private Sector Services.</td>
<td>Ongoing.</td>
<td>Residents are able to access affordable loans from a responsible provider.</td>
</tr>
<tr>
<td>Action number</td>
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<td>Outcomes</td>
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<tr>
<td>3.1</td>
<td>Support the implementation of the homelessness strategy.</td>
<td></td>
<td>2018</td>
<td>Fewer households become homeless. Cost of emergency accommodation is reduced.</td>
</tr>
<tr>
<td>3.2</td>
<td>Provide guidance on affordability of rents within the borough and seek to achieve the lowest rents viable.</td>
<td>Housing Development.</td>
<td>Ongoing</td>
<td>Affordable Rents are set at a level which is affordable to households on low incomes.</td>
</tr>
<tr>
<td>3.3</td>
<td>Ensure that new housing developments incorporate specialist housing where appropriate and that an overall target of 10 per cent of new affordable homes are for those in need of specialist housing.</td>
<td>Housing Development, Housing Advice, Planning.</td>
<td>Ongoing</td>
<td>The mix of new housing provided caters for identified needs.</td>
</tr>
<tr>
<td>3.4</td>
<td>Work with partners to increase provision of suitable homes for young people aged 16-25 people with learning disabilities those with complex needs those that need supported accommodation.</td>
<td>Housing Development, Housing Advice.</td>
<td>Ongoing</td>
<td></td>
</tr>
<tr>
<td>3.5</td>
<td>Promote the delivery of well-designed, flexible homes across all developments, to ensure that the requirements of future households can be met – for example the inclusion of level access thresholds to homes to allow easy adaptation if an occupant becomes disabled.</td>
<td>Housing Development, Housing Advice.</td>
<td>Ongoing</td>
<td></td>
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<tr>
<td>3.6</td>
<td>Work with partners to ensure an integrated approach towards providing housing care and support to vulnerable groups and people with specialist housing needs.</td>
<td>Housing Development, Housing Advice.</td>
<td>Ongoing</td>
<td></td>
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<tr>
<td>Action number</td>
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<tr>
<td>3.7</td>
<td>Promote independent living through the provision of information, disabled facilities grants, discretionary loans and adaptations of council homes.</td>
<td>Housing Development, Housing Advice.</td>
<td>Ongoing</td>
<td></td>
</tr>
<tr>
<td>3.8</td>
<td>Support the implementation of the later Life Strategy and ensure that older people have choice and a range of housing options that meet their needs and promotes independence.</td>
<td>Housing Development, Housing Advice.</td>
<td>Ongoing</td>
<td></td>
</tr>
<tr>
<td>3.9</td>
<td>Increase supply of pitches for travellers.</td>
<td>Housing Development, Planning.</td>
<td>Ongoing</td>
<td>Travellers’ housing situation is resolved. Reduction in unauthorised encampments and associated costs.</td>
</tr>
<tr>
<td>3.10</td>
<td>Investigate the use of combined heat and power in all high density new build schemes.</td>
<td>Housing Development.</td>
<td>Ongoing</td>
<td></td>
</tr>
<tr>
<td>3.11..</td>
<td>Review Council design guide for new build housing. Assess cost implications of increased energy efficiency and sustainability measures.</td>
<td>Housing Development.</td>
<td>2015</td>
<td></td>
</tr>
<tr>
<td>3.12</td>
<td>Produce an Affordable Warmth strategy and explore options for a county-wide strategy involving local health and well-being boards.</td>
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<tr>
<td>3.13</td>
<td>Educate tenants and landlords on how to ventilate properly to avoid damp, including work with schools.</td>
<td></td>
<td></td>
<td>Fewer complaints and interventions concerning condensation related damp.</td>
</tr>
</tbody>
</table>
Appendices

Appendix 1

Overview and statistical profile of the borough

Overview of the borough
Guildford is the second highest populated district in Surrey with 141,000 residents in 2013. Current estimates suggest this may rise past 150,000 during the lifetime of this strategy. The major urban areas are located in the town centre of Guildford and on the western fringes of the borough on the outskirts of Aldershot town. It is also the second largest borough in the county, covering approximately 270 square kilometres (104 square miles) of which 89 per cent is land designated as Green Belt.

The need for new housing development and associated infrastructure is a particularly sensitive issue for local people, with preservation of the high quality natural landscape, including the green belt, being a high priority.

The high cost of housing in Guildford is apparent in both the owner-occupied and private rented sectors.

In 2013, house prices were almost 74 per cent above the average for England and well above the average for the South East.

There is an ongoing shortage of affordable housing, particularly for first time buyers and a shortage of suitable accommodation for people wishing to downsize.
Guildford is mostly an affluent area with relatively low unemployment and low levels of crime and most residents enjoy a well above average life expectancy. The workforce is generally well educated and highly skilled. The town centre is a focus for major commercial and administrative functions and is a principal regional shopping destination.

The number of jobs in the borough continues to grow. The number of jobs available in the borough reached 71,700 in 2012 across a wide range of industry sectors. The level of unemployment in the borough, at 4.7 per cent in 2012, is well below the national average of 7.9 per cent. Guildford does have a skills shortage in some sectors, coupled with many workers being unable to afford homes close to work. This creates additional pressure to make sure that adequate provision is made for housing.

Despite the general prosperity, there are pockets of deprivation. There are concentrations of people on low incomes, particularly in Westborough, part of which is in the most deprived national quartile and is the fourth most deprived area in Surrey. Other areas that are amongst the most deprived in the county are located in Stoke, Ash Wharf, Friary and St Nicolas and Worplesdon. The impact of such relative deprivation is exacerbated in an affluent area such as Guildford. For example, high housing costs mean that access to affordable housing is a major challenge for many.

The Guildford Borough community is not very ethnically diverse. 91 per cent of residents described themselves as white in the 2011 Census. This proportion has fallen around 3 per cent since 2006 but is still higher than for Surrey (90 per cent) and England (85 per cent). Guildford has the third highest level among Surrey authorities of citizens who have arrived in the U.K since 2001 and ranks second highest for those born in EU accession states. There is an identified demand for social housing from some of these workers as many are in low paid employment, but the ethnic profile of those allocated social housing correlates closely to the general population. In 2013, 94 per cent of those housed were in combined white groups.
Evidence of Need

Strategic Housing Market Assessment (SHMA)

The SHMA is an assessment of peoples’ housing needs within the borough based on statistical evidence and it provides the Council with an objectively assessed measure of housing need. The previous SHMA was completed in 2009 but the Local Plan required a new SHMA to ensure that the Plan is based on up-to-date and robust information. The SHMA informs the calculation of the number of new houses needed for the lifetime of the Local Plan.

The 2009 SHMA covered three boroughs considered to constitute a housing market area, Guildford, Waverley and Woking. In 2013, Guildford commissioned its own SHMA, which has been published in draft form. Then in March 2014 the three boroughs commissioned a further joint SHMA building on the existing Guildford and Waverley assessments with a new one for Woking. This is expected to be published soon, and will provide a valuable view across the whole housing market area.

Employment levels and income

The SHMA data shows that employment levels in Guildford for the 16 to 64 age group are at 78 per cent, which is slightly above the pre-recession level.

The SHMA also highlights the fact that people working in the borough earn nearly £4,000 less per annum on average than people residing in the borough – this is as we would expect because those living in the borough and working elsewhere are often London commuters with higher salaries.

The purpose of the SHMA is to develop a robust understanding of housing market dynamics, to provide an assessment of future needs for both market and affordable housing and the housing requirements of different groups within the population.

The SHMA itself does not set housing targets. It makes no judgements regarding future policy decisions that the councils may take. The housing figure in the Guildford Local Plan is informed by the SHMAs but will also take into account factors such as local infrastructure capacity, housing land availability, viability, sustainability and the local ecology.

The draft Guildford SHMA finds that the objectively assessed housing need is for 650 and 780 homes per year. This reflects the affordability issues in Guildford coupled with the high level of affordable need. As the Local Plan progresses the aim is to balance this need with the level of housing growth that can be sustainably accommodated.

The draft Guildford SHMA and the recently completed Draft West Surrey SMHA, can be viewed at:

http://www.guildford.gov.uk/shma

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<tr>
<th></th>
<th>Median Workplace</th>
<th>Median Resident</th>
<th>Lower quartile Workplace</th>
<th>Lower quartile Resident</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford</td>
<td>£31,883</td>
<td>£35,355</td>
<td>£23,367</td>
<td>£23,939</td>
</tr>
<tr>
<td>Waverley</td>
<td>£26,252</td>
<td>£36,770</td>
<td>£20,000</td>
<td>£22,544</td>
</tr>
<tr>
<td>Woking</td>
<td>£25,159</td>
<td>£32,827</td>
<td>£17,616</td>
<td>£22,225</td>
</tr>
<tr>
<td>Surrey</td>
<td>£31,473</td>
<td>£34,595</td>
<td>£21,785</td>
<td>£23,515</td>
</tr>
<tr>
<td>South East</td>
<td>£28,181</td>
<td>£29,491</td>
<td>£20,010</td>
<td>£20,654</td>
</tr>
</tbody>
</table>

Source: NOMIS/Annual Survey of Hours and Earnings 2012
Housing Needs Survey

Guildford Borough Council conducted a major housing needs survey (HNS) in December 2012, working with a research company, asking residents from every ward in the borough about all aspects of their housing situation. Over 1000 households were interviewed capturing data on affordability, household composition, newly forming households and support needs. The previous HNS in 2007 was as part of the Strategic Housing Market Assessment work in 2009. The 2012 HNS was considered as part of the evidence base for the new Guildford SHMA


Some of the findings from the survey are summarised below.

Support Needs
14 per cent of respondents said that someone within the household had support needs. Seven per cent needed support with a physical disability and seven per cent with a medical condition, including two per cent who had mental health problems.

Housing costs
94 per cent of those who owned their home reported that their housing costs were less than 40 per cent of income. By contrast, 56 per cent of those renting reported that their housing costs exceeded 40 per cent of income.

Bedrooms required
With over-crowding and under-occupation both increasingly important issues, the survey looked at the number of bedrooms in respondents’ properties and compared this with the number required, calculated from our allocations policy according to household size.

One fifth of respondents had the exact number of bedrooms to accommodate the residents in their household. More than three-fifths who only needed one bedroom were living in a three or four bedroomed property.

Unsurprisingly, under-occupation was most common amongst home owners (79 per cent of those with a mortgage, and 91 per cent of those who own outright). In social housing, the survey showed a higher level of under-occupation in our own stock than in housing association stock (68 per cent of respondents as opposed to 20 per cent in HA stock). This is what we would expect because the age profile of our tenants is different to that of HA tenants – our tenants include a large number of elderly people who have been in council homes for a long time.

Only two per cent of households were categorised as overcrowded according to the allocations policy. However closer to 10 per cent considered themselves to be overcrowded.

Condition of housing
Although only 1 per cent of those surveyed considered their home to be in disrepair or lacking in basic facilities, a significant proportion of those with support needs considered that their home was in need of improvement to better meet those needs.
The Housing Register

There were 3,389 households on the housing register in Guildford on 1 April 2014 of which 2,461 were in Bands A-C, which are classed as ‘reasonable preference’ bands where applicants are likely to be allocated social housing. In Bands A-C households have a substantive local connection with the Borough through residence, employment or family connections. The graph below shows the change in the number of households on the housing register since 2009.

The number of households on the housing register has remained consistently between 3600-3800 apart from a large drop in Band D-E applicants in 2013/14. This was largely due to a policy change whereby reminders to renew applications were no longer sent to these applicants. Further changes to the allocations scheme in August 2014 have tightened requirements to have a long and substantial local connection to Guildford. There are also changes to requirements on tenant behaviour, housing debt and limits to income/savings for those permitted on the register. These changes may affect the total number on the register, but the pressure on social housing from those in housing need and with a strong local connection remains very high.

With only around 400 vacancies in the social housing stock per year, applicants must look at all options when considering their housing situation.

Homelessness

From early 2004-05, we changed the way we provided services following the implementation of our first homelessness strategy.

This resulted in a dramatic reduction in statutory homeless applications. There has also been a big reduction in the overall number of homeless households where a full housing duty was accepted. However, this number has been higher in the last three years.

We use a ‘housing options’ approach which, rather than dealing with homelessness as it arises, follows a four stage plan:

- increasing awareness and information about housing and the risk of homelessness
- providing general or specific housing advice for those with housing needs to prevent homelessness
- offering a range of housing options, direct support and intervention for those facing homelessness
- providing a safety net for those who do become homeless.

<table>
<thead>
<tr>
<th>Year</th>
<th>Housing Options cases</th>
<th>Homelessness prevented</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009/10</td>
<td>752</td>
<td>425</td>
</tr>
<tr>
<td>2010/11</td>
<td>635</td>
<td>484</td>
</tr>
<tr>
<td>2011/12</td>
<td>677</td>
<td>592</td>
</tr>
<tr>
<td>2012/13</td>
<td>614</td>
<td>466</td>
</tr>
<tr>
<td>2013/14</td>
<td>656</td>
<td>513</td>
</tr>
</tbody>
</table>
The main reasons for homelessness follow national trends. Principally, it is due to the loss of private rented accommodation, relationship breakdown, or eviction by family or friends. These may fluctuate but consistently remain the primary causes of homelessness.

![Guildford cases for the three main national causes of homelessness](image)

### Use of bed and breakfast accommodation

<table>
<thead>
<tr>
<th></th>
<th>2010-11</th>
<th>2011-12</th>
<th>2012-13</th>
<th>2013-14</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of placements</td>
<td>40</td>
<td>47</td>
<td>35</td>
<td>53</td>
</tr>
<tr>
<td>Average cost per night</td>
<td>£38.66</td>
<td>£47.73</td>
<td>£47.36</td>
<td>£44.67</td>
</tr>
<tr>
<td>Average no. of nights</td>
<td>17.2</td>
<td>15.7</td>
<td>27.3</td>
<td>26.6</td>
</tr>
<tr>
<td>Average cost per week</td>
<td>£270.62</td>
<td>£334.11</td>
<td>£331.52</td>
<td>£312.69</td>
</tr>
</tbody>
</table>

### Rough sleeping

We have invested in rough sleeping services for a number of years and this remains a priority area of our work. Our Homeless Outreach Support Team (HOST) service is very successful in helping to prevent rough sleeping, and joint work with the town centre hostels and Guildford Action drop-in centre contributes to this success.

There are many challenges in working with rough sleepers, in Guildford particular issues arise with:

- Access to hostel accommodation
- A shortage of assessment beds in the borough
- A regular influx of homeless people from outside the borough

![Street sleeping monthly snapshot - numbers](image)

![Primary client support needs - main needs by percentage](image)

![Local connection of HOST service users](image)

**Enterprise M3 Local Economic Partnership (LEP)**
Guildford is part of the Enterprise M3 Local Economic Partnership (LEP) and in its Strategic Economic Plan, Enterprise M3 recognises the link between housing and the economy and seeks to accelerate the delivery of new homes by up to 25 per cent over the next 10 years.

**Regeneris housing study**
Enterprise M3 recently engaged Regeneris to undertake a housing study across the LEP geography. The study identified Guildford, Elmbridge and Runnymede, as being the least affordable locations in the LEP area. It also put a strong case for increased delivery of new housing, both private and affordable, and identified several benefits that this would deliver; the most significant being the economic benefit of supporting labour mobility and recruitment. The LEP’s Proposal to the Local Growth Fund resulted in significant investment to the area, and in July 2014, the Government agreed a growth deal, which includes the 5G Arrow Project, securing the area’s world leading position as a centre of excellence in 5G technologies and research, with the 5G headquarters to be located at the Research Park in Guildford.
Appendix 2

Guidance to Registered Providers of Affordable Housing on Affordable Rented housing in the Guildford borough area.

Introduction
The Homes and Communities Agency (HCA) introduced a new model of Affordable Rented (AR) housing in 2011 to help fund the cost of new affordable housing development, which is social housing that may be let at higher rents of up to 80 per cent of local market rents. This is in contrast to social rented housing, which has ‘target rents’ which are set by government and are usually between 40 per cent and 50 per cent of market rents.

The purpose of this guidance is to inform Registered Providers (RPs) of the local housing market conditions and factors to consider when setting rents in the borough.

This guidance was updated in October 2014 to reflect current market rental values and in light of actual Affordable Rents charged in the previous year.

Definition of Affordable Rented housing
The National Planning Policy Framework defines Affordable Rented housing as “rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80 per cent of the local market rent ¹ (including service charges, where applicable).”

HCA position
All RPs that have entered into development contracts with the HCA and receive grant monies are required to charge Affordable Rents for new developments and to convert some of their existing social rented housing to the higher rent level.

The HCA expects that homes for rent which are funded with capital grant funding from the 2015-2018 Affordable Homes Programme will be let at Affordable Rent. While bids which include Affordable Rent at less than 80 per cent of local market rent will be considered, in very specific circumstances, such as where an Affordable Rent at 80 per cent of local market rent would exceed the Local Housing Allowance, the HCA generally expects providers to charge rents of up to 80 per cent of market rents to maximise financial capacity.

Affordability in the borough
Evidence contained in the Housing Strategy, the Homelessness Strategy and the Strategic Housing Market Assessment shows that rents in the borough are high and the majority of applicants on the Council’s housing register are unable to afford to access market housing without the help of housing benefit.

The following table shows the employment status of households nominated to council properties in the borough 2013-14.

<table>
<thead>
<tr>
<th>Employment Status</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full time work</td>
<td>35.8%</td>
</tr>
<tr>
<td>Part time work</td>
<td>10.3%</td>
</tr>
<tr>
<td>Retired</td>
<td>18.1%</td>
</tr>
<tr>
<td>Unemployed</td>
<td>6.7%</td>
</tr>
<tr>
<td>Not seeking work</td>
<td>20.9%</td>
</tr>
<tr>
<td>Disabled/Long term sick</td>
<td>7.8%</td>
</tr>
<tr>
<td>Other</td>
<td>0.4%</td>
</tr>
</tbody>
</table>

¹ Market rent is based on a RICS valuation for the property. Affordable Rents will increase at up to RPI + 0.5 per cent per annum, up to April 2014 and thereafter at CPI plus 0.5 per cent with re-basing of the rent on each new tenancy.
As the table above shows, almost half of those we house are working, often in low paid employment and may qualify for housing benefit and tax credits. Such households may also have a pattern of being on and off benefits at different times.

As at March 2014, 58 per cent of council tenants were in receipt of housing benefit.

There is a risk that households on the housing register will struggle to meet higher rents, both now and in the future, whether they are in work or on benefit. The situation is likely to get worse following the introduction of Universal Credit.

We therefore consider that we should take account of the levels of housing benefit (Local Housing Allowance 2) payable on private rented housing in the borough in setting any guidelines regarding levels of rent for this type of social housing.

**Local Housing Allowance Rates (period 1 April 2014 to 31 March 2015)**
For revised LHA rates visit:

www.guildford.gov.uk/localhousingallowance

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**Weekly rents/percentage of income spent on rent 2013-14**
The 2013 housing needs survey 3 indicated that, across the borough as a whole, 56 per cent of those renting reported that their housing costs exceeded 40 per cent of income.

There is no set maximum percentage of income that households are expected to spend on their rent, and clearly the higher the income the greater percentage the household can afford to spend. The housing sector uses 33 per cent as a reasonable figure for those on low incomes living in social housing to spend on rent. The Mayor of London suggested a figure of 40 per cent as the maximum. The draft Strategic Housing Market Assessment tested a range of between 30 and 40 per cent.

**Percentage of income spent on rent**
We researched the amount of income certain households would have to spend on rent in the borough. The following assumptions were made:

**Rent levels**
Actual Affordable Rents are based on RICS valuations of the individual properties as they become available for letting. Now that the Affordable Rent regime has been in place for three years, we and others have been able to collect data on the actual Affordable Rents charged, which gives us a better idea of future rent levels. Our previous guidance was based on less accurate estimates because at that point no Affordable Rented properties had actually been let.

### Local Housing Allowance Rates (period 1 April 2014 to 31 March 2015)

<table>
<thead>
<tr>
<th>NUMBER OF ROOMS</th>
<th>CATEGORY</th>
<th>MAXIMUM WEEKLY AMOUNT</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td><strong>GUILDFORD</strong></td>
</tr>
<tr>
<td>Shared Accommodation</td>
<td>A</td>
<td>£80.81pw</td>
</tr>
<tr>
<td></td>
<td></td>
<td>£350.18pm</td>
</tr>
<tr>
<td>1 Bedroom</td>
<td>B</td>
<td>£168.98pw</td>
</tr>
<tr>
<td></td>
<td></td>
<td>£732.25pm</td>
</tr>
<tr>
<td>2 Bedrooms</td>
<td>C</td>
<td>£214.38pw</td>
</tr>
<tr>
<td></td>
<td></td>
<td>£928.98pm</td>
</tr>
<tr>
<td>3 Bedrooms</td>
<td>D</td>
<td>£265.38pw</td>
</tr>
<tr>
<td></td>
<td></td>
<td>£1149.98pm</td>
</tr>
<tr>
<td>4 Bedrooms</td>
<td>E</td>
<td>£346.15pw</td>
</tr>
<tr>
<td></td>
<td></td>
<td>£1499.98pm</td>
</tr>
</tbody>
</table>

2 LHA is set at the 30th percentile of available rented properties (the three out of every 10 homes with lowest rents).
3 [http://www.guildford.gov.uk/CHandler.ashx?id=15205&p=0](http://www.guildford.gov.uk/CHandler.ashx?id=15205&p=0)
An indicative rent was arrived at by considering the following factors:

- Data collected by our Homes4U team who assist households to access the private rented sector
- Homes and Communities Agency statistics on actual ARs charged
- Figures of actual ARs charged on properties that our rehousing and allocations staff has dealt with
- A snapshot of advertised rents from Rightmove.co.uk
- The lowest available market rent for a property in the borough
- The range of rents identified in the Strategic Housing Market Assessment
- Uprating of figures from previous years by the standard housing association rent increase of CPI plus 1 per cent
- CPI was taken as the rate at the end of August 2014, which was 1.5 per cent.

We believe that the most representative figure is the median rent from the Rightmove snapshot, which falls in the lower end of the range of rents identified in the SHMA, as the majority of available properties are let at this rent, and this is the type of property which applicants to the housing register are most likely to occupy.

**Type of household**
Affordability was assessed for a typical household: a couple (both aged over 35) with two children, and only one of the couple in work. It was assumed that the household would not be affected by the removal of spare room subsidy (also known as the bedroom tax).

**Income from employment**
Various salary levels were considered, to cover the span of low to medium income on our housing register. We also looked at the situation of a single person on the median resident income as identified in the SHMA (£32,000).

**Benefits, including LHA, child benefit, working tax credit**
We used a benefits calculator to assess what benefits families would be entitled to, including whether they would be subject to the benefit cap.

Details of rents, benefits and income levels will be updated regularly, and are available on request.

**Percentage of income spent on rent**
The table below summarises how families on a low to medium income are affected by rents which are set at 70 per cent of a market rent, 80 per cent of market rent and at the rate of Local Housing Allowance.

<table>
<thead>
<tr>
<th>Household</th>
<th>Size of property</th>
<th>Annual earnings from employment</th>
<th>GFD 70%</th>
<th>GFD 80%</th>
<th>GFD LHA</th>
<th>ASH 70%</th>
<th>ASH 80%</th>
<th>ASH LHA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single person over 35 on median resident income</td>
<td>1 bed flat</td>
<td>£32k (from SHMA)</td>
<td>33%</td>
<td>38%</td>
<td>36%</td>
<td>26%</td>
<td>29%</td>
<td>30%</td>
</tr>
<tr>
<td>Couple with two children</td>
<td>2 bed house</td>
<td>£ 16,000</td>
<td>38%</td>
<td>43%</td>
<td>37%</td>
<td>30%</td>
<td>33%</td>
<td>33%</td>
</tr>
<tr>
<td>Couple with two children</td>
<td>2 bed house</td>
<td>£ 26,000</td>
<td>37%</td>
<td>42%</td>
<td>36%</td>
<td>29%</td>
<td>32%</td>
<td>32%</td>
</tr>
<tr>
<td>Couple with two children</td>
<td>2 bed house</td>
<td>£ 40,000</td>
<td>34%</td>
<td>39%</td>
<td>33%</td>
<td>25%</td>
<td>29%</td>
<td>29%</td>
</tr>
<tr>
<td>Couple with two children</td>
<td>3 bed house</td>
<td>£ 16,000</td>
<td>42%</td>
<td>47%</td>
<td>42%</td>
<td>37%</td>
<td>42%</td>
<td>37%</td>
</tr>
<tr>
<td>Couple with two children</td>
<td>3 bed house</td>
<td>£ 26,000</td>
<td>41%</td>
<td>46%</td>
<td>41%</td>
<td>36%</td>
<td>41%</td>
<td>35%</td>
</tr>
<tr>
<td>Couple with two children</td>
<td>3 bed house</td>
<td>£ 40,000</td>
<td>38%</td>
<td>43%</td>
<td>38%</td>
<td>33%</td>
<td>38%</td>
<td>33%</td>
</tr>
</tbody>
</table>
Given income levels in Guildford, we do not consider that rents in excess of 40 per cent net income are acceptable or affordable for tenants in social housing, and ideally, the proportion should not exceed 35 per cent of net income.

**Impact of rent increases**
Rents on affordable homes increase at a capped rate, set by Government, which is currently CPI plus 1 per cent.

Housing benefit, or in future Universal Credit, may not increase at the same rate as rents. In addition wage rises may be limited therefore there is an ongoing risk that rents originally set at LHA rate may not remain affordable in the longer term.

Recommended rent levels in the Borough
Based on our research and recent review of rents and affordability as set out in this guidance, we propose that Affordable Rents be set at no higher than the maximum Local Housing Allowance (LHA).

We will review the guidance on an annual basis to ensure that it accurately reflects the local housing market and income levels of applicants for affordable housing.

**Tenure mix of affordable housing**
Current policy on the tenure mix of affordable housing is that at least 60 per cent of the affordable housing on Section 106 sites must be for Affordable Rent, at no higher than Local Housing Allowance, with the remainder being intermediate tenures such as shared ownership.

The draft Local Plan proposes that the minimum proportion of rented affordable housing should be 70 per cent.

**Size and type of affordable housing**
The size and type of affordable housing required will depend on the overall housing mix on the site, the need for housing in the borough, and any requirements for specialist housing.

Please contact Housing Advice Services if you need to determine the appropriate mix for a particular site.
Appendix 3

Part I
Affordable housing stock in the borough by area

<table>
<thead>
<tr>
<th>AREA/PARISH</th>
<th>Number of housing association properties</th>
<th>Number of Council owned properties</th>
<th>TOTAL affordable housing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albury</td>
<td>10</td>
<td>24</td>
<td>34</td>
</tr>
<tr>
<td>Artington</td>
<td>26</td>
<td>9</td>
<td>35</td>
</tr>
<tr>
<td>Ash</td>
<td>444</td>
<td>275</td>
<td>719</td>
</tr>
<tr>
<td>Ash Vale</td>
<td>62</td>
<td>63</td>
<td>125</td>
</tr>
<tr>
<td>Belfields</td>
<td>77</td>
<td>611</td>
<td>688</td>
</tr>
<tr>
<td>Burpham</td>
<td>81</td>
<td>42</td>
<td>123</td>
</tr>
<tr>
<td>Chilworth</td>
<td>17</td>
<td>167</td>
<td>184</td>
</tr>
<tr>
<td>Compton</td>
<td>12</td>
<td>53</td>
<td>65</td>
</tr>
<tr>
<td>East &amp; West Horsley</td>
<td>25</td>
<td>122</td>
<td>147</td>
</tr>
<tr>
<td>Effingham</td>
<td>32</td>
<td>12</td>
<td>44</td>
</tr>
<tr>
<td>Hurtmore</td>
<td>0</td>
<td>25</td>
<td>25</td>
</tr>
<tr>
<td>Merrow</td>
<td>195</td>
<td>321</td>
<td>516</td>
</tr>
<tr>
<td>Normandy</td>
<td>18</td>
<td>95</td>
<td>113</td>
</tr>
<tr>
<td>Ongslow</td>
<td>6</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>Park Barn</td>
<td>92</td>
<td>658</td>
<td>750</td>
</tr>
<tr>
<td>Peaslake/Holmbury St</td>
<td>3</td>
<td>36</td>
<td>39</td>
</tr>
<tr>
<td>Pirbright</td>
<td>7</td>
<td>31</td>
<td>38</td>
</tr>
<tr>
<td>Puttenham/Seale</td>
<td>7</td>
<td>28</td>
<td>35</td>
</tr>
<tr>
<td>Ripley</td>
<td>34</td>
<td>82</td>
<td>116</td>
</tr>
<tr>
<td>Send</td>
<td>30</td>
<td>117</td>
<td>147</td>
</tr>
<tr>
<td>Shalford</td>
<td>4</td>
<td>50</td>
<td>54</td>
</tr>
<tr>
<td>Shere and Gomshall</td>
<td>49</td>
<td>50</td>
<td>99</td>
</tr>
<tr>
<td>Sylfield</td>
<td>28</td>
<td>188</td>
<td>216</td>
</tr>
<tr>
<td>Stoughton</td>
<td>127</td>
<td>265</td>
<td>392</td>
</tr>
<tr>
<td>Tongham</td>
<td>27</td>
<td>212</td>
<td>239</td>
</tr>
<tr>
<td>Town</td>
<td>349</td>
<td>701</td>
<td>1050</td>
</tr>
<tr>
<td>West Clandon</td>
<td>19</td>
<td>70</td>
<td>89</td>
</tr>
<tr>
<td>West'brgh</td>
<td>46</td>
<td>487</td>
<td>533</td>
</tr>
<tr>
<td>Wood Street</td>
<td>43</td>
<td>129</td>
<td>172</td>
</tr>
<tr>
<td>Worpleston</td>
<td>24</td>
<td>35</td>
<td>59</td>
</tr>
<tr>
<td>TOTAL</td>
<td>1894</td>
<td>4958</td>
<td>6852</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>AREA/PARISH</th>
<th>Number of housing association properties</th>
<th>Number of Council owned properties</th>
<th>TOTAL affordable housing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Town</td>
<td>349</td>
<td>701</td>
<td>1050</td>
</tr>
<tr>
<td>Park Barn</td>
<td>92</td>
<td>658</td>
<td>750</td>
</tr>
<tr>
<td>Ash</td>
<td>444</td>
<td>275</td>
<td>719</td>
</tr>
<tr>
<td>Belfields</td>
<td>77</td>
<td>611</td>
<td>688</td>
</tr>
<tr>
<td>West'brgh</td>
<td>46</td>
<td>487</td>
<td>533</td>
</tr>
<tr>
<td>Merrow</td>
<td>195</td>
<td>321</td>
<td>516</td>
</tr>
<tr>
<td>Stoughton</td>
<td>127</td>
<td>265</td>
<td>392</td>
</tr>
<tr>
<td>Tongham</td>
<td>27</td>
<td>212</td>
<td>239</td>
</tr>
<tr>
<td>Sylfield</td>
<td>28</td>
<td>188</td>
<td>216</td>
</tr>
<tr>
<td>Chilworth</td>
<td>17</td>
<td>167</td>
<td>184</td>
</tr>
<tr>
<td>Wood Street</td>
<td>43</td>
<td>129</td>
<td>172</td>
</tr>
<tr>
<td>East &amp; West Horsley</td>
<td>25</td>
<td>122</td>
<td>147</td>
</tr>
<tr>
<td>Send</td>
<td>30</td>
<td>117</td>
<td>147</td>
</tr>
<tr>
<td>Ash Vale</td>
<td>62</td>
<td>63</td>
<td>125</td>
</tr>
<tr>
<td>Burpham</td>
<td>81</td>
<td>42</td>
<td>123</td>
</tr>
<tr>
<td>Ripeley</td>
<td>34</td>
<td>82</td>
<td>116</td>
</tr>
<tr>
<td>Normandy</td>
<td>18</td>
<td>95</td>
<td>113</td>
</tr>
<tr>
<td>Shere and Gomshall</td>
<td>49</td>
<td>50</td>
<td>99</td>
</tr>
<tr>
<td>West Clandon</td>
<td>19</td>
<td>70</td>
<td>89</td>
</tr>
<tr>
<td>Compton</td>
<td>12</td>
<td>53</td>
<td>65</td>
</tr>
<tr>
<td>Worpleston</td>
<td>24</td>
<td>35</td>
<td>59</td>
</tr>
<tr>
<td>Shalford</td>
<td>4</td>
<td>50</td>
<td>54</td>
</tr>
<tr>
<td>Sylfield</td>
<td>28</td>
<td>188</td>
<td>216</td>
</tr>
<tr>
<td>Peaslake/Holmbury St</td>
<td>3</td>
<td>36</td>
<td>39</td>
</tr>
<tr>
<td>Pirbright</td>
<td>7</td>
<td>31</td>
<td>38</td>
</tr>
<tr>
<td>Artington</td>
<td>26</td>
<td>9</td>
<td>35</td>
</tr>
<tr>
<td>Puttenham/Seale</td>
<td>7</td>
<td>28</td>
<td>35</td>
</tr>
<tr>
<td>Albury</td>
<td>10</td>
<td>24</td>
<td>34</td>
</tr>
<tr>
<td>Hurtmore</td>
<td>0</td>
<td>25</td>
<td>25</td>
</tr>
<tr>
<td>Ongslow</td>
<td>6</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>TOTAL</td>
<td>1894</td>
<td>4958</td>
<td>6852</td>
</tr>
</tbody>
</table>
Appendix 4

Rural Housing Needs Surveys

Many households want to stay in the rural communities in which they grew up or have lived and worked for many years. However these households are increasingly priced out of villages in the borough.

Affordable housing on a suitable site can help to maintain a mixed balance of households, supporting the local school, village shops, pubs or post office and helping local businesses recruit and maintain staff through the availability of more housing.

Building affordable homes on ‘Rural Exception Sites’ can help to meet local housing need in a rural parish. Planning permission can be granted on these sites, outside existing village settlement boundaries, as an exception to planning policy, if they provide rural affordable housing to meet an identified local need. Rural Housing Needs Surveys, commissioned by the parish council, provide information about current and emerging housing need at parish level and is the first step in the process of developing new rural exception affordable housing for local people with a housing need. These surveys are carried out by the Surrey Rural Housing Enabler, who is employed by Surrey Community Action. Although parish councils usually pay for some or all of the survey costs, the Council can help with postage and printing costs if a survey is required.

The support of the parish council is vital in delivering new rural exception affordable housing to meet local need. More information is available for parish councils in the Rural Housing Alliance publication “Affordable Rural Housing; A Practical Guide for Parish Councils”

Where a need for affordable housing has been identified by a Rural Housing Needs Survey, the parish council can begin to look for suitable sites. Landowners of the sites identified through this process are approached to find out if they are willing to sell their land to enable it to be brought forward for development. If more than one suitable site is available, consultation will take place within the parish to select the preferred site. When a suitable site has been selected, a new affordable housing scheme can be drawn up in consultation with the community, before a planning application is submitted.

In some cases, a survey is commissioned when the parish council is approached by a landowner who wishes to bring forward a site for rural exception development, and there has not been a rural housing needs survey within the past five years.

Rural exception developments have been completed in the following parishes over the past 5 years:

• Chilworth
• East Horsley
• Normandy
• Ripley
• Shackleford
• West Clandon.

The following parishes had rural exception developments in the previous 10 years:

• Effingham
• Gomshall
• Normandy
• Peaslake
• Pirbright
• Shalford
• Shere
• Tongham.
The Rural Housing Enabler (RHE), in conjunction with parish councils and the Council, has drawn up a list of parishes requiring a housing needs survey, prioritising them according to:

- Anecdotal evidence from parish councils of a local housing need
- Willingness of parish councils to consider rural exception development
- Time since last rural housing needs survey
- Time since most recent rural exception housing development in the village
- Comments from Planning Services and Housing Advice Services on the likelihood of finding a suitable site
- Input from housing associations

Most parishes have now been surveyed and we are continuing with a programme of between two and four surveys per year.

For the results of rural housing needs surveys, please contact Housing Advice Services. Telephone: 01483 444244 Email: housingadvice@guildford.gov.uk
<table>
<thead>
<tr>
<th>Parish</th>
<th>Survey completed</th>
<th>Sites identified</th>
<th>Planning Application</th>
<th>Planning permission</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>St Martha</td>
<td>Yes, 2013-14</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>No need identified.</td>
</tr>
<tr>
<td>Ripley</td>
<td>Yes, 2012-13</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>Need identified. Scheme being built by A2 Dominion (10 units on RES). Identified need shows need for further RES homes if a site can be identified.</td>
</tr>
<tr>
<td>Send</td>
<td>Yes, 2013-14</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>Need identified. Developer contacted who is interested in developing exception site, however landowner is awaiting outcome of Local Plan.</td>
</tr>
<tr>
<td>Shalford</td>
<td>YES 2012-13</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>Need identified, but no suitable sites found.</td>
</tr>
<tr>
<td>Pirbright</td>
<td>YES 2012-13</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
<td>Need identified. Two potential sites now identified. Initial advice sought from planning, and both sites passed to English Rural Housing Association for further investigation.</td>
</tr>
<tr>
<td>Peperharow + Shackleford</td>
<td>YES 2012-13</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>Need identified, development on site and nearing completion. Nominations to be shared with Waverley BC because crosses border to neighbouring borough.</td>
</tr>
<tr>
<td>Normandy</td>
<td>YES 2010-11</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>Need identified. Development of 16 units on site (Mount Green HA) and due to complete in March 2015.</td>
</tr>
<tr>
<td>Worplesdon</td>
<td>YES 2011-12</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
<td>Need identified, however so far none have made as far as planning application.</td>
</tr>
<tr>
<td>Albury</td>
<td>YES 2012-13</td>
<td>YES (but not acceptable to planners)</td>
<td>NO</td>
<td>NO</td>
<td>Report presented to PC by the RHE - information has since been used to produce parish questionnaire. RHE to find out results of parish questionnaire.</td>
</tr>
<tr>
<td>Effingham</td>
<td>Yes</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>Effingham PC have carried out an extensive survey for their neighbourhood plan. RES not found, however S106 site put forward by developer which may meet some of the need.</td>
</tr>
<tr>
<td>Puttenham</td>
<td>Survey underway</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
<td>PC has organised a RHNS and forms were sent out in September 2014.</td>
</tr>
<tr>
<td>Shere</td>
<td>Survey underway</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>PC and RHE have started RHNS.</td>
</tr>
<tr>
<td>West Horsley</td>
<td>Survey underway</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>Survey recently carried out - await results from the RHE.</td>
</tr>
<tr>
<td>East Horsley</td>
<td>YES - survey carried out for E and W Horsley combined, out of date (2004)</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>Scheme recently completed. Survey now out of date. PC for East Horsley has requested an updated survey. RHE to arrange. RHE has also been in contact with West Horsley PC and survey recently carried out (awaiting report).</td>
</tr>
<tr>
<td>West Clandon/East Clandon</td>
<td>YES, but out of date (2006)</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>14 units granted permission - Successful bid made to HCA for housing to be built out in 2014 -15 as social rented. Now on site (Meadowlands).</td>
</tr>
<tr>
<td>Wisley</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>No contact, very small parish</td>
</tr>
<tr>
<td>Seale and Sands</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>No contact</td>
</tr>
<tr>
<td>Wanborough</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>RHE has met the parish council. PC to discuss at their next meeting and decide on commissioning a survey.</td>
</tr>
<tr>
<td>Arlington</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>RHE has contacted PC in summer 2014 but no response.</td>
</tr>
<tr>
<td>Compton</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>PC interested - RHE in discussion re: RHNS.</td>
</tr>
<tr>
<td>Ockham</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>Contact made with parish chairman but so far no survey commissioned by the PC.</td>
</tr>
</tbody>
</table>
Affordable housing: Affordable housing is subsidised housing provided at below market rates, and includes social rented, shared ownership, intermediate housing, and Affordable Rent. It is provided to specified eligible households whose needs are not met by the market. Affordable housing should be available at a cost low enough for eligible households to afford determined with regard to local income and house prices.

Affordable Rent: Affordable rented housing is let by Registered Providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable).

Decent Homes Standard: A standard aimed at providing a minimum standard of housing in the social sector.

Department for Communities and Local Government (DCLG): The government department in England responsible for setting policy on supporting local government, communities and neighbourhoods, regeneration, housing, planning, building and the environment, and fire.

Disabled Facilities Grant (DFG): Disabled Facilities Grants are available in approved cases to help disabled people who need special adaptations to their home. Frequently funded works include flush floor shower rooms, ground floor bedrooms, stair-lifts, kitchen adaptations and ramps to and from the dwelling. These grants are means tested and are available to owner-occupiers, tenants and landlords including social landlords.

Fuel poverty: A household is said to be in fuel poverty if it needs to spend more than 10 per cent of its income on fuel to maintain a satisfactory heating regime (usually 21 degrees for the main living area, and 18 degrees for other occupied rooms) Source: www.decc.gov.uk

Homelessness acceptances: Applications from people applying to the Council as homeless under Part 7 of the Housing Act 1996 as amended by the Homelessness Act 2002 that have been accepted. Councils have a statutory duty to make an offer of permanent accommodation to people accepted as homeless.

Homelessness duties: The statutory duties on a local authority to ensure advice and assistance is provided to households who are homeless or threatened with homelessness and eligible for assistance under Part 7 of the Housing Act 1996 as amended by the Homelessness Act 2002.

Homes and Communities Agency (HCA): The national housing and regeneration delivery agency for England, which aims to contribute to economic growth by enabling communities to deliver high quality housing that people can afford. The HCA provides grant funding for Registered Providers to build new affordable housing.

Homes4U: A service provided by the Council to assist applicants to access private rented housing and including the provision of rent deposit bonds.

House in Multiple Occupation (HMO): Housing Act 2004 introduced mandatory licensing of high risk houses in multiple occupation (HMOs) – these are HMOs of three storeys or more, which are occupied by five or more people, who form two or more households.
Housing Allocations Scheme:
The Housing Act 1996, as amended by the Homelessness Act 2002, requires the Council, under part 6, to have a published Housing Allocations Scheme which sets out how it will prioritise those households seeking social housing.

Housing Need:
Housing need is defined as the number of households who lack their own housing or live in unsuitable housing and who cannot afford to meet their needs in the market.

Housing Register:
The housing register is a list of all individuals or households who have applied to the Council for affordable housing and met the criteria set out in the housing allocations scheme.

Housing Revenue Account (HRA):
The HRA is the account of expenditure and income that every local authority landlord must keep. The account is kept separate or ring fenced from other council activities. Intermediate housing/intermediate tenure: Housing at prices or rents above those of social rent but below market prices or rents. Intermediate housing can include shared equity products (for example Homebuy), other low cost homes for sale and intermediate rent which is usually around 80 per cent of market rents.

Local Enterprise Partnership (LEP):
Voluntary partnerships between local authorities and businesses set up in 2011 by the Department for Business, Innovation and Skills to help determine local economic priorities and lead economic growth and job creation within the local area. They carry out some of the functions previously carried out by the regional development agencies abolished in March 2012.

Local Housing Allowance (LHA):
This is housing benefit entitlement for tenants renting in the private sector, and it is based on the household’s bedroom requirement. It is applied to different areas called ‘Broad Rental Market Areas’ and the rate is determined by calculating the 30th percentile of market rents for each area. In other words, 3 in 10 properties in Broad Rental Market Area should be let within or below LHA levels.

Local Plan:
The Local Plan is a development planning framework for the area; its key elements include the spatial strategy, policies, infrastructure provision and site allocations.

New Homes Bonus:
The New Homes Bonus is paid each year for 6 years. It is based on the amount of extra Council Tax revenue raised for new-build homes, conversions and long-term empty homes brought back into use. An additional payment is made for providing affordable homes.

Overcrowding:
An overcrowded dwelling is one that is below the bedroom standard.

Registered Provider:
Providers of affordable housing (including housing associations, and the Council) which are registered with the Homes and Communities Agency. Housing associations were formerly known as Registered Social Landlords (RSLs).

Right to Buy (RTB):
A policy which gives secure tenants of councils and some housing associations the legal right to buy, at a discounted rate, the home they are living in.

Rural Exception Housing:
Sites adjoining rural settlements that would not normally be available for development. Planning permission is only given for affordable housing that is needed in the area.

Section 106 agreements:
A legally binding agreement made between a local planning authority and a landowner or developer in association with the granting of some planning permissions. These generally require a contribution towards social and/or physical infrastructure, either financial or in-kind, to make the development acceptable in planning terms. In relation to this Strategy it refers to the provision of affordable housing.
**Shared Ownership:**
Affordable housing provided through housing associations. A share of the property (between 25 per cent and 75 per cent of the home’s value) is bought and rent is paid on the remaining share.

**Social rented housing:**
Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

**Strategic Housing Land Availability Assessment (SHLAA):**
A key part of local planning authorities’ evidence base in respect of housing supply which identifies sites with the potential for housing, assesses approximately how many homes they could cumulatively provide and estimates when they could be developed.

**Strategic Housing Market Assessment (SHMA):**
The SMHA provides an evidence base on the future balance of housing supply. It assesses need and demand in terms of tenure, type, location and affordability.

**Supporting People:**
A government scheme that aims to support people in their own homes so that they can lead more independent lives. In Surrey, the Supporting People funding is administered by SCC through contractual arrangements with service providers.

**Tenure:**
The financial arrangements under which someone has the right to live in a house or flat, for example owner-occupation, private rental (in which rent is paid to a private landlord) or social rented (in which rent is paid to a local authority or housing association).

**Temporary accommodation:**
Housing such as bed and breakfast (B&B) or hostel accommodation that may be used in an emergency to accommodate households who are homeless whilst they await an offer of permanent accommodation.

**Universal Credit:**
The new benefit introduced by the Welfare Reform Act 2012 between October 2013 and December 2017 that will replace a number of benefits including Income related Job Seekers Allowance, Income related Employment Support Allowance, Income Support (including support for mortgage interest), Working Tax Credits, Child Tax Credits, and Housing Benefit.

**Unsuitable housing:**
All circumstances where households are living in housing which is in some way unsuitable, whether because of its size, type, design, location, condition or cost. Households can have more than one reason for being in unsuitable housing.

**Viability:**
A viability assessment tries to identify a reasonable percentage above the existing use value for the residual value to be attractive enough for to a landowner to bring forward their site.

**YSS:**
The Youth Support Service (YSS) works with partners, covering the whole of Surrey, to encourage participation in education, training and employment, reduce offending and anti-social behaviour, and provide support for homeless young people.
Endnotes

i Home Trust loans are provided by Parity Trust, an ethical, socially responsible lender, working in partnership with the Council. Loans are secured and subsidised by the Council at a guaranteed low interest rate.

ii The Right to Buy is primary legislation, set by central government, which allows tenants of council properties to buy their home at a discount. This policy is not within the Council’s control, and the maximum discount has recently been increased to £77,000. However under new rules, we are allowed to keep a much greater proportion of the receipts from Right to Buy sales than we were previously (when the bulk had to be returned to central government), providing we use the receipts to build new affordable homes.

iii We are working with consultants to finalise a draft Development Viability Study. This draft Study assesses viability at a strategic level, and will be used to inform:

• The affordable housing policies of the draft Strategy and Sites Local Plan
• Viability of the draft Strategy and Sites Local Plan as a whole
• Viability assessments of theoretical developments taking into account requirements of the draft local plan and other costs to inform Community Infrastructure Levy (CIL) rates.