

We held a housing forum in July 2014, during which officers explained current and emerging policy, including the Local Plan. We set out the aims of the housing strategy, and held discussions about the affordability of different tenures, access to private rented housing, delivery on new homes, improving existing homes and bringing empty homes back into use.

The responses from the forum were used to produce the draft strategy, which was published for consultation between 21 October and 16 December 2014. We asked the following questions about the draft strategy:

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

1. Do you consider that there is more we can do to increase the supply of affordable housing?
2. Do you agree with our approach to Affordable Rent levels in the borough? We have taken local affordability and national policy into account (see Appendix 2.)
3. On new developments, we expect 70 per cent of the affordable provision to be for rent, with the remainder being part-buy, part-rent or other 'intermediate tenure'. Do you agree this split is right?
4. There are other types of housing model being promoted by government such as 'Rent to Buy', discounted market housing, and private rented housing – do you think we should consider these as part of the other intermediate tenures within the affordable housing provision? (see page 28.)
5. Do you think we should accept plots for self-builders as part of the 'intermediate tenure' affordable housing on a site? (see page 29.)

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

1. Do you consider that there is more we can do to bring empty homes back into use?
2. Do you consider that there is more we can do to improve housing conditions across tenures?
3. Is our approach the right way to make best use of the private sector?
4. Do you think there is any more we could do to promote sustainability and energy efficiency?

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

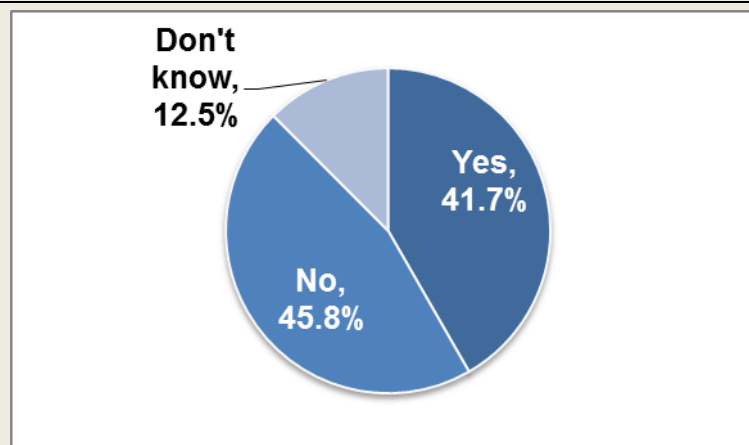
1. Our aim is for 10 per cent of new affordable homes or accommodation developed over the life of the strategy to be specialist housing. (For older people, those with disabilities, young people, travellers for example). Do you agree this level is about right?
2. Are there any other particular groups or household types for whom new affordable homes should be a priority?

**General**

Are there any issues we have not addressed that you think should be included?

The comments received, and our response to them, are summarised below. Some of the comments and suggestions are matters that are better dealt with through the emerging new Local Plan, so these have been passed on to the Planning Policy team.

**1. Ambition 1 (page 25) sets out how we plan to increase the supply of affordable homes. Do you think there is anything more we could do to increase the supply of affordable housing?**



**1.1. Buy land yourselves**

Our priority for our affordable housing development programme will be brownfield sites in the Council's ownership; however, we already consider purchasing sites or properties when they become available on the open market. When bidding for land we must balance the need to make a competitive offer against the need for a viable development, which allows us to maintain a long term development programme. Opportunities are assessed against various factors, including the deliverability of sites and social benefits of development, as well as the impact on our funding and borrowing

	<p>capacity. We are looking into possible partnerships with housing associations which might increase our ability to compete with private-led developments – however we must also be mindful of the effect on land prices of public authorities outbidding private developers, which would ultimately be detrimental to housing delivery.</p>
<p>1.2. Ensure that viability is not used as an excuse to reduce the affordable quotient for all new developments. Build tied housing.</p>	<p>The Council maintains a robust attitude to delivering the affordable quotient on new developments, and we recently completed viability testing of the draft Local Plan 2014 which demonstrates that development in nearly all areas of the borough can viably deliver the level of affordable housing set out in that plan as well as other planning obligation requirements.</p>
<p>1.3. Yes. Effingham Parish Council believes that Guildford Borough Council is not achieving the ratio of 20% of affordable homes in appropriate housing stock (new or refurbished) across the borough. Targets are not being met, nor are they realistic. There is no short or medium term prospect of reaching targets even at 20%. It is difficult to assess what the target levels for affordable housing should be, for various reasons, including the wide variety of different needs – older people, single parent families, families involved in divorce, people with disabilities etc., but Effingham Parish Council believes an aspirational target would be 30%, though this would be difficult to achieve. There appears to be a significant unmet need for small affordable homes which developers are unwilling to provide. More availability of small housing stock might release some larger homes for families who also have needs. Further, balancing the supply of housing stock towards small affordable homes might allow key workers a chance</p>	<p>Under current planning policy, sites of below 15 units in town, or 10 units in rural areas, are not required to provide affordable housing. This makes it difficult to achieve a ratio of even 20% affordable homes, because many sites in the borough are small and do not trigger the requirement for affordable housing .The draft Local Plan aims to deal with this problem by proposing that smaller sites contribute to affordable housing, and requiring all qualifying sites to provide a greater proportion of affordable homes. However new national policy introduced in Nov 2014 prevents us from requiring developers of sites smaller than 11 units and 1,00sqm to provide affordable housing.</p> <p>As discussed in the response to 1.2, above, we maintain a robust attitude to achieving the policy requirement (currently 35%) for affordable housing to be provided on site. We recently refused permission for a scheme which did not meet the requirement, and we</p>

<p>to move into and stay in the area. Ways should be found to encourage developers to build such homes, and they should be discouraged from building larger homes for their own pecuniary advantage</p>	<p>await the decision of the Planning Inspector, following a recent appeal against the refusal.</p> <p>Regarding smaller family homes, the Local Plan (based on evidence from the SHMA) sets out our aims to deliver the mix of housing required to meet the need and demand in the borough.</p>
<p>1.4. Homes need to be affordable in a real sense and not just affordable according to the meaningless official definition of the term. So, refuse planning permissions for homes with more than 3 bedrooms, in order to reverse the trend towards the building (and conversion) of bigger and bigger 'executive'-style houses. These are visibly displacing smaller dwellings, such as retirement bungalows, throughout the borough, turning Guildford into a dormitory suburb of London and buy-to-leave investor's proposition for overseas buyers. Secondly, GBC should close all the many loopholes that allow housebuilders to evade or wriggle out of their affordable housing commitments by claiming commercial unviability. Third, brownfield development should be aggressively prioritised with penalties for land-banking. Fourth, Councillors should set a better example in their own personal property speculations by developing the same proportion of affordable homes as they have proposed in the draft Local Plan.</p>	<p>We published the draft West Surrey SHMA on 19 December, and it is available at <a href="http://www.guildford.gov.uk/shma">www.guildford.gov.uk/shma</a>. Paragraph 159 of the National Planning Policy Framework (NPPF) states that the SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:</p> <ul style="list-style-type: none"> <li>• meets household and population projections, taking account of migration and demographic change;</li> <li>• addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and</li> <li>• caters for housing demand and the scale of housing supply necessary to meet this demand</li> </ul> <p>As part of this process we are therefore required to <u>identify the need for both market and affordable homes</u>. The starting point for assessing housing need is the latest ONS population and CLG household projections (Section 4). The need for affordable homes is covered in Section 6 of the draft West Surrey SHMA. This follows the requirements of the NPPG and is based on the Basic Needs</p>

	<p>Assessment model. The calculation involves adding together the current unmet housing need and the projected future housing need and then subtracting this from the current supply of affordable housing stock. The NPPG sets out that consideration should be given as to whether housing need should be increased from the demographic evidence in order to support economic growth, improve affordability or increase the provision of affordable homes. The draft West Surrey SHMA considers these tests in identifying our objectively assessed housing need.</p> <p>In addition to the market-led supply of affordable homes, we are proactively building and increasing our own council owned stock.</p> <p>Regarding <u>the size of homes built by developers</u>, this is to some extent dictated by the market, since developers will only build what they can sell and what is economically viable for their development. However the new Local Plan will also ensure that developers are required to build a mix of housing in each area to create sustainable, inclusive and mixed communities. It will also be guided by the new Local Plan.</p> <p>The draft West Surrey SHMA sets out the size and type of homes that we need. This is explained in greater detail in Section 8 and indicates indicative sizes of homes required for both market and affordable homes. We will use this information alongside other local information when negotiating individual schemes.</p> <p>The new draft Local Plan will also consider the issue of housing size and mix.</p> <p>With reference to land banking, there are limits to what the Council is able to do to bring forward land that is in private ownership for development. Similarly it is not possible to require land owners</p>
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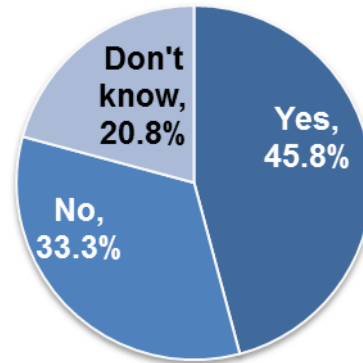
	<p>to develop land which has planning permission for development. However we do continue to liaise with landowners regarding their intentions. We also take into account the number of dwellings with existing planning permission for development when assessing the dwelling capacity of the borough.</p>
<p>1.5. Remove the requirement for SPA and other financial contributions on affordable housing where all or part of a housing scheme.</p>	<p>We are in the process of putting in place our Community Infrastructure Levy (CIL), which will support our new Local Plan. CIL is the system introduced nationally in 2010 for collecting contributions from landowners and developers that we can pool to fund infrastructure to support development in the borough.</p> <p>Certain types of new development are exempt from CIL liability, and this includes affordable housing, extensions under 100sqm, and (subject to meeting requirements) homeowners' applications for large extensions. All (net increases in) new homes in the borough within the European-habitat affected areas must mitigate potential harm to the SPA.</p>
<p>1.6. Change empty commercial property into dwellings, Kingston has done this with great success</p>	<p>Regarding converting commercial property into residential dwellings, in accordance with the NPPG, we will be producing a Land Availability Assessment to inform the new Local Plan. This will consider land which may be suitable, available and achievable for housing and employment uses over the plan period. The National Planning Policy Framework identifies the advantages of carrying out land assessments for housing and employment as part of the same exercise, in order that sites may be allocated for the use which is most appropriate. As part of this process there may be sites currently used for employment purposes which could be more appropriately</p>

	<p>used for housing.</p> <p>The NPPF (paragraph 51) requires us to take a generally positive stance on proposals to change buildings from office to residential use :</p> <p>“Local planning authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.”</p> <p>Also, for a couple of years now, the change of use from office to residential can be permitted development (subject to complying with criteria) under Class J.</p>
<p>1.7. Understand the meaning of 'affordable homes'</p>	<p>Our policy (as set out in appendix 2) is to set rent levels at no more than Local Housing Allowance, which is less than the Government's recommended level of 80% of market rent. This means that anyone unable to afford the rent will be able to apply for housing benefit, which is means tested according to the amount of income that the Government considers to be sufficient to live. Our research indicates that rents at this level will take up no more than 40% of a household's income.</p> <p>To clarify, the traditional 'social rent' is charged on council homes, and on most housing association homes built before 2011. However housing association homes are now being 'converted' to Affordable Rent when they become vacant. Social rent is normally at between 50 and 60 per cent of the market rent, whereas Affordable Rent is</p>

	normally between 70 and 80 per cent. Intermediate housing can include shared equity/shared ownership purchase or below-market rent – usually about 80 per cent of market rent.
1.8. Locally - No, Nationally - Yes, stop the right to Buy	The Right to Buy policy can be helpful to individuals who are able to purchase their home, however it has a negative effect on our ability to house those most in need of assistance. This is national policy and we have very little influence over it. However thanks to the financial reforms of the past few years, we are now able to retain most of the local Right to Buy receipts to reinvest in housing provision.
1.9. When planning permission is given for change of use from agriculture to housing the profits are so large that you could go for 50% at least	The Development Viability Study 2014 looks at viability of development across the borough, and recommended a general 45% requirement from such sites, taking into account other infrastructure and policy requirements.
1.10. YES, through strict unvariable requirements imposed on new developments of more than 10 dwellings	Noted.



**2. Do you agree with our approach to Affordable Rent levels in the borough? We have taken local affordability and national policy into account (see Appendix 2.)**

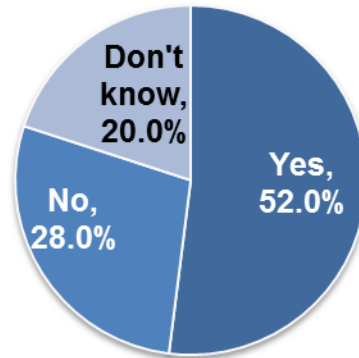


<p>2.1. I don't agree with your vision: everyone should have a home to meet their needs</p>	<p>As part of the draft Local Plan process we have looked at the need and demand for both market and affordable housing, and the most recent draft of the Local Plan includes a draft policy called 'Homes for All'.</p>
<p>2.2. 80% of market rent is not affordable, and this is not a justifiable policy.</p>	<p>See response to 1.7, above.</p>
<p>2.3. GBC should lobby the Government to change its Right to Buy Policy. The policy offers too great a subsidy to tenants exercising their right to buy which ultimately results in many of the homes entering the private rental sector thereby pushing up average rental costs.</p>	<p><a href="#">Right to Buy (see Question 1 responses).</a></p>

2.4. Yes. The rents appear to be based on realistic market rents.	-
2.5. Have the income levels of the people on your Housing Waiting List been investigated to see if they can afford to pay an LHA rate rent? This is unclear.	We have gathered survey information on incomes of households in various tenures in the borough, and our testing of affordability is based on typical households from the housing register. We intend to carry out more detailed research into income levels for the 2015-2016 update of our rents and affordability guidance. In theory, every household should be able to pay rent at LHA level, providing they are in a property of a size appropriate to their needs, because if they are unable to pay, they will be means tested and awarded housing benefit to make up any shortfall.
2.6. You must do something drastic to boost the rental sector, such as offering huge Council tax reliefs for live-in landlords who sublet rooms to single people and disadvantaged families. The almost total disappearance of lodging is one of the biggest social developments of recent decades and is a major cause of homelessness. It is in GBC's power to reverse this locally.	There is currently tax relief on the income from lodgers.  There is no discount available within the legislation on council tax that would discount lodgers. The Council could use a discretionary function of the council tax legislation to exclude lodgers from council tax. However this would exclude every lodger in the borough, with the cost of the discounts being passed on to all other taxpayers. We will ask Members to consider this option, which, if they were in favour, would require public consultation.
2.7. Should be no more than Blackwater Valley average.	Noted.
2.8. You are ruining the villages around Guildford and Woking and are increasing traffic onto these roads that can't cope already	These comments are matters that are better dealt with through the emerging new Local Plan, so these have been passed on to the Planning Policy team
2.9. You do not appear to understand the concept of affordable home! Affordable to whom?	Affordable housing is defined by government within the National Planning Policy Framework glossary as 'social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market.' Social rented housing

	has guideline target rents determined through the national rent regime.
2.10. The rents appear to be based on realistic market rents.	Noted.
2.11. As a Parish Council we do not have expertise on Affordable Rents. However what is stated seems reasonable	Noted.

**3. On new developments, we expect 70 per cent of the affordable provision to be for rent, with the remainder being part-buy, part-rent or other 'intermediate tenure'. Do you agree this split is right?**

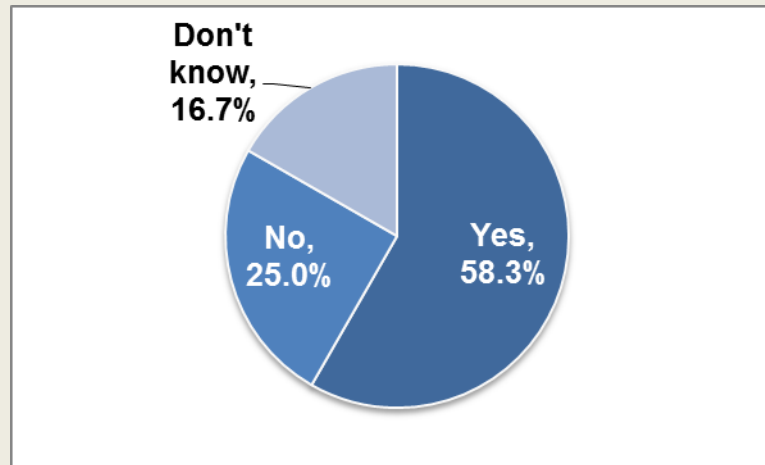


3.1. 100% rent controlled is the only way to ensure affordable, otherwise once on the open market the price becomes out of reach

Requirement for 70% of affordable housing to be rented: The draft West Surrey SHMA indicates that to reflect the need for housing based on income levels in the borough, 75% of affordable housing should be 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 cater only 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% 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.
3.2. Maybe 80 affordable rental / 20 intermediate tenure would be a better split.	See response to 3.1, above.
3.3. We agree in principle, though we do not know all the details of the latest mechanisms and circumstances for part-buy, part-rent and intermediate tenure.	Noted.
3.4. 70 % seems high- where has this rate been formed from?	See response to 3.1, above.
3.5. Suitable for larger, general needs sites only.	Noted.
3.6. I think it should be weighted equally 50/50.	See response to 3.1, above.
3.7. You obviously use the word 'affordable' to make it sound as if when you build these home they will be affordable, again to whom> Its all spin	See response to 1.7, above.
3.8. All for rental with no option to purchase	It is unlikely that a Planning Inspector would support a demand for 100% of the affordable housing on a private development site to be rented, particularly as the SHMA identifies some need for shared ownership and other intermediate tenures. The NPPF accepts that some forms of part-purchase (as opposed to low cost market housing) such as shared ownership and shared equity can count as affordable housing. We must also consider the overall viability of sites, and the Local Plan as a whole, and the inclusion of some shared equity properties assists viability.
3.9. This is acceptable BUT the percentage must not be dropped.	Noted.

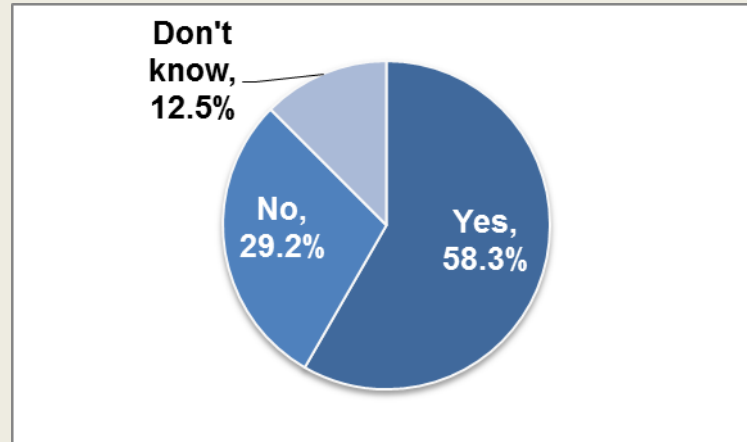
**4. There are other types of housing model being promoted by government such as 'Rent to Buy', discounted market housing, and private rented housing. Do you think we should consider these as part of the other 'intermediate tenures' within the affordable housing provision? (See page 28.)**



4.1. I believe these models will inevitably increase the cost of homes. Policies which turn disused buildings into homes, or discourage purchase of homes for investment rather than occupancy would be better	Noted.
4.2. Yes, As in Q3 we don't know all the details, but Effingham Parish Council would like to see effective use of public monies	Noted.
4.3. Where appropriate and to assist sustainable communities and viability	Noted.
4.4. We should build more Council properties and manage them properly. Selling Council properties has only increased the use of family homes by students in the	See comments on the Right to Buy, above. We are building Council properties, however the bulk

<p>Guildford area</p>	<p>of new affordable housing provision in future will still come from private developers via planning obligation. There is not sufficient funding to provide affordable housing by other means.</p>
<p>4.5. Yes, As in Q3 we don't know all the details, but Effingham Parish Council would like to see effective use of public monies.</p>	<p>Noted.</p>
<p>4.6. All types of housing model should be considered by the Council in planning future policy and strategy. However the emphasis should remain on Guildford BC increasing its overall stock of dwellings for rent either directly or by a contractual partnership with local and national housing associations.</p>	<p>Noted.</p>

**5. Do you think we should accept plots for self-builders as part of the 'intermediate tenure' affordable housing on a site? (See page 29.)**

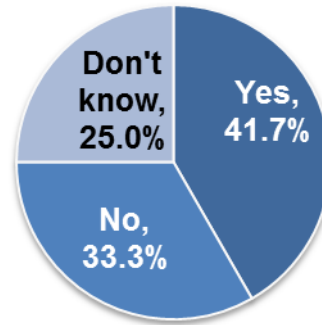


5.1. If there is demonstrable demand and capability to deliver homes	So far there has been limited interest, but we are keeping a list of people who have expressed interest in self-build.
5.2. The view of Effingham Parish Council tends towards No. Priority should be given to affordable housing. EPC does not wish to see measures put in place which might effectively transfer public funds to private owners at the expense of other council tax payers. More details of any scheme should be provided, otherwise definitely No	We agree that priority should be given to affordable housing. Self-build plots could be provided as part of the private element of a site.
5.3. But within reason, no green belt or nature reserve should suffer. There are plenty of homes that need better management.	Noted.



5.4. This just helps property developers get richer and push up the private rent market	Noted.
5.5. Affordable for those who build but when resold they potentially cease to be affordable	This is the nature of self-build and part of the incentive for doing so. The Government has recently consulted on a paper called 'Right to build: supporting custom and self-build'. Within this consultation document it is suggested that local planning authorities have the discretion to exclude from their register individuals who had purchased a plot of land through the right to build scheme in the last five years. There would therefore be less incentive to focus on self-build as a profit making exercise.
5.6. No. Standards of build may be below an acceptable level	Building standards are covered by building regulations.

**6. Ambition 2 sets out how we plan to bring empty homes back into use. Do you think there is anything more we could do to bring empty homes back into use? (See page 33.)**



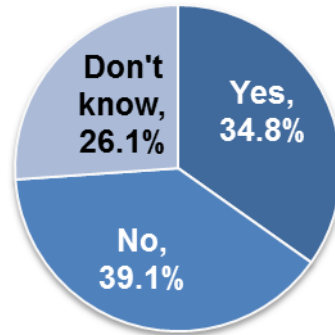
6.1. Build more social care homes; hikes in council tax for empty properties	<a href="#">See comments on council tax and empty properties, above.</a>
6.2. GBC has a relatively low percentage of bringing empty homes back into use, compared to other boroughs. Some empty homes are council owned.	<a href="#">Noted.</a>
6.3. Lobby the Government to change the law / introduce policies which discourage the practice of leaving home empty.	<a href="#">The empty homes policy actively seeks to pursue a vigorous policy of getting homes back in to use. This is achieved through persuasion, incentives and enforcement. The numbers of properties empty for more than a year has been reduced to about 150 and these are being systematically tackled.</a>
6.4. Yes. There are several possibilities: 1. Link self builders with empty	<a href="#">Linking self-builders with empty houses for renovation, as has</a>

<p>houses for renovation. Schemes in cities such as Liverpool and Stoke have offered empty homes for £1, on condition that the houses are brought back into use. The success of schemes such as these is questionable, but can lead to some good outcomes if handled well. The self-builder has to put more funds into each project in order to create a habitable home and bring it up to the standards agreed with the council. Some flexibility in scheduling is desirable so as to give the self-builder an incentive to continue the work. If contracts are enforced without flexibility and adaptation, the self-builder may end up losing as a strict interpretation of an unamended contract can revert a property back to council ownership, with a significant loss to the self builder. Such projects need careful management and agreement on progress. A project which is delayed, but 80% of the way to completion could be extended. See information on Liverpool and Stoke schemes at <a href="http://www.bbc.co.uk/news/uk-england-28641045">http://www.bbc.co.uk/news/uk-england-28641045</a> 2. More pro-actively seek out empty houses, and maintain an up to date list of empty properties, and consider compulsory purchase to put empty houses back into the housing stock.</p>	<p><u>been achieved in the North of England:</u> This policy has worked in Northern towns where there were substantial numbers of homes which had fallen into disrepair. However this is not the case in Guildford, where any property, even one in serious disrepair, has a high value due to the plot of land on which it sits. We do however offer grants and loans to owners wishing to bring empty homes back into use.</p>
<p>6.5. Actions seem very thorough</p>	<p>Noted.</p>
<p>6.6. See answer to 2 above. The problem is not so much non-occupancy as under-occupancy. Guildford has unbelievably high numbers of large properties with just one or two (usually elderly) people living in them. The economic incentives need to be changed so that empty rooms are brought into use at more reasonable levels of occupancy density.</p>	<p><u>Under-occupancy:</u> There is a very high level of under-occupancy in the borough, however this is difficult to deal with, because there are many wealthy residents who wish to have extra rooms and are willing and able to pay for them. We are aware from responses to both draft housing and planning documents and to rural household surveys that there are many elderly single and couples that would like to downsize and to stay in the area, but suitable housing stock is not available in the area.</p> <p>This is best addressed via the housing mix policy of the draft Local Plan, which will seek to ensure that developers provide a</p>

	<p>mix of properties, including homes suitable for downsizing, for those who are in larger homes but would prefer to move to something more manageable in their chosen location. This will in time free up the larger houses in these areas for larger families to move into.</p>
<p>6.7. Increased taxes on empty homes, easier marketing for people to sell/ rent their homes, work with local businesses to see about marketing to international workers.</p>	<p>It is already the case that higher council tax is paid on empty homes that have been vacant for over 2 years. Currently, a council tax discount is given for the first month that a home is empty. Full council tax is then paid until the home has been empty for 2 years, at which point the council tax increases to 150%. This is the maximum increase in council tax that we can impose under the current legislation.</p>
<p>6.8. More public sector investment in provision and maintenance of stock. Additionally more effective checks and controls over private sector landlords.</p>	<p>There is £600,000 in the Council's budget each year to finance improvements, repairs and adaptations to owner occupier or privately tenanted properties. The Council will investigate complaints from tenants and take appropriate action. In addition we are intending to introduce an accreditation scheme for landlords and letting agents which will help to raise standards. They would sign up to a code of conduct and be expected to demonstrate a professional competency.</p>
<p>6.9. Change the usage of empty commercial property into dwellings, Kingston Council has done this and it is working really well</p>	<p>Planning controls have been relaxed to enable change of use within certain class uses i.e. offices. It is a viable option for some commercial buildings to be used for housing. We will support this where appropriate.</p>
<p>6.10. Grants for those who wish to support and bring back to life empty dwellings</p>	<p>Grants are currently available. There is £600,000 in the Council's budget each year to finance improvements, repairs and adaptations to owner occupier or privately tenanted properties. Part of the policy allows for funding to landlords</p>

	bringing empty homes back in to use.
6.11. Better legislation to allow the process to be speeded up	We already have powers to deal with Empty Homes, including Empty Dwelling Management Orders and Compulsory Purchase. We will respond to Government consultations on legislation and request that they streamline the process.
6.12. Yes work faster to fill dwellings that have been vacated. Demand higher council taxes from empty home owners in order to encourage homes to be bought back into use.	<a href="#">Higher council taxes on empty homes</a> : See response to 6.7, above.

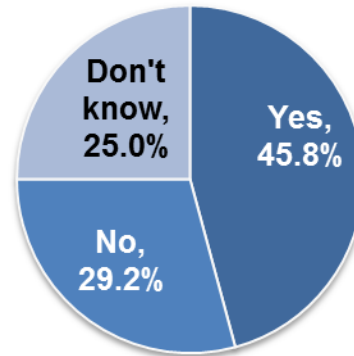
**7. Do you think there is more we could do to improve housing conditions across tenures?**



7.1. More choices on house upgrades, perhaps some optional upgrades that are part paid by the tenant	-
7.2. Housing conditions should be acceptable across all tenures. Various “best practice” measures should be in place to ensure that housing conditions are acceptable, and ideally a plan of continuous periodic monitoring and improvement should be in place.	<p>There is an obligation for the council to monitor housing conditions from time to time including private homes. This helps to inform our housing renewal policies which are reviewed each year. Information is collected by either a local or national house condition survey. The last local survey was done in 2009 and the next one is likely to be done within the period of the strategy.</p> <p>There is separate monitoring of energy efficiency through Energy Performance Certificates which identifies trends and improvements.</p>
7.3. Damp checks, renovation, checks, consistent council tax.	Householders are able to contact the private sector housing team when they have concerns about living conditions. We have an

	<p>enforcement team which responds to complaints from private tenants and a Care and Repair service which can diagnose defects and advise and support elderly and disabled residents through remedial works. There is a handyman service, which can undertake smaller DIY jobs for all householders. There is a grant and a loan scheme to help finance major works to properties.</p>
<p>7.4. More public sector investment in provision and maintenance of stock. Additionally more effective checks and controls over private sector land lords</p>	<p>We already make a significant investment in the maintenance of the Council housing stock; we have achieved, and in many cases exceeded, the Decent Homes Standard.</p>
<p>7.5. yes be firmer but fairer to tenants</p>	<p>New legislation has been introduced which requires landlords to sign up to a redress scheme, which enables tenants to complain to an independent body about the service they have received.</p>
<p>7.6. Greater powers to deal with private sector landlords</p>	<p>See above. There is legislation available for Councils to enforce safe standards. We intend to introduce an accreditation scheme for landlords and letting agents which will help to raise standards. They would sign up to a code of conduct and be expected to demonstrate a professional competency.</p>

**8. Is our approach the right way to make best use of the private sector?**

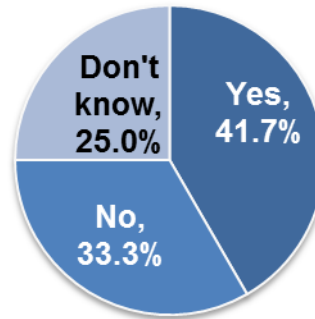


<p>8.1. Buy your own land, build your own social houses, take away right to buy.</p>	<p><a href="#">Buying land, Council building, Right to Buy</a>: See Question 1 responses.</p>
<p>8.2. Market rate homes should not be used to achieve viability for rural exception sites</p>	<p><a href="#">Inclusion of market housing on rural exception sites</a>: National Planning Policy suggests that market housing should be considered on rural exception sites. Inclusion of market housing can help make schemes viable and allow housing providers to charge lower rents on the affordable properties. However it risks undermining the justification for the policy and pushing up land prices. Because of these risks our draft Local Plan 2014 policy 4 limits the amount that can be paid for rural exception land and limits</p>



	the inclusion of market housing strictly to what makes the scheme viable.
8.3. Private sector should be used to provide affordable housing. At present the planning system is acting as a supply mechanism for the private building sector, which is inappropriate.	Noted.
8.4. "Best practices" for landlords should bring all properties up to a desirable level for all groups – types of tenure. Accredited landlord and property schemes should be adopted, with certification of landlords.	We intend to adopt a scheme of landlord accreditation for Houses in Multiple Occupation from June 2015. If this is successful we will consider expanding it to all landlords. We currently advise landlords of landlord associations which offer advice, for example the Southern Landlords' Association.
8.5. See 2 and 6 above. The discredited Guildford draft Local Plan places all its hopes on new housebuilding, when there is (a) no room for this because of the Green Belt and (b) no public support for it either. There should be a total shift of emphasis to sensibly re-using existing housing stock while prioritising brownfield newbuild, as has been happening in most of London for a couple of decades.	These comments are matters that are better dealt with through the emerging new Local Plan, so these have been passed on to the Planning Policy team.
8.6. You must listen to the general public, the existing infrastructure will be overloaded and will not be able to cope, schools, doctors surgeries are stretched as it is. The roads around Guildford are already full during rush hour.	We are preparing an Infrastructure Delivery Plan (IDP) to support our draft new Local Plan. The IDP will set out the infrastructure required to support the planned growth. It will also set out who will provide it, the delivery mechanisms, possible funding sources and phasing.
8.7. Not in relation to housing. The private sector are only interested in making lots of money	Noted.
8.8. Try a different county	The Council is responsible for meeting housing need within our borough.
8.9. "Best practices" for landlords should bring all properties up to a desirable level for all groups – types of tenure. Accredited landlord and property schemes should be adopted, with certification of landlords.	See response to 8.4, above.

**9. Do you think there is any more we could do to promote sustainability and energy efficiency?**

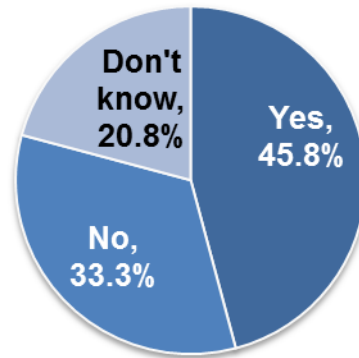


<p>9.1. Combined heat and power should be investigated for high density builds, solar panels could be added to existing dwellings and garages</p>	<p>We will always look at the feasibility of CHP and heat networking on any new development.</p>
<p>9.2. Very little in terms of design focuses on sustainability or energy efficiency.</p>	<p>We agree that design is key for energy efficiency and sustainability, and energy efficiency is dealt with in the section “energy efficiency in design” in the strategy.</p>
<p>9.3. If by sustainability you mean sustainable development GBC needs to increase its re-use of brownfield sites and increase housing densities by encouraging / building more low-rise (say 5-6 story homes). Any use of Greenbelt Land is unsustainable as it takes away that Greenbelt forever.</p>	<p>The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The borough consists of 89 per cent Green Belt.</p> <p>9 per cent of Guildford borough is urban area. Brownfield land in these areas offers limited capacity. Given the findings of the SHLAA (June 2014) and the draft West Surrey SHMA (December 2014), it is likely that countryside land would need to be used for</p>

	<p>future development, alongside urban and village settlement land, to meet the objectively assessed housing need over the plan period.</p> <p>Additionally, non-green belt land can in some cases be designated as new Green Belt land.</p>
9.4. Sustainability and energy efficiency considerations should follow the latest best practice guidelines.	Energy efficiency, especially fabric efficiency, will follow appropriate best practice and conform to the latest standards of building regulations on energy efficiency. Sustainability will be a central component of the design of any new housing developments.
9.5. Make the most of government funding and schemes	Noted.
9.6. Guildford's urban skyline shows what a pathetically low level of adoption there has been of solar energy panels. So, first of all, GBC should set an example by generating all its own energy via solar panels. This is increasingly cheap and not difficult to achieve. Secondly, it should properly resource administration of the new phase of the Government's Green Deal, so that applications for vouchers for solid wall insulation etc. are processed quickly and a disproportionate amount of the national budget available comes to Guildford.	<p>We embarked on our own programme of solar photovoltaics some years ago and continue to look for opportunities on our own building estate. As far as Guildford borough is concerned the restrictions on solar panels on listed buildings, of which Guildford has many, are part of the reason there are fewer in Guildford.</p> <p>The Green Deal is a central Government administered scheme and Guildford's involvement in obtaining funding for solid wall insulation is conducted by Action Surrey. Action Surrey is a partnership project across all of Surrey's local authorities to provide impartial energy advice to Surrey's private residents and raises awareness of local and national schemes; Action Surrey does not administer the Green Deal.</p> <p>The rush to obtain that funding was the result of high levels of national demand and we believe that Guildford received a reasonable allocation. We do not see a case for Guildford to receive a disproportionate amount of the national budget.</p>
9.7. More awareness when buying or renting a property, offer other ethical	We do not have, and should not have, any control or influence

gas and electricity providers (ecotricity etc.)	over who residents wish to use as their energy supplier.
9.8. by building more eco friendly housing or changing existing housing to eco friendly housing	We seek to improve the sustainability of our housing stock over and above the gradual improvements already being imposed by planning regulations.
9.9. Advertise better monitor better and promote grants	We have a Climate Change and Energy Management team which focus on these matters.
9.10. Use locally based contractors wherever possible	We are bound by procurement rules, which, depending on the size of the contract can require us to tender projects to the whole EU. However we notify local contractors when there is work available to ensure they can apply.
<p>9.11. Action Surrey comments (summarised):</p> <ul style="list-style-type: none"> <li>- The Council should utilise BRE stock condition information</li> <li>- Strategy should contain figures relating to excess winter deaths in the borough and fuel poverty statistics. We should put in place an affordable warmth strategy.</li> <li>- Action Plan - Action Surrey was helping to deliver on these so should we not be mentioned here for items 2.8 and 2.16? Could look at some activity here with CCG/Health professionals?</li> </ul>	<p><u>Sustainability and Affordable Warmth</u>: Points have been added to the strategy action plan to reflect these comments.</p> <p>We are already making use of the BRE information.</p>

**10. Our aim is for 10 per cent of new affordable homes or accommodation developed over the life of the strategy to be specialist housing. (For older people, those with disabilities, young people, travellers, for example.) Do you agree this level is about right?**



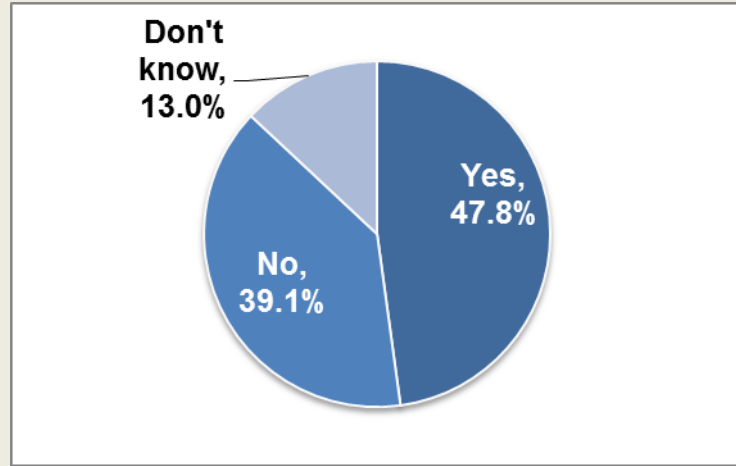
10.1. Shouldn't travellers be excluded - if they are travelling why should they be provided with homes?

Travellers with permanent homes: The National Planning Policy Framework requires local planning authorities to address the need for all types of housing and the needs of different groups in the community. Planning policy for traveller sites sets out how travellers' accommodation needs should be assessed. Communities and Local Government recently consulted on amendments to planning policy for traveller sites, and proposed changes to the planning definition of a traveller. This consultation document carries no weight at present. Whether a traveller is still

	travelling or not, their housing need should still be assessed and provided for. To assess and provide for the accommodation needs of other groups, but not travellers, would potentially be discriminatory and therefore unlawful.
10.2. I think the term travellers is incorrect as if they have permanent homes they are not travellers	See response to 10.1, above.
10.3. Travellers should mean those who travel, not a particular ethnic group, or this becomes discriminatory against the rest of the population. Disability groups do require specialist housing, as do older people. Not clear that young people require specialist housing, but they do need housing to be genuinely affordable.	See response to 10.1, above.
10.4. The percentage should be worked out in accordance with genuine demand. Provision of these homes should be regarded by the beneficiaries as a privilege, not a right.	Noted.
10.5. Having some specialist housing means that the accommodation may not be suitable for others, and this might present problems. This may also present other issues. What exactly is meant? One form of specialist housing would be houses for shared occupancy, for example by some people who have difficulty in organising themselves, but can do so in a community, with some management support. Other forms of specialist housing might be some form of sheltered accommodation for older people. Yet again there might be a need for specially adapted houses for people with particular physical disabilities. The policies on specialist housing would need to be considered very carefully. It would be important to ensure that houses are in the right places, and serve people appropriately. There might also be a need to consider the availability of appropriate services in the immediate vicinity of such specialist housing, yet creation of housing ghettos where most residents have similar problems or	<u>Target of 10% for specialist housing:</u> 10 per cent is based on information from the County Council's joint accommodation strategy, from local housing needs assessments. However In practice, the need for specialist housing on a new build site depends very much on the type and location of the development, and the particular need arising as the development comes forward. For example, in recent years, several fully wheelchair accessible units have been provided by developers, and tailored to the needs of households identified by the Council's Disability Panel . In other cases, the provision of specialist housing, such as supported housing, is dependent on the availability of ongoing funding for the service from the County Council. When a new development is proposed, the proportion of specialist housing will be agreed on a site by site basis.

characteristics may not be desirable, and could lead to poor social integration. Effingham Parish Council questions the figure of 10% for specialist housing. How is this figure obtained?	
10.6. The average age for death is now higher in the UK and the age of young adults leaving home is lower this % needs to be reassessed to match the need and should be nearer 30-35% minimum	<p>ONS data shows that there has been a large increase in 20 to 34-year-olds living with their parents since 1996.  <a href="http://www.ons.gov.uk/ons/rel/family-demography/young-adults-living-with-parents/2013/sty-young-adults.html">http://www.ons.gov.uk/ons/rel/family-demography/young-adults-living-with-parents/2013/sty-young-adults.html</a></p> <p>This is a national trend, which is also occurring in Guildford due to the high cost of housing, and more people going to university rather than straight into work.</p>
10.7. Specialist housing should be provided in discrete developments to make management and maintenance more cost effective and efficient.	Noted.
10.8. Once again you have to understand the meaning of 'affordable'	Noted.
10.9. Specialist housing for the elderly and disabled only	Noted.
10.10. Arbitrary targets can be counterproductive - I hope this is based on sound research	See response to 10.5, above.
10.11. Too high	Noted.
10.12. Yes, seems reasonable	Noted.

**11. Are there any other particular groups or household types for whom new affordable homes should be a priority?**



<p>11.1. Lower income employed, lower income disabled, and lower income elderly</p>	
<p>11.2. Those in employment</p>	<p>When a significant number of new homes come forward, the Council often puts in place a lettings plan which includes a mix of working/non-working households as well as family sizes/ages of children. The Government is introducing amendments to legislation which would give priority to working households who wish to transfer from one affordable home to another. However it is not clear yet how this will work – allocating based on employment raises difficult issues of what employment would make someone eligible, e.g. length of employment, permanent/temporary contract, type of job, and what would happen if someone in employment is allocated housing and</p>



	ceases to work soon after.
11.3. There is no immediately obvious group which should have priority. All groups should be treated fairly.	Noted.
11.4. Some downsizers	Noted.
11.5. Less well-off singles, who account for the vast majority of new household formation.	Noted.
11.6. New buyers, and over 60s	Noted.
11.7. Single people	Noted.
11.8. Short term lets for younger persons already in the community.	Noted.
11.9. Teachers, nurses, firefighters, ambulance workers	See response to question 1 regarding key workers.
11.10. Keyworkers, i.e. police and workers in specialist areas, i.e. if Guildford needs primary school teachers then this cohort should be a priority. It should be fluid to attract good workers to an expensive area	See response to question 1 regarding key workers.
11.11. First time buyers these might not necessarily be young people	Noted.
11.12. You appear to have ignored the fact that in order to have what is welfare housing we need to attract young highly skilled relatively well paid people who cannot afford costly housing at this stage. Especially near University we need say 300/500 houses for skilled science based workers	Noted.
11.13. Yes young single people	Noted.
11.14. There is no immediately obvious group which should have priority over others. Treat all groups fairly.	Noted.
11.15. Key workers, e.g. teachers, nurses, carers, firemen, policeman, should be included in the strategy, possibly with an upper age limit of 35 years.	We have had key worker schemes in the past, when Government funding was specifically targeted at these groups. It can however create difficulties, for example with properties remaining empty or taking a long time to let when no key workers come forward who meet the criteria. (Also see response to question 1).

<p><b>12. Are there any issues we have not addressed that you think should be included? Please also use this box for any additional comments or suggestions.</b></p>	
<p>12.1. I am concerned that GBC proposes to set an income threshold of £70,000 per couple, so that anyone earning below this can qualify for social housing. It is a huge increase over the current threshold. This threshold is only slightly below the median income for GBC, excluding overtime (the weekly medium pay, excluding overtime, was £33,368.40 pa in 2013, which means a couple on median earnings would receive £66,737pa.) It would mean that around 50% of full-time working residents could qualify (potentially 13,500 couples). The use of this threshold could vastly increase the social housing list and a longer housing waiting list could then justify a huge private sector building programme - which I am against for the South East in general - particularly if it involves building on Green Belt</p>	<p><a href="#">Response to 12. 1. Re: Allocations</a></p> <p>The £70,000 threshold to join the housing register applies only to couples with children. For couples without children the threshold is £35,000. The £70,000 threshold is a maximum, and in reality there are very few households on the housing register with this level of income. Those who do have this level of income tend to resolve their housing problems in the private sector rather than wait for social housing.</p> <p>However, as part of our annual review of the housing strategy and guidance on affordability, we intend to carry out detailed analysis of incomes on the housing register, which should ease concerns about an artificially high housing need.</p> <p>In any case, the SHMA relies on household income data from central government (for example the Annual Survey of Hours and Earnings, CACI data, and census data) to assess how many households are in need of housing, and does not extrapolate from housing needs register numbers. Before the £70,000 threshold was introduced, there was in fact no upper limit to earnings for those applying for rented housing in the borough; but then, as now, most couples with a significant income seek private housing and do not approach the Council.</p>
<p>12.2. The Rural Exception site policy is a 'Trojan horse' allowing</p>	<p><a href="#">Response:</a> Rural Exception only allows for small scale development of</p>

<p>developers onto greenfield or other protected areas for market rate houses to be built. It is a policy that should be ceased forthwith. Conserving and protecting our countryside should be a priority and brownfield urban sites should be used instead</p>	<p>affordable housing for local / Parish needs on the edge of or close to village settlement boundaries, if there is a proven need for affordable housing within that parish. Rural exception policy is in the 2003 Guildford Local Plan (policy H12) and has also been national policy for many years.</p> <p>To illustrate the scale of rural exception development, over the past six years planning permission has been granted for 50 rural exception homes in the borough – (47 affordable homes for rent and 3 affordable homes for shared ownership purchase) - on five sites. Most rural exception sites are around 10 or 12 units in size. The homes are secured as affordable in perpetuity, are allocated to people with a proven connection to the parish, and tenants do not have the Right to Buy.</p>
<p>12.3. We Object to the use of Rural Exception Sites - Clause 54 - this is not acceptable to us in green belt areas</p>	<p>See response to 12.2 above.</p>
<p>12.4. Use of brownfield should be prioritised for affordable housing, as set out by Brandon Lewis.</p>	<p>Noted.</p>
<p>12.5. I cannot understand why GBC is prepared to pay 10 times agricultural land values for Rural Exception Housing. Why can it not use Compulsory Purchase Orders at say 2 or at most 3 times the agricultural value? Rural Exception Housing should be built for true exceptional requirements and not to provide a windfall for land owners, GBC need to rethink this policy.</p>	<p>10 times agricultural values is seen by officers as a reasonable compromise between the need to encourage landowners to bring their land forward for affordable housing development, whilst ensuring that housing providers can acquire the land at a value that makes schemes viable with no or very little market housing. Although a tenfold increase in land value from agricultural to housing sounds a lot, if a field gains planning permission for market housing, the uplift is between 50 and 100 times agricultural value.</p> <p>Compulsory Purchase Orders are a lengthy and expensive process.</p>

	<p>We would not be able to compulsorily purchase agricultural land at its current use value and then build housing on it. Compulsory Purchase requires the Council to pay the full market value for the land, which if were to be developed as housing would be above agricultural value.</p>
<p>12.6. We believe that the proposals for affordable housing should not over burden the council tax payer. Policies relating to affordable housing should be fair and balanced between groups who need to be housed, developers and the Council Tax payer. There is no point in setting affordable housing targets that are unachievable. It is much better to set targets that can be delivered practically by developers and/or council building. It is better to have a target of 20% or 30% which is agreed by all groups than impractical targets of 40% where developers make excuses and overall the affordable number that gets built is less than 10%. Also most affordable housing needs to be built in urban areas where there are good nearby facilities and good transport links.</p>	<p>Urban areas are prioritised for housing. However the strategic housing land availability assessment shows that even if all urban sites are developed, there will still be a shortfall of housing in the borough against our assessed need.</p>
<p>12.7. Traffic - with the new houses being built or suggest roads need to be looked after better and alternative routes should be built so smaller villages do not suffer with traffic, pollution and dirt.</p>	<p><u>Infrastructure:</u> Alongside our Local Plan, we are preparing an Infrastructure Delivery Plan which will set out the infrastructure required to support the planned growth. It will also set who will provide this, the delivery mechanisms, possible funding sources and phasing.</p> <p>We are currently undertaking several transport studies to investigate how additional infrastructure can be improved to deal with additional traffic and people using public transport arising from planned development.</p>
<p>12.8. Whilst I am supportive of the need for a housing strategy I find it difficult to support increased levels of housing in areas where the infrastructure, particularly transport, has not been upgraded in advance of any increases in housing. Given that the Guildford Local Plan has taken a step back rather than forward I find it difficult to see how any</p>	<p>In recent years, despite developers' arguments over viability, the full quota of affordable housing has been provided on all developments which triggered the planning requirement. The high sales values of properties in the borough mean that it is almost always possible for developers to provide affordable housing within a viable scheme. The</p>

<p>strategies, especially building new housing that relate or rely on it can proceed until that is agreed.</p>	<p>reason that less than 35% has been provided overall is that sites of below 15 units (or below 10 units in rural areas) are not required to provide affordable housing, and a large number of sites in the borough have been too small to provide affordable housing.</p> <p>This is being addressed via the proposed affordable housing policies in the draft Local Plan, which require affordable housing contributions from all sites of 5 units or more. However the Government has proposed new legislation that will exempt all developments of 10 units or fewer from affordable housing and other planning contributions.</p> <p>Under current planning policy, sites of below 15 units in town, or 10 units in rural areas, are not required to provide affordable housing. This makes it difficult to achieve a ratio of even 20% affordable homes, because many sites in the borough are small and do not trigger the requirement for affordable housing .</p> <p>The draft Local Plan aims to deal with this problem by proposing that smaller sites contribute to affordable housing, and requiring all qualifying sites to provide a greater proportion of affordable homes. However new national policy introduced in Nov 2014 prevents us from requiring developers of sites smaller than 11 units and 1,00sqm to provide affordable housing.</p>
<p>12.9. This is a lengthy and complicated plan. Overwhelmingly from the people I have spoken to it would appear that extending Guildford has been poorly thought out. There are no plans for new roads (according to people in the swan lane shop) and Guildford already can't cope with the amount of people in it. Trains and roads should be a priority. I.e. making Guildford train station a terminal and building new roads. My family for one (and I know others) are seeking to leave the area</p>	<p>See earlier responses regarding infrastructure.</p>

<p>because of this. I feel that sadly Guildford is being stretched too far.</p>	
<p>12.10. Yes we should build on Brown Belt sites and the site of the old Generating Board in Portsmouth Road is a disgrace. How long has that been empty? Why are there so many empty offices? Use these spaces before the Green Belt. Also the plan if you can call it that does not appear to address the obvious traffic problems that will arise. Where will all the cars go? I would also bet that all the house building will not have any effect on the council waiting list?</p>	<p>Urban areas are prioritised for housing. However the strategic housing land availability assessment shows that even if all urban sites are developed, there will still be a shortfall of housing in the borough against our assessed need.</p> <p>The site on the Portsmouth Road was subject to a covenant which prevented residential development. This has now expired and the site has been acquired by a residential developer, who intends to build housing on the site. However the Council is unable to control the speed at which a private owner brings forward their site for development.</p> <p>We will support the conversion of offices where appropriate, and there have been several conversions recently, assisted by new permitted development rights. Whilst there is an excess of office space in the borough, some of the office space is not in the location, or of the type, that businesses want.</p> <p>It is up to the owners of office space to judge whether their asset has a long term value as offices, and whether it would be viable to redevelop as housing.</p>
<p>12.11. Save Hogs Back Campaign: Whilst we agree with the principle of providing affordable homes to those in most need and we believe that there is more that could be done to increase the supply of affordable housing, we have a fundamental concern with the ambition, which assumes that the supply of affordable housing described in the policy is needed. We believe that the policy should seek to provide a finite number of affordable homes and not a proportion of all new homes being built as currently stated. If the Council follows an aggressive house building agenda to boost the local and national economy, then the result would be more houses than are necessary to</p>	<p>In the unlikely situation that the objectively assessed need for either market or affordable housing has been met, the Council will be able to review the need for further homes to be built in the borough.</p>

<p>meet the objectively assessed needs and possibly the building of more affordable homes than are needed too.</p>	
<p>12.12 We have concerns about the statement on page 27 (under the section: working with housing providers) that “the main source of new homes is likely to be via Section 106 planning obligations ... ” This approach to meeting affordable housing needs might be driving (and further incentivising) GBC to build more housing than is needed to meet its objectively assessed needs. The strategy for building affordable homes that GBC needs should be capable of being carried out independently.</p> <p>We are also concerned that GBC, and sections of the community, might support (and justify) the need to build an exaggerated and overstated overall housing figure (for example the inflated figure of 652 per year compared to existing levels) on the basis that it is needed to provide a proportion of affordable homes.</p>	<p>There is indeed a link between affordable housing delivery and market housing delivery. In an ideal world, funding for affordable housing would be completely separate from private development, and there would be sufficient land under the Council’s control to provide all necessary affordable homes. However the Government does not wish to directly grant fund affordable housing, preferring instead for it to be delivered via planning obligations. Regarding the overall requirement for housing, the draft West Surrey SHMA has identified a need for market housing as well as affordable housing, however when applying the tests set out by national guidance it indicates that the overall estimated need for housing should be increased by about one sixth due to the need to deliver affordable housing.</p>
<p>12.13 Whilst we agree with the need to supply affordable housing for those in greatest need, the information in the draft strategy does raise a number of issues, in particular:</p> <ul style="list-style-type: none"> <li>- Figures presented show that there are 6,850 affordable homes out of a total 54,500 households. This puts the proportion of households being affordable at around 12.5%.</li> </ul> <p>The amount of affordable houses that is presented in the consultation document works out to be 260 homes per year (based on the current SHMA figures). This will have the net effect of increasing the overall</p>	<p>Whilst the number of currently available affordable homes is relevant to predictions of future need, the proportion is less so, because it would be wrong to assume that an increase in population will increase the need for each type of tenure by a similar proportion. In addition, whilst there are 6,850 affordable homes, there are many households in housing which is not categorised as affordable, who are not adequately housed, or who are struggling to pay high private sector rents.</p>

proportion of affordable houses above the existing 12.5%.

The provision of 260 houses per year seems to be higher than needed:

It is much greater than the natural population growth of Guildford (understood to lead to a requirement of less than 100 homes per year).

260 homes per year is much greater than those being built between 2008-14 (so 339 - just over 50 per year), but against this backdrop, GBC, (since 2011) has housed 1,047 households from the housing register in social rented housing, assisted 67 households to buy a shared ownership scheme and prevented 1,571 households from becoming homeless. (These figures have been taken from the consultation document.)

Given the size of the existing waiting list (3,389 applicants - 2,461 in highest band) and the success in placing those in accommodation since 2011, then there doesn't appear to be the need to raise the provision of new affordable homes from 50 per year to 260 per year. It would appear that this backlog could be achieved in a similar period (i.e. 3 years since 2011) - in which time just 150 odd houses would be built. Clearly there is a lot of movement of people into and out of social housing - in the same way there is churn in the private rental market.

Even if you were to assume that everyone on the housing waiting list was housed over the next 6 years, (40% of 652 provides 260 homes per year, so in 6 years there would be sufficient homes to supply 3,389 on the waiting list - assuming 2.3 people per household (average home delivered since 2011).

Providing sufficient housing for everyone on the waiting list would increase the proportion of affordable homes to approximately 15%

It is unclear what the 'natural' population of Guildford is. However the Strategic Housing Market Assessment (SHMA) indicates that the requirement for housing is significantly higher than this.

Despite housing 1,047 households from the housing register since 2011, the number of households on the housing register has not reduced. This is because whilst some needs are met, new households are formed, so we need to address newly arising need. Assessing the overall need for housing is complex, and is dealt with via the SHMA. However it is clear that each year for the past decade, despite all the vacancies that arise and new affordable homes built, the number of people in priority need (currently 2,461) has remained roughly the same.

It is fair to say that if we consistently delivered 260 new affordable homes per year, this would make a significant dent in the housing register. However it is already clear that we will not see this level of affordable housing completions in the coming two or three years - we are able to predict this fairly accurately because the time it takes a site to get from the planning stage to completion is normally at least two years. That leaves 13 years of the Local Plan period up to 2031, during which we would also have to allow for population growth, the loss of affordable homes via the Right to Buy, and any years in which the target of 260 was not met. It seems, therefore, quite reasonable to aim for 260 affordable homes per year.

However if, in five or ten years' time we have seen significant delivery of affordable housing and the housing register has significantly reduced, it would be appropriate for the Council to review the need for housing. SHMAs are normally undertaken every five years to ensure



<p>(assuming everyone on the list was provided with an affordable house). Why would you then need to continue beyond year 6 to build at a rate of 40% per year?</p> <p>Why does the rate need to be set at a proportion of 40% of the annual housing supply? This figure should be calculated as a number per annum, which reflects actual housing need and our concern is that the estimated need for affordable housing might be driving the GBC targets for overall housing numbers.</p> <p>It would seem that the strategy whereby 40% of all homes in the future will be affordable homes will simply be one in which the market rates for housing are artificially inflated by GBC policy - and there will be no economic case for the rent levels to readjust.</p> <p>The draft Local Plan relies heavily on developers to provide affordable housing - with 40-45% being cited as the proportion of affordable homes to be built on larger Green Belt sites. Unfortunately, this level of provision is dependent on a subjective assessment of whether it's deemed "economically viable" and therefore there is little justification for assuming that it will be met. Having met with the stakeholder of one of the so-called key strategic green belt sites, it's clear that there is little intention to provide the 45% quota of affordable housing that draft local plan asks for. GBC either has to remove this caveat - or provide the necessary level of affordable homes itself, using compulsory purchase orders if necessary.</p>	<p>that the data is up to date. It would also be sensible to review the housing register to assess whether the mix of affordable housing proposed by the Local Plan continues to meet priorities.</p> <p>As discussed in the response to 12.7, above, the government has chosen to provide affordable housing via obligations on private developers. Whilst the Council is doing all it can to directly provide affordable housing, as are our housing association partners, our resources are limited and we cannot realistically meet the need for affordable homes on our own (or at least, not without huge increases in council tax). We have the power to use compulsory purchase orders, but this is a lengthy legal process and if successful requires the Council to pay the market value for land, so again it is likely to be beyond our financial capacity to deliver all the necessary affordable housing via this method.</p> <p>Economic viability is somewhat subjective, however we are robust in assessing developers' viability evidence, and have so far not been successfully challenged on grounds of viability. We have tested the Local Plan and shown that it is viable for developers to provide the proposed levels of affordable housing, alongside other planning contributions.</p>
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<p>We support GBCs plans to review its council holdings and consider areas which could be regenerated and the density of housing increased (pp 26/27). Whilst the benefit of doing this might not be so great as it otherwise could be (due to the good condition of GBC property as described) we do feel that this solution needs to be compared to the long-term costs and harm of the alternatives (considering for example the high environmental and economic costs resulting from the potential loss of Green Belt land). This assessment should also consider how this approach would be more sustainable over the long term (from an efficient land-use perspective and from the perspective of existing infrastructure, services, proximity to the town centre and employment areas).</p>	<p><u>Response:</u> The Council is exploring the option of regenerating areas which are already developed, and increasing housing density. We are in the process of carrying out feasibility studies in two areas of the borough. However there are a number of problems with this approach.</p> <p>Due to the impact of the Right to Buy, there are very few areas where the Council owns a significant proportion of the housing stock – therefore in order to assemble a potential development site, we would have to purchase (compulsorily) a large number of residents’ private homes, at full market value, and then demolish homes which are in good condition, in order to build taller buildings in their place.</p> <p>Higher density development brings its own localised problems of traffic and parking, as well as blight of surrounding properties which suffer from loss of light or amenity.</p> <p>Higher density redevelopment in town is favoured by those living in the countryside, whereas those living in more populated areas are unlikely to feel that the benefits of preserving the rural environment outweigh the detriment to their own local area.</p>
<p>We are concerned that the policy for rural exception housing may be used as a means to allow the development of market housing through the back door. Perhaps GBC should consider a policy for all rural exception housing to be provided by the Council (thereby limiting any need for any market housing to finance the development) and if more than one property was needed then this could be Council-owned as well. Perhaps GBC should also have a policy (if this isn’t already a requirement for rural exception housing) that this rural exception housing should be for rent only and there should be mechanisms to ensure that it remains so in perpetuity. Safeguards should be put in</p>	<p><u>Response:</u> The Right to Buy does not apply to rural exception sites – homes built under this policy have to remain affordable in perpetuity. It does not fall within the Council’s planning powers to restrict development of land to the Council only, which in any case might be seen as a conflict of interest.</p>

<p>place so that this housing isn't sold off under right-to-buy schemes and this form of housing requirement remains "exceptional" rather than the norm. Our concern is that rural exception housing may just be a route for development in the countryside and using right-to-buy as a way of exploiting this relaxation of Green Belt planning rules.</p>	
<p>We believe that a more sustainable approach to the provision of affordable housing is that housing built as affordable should be provided for those in need. This means that safeguards should ensure that this property remains as such in the long term so doesn't transfer into private ownership and families who are no longer meet the need for affordable homes (due to change in circumstances) will be encouraged to vacate the property and rent on the open market and in some circumstances move to a smaller property if it suits their needs - thereby vacating the larger property for others in need. For this reason, we believe that all affordable housing should remain rentable - not just the 70% target you state. We are concerned that the need to provide affordable social homes is being used as an excuse to build on the Green Belt.</p>	<p>Following various housing reforms in 2011, we have introduced 'flexible tenancies'. Tenancies are reviewed after five years, and if the resident would no longer be eligible to apply for social housing, the Council can request that they vacate the property and move to more suitable accommodation. This will not have a huge effect in the short to medium term, because households granted tenancies now will probably remain in similar circumstances for five to ten years.</p>
<p>We believe that the empty housing policy should also consider the current situation whereby many homes are left empty for many months in the year (due to being student lets) as well as housing left empty for longer periods. We believe that student accommodation in market homes isn't efficient use of this housing stock and, as mentioned elsewhere, students should be accommodated largely on campus. The policy should ensure that students, who form part of the proposed 1,500 cap of students who do not live on campus, should be using accommodation all year round - so these could be for PhD students as an example or others who would not vacate the town over the summer.</p>	<p>The number of empty properties overall reduced last year by 90 properties. 20 of these were as a result of specific and direct intervention by the Council. However the advice given to landlords and checks to ensure that properties are correctly categorised for council tax purposes has resulted in more properties either coming back into use, or being correctly classified as in use. There is a constant 'churn' of properties becoming empty and then returning to use once they have been sold, inherited etc. In any one year, most of the long term empty properties will come back into use, but total number remains similar as other properties join the list, having been empty more than 6</p>

<p>GBC can do more to bring empty properties into use and the target in the action plan appears far too low and also over too long a time-frame.</p>	<p>months.</p>
<p>The document states that the “provision of student housing is not a priority” in this housing strategy. We believe that this is wrong and that part of this strategy should focus on student housing. In particular, there are approximately 13,500 FTE students at the University of Surrey, whilst the population of Guildford Town is approximately 70,000. Furthermore, the majority of these students live in houses in the town. This puts pressure on the availability of accommodations for those in need of accommodation all year round and it serves to push up the price of rental accommodation at the cheaper end of the market.</p> <p>According to University of Surrey’s figures, around 7,000 students are living off-campus. This means that one in ten homes in Guildford is occupied by a student. Most of these are at the lower end of the market and could be rented to families as part of GBC’s affordable housing strategy. If the University is required to house a much higher proportion of its students on campus, this would release hundreds of homes for families in need.</p> <p>If the University of Surrey was required to build the student residences it committed to in 2003, this would release Hazel Farm (300 units), as originally planned, for residential use. Due to its proximity to the SPA (Special Protection Area), Hazel Farm would not be suitable for ordinary residential use, but Natural England has indicated that it could be used as a care home. Data 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</p>	<p>Students have a free choice over where they decide to live. Our draft Local Plan (July 2014), on which we consulted over the summer, required in Policy 3 that we would expect a minimum of 60 per cent of the University or Surrey eligible student population (full time equivalent) to be housed on campus or university owned land. The draft West Surrey SHMA makes a similar assumption in calculating the need for student accommodation and general housing to meet student growth.</p> <p>The University, in response to this consultation, has informed us that it is putting forward plans for 1000 additional rooms on campus.</p> <p>Our Strategic Housing Land Availability Assessment (SHLAA) has assessed potential development land for new homes in our urban areas and villages, including previously developed land. We have also assessed and are seeking to develop sites in our own ownership and reviewed our estates. Compulsory purchase is an expensive and lengthy process, and we would need to consider other alternatives in the first instance. Aside from the political implications of compulsorily purchasing private land, compulsory purchase requires the Council to pay the full market price for land, and with limited Council resources, it would not be possible to provide all the necessary affordable housing via this method.</p> <p>It does not follow that ‘one in ten homes in Guildford is occupied by a student’ based on there being 7,000 students living off campus. There</p>

15 to 20 years.

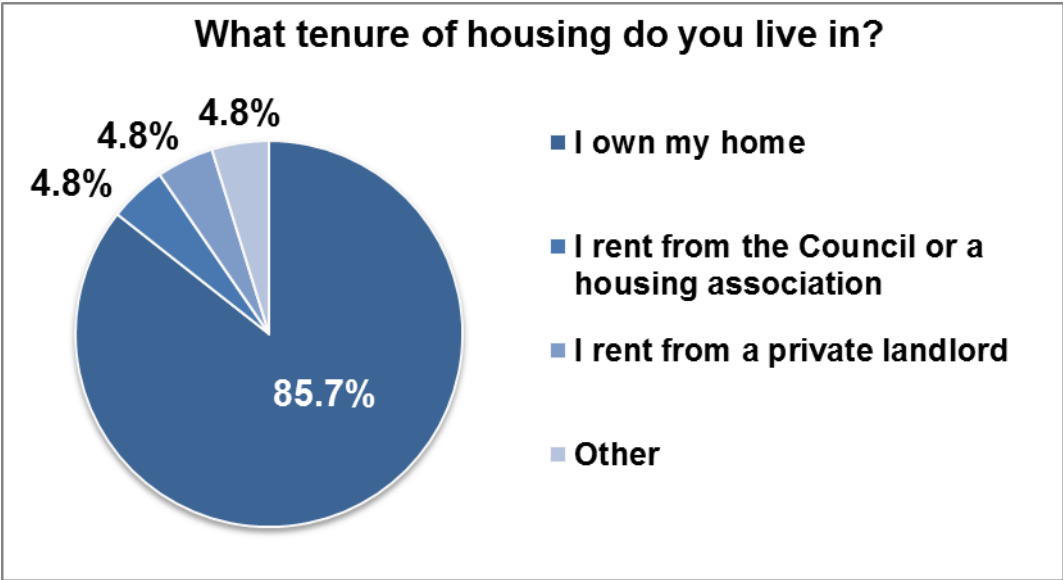
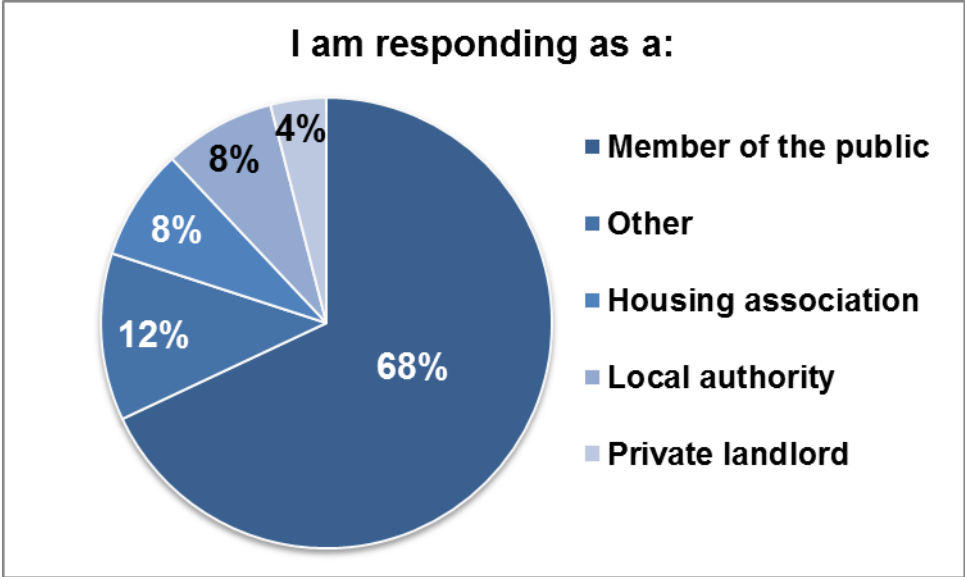
We believe that the policy should impose an absolute limit on University students living off campus. We believe that a cap of 1,500 living off campus would be suitable and achievable. This cap should remain at this level so that any future growth in student numbers should be accompanied by further accommodation being provided on-campus. A similar approach has been adopted by Oxford City Council and applied to both the universities in the city. GBC should consider how similar approaches could be taken with the Guildford Law School and, where appropriate, at Guildford College.

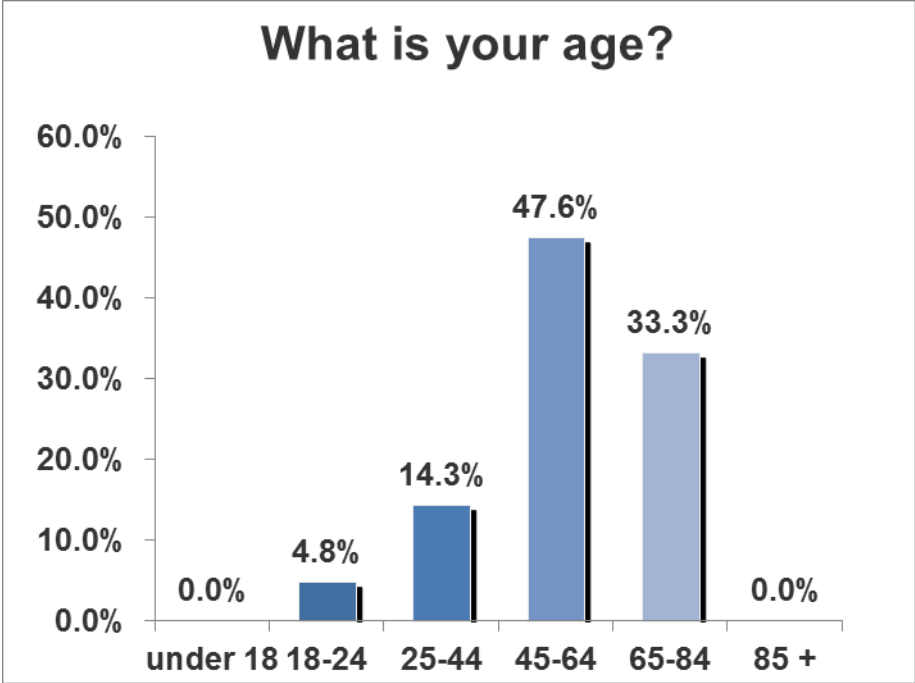
We believe that GBC should use its powers of compulsory purchase to ensure that student accommodation is built and to also make greater use of this accommodation for more than a third of the year when students vacate their accommodation to return home. GBC could explore how this could provide temporary accommodation over the summer for those in most need.

are 55,000 homes in the borough, which even if every student was the sole occupant of a property would be 1 in 8. Students tend to live in shared houses, and those that do not may well be living with their parents and attending university locally.

Students have a choice over where they live, and often choose shared houses in town over more expensive campus accommodation.

Regarding the use of student accommodation over the summer, this may not be practical because it is unlikely that a household's need for temporary accommodation will begin or end in line with the summer holiday period. Also, temporary accommodation requires a different level of management to university accommodation, which the university may not be geared up to provide. We will however approach the university to see if there is a possibility of short stay temporary accommodation during the holidays.





<b>Summary of other general comments received on the draft strategy (comments have been summarised)</b>	
<p>B1. Objection to rural exceptions housing policy on the grounds that Green Belt development is unacceptable.</p>	<p>Rural exception policy is a separate issue to reviewing the Green Belt as part of the Local Plan. The policy has existed for many years and enables small scale (always fewer than 20 units) developments which provide affordable housing for people local to the parish.</p>
<p>B2. Concerns about immigration and the effect on the need for housing in the borough.</p>	<p>The Council does not control immigration, either from other countries or internally to the UK. In the case of affordable housing, a local connection to the borough is required to be eligible. Market housing is open to anyone who can afford it.</p>
<p>B3. I have commented using the online questionnaire, but thought I would just add found the strategy very readable, due its succinct, informative and evidence based approach.</p> <p>The reference to Rural exception sites is very much supported throughout, but notice no reference to the work of Parish Councils &amp; Surrey Community Action and other partners in the main report, although detailed in Appendix 4. Worth checking status of surveys with SCA in Sands &amp; Seale in Appendix 4. The tariffs associated with THBSPA (where applicable) continue to be a dis-incentive on development on small rural schemes where viability is often tight.</p>	<p>Reference to the work of parish councils and SCA will be added to the strategy.</p> <p>The requirement to pay tariffs for mitigation against the potential harm caused to birds in the Thames Basin Heath Special Protection Area is to enable development which would otherwise be vetoed by Natural England. However, the matter of tariffs being paid by affordable housing developers is being addressed via the Local Plan, and there is also national planning policy being considered in relation to this.</p>
<p>B4. I am writing these comments as a private individual, rather than as a parish councillor. A relatively small point - from the 2011 census</p>	<p>The figure of 150,000 was rounded up. The SHMA takes into account all the latest population data, and there have been additional</p>



<p>(according to the data provided in the Draft document) there were 137,183 people in Guildford in 2011. A 6 percent increase would take that population to 145,414 which is slightly less than 150,000 by about 4000. It is stated that the expected population will be 150,000 by 2020, but if the rate of increase stays the same this seems to be an over estimate – firstly because the figures appear to have been rounded up, and secondly because basing my calculation on a 6 percent increase also ignores the fact that it was stated that the previous increase was over a decade, rather than 9 years from 2011 to 2020. I am concerned that the expected population figures may be needlessly estimated higher than they need be.</p>	<p>documents published which look into the population figures in detail.</p>
<p>Objection to housing being provided for London commuters, rather than current Guildford residents. Suggestion that workers could live elsewhere, and could work from home, as could local workers, if proper facilities and technology were available to enable home working.</p>	<p>Planners do take account of home based working to some extent in looking at commercial land requirements for the future and hence the total number of houses required. I agree that we need more low cost easy access business incubators and enterprise offices both in urban and rural areas. In Guildford there is a lack of supply of low cost, easy access, business incubators and enterprise offices in both urban and rural areas, Our economic development team is developing our site at Midleton Road to become a business start-up and support office with the aim of supporting up to 30 businesses, many of whom are working from home. These offices will provide the short- term leases that start-up companies need.</p> <p>Rural areas are currently more problematic because the infrastructure is not in place in all areas to support home working. However we are working with Surrey County Council to improve superfast broadband coverage.</p> <p>Some local employers such as Ericsson are attempting to tackle this</p>

	<p>issue, and work a very innovative model with hot-desking and virtual teams to be able to operate a high headcount within a restricted office capacity.</p>
<p><b>B5. Guildford Greenbelt Group:</b></p> <p>The policy of inclusion of market housing in the rural exception site category seems inappropriate; rural exception sites are by definition only acceptable in the context of genuine local need, which cannot be demonstrated in the context of market housing. Such sites should be limited to local people (i.e. local at parish level) only, and be maintained for rent in perpetuity.</p>	<p>Regarding the inclusion of market housing on rural exception sites, the NPPF states that we should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. Our draft Local Plan (July 2014) says in relation to Policy 5 that:</p> <p>There may be situations where a developer demonstrates that a rural exception scheme would be unviable without public subsidy. In such situations, and where there are no alternative sites available to provide the identified local affordable housing needs (as required by national policy) we will consider permitting the minimum number of market homes to make the scheme viable at our discretion. We may also consider allowing at least one market home where this would result in a significant improvement in the housing mix (tenure, type or size) or rent levels. The inclusion of market housing must serve to benefit the rural affordable housing stock and not inflate the “threshold land value”. This is the price that a developer pays for the land.</p> <p>Land values are generally high across the borough. Therefore where a developer proposes that at least one market house needs to be included to make the rural exception scheme viable, in considering the submitted development appraisal, we will limit the existing land value to no more than ten times the agricultural land value at the time. Where agreement cannot be reached, external consultants will be appointed at the developer’s cost to provide an independent assessment of the scheme’s viability. Any market housing must improve the mix of market housing in the village, and must be</p>

	integrated into the rural exception development.
<p>If the council policy of owning council homes itself (rather than allocating the responsibility for such homes to a housing association) is likely to permit increased selling of council owned properties under right to buy legislation, then this should perhaps be considered again and the option of using housing associations in part should be reviewed.</p>	<p>Regarding the Right to Buy (RTB), Housing Association homes generally have the Right to Acquire (RTA) which is in effect the same as RTB, if the homes are built using Government funding and/or let at Affordable Rents.</p>
<p>We are also concerned at the definition of affordable. We understand that this is defined now as 80% of market rent (for rent) or market value (for purchase), which is not an affordable level for those who are in genuine need and have a valid reason to require subsidised housing.</p>	<p>Affordable housing is defined in the National Planning Policy Framework as social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. The Government is currently pursuing a policy of rents being set at 'up to 80 per cent of market rent'. We consider this to be too high in Guildford, and our policy limits rents to the maximum amount of housing benefit for the relevant area of the borough.</p> <p>Regarding our Affordable Rent policy, our current position is fully outlined in Appendix 2 to the Housing Strategy, "Updated guidance on rents and affordability".</p>
<p>We would prefer that affordable housing meant that genuinely subsidised housing should be provided to those in genuine hardship and the ownership of a significant proportion of affordable homes should remain under the control of the council or a housing association (i.e. not be lost to the social housing sector through</p>	<p>It is difficult to define 'genuine hardship'. However there is legislation concerning homelessness and housing need. We also have our own Allocation Policy.</p>

<p>subsequent right to buy provisions).</p>	<p>Primary legislation allows homes to be lost to the Right to Buy, in both the housing association and council stock. This is beyond our control, and it will continue unless the Government changes policy.</p>
<p>B6. What about school places and where new schools would be built to deal with extra housing in the town centre? What provision is there for schools, and how it might affect people living in the town centre. I am concerned about the catchment area for town centre schools shrinking due to more housing being built nearby.</p>	<p>"Surrey County Council, as the Education authority, will work with borough council officers and liaise with other neighbouring authorities (borough and county level) to determine the additional need for school places that will be required to support the emerging Guildford Borough Local Plan.</p> <p>At primary school level, our main concern is the need for additional provision of places in and around Guildford town where all the schools are reaching capacity and the number of new homes that are being suggested will place additional pressure on local schools. Expansions that are currently being progressed are mainly to meet the ongoing increase in the birth rate, although there is some scope to meet demand from the new housing in the Local Plan in selected areas through expansion of existing primary provision.</p> <p>There is therefore a need to co-operate to find new sites for potentially two primary schools; one to the west of the town and one on the outskirts of the town centre in addition to meeting any provision resulting from urban strategic sites that may or may not come forward at Gosden Hill Farm, Blackwell Farm, the former Wisley Airfield and the Slyfield site.</p> <p>At secondary level, schools are not yet under pressure from the recent rise in birth rates, but capacity is projected to be reached around 2016-2018 and additional places are expected to be needed from 2017. Any development proposed in the draft Local Plan will add to these pressures and at least one new secondary school will be</p>

	needed to support development growth."
<p>B7. I write on behalf of the University of Surrey to provide comments on the draft Housing Strategy. The University has read the strategy with great interest as it considers the provision and affordability of housing in the Borough to be a significant concern for its activities as a higher education and research institution, and as an important local employer. The University, as well as businesses on its Surrey Research Park and indeed across the borough, experiences difficulty in recruiting and retaining staff as a result of the lack of housing that even staff on what would appear to be relatively high salaries can afford. Hence whilst the University notes that the strategy concentrates on affordable housing and the use and quality of existing homes, and has a relatively short time horizon of five years, the University would comment that there is a significant issue regarding the affordability of market housing that requires addressing over a longer time period.</p> <p>Whilst that can be achieved to an extent through the emerging local plan and the level of housing it will provide, this issue should be reflected in the housing strategy in an appropriate way, perhaps by the addition of an ambition to provide housing for key workers, whilst recognising that what constitutes a 'key worker' will require careful definition, as will the relationship between housing for these workers and the affordable housing provided under the usual application of the Government's definition. Against this background, the University fully recognises and understands the challenges set out on page 5 of the document and supports GBCs efforts to address these challenges, but would suggest that the issue of providing housing for the workers needed to maintain the Guildford economy should be more prominently featured, without detracting from the need to provide for the most vulnerable in society. The University supports Ambition 1, to increase the delivery of affordable housing, and notes that the main source of delivery is through Section 106 planning obligations. This</p>	<p>Response: Regarding key worker accommodation, the University is in a position to contribute to this provision by providing low cost housing on its own development sites, and using its land holdings to provide housing for staff and students. It is encouraging, particularly given some of the consultation responses above, that the University is taking steps to bring forward additional student housing in the borough.</p>

itself requires the grant of planning permission for market homes, and the delivery of the housing strategy is therefore inextricably linked with the local plan process of site allocations, and the subsequent grant of planning permissions. The more market houses that are delivered through the local plan, the more affordable houses can be secured. It is therefore imperative to the success of the housing strategy that there is a draft local plan in place and that it takes an objective approach to the number of new homes needed in the borough.

In addition, the University believes that housing that is provided should include a proportion for workers that are needed to support Guildford's economy and this might be reflected in providing for a part of the affordable housing provision to be set aside for these workers through nomination agreements and a relationship between rent and salary.

It is noted that provision of student housing is not a priority within the strategy, with the expectation that the University and other educational establishments will make provision as far as possible for their own housing need or their students access to existing housing in the borough. Against this background, the University would emphasise that it provides a significant proportion of housing for its students on its campus and will continue to do so. Detailed plans for a further 1,000 rooms are in the process of being prepared for a planning application in 2015.

It is noted in the strategy that the viability testing of the local plan demonstrates that market led developments in the borough can in most cases provide 40% affordable housing and remain viable. However the University notes that there may be many calls made on development sites, of which affordable housing is only one, and the viability testing of individual sites as they come forward over time must take account of this, with variable impact on ability to deliver affordable housing at the level sought in the local plan. It is therefore even more important to ensure that sufficient land is allocated to secure delivery of housing, both market and affordable. The University has engaged with GBC on development viability and will be commenting in detail on GBCs assessment of development viability

Our guidance on rents and affordability is based on the relationship between rents and salary (and benefits). However this is general guidance, and establishing a more direct relationship between the rents on specific properties and salaries in certain businesses would create the danger that the relationship is reversed, and salaries are set with regard to the rents on key worker properties!

These points are noted, however as discussed above, the evidence indicates that development is viable with the proposed levels of affordable housing and other contributions, due to the very high sale price of properties in the borough. This is particularly true of Greenfield sites which are not as likely to have the same constraints as town centre sites.

<p>when there is consultation on this in 2015.</p> <p>The University supports Ambition 2 to make best use of existing homes and improve housing conditions.</p> <p>The University welcomes the recognition on page 36 that not all HMOs are lived in by students, which is a common misconception, and that many young professionals also live in this type of accommodation. This itself is a result of the increasing lack of affordability of housing generally in Guildford (as opposed to the defined affordable housing types) which means that living in shared houses is the only form of accommodation that is feasible for many young working people of all types if they want to live in the town near their place of work. This should be addressed through provision of more housing that is affordable to these young workers who are often highly skilled and valued employees of businesses in the knowledge economy in the town. The strategy should address how this might be achieved.</p> <p>The University acknowledges the impacts of high concentrations of HMOs on local communities, and actively seeks to address these with its student body.</p> <p>The University supports Ambition 3 to improve social and economic well-being. However, whilst it is right that there should be a focus on homelessness, specialist housing and support to vulnerable groups, provision of housing that is affordable for young workers in the thriving sectors of the local economy would also improve social and economic well-being in a broad sense. The University hopes that these comments are helpful in concluding a strategy that meets the vision that “everyone should have a home that meets their needs”.</p>	
<p>B8.1 We need to consider the consequential social and economic effects of providing affordable housing - and you confirmed that those eligible were chosen on the basis of income and social need - so</p>	<p>Being in receipt of benefits is not the main criteria for being allocated affordable housing. Our allocations scheme can be viewed at <a href="http://www.guildfordhomechoice.org.uk/Data/ASPPages/1/8.aspx">http://www.guildfordhomechoice.org.uk/Data/ASPPages/1/8.aspx</a></p>

<p>being in receipt of benefits would be the main criteria. We did not identify "key workers" as candidates as it was an understandably difficult category to define.</p>	
<p>B8.2 While this is a fully justified social policy and one which a wealthy community should support it has two negative economic consequences. Since it has to be funded by market housing this makes market housing more costly and makes access to market housing more difficult to younger professional people. Secondly since it is these "key workers" who are responsible for our economic future ( it has been estimated that the Gross Value Added of their output is over £75k compared with under £25k for retail workers)"</p>	<p>If these workers are producing such a high GVA, shouldn't their employers be paying them enough to live close to their place of employment?</p> <p>One of the difficulties with linking key worker housing to local businesses is that this could be regarded as an unfair advantage being given to those businesses over other businesses – in effect subsidising their staff costs with taxpayers' money.</p> <p>The funding of affordable housing is largely within the control of central government – previously, large amounts of capital funding were provided for the construction of affordable housing. The Government has drastically reduced funding, meaning that development is ever-more reliant on planning obligations, as well as higher rents being charged on affordable homes.</p>
<p>B8.3 There is a great scarcity of "available housing which the average employee can afford which takes towns like Guildford off most companies list" - report from a national association responsible for corporate development in UK.</p> <p>B8.4 Unless we have economic development - which is now largely and will be dependent on highly skilled services - we will not be able to have affordable housing or indeed welfare generally unless we find a way of attracting these "key" workers.</p>	<p>The provision of affordable housing, as well as additional market housing, would help to ease this situation.</p> <p>There is a very high level of employment in the borough, and very few people wholly dependent on 'welfare'. Although we need highly skilled services, people living and working in these highly skilled jobs also need services to support them, manned by less skilled workers. Affordable housing is therefore equally important, since people on low wages cannot afford to commute in to the borough to work.</p>



B8.5 Of course it is a question of striking a balance between the two - but at present all our effort seems to be going down the welfare route. What the balance should be needs a good deal of further thought.	With fewer than 400 new affordable homes provided in the borough since 2008, there is arguably a lack of housing being provided via 'the welfare route'.
B8.6 But the basic problem of defining a key worker still remains. On reflection trying to define it as a discipline gets nowhere. There is a solution - that is to use the definition used at a national level to determine immigration policy - basically it's an employer who puts in a bid for an employee - it works at a national level in many countries so why not something similar ? e.g. A business at the Surrey Research Park says they need two IT experts with certain skills - or the university might need a specialist worker - so there could be an allocation for them?	As discussed above, this would be to some extent subsidising businesses. Workers do not require a passport to come to the borough, and policies that are applied on a national level may not be appropriate at a local level.  As is the case nationally, we also have an obligation to house the most vulnerable people in our community.
B8.7 My preference would be to come to an agreement with the University to allow them some affordable housing which they could then rent out on say a 5 year basis to young professionals for whom there were jobs available locally.	The university is in a position to provide affordable housing for its employees, or for young professionals, by using land in its ownership.
B8.8 I wish to enter my objection to the use of the Rural Exceptions Sites clause in cases such as that of Peaslake Farm, Ewhurst Road, where its use as a Farm has not been established as not a viable one. The Rural Exceptions Sites clause is referred to as a Trojan Horse, by green belt campaigners (I am not one) but I agree.	As discussed above, rural exception policy has existed for many years and enables small scale (always fewer than 20 units) developments which provide affordable housing for people local to the parish.