

## Summary of comments and questions raised by respondees to the Housing Strategy Consultation and the Council's response

Priority A – Increase the supply of affordable housing	
Comment	Response
1. Within the section 'Tell us your views' you have set out that the Council will 'take steps to ensure...' I doubt that the Council will be able to ensure partner's plans reflect 'actions agreed' or that 'desired outcomes are prioritised.'	The Council will continue to work with partners to encourage participation and wherever possible promote a joined up approach to the delivery of services.
2. The Council needs to make a clear statement on which partners it will work with in the delivery of any affordable housing and an equally clear statement on standards of the future management of any new provision by those providers.	<p>The Council is happy to work with qualifying Registered Providers in developing affordable housing in the borough, especially in the current housing climate where the number of units produced by Section 106 sites is minimal.</p> <p>A Registered Provider protocol is being worked on and will be published in 2015/16, listing the expectations and standards expected of those with stock in the borough or who wish to work in the borough.</p>
3. Whilst the Council cannot stop new Registered Providers developing in the Borough (it certainly wouldn't wish to lose opportunities for new provision) there has to be a rational approach to the number of landlords operating in the area and this can only be led by the Council.	The Council recognises there is a high number of registered providers with stock in the borough and where practical the Council will support stock rationalisation through transfer but it needs to maximise development opportunities.
4. A pooled input into the development of housing schemes is needed	This approach will be taken into account through implementing the subsequent actions that are identified to enable delivery of this priority.
5. An explanation of the Mayor's housing zones is needed	Contained in the Housing Strategy document
6. Will the strategy's reference to housing zones be removed if the Council's funding bid fails?	If the housing zone bid fails it is still the Council's aim to prioritise the identified sites and work to achieve new housing supply.
7. Why has Hackbridge been chosen as a sustainable district centre and sustainable suburb?	In 2009 the Council's Core Planning Strategy identified the promotion of regeneration within the Wandle Valley corridor. Hackbridge was identified as an accessible and sustainable location for future growth in terms of potential for retail growth, housing development and with good access to a main-line rail station.

<p>8. The identification of land that could be used for building additional housing needs careful consideration to avoid the risk of increasing density beyond what is sustainable for the community involved.</p>	<p>The necessary infrastructure is taken into account as part of the development and delivery of new affordable housing.</p>
<p>9. Ensure necessary infrastructure is in place to support an increase in affordable housing in the borough e.g. GP, schools,</p>	<p>The necessary infrastructure is taken into account as part of the development and delivery of new affordable housing.</p>
<p>10. The definition of 'affordable' needs to be clarified as to what it means for Sutton residents both in the terms of rent and also in home ownership.</p>	<p>The Council's Strategic Housing Market Assessment 2015 provides some clarification of this term. This document has been published on the Council's website.</p>
<p>11. Ensure affordable housing is actually 'affordable' to people on low income and benefits as well as sustainable</p>	<p>The Council agrees rents with housing associations in line with national and GLA guidance.</p>
<p>12. Focus on mix of provision of affordable housing across the borough</p>	<p>The Council is limited to some extent by the availability of suitable sites. However, we aim to facilitate a diverse mix of tenures and property types across the whole borough.</p>
<p>13. Ensure high standard of new build and value for money is achieved</p>	<p>Value for money will be considered as part of the procurement of a developer for Council new build and quality will be a measured outcome of the process.</p>
<p>14. Balance the need for green spaces and need for land for housing and avoid negative effects on safety and an overly built-up environment</p>	<p>Green belt and Metropolitan Open Land are protected via planning policies and the need for sufficient amenity space and the impact of new development is considered through the planning process.</p>
<p>15. Building to high eco standards is a positive aim but high cost of land may make eco standards difficult to achieve without additional funding</p>	<p>It is the aim of the Council that all new dwellings achieve Code of Sustainable Homes level 4 and any relevant corresponding standards that are introduced. We recognise that achievement of this standard often presents challenges.</p>
<p>16. Make greater use of sustainable powered units using solar and wind power etc. to benefit environment</p>	<p>The cost of on-site renewable sources of energy has to be built into the viability appraisal for a site and is reviewed through the planning process</p>
<p>17. Care needs to be exercised when demanding 'high eco levels' to prevent over-insulated homes causing over-heating</p>	<p>Policy DM6 of Sutton's Site Development Policies DPD does not include any reference to minimum fabric energy efficiency (or air tightness standards) that all new dwellings must achieve. Furthermore, it is considered unlikely in practice that the relatively modest levels of CO2 reduction which the Council currently requires new developments to achieve (typically a 25% reduction compared to Part L of the 2010 Building Regulations) make it necessary for developers to pursue exemplary standards of fabric energy efficiency or air tightness</p>

	in their proposed developments. The risk of overheating being caused as a direct consequence of the Council's planning policies is therefore considered to be small.
18. All affordable housing should achieve the London design standard from the GLA	The GLA London Design Standard is fully taken into account when developing new affordable housing.
19. Unfortunately building housing to high eco-levels can be expensive and some of the newer modular designs that are used in other countries could be considered as a way forward.	It is the aim of the Council that all new dwellings achieve Code of Sustainable Homes level 4 and any relevant corresponding standards that are introduced. We recognise that achievement of this standard often presents challenges.
20. It is important that homes are cheap to run for fuel consumption minimising issues of future fuel poverty and that they are able to meet the changing needs of residents.	It is the aim of the Council that all new dwellings achieve Code of Sustainable Homes level 4 and any relevant corresponding standards that are introduced. We recognise that achievement of this standard often presents challenges.
21. Design and innovation, neighbours and friends and the ability of housing to adapt with lifestyle and health changes will help people to remain in the community	These factors will be taken into account as part of the forthcoming review of sheltered housing, and as we develop further proposals for specialist housing or supported living for vulnerable adults of all ages.
22. Design of new build will support the reduction of fuel poverty and prevent ill health thus reducing reliance on health and care support	Our policy aim is that new homes should be built to high thermal standards that will ultimately have an impact on reducing the fuel bills of the occupiers.
23. Use specific design standards e.g. HAPPI to ensure not just homes but communities are built	We are aware of the good practice that HAPPI (Housing our Aging Population: Panel for Innovation) identified and will achieve these where possible and if finances permit.
24. Ensure that the design standards included reference to size of individual rooms and the overall property; homes seem to be getting smaller.	It is the aim of the Council that all new dwellings achieve Code of Sustainable Homes level 4 and any relevant corresponding standards that are introduced. We recognise that achievement of this standard often presents challenges.
25. Security and privacy are also important in any new homes as well as noise insulation, particularly for flats/maisonettes, so that issues of lifestyle differences are less likely to impact on neighbours.	Any affordable housing that receives funding from the GLA must achieve the London Housing Design Guide Standards, Section 5 of which covers both visual and acoustic privacy.

<p>26. Rather than selling Council homes, those who can genuinely afford to buy should be encouraged to do so in the private sector</p>	<p>The Right to Buy policy is a nationally determined policy from central Government. The Council cannot limit this right.</p>
<p>27. It may be possible to use regular checks and a sliding scale of rents to increase rental income with those in need receiving the required benefits to make up the difference between what they can afford and the market rent for the property.</p>	<p>Although rents are related purely to the attributes of the property, service and support charges are levied based on the services provided. Help with the charges are available through the benefit system.</p>
<p>28. Affordable housing should remain in Council ownership</p>	<p>As above (point 26)</p>
<p>29. Social housing should not become part of developers' assets</p>	<p>No action is required</p>
<p>30. The council should lever in funding to build new Council homes from a number of sources, including cheap Government loans, the private rented sector, Registered Providers, institutional investors etc.</p>	<p>The Council will apply for and maximise the use of all relevant funding for new build Council homes.</p>
<p>31. Developers should not be able to buy Council land cheaply and build and sell at a profit</p>	<p>Where a decision is made to sell Council land through open market tender, the Council is legally obliged to obtain the best price reasonably obtainable.</p>
<p>32. Should not give priority to private planning applications, which encourages private profiteering</p>	<p>Priority is not given to private planning applications. All applications are treated strictly in order, based on the date they are validated unless an extension of time is given.</p>
<p>33. A methodology for identifying land opportunities should be owned by the Council</p>	<p>This will be addressed through the delivery of Priority A and the work of the Development Company</p>
<p>34. Greater immigration and population control needed rather than encroaching on the Green belt and make greater use of Brownfield sites</p>	<p>Immigration policy and measures to restrict population are matters for national Government.</p>
<p>35. There is a sufficient supply of housing association and Council property</p>	<p>Based on the recent Strategic Housing Market Assessment and the Council's housing register, there continues to be a significant need for additional social housing.</p>

<p>36. During these times of austerity, greater focus should be on investing in and improving existing stock rather than increasing the supply of housing.</p>	<p>There are two separate funding streams for these two types of activity and one cannot be used for the other. The Housing Revenue Account Business Plan addresses the stock investment requirements for the Council's own housing and sets out plans to address those requirements, alongside use of borrowing headroom and net Right to Buy receipts to build more council homes.</p>
<p>37. Leasehold tenure is not necessarily the way forward for meeting the housing need. This is particularly true for those who are retired as the ongoing annual financial commitment and also the lack of control that leasehold tenure provides in relation to major works, repairs and associated costs, means many struggle to maintain payments which may lead to stress and ill health.</p>	<p>No action is required</p>
<p>38. Shared ownership is expensive and unaffordable for most households</p>	<p>Shared ownership is still considered by the Government and the GLA to be an important form of tenure for households wishing to start on the property ladder and is classed by national planning policy as affordable housing. Negotiation with individual developers/housing associations will determine the actual cost to the incoming shared owner of an equity share alongside their rental commitment. Alternative models of intermediate housing (for example sub-market rent) are also considered with developers.</p>
<p>39. Target sites in more affluent areas to increase affordable housing there e.g. Cheam</p>	<p>This will be dependent on the availability of appropriate sites. However, the Council in partnership with Viridian Housing is developing the former Elizabeth House site to provide 131 new flats across a range of tenures in the heart of Cheam Village.</p>
<p>40. Social housing should be built in cheaper areas</p>	<p>This will be dependent on the availability of appropriate sites.</p>
<p>41. Utilise unused patches of land in the borough to build more homes</p>	<p>This will be dependent on the ownership of the land. The Council and Sutton Housing Partnership (SHP) have already undertaken an appraisal of small sites within the Housing Revenue Account which have the capacity for new council homes and we will be bringing some of these forward for development as part of our planned new build programme.</p>
<p>42. Identify empty industrial commercial units and change the land use to secure planning permission for affordable homes</p>	<p>Through planning policy sufficient space for commercial use needs to be maintained. However, on relevant sites this is considered.</p>

43. All Right to Buy money should be used to build council housing for people in need and the Government fought to ensure this	All reinvestible net Right to Buy receipts can be invested into council new build but they cannot pay for more than 30% of the cost.
44. Utilise unemployed builders and provide incentives for them to build affordable housing	The building of affordable housing commissioned by the Council includes the requirement to ensure that the local supply chain is utilised and local work opportunities are enabled.
<b>Priority B – Invest in and make best use of the borough’s existing housing stock</b>	
<b>Comment</b>	<b>Response</b>
45. The title of this priority is slightly confused. It refers to the ‘borough’s existing housing stock’. It might be more accurate to refer to existing housing within the borough.	This has been noted but given the range of responses it is considered to be suitable
46. As the development of Hackbridge in relation to new housing is largely underway, there is limited scope for the Council’s Housing team to exert further influence. This may be a more appropriate Planning statement.	The development of new affordable housing in Hackbridge is ongoing and there are sites that the Housing Team are involved with, not only the Felnax site but several other sites in the area as well.
47. If the Council is committed to improving its housing stock it has to increase its rent levels to more realistic figures. Difference of 30% within the social housing sector is wholly unreasonable and indefensible within the current London housing market	The Council is restricted by government as to how much it can increase rents on an annual basis.
48. Turnaround time for void council housing needs to be kept to a minimum whilst ensuring that new tenants are moving into a home in a reasonable state of repair and safety.	The aim is always to turnaround void properties as quickly as possible to ensure people on the housing register are housed as quickly as possible and to reduce the rent loss the authority incurs whilst the property is empty. When letting council housing the property must meet the ‘letting standard’, a standard that was agreed in consultation with residents regarding the condition of the property. Whilst empty, all properties receive a gas and electrical safety check
49. Alignment of social housing sector rents might help achieve issues relating to under occupation	As above (point 47)

<p>50. Goal relating to a reduction in under/over occupation should include all social housing in the borough and a strategy developed for doing so with funded initiatives and through partnership with registered providers</p>	<p>There are existing partnership arrangements with registered providers and the reduction of under occupation includes the majority of all social housing</p>
<p>51. Have heard of schemes in other parts of the country where residents who need help with daily living and have a spare room are able to provide accommodation for someone else who then in return helps the resident with specified daily/weekly needs.</p>	<p>This will be taken into account through implementing the subsequent actions that are identified to enable delivery of this priority.</p>
<p>52. Another scheme for consideration is where an older resident can be given appropriate housing provided by the local authority whilst the local authority gains a larger home to use as housing until such time as the home owner bequeaths the property.</p>	<p>Such a scheme has been looked at and will be considered further as we deliver this priority.</p>
<p>53. From our experience tenants would be happier to downsize when they are under-occupying if they were able to move to another property either in the same block or estate.</p>	<p>In our experience the majority of under occupiers want to move away from their current area, however, there are occasions when they want to stay in their current location. We work with them to try to meet their wants and needs taking into consideration whether the type of property they request is likely to become available and the timescales involved enabling them to make an informed choice.</p>
<p>54. Council should work closely with registered providers to ensure effective void turn around, transfers and nominations</p>	<p>Sutton Council works closely with registered providers to ensure effective void turnaround. The Partners Protocol, which sets out agreed timescales for advertising/letting of vacancies, is adhered to by the Council and registered providers.</p>
<p>55. Need to raise the quality of private sector stock in the borough in line with social housing</p>	<p>Public sector resources to improve private sector homes are and are likely to remain extremely limited, but the Council has a strong track record of improving empty homes in partnership with their owners, ensuring nomination rights to those homes as a condition of grant payment.</p>

<p>56. The Council's priority should be to ensure that empty properties, both social and private, are made habitable and let as soon as possible and that any that have been allowed to fall in to disrepair are brought back in to use.</p>	<p>As above (point 55)</p>
<p>57. The quality of affordable housing should be improved</p>	<p>The decent homes programme is in place to raise the quality of social housing. The Council works with housing associations regarding improvements to their existing stock.</p>
<p>58. Transfer the Council's housing stock to a registered provider to avoid the costs being incurred by SHP and would make more money available for investment</p>	<p>We will keep this option under review but many of the financial advantages of large scale voluntary stock transfer have largely disappeared following the self-financing settlement in April 2012.</p>
<p>59. Agree that better housing, well serviced by transport and strict tenancy controls makes for a better environment</p>	<p>Agreed, and this be taken into account through implementing the subsequent actions that are identified to enable delivery of this priority. However, if by tenancy controls, the respondent is referring to rents for private sector tenancies, there is no legal power to restrict these.</p>
<p>60. The existing stock of social housing for older people is unattractive to independent older people</p>	<p>We are embarking upon a review of older people's housing support needs including the suitability of sheltered housing. Recently there has been significant investment in the provision of new older people's housing in the borough.</p>
<p>61. The design of social housing for older people is not fit for purpose and unsuitable for older people as they become frail and experience age-related health problems</p>	<p>As above (point 60)</p>
<p>62. Mixed tenure housing for older people is needed as affluent older people account for greater proportion and want aspirational housing for active older people</p>	<p>We have delivered, through working with our registered provider partners, private and shared ownership properties and further provision is in the pipeline.</p>
<p>63. It would be helpful to clarify the ownership of the sheltered schemes referred to as requiring remodelling and how this work will be funded</p>	<p>As above (point 60). Discussion will take place with individual registered providers as part of the plans for remodelling.</p>
<p>64. Remodelling of sheltered housing schemes provides an opportunity for local providers of sheltered housing to access funding for the improvements and to provide a locally based management</p>	<p>As above (point 60). Discussion will take place with individual registered providers as part of the plans for remodelling.</p>



65. Invest in short term lets to house the homeless temporarily rather than out of borough bed and breakfast	Work is currently being undertaken to increase the provision of in-borough emergency/temporary accommodation as an alternative to out of borough bed and breakfast.
66. Tax payers' money should not be spent on bringing empty properties up to standard. Instead, the Council should buy the property and let as private rented accommodation or sell as shared ownership	We have not had the resources to do the latter to date but this is something that could be considered as part of the Council's development company business plan.
67. Work closer with Planning on design and greater integration of health and housing	This will be taken into account through implementing the subsequent actions that are identified to enable delivery of this priority.
68. Regeneration needs to be carried out for a whole area otherwise the other parts will look worse compared to the regenerated parts and attract damage due to this.	Agreed as a principle to underpin regeneration. However, the feasibility of this is dependent on resources being available and ownership of land.
69. Introduce new health and telecare products into the home to lead to financial efficiencies	This already happens through relevant care and support packages commissioned by the Council and is built into the delivery of some new housing
70. Make use of the HCA's Continuous Market Engagement programme	The Continuous Market Engagement programme is utilised wherever possible
71. Energy saving schemes should be for all and not just council tenants	The eligibility for current central Government energy saving schemes is outside the control of the Council. A number of local initiatives e.g. support for behaviour change via Sutton Ambassadors will be provided across all tenures.
72. Make a small charge for energy schemes for the wealthy	National policy determines the way in which means are taken into account for different energy schemes.
73. Not aware of any achievements in relation to energy efficiency or coordinated on behalf of the Council and unless plans are in place and funding streams identified this is an unachievable goal	We are currently in conversation with the RE:NEW support team regarding the availability of different funding streams to help increase the number of properties where we can complete works to increase energy efficiency.
74. Work in partnership with the sub-region, share knowledge and expertise and utilise additional funding to tackle empty properties	We have been using sub-regional funding to tackle empty properties and we will continue to bid sub-regionally for funding if further funding becomes available

75. Help private landlords to understand the impact of poor quality housing on people and the public purse	This is delivered by way of the Council run private landlords forum and through advice provided by the Housing Centre and Environmental Health staff
76. Provide some assurance for private sector landlords, as they are reluctant to let to people on benefits	A range of incentives has been compiled to offer an attractive package to landlords to maximise the availability of private rented properties. Landlords are supported with management issues for the duration of the tenancy.
77. Cynicism expressed regarding the use of private sector accommodation to house people affordably when the main aim of that sector is to make a profit	The lack of supply of social rented housing means that private sector rented housing has to play a significant role in meeting need.
78. Private rented sector rents should be capped to prevent profiteering	There is no legal power to restrict private sector rents.
79. The Council should not discharge duty into the private sector as landlords do not intend to assist households in the long term	This is not always the case. Discharge of homelessness duty only takes place where a tenancy of 2 years has been agreed.
80. The experience of ex-homeless people to identify needs could be helpful	This will be taken into account through implementing the subsequent actions that are identified to enable delivery of this priority.
81. Consider the needs of non priority groups regarding their needs e.g. access to transport, local amenities, gyms, breakfast and after school clubs etc.	This will be taken into account through implementing the subsequent actions that are identified to enable delivery of this priority.
82. Clubs needed for the elderly to avoid feelings of isolation as well as availability of transport	<p>There are many clubs available across the borough for elderly people to help avoid isolation. Many of these are operated by local faith groups, residents associations and housing associations as well as the local voluntary sector. Information about what is available can be obtained for Sutton Centre for Independent Living and Learning (SCILL) information and advice service.</p> <p>In addition to public transport people with mobility issues can use dial-a-ride, and maybe eligible for a blue badge or a Taxicard. In addition some of the schemes have their own transport arrangements.</p>
83. Housing allocations policy should be considered more on an individual basis based on circumstances	The policy requires individual assessment of need taking into account the specific circumstances of each applicant.

<p>84. 90% of Housing Association properties should not be taken away needed by the association residents should not be taken away.</p>	<p>Housing Association tenants with a Housing Need are entitled to apply for a transfer with the Council and afforded the same level of priority as London Borough of Sutton tenants.</p>
<p>85. Priority should be given to those in a 2 bedroom property with a real need for a 3 bedroom property</p>	<p>Applicants are assessed in accordance with the allocations policy and are placed in the appropriate band on the housing register or transfer list if they have a need for an additional bedroom. Three bedroom properties are only allocated to those who have a need for this size property.</p>
<p>86. The Council should increase revenue by creating homes for those who pay council tax</p>	<p>All households have a legal duty to pay Council Tax. The Council's Council Tax Benefit arrangements are carefully assessed and scrutinised by member of the Council before the basis of provision of subsidy through this channel are agreed. There is no legal power for the Council not to provide homes because people are reliant upon benefit to pay Council Tax.</p>
<p>87. Provide affordable housing for working people on low incomes and claiming benefits</p>	<p>This is taken into account in the housing allocations policy.</p>
<p>88. Methods to be employed to ensure genuine low paid families can access housing</p>	<p>The Housing Allocations Policy contains a financial assessment; households deemed to be able to afford other forms of tenure may not be accepted onto the housing register.</p>
<p>89. People under 35 should be considered for non shared social housing</p>	<p>Assuming this refers to the Housing Benefit regulations where benefit is only paid to the single room rate and therefore central government policy, the allocation policy may not consider a single person under 35 in a room to have a housing need, consideration for non-shared social housing would depend on individual circumstances.</p>
<p>90. There is a need for housing for young people under 25 who are not able to remain at home</p>	<p>There are housing options available to under 25 year olds, depending on their circumstances and availability. The question of the overall supply of housing to meet need is one that we are seeking to address through the housing strategy</p>
<p>91. Priority should be given to meet the needs of our more vulnerable residents</p>	<p>Consideration is given to the medical and other circumstances of an individual applicant if they apply as homeless or to the housing register</p>
<p>92. Medical circumstances should be given greater priority rather than transfers or those in temporary accommodation</p>	<p>The band that an individual will be allocated to will depend on their circumstances, in accordance with the housing allocations policy. The level of choice an applicant has will depend on the band and any agreed restrictions on the type of property that will meet their needs. Those with the highest medical need are already placed in a higher band than transfer applicants or homeless families in temporary accommodation.</p>
<p>93. Greater priority should be given to residents who work or give something back to the community</p>	<p>This question has been considered through previous reviews of the Council's housing allocations policy.</p>

94. Assess the needs of local people before getting outsiders housed	The housing allocations policy contains a general residency qualification of 2 years unless an applicant falls within a specific exceptional category.
95. Priority should be given to women fleeing violence	In certain situations women fleeing violence will be considered to be in a priority group.
96. Give assistance to those with mortgages who have fallen on hard times	Advice is available from and provided by Housing Centre staff.
97. Need adequate supply of housing for people with dementia to meet growing demand	The Council has provided a scheme consisting of 30 flats specifically designed for older people with dementia which opened in early 2015
98. Underutilised supported schemes should be used for other vulnerable individuals e.g. victims of domestic violence	Supported living schemes are assessed for individuals with specific needs and vacancies filled accordingly. The Council also supports the provision of housing for people fleeing domestic violence.
99. Encourage those under occupying to share with other family members in need	This option is one which we will encourage all social landlords to promote.
100. The Council needs to be more specific about what 'robust performance' means	The Council works in partnership with Sutton Housing Partnership to set specific and ambitious performance measures and these are monitored on a regular basis
101. Housing allocations IT system should be suitable to ensure that allocations of affordable housing are in accordance with policy	A new IT system for housing allocations has recently been implemented.
102. System for allocating properties needs to be overhauled to reconcile tenants with properties	It is not clear what this response refers to. If it concerns the question of ensuring authorised occupancy of properties let to incoming tenants, then SHP has in place procedures to ensure that this is the case. Individual examples where unauthorised occupancy is suspected are always followed up if drawn to the attention of SHP officers (see also below).
103. Check that those in need actually live in the property allocated	Counter-fraud activities are currently taking place and will be transferred to a Shared Service (South West London Fraud Partnership) to improve the Council's capacity to deal with all aspects of fraud, including housing and tenancy fraud.
104. Personal details of housing applicants should be safeguarded	This is currently taking place.
105. Enforce the move to smaller property where need is no longer there	The Council cannot force an under occupying secure tenant to move. However, we will encourage tenants in this situation to do so.
106. Owners of empty properties or under occupying households should be fined	The liability for Council Tax when a property is empty has recently been strengthened to ensure owners are incentivised financially to bring that empty property back in to use. There is no legal power to fine council tenants who are under-occupying.

107. Encourage volunteering to reduce labour costs and provide free training costs	Partner agencies e.g. SCILL and Sutton Centre for Volunteers carry out similar work.
<b>Priority C – Promote excellent housing management standards across all types of housing</b>	
<b>Comment</b>	<b>Response</b>
108. This will only be achievable if the Council commits to supporting liaison with Registered Providers, in the first instance via SUTHAG	The Council will continue to actively support communication with Registered Providers, through SutHAG and other forums where this is thought to be productive.
109. Good management and tenant involvement is important to ensure social issues such as domestic violence and abuse, child and adult safeguarding etc are addressed.	The Community Wellbeing programme aims to increase community involvement on relevant estates and the effectiveness of management of social stock is monitored through our work with SHP and housing associations.
110. There needs to be more done to improve the satisfaction levels of leaseholders so that there is not the current disparity between satisfaction of tenants and leaseholders with the overall housing management service.	The satisfaction of tenants and residents is measured across a range of areas. Improvements are and will be planned in the light of this information to address areas of dissatisfaction, either in services as a whole or the views of specific groups, eg leaseholders.
111. Improvement of management standards requires a commitment from the Council to properly resource liaison and joint working with other housing providers; otherwise it will not be achievable.	See above (Point 108)
112. Robust management should include defined periods for inspection which could be tied in with gas or other safety checks. With limited funds it is essential that the London Borough of Sutton ensures that its stock is being well looked after by its tenants as well as appropriately maintained by its managing agent.	Effective use of resources will be used to ensure the condition of the housing stock is properly assessed to both plan investment but also ensure the tenancy conditions are being adhered to and repairs recharged where necessary. Use of contractors to highlight issues with the property form part of using resources effectively.
113. No indication is given as to how excellent standards of service will be promoted.	This will be developed and implemented in conjunction with the Council's ALMO and Registered Providers.  SHP will consult with residents to understand standards expected and use residents as part of its scrutiny function to ensure standards are being maintained and improved.

<p>114. There is certainly a need for rationalisation of stock owned by Registered Providers in the borough. The Council should attach priority to this having first identified which RPs it wishes to support and why.</p>	<p>This will be taken into account through implementing the subsequent actions that are identified to enable delivery of this priority.</p>
<p>115. Greater multi-agency working and problem solving approach should be adopted</p>	<p>Agreed. This is the approach that the Council seeks to take in all its work.</p>
<p>116. Paying the landlord housing benefit direct rather than to the tenant might encourage landlords to let to low earners</p>	<p>The Council's Private Sector Procurement Officers liaise regularly with the Housing Benefit team to put forward cases for Local Housing Allowance to be paid directly to private landlords</p>
<p>117. Think it is highly unlikely that management standards can be imposed on private landlords.</p>	<p>The Council will continue to work with and develop positive relationships with private sector landlords to promote good management standards wherever possible.</p> <p>Management standards within houses in multiple occupation are set out in legislation and enforced where necessary in line with the council's enforcement policy.</p> <p>The development of an in-house Private Rented Sector Accommodation scheme to become an accredited social lettings agency may further influence management standards amongst private landlords.</p>
<p>118. How are we going to raise standards in the private rented sector e.g. accreditation, licensing or pro-active enforcement?</p>	<p>The council actively supports the London Landlord Accreditation Scheme and promotes landlords within the borough to become accredited. Regular engagement with the landlords takes place by annual landlords forums and newsletters promoting standards.</p> <p>Pro-active enforcement takes place within the borough and is aimed at higher risk premises such as larger houses in multiple occupation.</p>
<p>119. Good resident participation and scrutiny is needed, using good practice that is available across London</p>	<p>A management standards agreement has been drafted and shared with registered providers.</p>
<p>120. A strong partnership approach with registered providers is needed to raise and maintain standards</p>	<p>A management standards agreement has been drafted and shared with registered providers.</p>
<p>121. Flexible arrangements should be put in place to encourage resident participation at different levels</p>	<p>Agreed. This will be taken into account through implementing the subsequent actions that are identified to enable delivery of this priority.</p>
<p>122. Support ALMO Board to ensure service standards are met and exceeded</p>	<p>The effectiveness of the Sutton Housing Partnership Board is regularly reviewed and by way of monthly monitoring meetings to ensure that standards are met. In addition the Council agrees an annual plan that is approved by the Council's Housing Economy and Business Committee.</p>

<p>123. Need to ensure value for money with quality services</p>	<p>SHP benchmarks its services for cost and quality to assess how it is performing. SHP aims to be in the top quartile of housing providers to give residents confidence they are getting value for money.</p>
<p>124. The management and procurement of major works for council owned properties needs to be looked at closely as the cost of council let contracts for works is excessively high and not value for money for both the Housing Revenue Account and the leaseholders who are charged their proportion of the costs.</p>	<p>SHP follow public procurement rules when appointing contractors and seek to use the most effective arrangements for the benefit of residents. As well as following the statutory leasehold consultation, SHP will involve residents more broadly to help scope contracts and choose contractors.</p>
<p>125. Effective resident involvement such as befriending and volunteering can enhance the health and well being of residents and reduce pressure on statutory services</p>	<p>SHP supports the role of individual residents and local community groups to support each other and increase well-being. This is done by promotion, staff support and financial assistance where appropriate.</p>
<p>126. Apply fines to tenants if standards are not met</p>	<p>It is not clear what actions or omissions by tenants are proposed to be subject to a fine.</p>
<p>127. Regular auditing of tenant details and property records is needed as part of enforcement of management standards</p>	<p>Tenants' details are reviewed and updated as well as cross referencing to check consistency. Tenants are also surveyed to provide updated information.</p> <p>Property records are also updated to reflect works carried out and surveys undertaken.</p> <p>Despite this there will always be some outdated records, but the aim is to minimise these and discover them promptly.</p>
<p>128. More explicit management standards for private rented accommodation are needed</p>	<p>The Council promotes good management standards within the private rented sector and encourages landlords to become accredited.</p> <p>Management standards would need to be imposed by legislation or the introduction of licensing. Licensing can only be introduced where there is evidence of a poor quality private rented sector within the borough. Within Sutton there are isolated incidences of poor management standards and disrepair, however, there is insufficient evidence at this time to support the introduction of licensing.</p>
<p>129. These are commendable objectives to establish management standards in the private rented sector and encourage resident participation which will be very difficult to achieve.</p>	<p>No action required</p>

130. Promotion of excellent housing management standards should include place shaping and strengthening the community.	This will be taken into account through implementing the subsequent actions that are identified to enable delivery of this priority.
131. Involve residents in shaping and planning of services and housing developments to encourage ownership	This is already a principle applied to our regeneration projects.
132. Creation of community hubs to bring the community together and ensure that housing is integrated with health and the voluntary sector	The creation of community hubs will be considered on a case by case basis with a core principle being to maximise the use of existing resources.
133. Discounts on Council Tax bills should be offered to social housing tenants who are fully occupying their accommodation	It is not proposed to take this forward as tenants' liability for Council Tax applies irrespective of the level of occupancy or a property.
<b>Priority D – Provide housing options advice and address homelessness</b>	
<b>Comment</b>	<b>Response</b>
134. The goals within this priority appear to be a statement of the borough's statutory responsibilities. I suppose this reflects the restricted resources available to the Council.	No action needed
135. Advice should target households whose income might change to encourage people to live within their means as this helps peoples' health and wellbeing and that of the community	Where it has been possible to identify such individuals e.g. households affected by the welfare benefit cap, targeted advice has been made available.  The Council supports a Citizen Advice Bureau financial advisor post and refer cases for assistance.
136. Face to face contact should be given to homeless people and a helpful service provided	Face to face contact is available to households who are homeless, in cases where casework intervention is considered necessary, domestic violence cases or when 6/17 year olds need assistance. Face to face advice is also available at drop in advice sessions that take place at three Children's Centres across the borough, and at the SCILL centre.
137. Prevention to head off a crisis has to be at the heart of the strategy	We agree with this principle.



<p>138. It is difficult to get the advice you need on the website for your particular circumstance and the criteria for eligibility is complicated and unclear</p>	<p>The Council's housing advice staff are available during office hours to provide telephone assistance if applicants experience difficulty obtaining the relevant advice.</p> <p>We recognise that the eligibility criteria are complicated and continually review information provided and respond to feedback provided.</p>
<p>139. Inconsistent advice and information from advice staff because speak to someone different each time on the phone rather than seeing the same person face to face</p>	<p>The ability to provide face-to-face contact from the same officer every time contact is made is constrained by the need to deliver significant savings to the staffing budget for the Housing Centre. The Council's Housing Advice and Prevention Personal Advisers are all trained to a high standard and are able to provide consistent housing advice. The personal experience of an individual applicant will have to be addressed on a case by case basis to take steps to remedy any dissatisfaction where possible.</p>
<p>140. Provide effective advice that leads to a secure living environment as this improves health and the voluntary sector to continue to provide support to enable sustainable tenancy</p>	<p>As above (point 139)</p>
<p>141. Financial advice to be provided to those who have experienced past problems to avoid a repeat</p>	<p>This will be addressed through the planned commissioning of Information and Advice Services</p>
<p>142. Ensure correct benefits are paid to avoid overpayment and claiming back that results in difficulties for households</p>	<p>Noted and agreed. Measures are in already in place to minimise the risk of this within the Council, but these do rely upon prompt notification of changes in circumstances by individual residents.</p>
<p>143. Unclear how tenants/residents who are not existing Sutton Housing Partnership tenants/leaseholders can be helped with welfare benefit changes</p>	<p>Private rented sector tenants who are affected by the Single Room rate were identified and contact made to offer assistance.</p>
<p>144. Those who cannot afford to live in a particular location should move elsewhere</p>	<p>This is a matter for individual choice based upon the cost of housing in different localities.</p>
<p>145. Use SMART toolkit of intervention to support engagement with vulnerable individuals with challenging behaviour</p>	<p>This will be taken into account through implementing the subsequent actions that are identified to enable delivery of this priority.</p>
<p>146. Full assessment to be carried out at initial sign up to identify potential problems of sustaining the tenancy in future</p>	<p>This is already part of the allocations and lettings process but in some case, issues only emerge after tenancy commencement.</p>

147. Encourage shared ownership for low earners in receipt of benefit to break the cycle of dependence on social housing.	Shared ownership is still considered by the Government and the GLA to be an important form of tenure for households wishing to start on the property ladder and is classed by national planning policy as affordable housing. Negotiation with individual developers/housing associations will determine the actual cost to the incoming shared owner of an equity share alongside their rental commitment. Alternative models of intermediate housing (for example sub-market rent) are also considered with developers.
148. Provide hostel type accommodation as temporary accommodation rather than bed and breakfast	Additional emergency accommodation within the borough is being developed for homeless households
149. Work with London boroughs to ensure temporary accommodation is safe and affordable	We and other London boroughs work closely to improve the standard and value for money of temporary accommodation
150. Homelessness needs to be managed and temporary accommodation needs to be planned appropriately to ensure the health and well being of both those that find themselves unfortunately homeless and the community in to which they may be housed on a temporary bases.	This is currently taking place and is being developed further.
151. Temporary accommodation needs to be of a suitable size without overcrowding or vast numbers of people in the same situation being housed together	The Council has taken this into consideration through the development of temporary accommodation in the borough.
152. Build cheap static caravans to house the homeless	A temporary accommodation strategy followed by plans to procure additional temporary accommodation is in preparation.
153. Ensure a mixed tenure of housing to dilute the impact of difficult tenants	Mixed tenure is always considered in the delivery of sites for affordable housing and is subject to viability
<b>Priority E – Provide housing support and improve the health and wellbeing of residents</b>	
<b>Comment</b>	<b>Response</b>
154. I would assume the number of disabled people assisted with adaptations in their properties (this would be a better heading) is significantly more than 49.	Housing support relates to the provision of support to assist a broad range of vulnerable people, including people who have a physical disability

<p>155. Through policies promoted by the Council the number of people in property owned by RPs would be worth including here (the number assessed through recommendations made by OTs)</p>	<p>This detail was given consideration but not thought necessary for inclusion in the consultation document</p>
<p>156. Housing should work in collaboration with Public Health, to explore opportunities via the Health and Wellbeing Board and Better Care Fund</p>	<p>This is currently taking place and will be developed further.</p>
<p>157. The integration of housing and health is increasingly important to sustain tenancies and achieve aspirational living</p>	<p>As above (point 156)</p>
<p>158. To ensure stability of housing there should be coordinated intervention via various agencies regarding particular categories of client e.g. perpetrators of domestic violence, offender management etc.</p>	<p>SHP works with all the local agencies using agreed protocols to ensure there is as much co-ordination as possible.</p>
<p>159. Work should be carried out with the London Fire Brigade and Police to support marginalised groups to reduce crime, fear of crime and isolation</p>	<p>This is currently taking place and will be developed further.</p>
<p>160. Work with other agencies and groups e.g. Sutton Multi-Agency Self Neglect and Hoarding initiative, local GP practices to support residents to sustain their tenancies</p>	<p>This is currently taking place and will be developed further.</p>
<p>161. Those in care should have good quality care. (Carers are vastly under paid)</p>	<p>This has been noted</p>
<p>162. The Council should not put in place policies etc. that are coercive and detrimental to people who are physically ill or have a mental illness</p>	<p>The Council is actively working to be inclusive and support vulnerable individuals via its policies</p>
<p>163. Priority should be given to people with physical and mental health problems for social housing</p>	<p>The needs of people with physical and mental health problems are taken into account when they are being assessed for social housing. The priority allocated will depend on their individual circumstances.</p>

164. The needs of disabled people must be taken into account but not all disabled people are dependent and unable to work	The needs of people with physical and mental health problems are taken into account when they are being assessed for social housing. The priority allocated will depend on their individual circumstances.
165. A stronger line must be taken with people who can't work because they are too fat.	It is the role of the Department of Work and Pensions to determine the policies relevant for assessing ability to work.
166. Support to occupants of private accommodation should be considered as well as social housing tenants	In terms of floating support, this is already receiving consideration.
167. Hubs can provide holistic a approach to services to support residents to remain in their own homes and not just older people	This is already being taken into account and will be developed further by the Council if appropriate to do so.
168. Vulnerable groups should be clustered together to make efficient use of resources	This is considered in certain circumstances.
169. Local lettings plans should be developed to encourage move-on from independent living to the community	The Allocation policy provides for local lettings plans to be implemented to address particular issues in a locality. In addition pathways are in place to support move-on from supported housing into independent living where appropriate.
170. Modernising services should take place to support residents to live independently	This is currently taking place and will be developed further.
171. Use of shared accommodation should be encouraged	As above (point 168)
172. There should be an integrated approach to the provision of accommodation for Gypsies and Travellers to encourage tolerance	This is currently taking place and will be developed further.
173. In certain circumstances Gypsies and Travellers should be granted permission to pitch on local authority land for a limited period for a fee and provided with suitable amenities	This will be taken into account through implementing the subsequent actions that are identified to enable delivery of this priority.
174. Commendable to undertake initiatives in the social rented sector that support Sutton residents' health and wellbeing. However this will require the input of social landlords operating in the borough	The Council will continue to work with partners to encourage participation and wherever possible promote a joined up approach to the delivery of services.

175. Work should be undertaken with local businesses to train and gain employment	This is a key strategic priority of the local authority through our "Opportunity Sutton" programme.
176. Proper control of marginalised groups is important to ensure they obey the law, pay their taxes and are not marginalised	This comment has been noted.
177. Provide targeted support e.g. payment of fuel rather than giving money that can be spent on other things, as some people have no self discipline	Appropriate safeguards are taken into account when assessing the needs of vulnerable adults and developing a support plan.
178. Ensure energy providers do not overcharge and ensure that benefits are passed on to customers	The question of energy suppliers passing on reductions in costs to consumers is a matter of current national debate.
179. Partner organisations working with the Council to tackle and reduce fuel poverty should be defined.	This has been noted and future versions of the Council's Fuel Poverty Strategy delivery plan will seek to deliver this
180. It will be very difficult to identify those in fuel poverty outside of the social housing sector.	The Government's new national Fuel Poverty Strategy suggests a number of methods that can assist in identifying those in fuel poverty
181. Query regarding fuel poverty. Believe this is the complaint of the overweight. We should encourage walking and bicycle schemes. Fuel poverty is a result of laziness.	The circumstances of each individual household is unique and would need to be taken into account rather than making generalisations
182. Encourage swap to cheaper energy suppliers	Opportunity to deliver this action is utilised by the Council and will continue to do so.
183. Those in receipt of benefits and working could rent to buy, therefore ending a possibly cycle of generations in council housing as they can afford to buy a certain percentage	The circumstances of each individual household is taken into account via the Council's Housing Allocations Policy, as circumstances can differ greatly
184. When a person reaches 50 and 50 plus, should they should be entitled to a reasonable rent and secure tenancy as they are at an age where they can no longer set up home easily with a man/woman with the potential of having a family. They are more vulnerable without support of family and not in a position to start out on their own.	As above (point 183)

<p>185. There needs to be more done to ensure tenants are able to maintain their tenancy without adversely impacting on their neighbours and community. Receiving help when it is required needs to be a requirement of the tenancy rather than a choice as the current policy leaves neighbours and communities suffering whilst a long drawn out process is implemented to deal with anti social behaviour.</p>	<p>SHP has set up a tenancy sustainment team to ensure there is pro-active intervention where some aspect of vulnerability impacts on the wider community. It is recognised that within the current legal framework, it can be difficult to force residents to engage with support agencies, but this can be achieved in many cases.</p>
<p>186. Properties that have had adaptations need to be utilised more appropriately so that money is not wasted on adapting properties when there are properties available with suitable adaptations for new tenants with needs.</p>	<p>SHP evaluates all properties with adaptations on the termination of a tenancy. SHP attempt to match these properties with a suitable resident on the waiting list. However this has to reflect the bespoke nature of some adaptations and the applicants with the highest housing need at any one time.</p> <p>Where possible all properties with adaptations that become void are offered to households with a need for adaptations. Households living in properties with adaptations that are no longer needed are encouraged to move to alternative housing to free up this accommodation for another household in need.</p>