

20 March 2017

HOUSING COMMITTEE

A meeting of the Housing Committee will be held on **TUESDAY 28 MARCH 2017** in the Council Chamber, Ebley Mill, Ebley Wharf, Stroud at **7.00 pm.**



David Hagg
Chief Executive

Please Note: This meeting will be filmed for live or subsequent broadcast via the Council's internet site (www.stroud.gov.uk). By entering the Council Chamber you are consenting to being filmed. The whole of the meeting will be filmed except where there are confidential or exempt items, which may need to be considered in the absence of the press and public.

AGENDA

- 1 **APOLOGIES**
To receive apologies for absence.
- 2 **DECLARATIONS OF INTEREST**
To receive declarations of interest.
- 3 **MINUTES**
To approve the minutes of the meeting held on 21 February 2017.
- 4 **PUBLIC QUESTION TIME**
The Chair of Committee will answer questions from members of the public submitted in accordance with the Council's procedures.
DEADLINE FOR RECEIPT OF QUESTIONS
Noon on THURSDAY 23 MARCH 2017.
Questions must be submitted in writing to the Chief Executive, Democratic Services, Ebley Mill, Ebley Wharf, Stroud and sent by post or by Email:
democratic.services@stroud.gov.uk

- 5 **WORK PROGRAMME**
To consider the work programme.
- 6 **PERFORMANCE MONITORING**
To receive an update on performance monitoring.
- 7 **HOUSING REVENUE ACCOUNT (HRA) BUDGET MONITORING REPORT
2016/17 – REPORT 3**
To inform members of the forecast 2016/17 outturn position on the HRA.
- 8 **TENANT SERVICES ENERGY STRATEGY**
To approve the Tenant Services Energy Strategy.
- 9 **COMMUNITY HOUSING FUND**
To seek authority to allocate Community Housing Funds received from DCLG to qualifying projects.
- 10 **TENANCY FRAUD POLICY**
To adopt the revised Tenancy Fraud Policy.
- 11 **MEMBERS' QUESTIONS**
See Agenda Item 4 for deadline for submission.

Members of Housing Committee

<p>Councillor Mattie Ross (Chair) Councillor Chas Townley (Vice-Chair) Councillor Catherine Braun Councillor Miranda Clifton Councillor Colin Fryer Councillor Julie Job</p>	<p>Councillor Norman Kay Councillor Phil McAsey Councillor Jenny Miles Councillor Liz Peters Councillor Tom Skinner Councillor Debbie Young</p>
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Tenant Representatives

Ian Allan
Sadie Tazewell

HOUSING COMMITTEE

21 FEBRUARY 2017

7.00 pm – 8.55 pm
Council Chamber, Ebley Mill, Stroud

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Minutes

Membership

Councillor Mattie Ross **	P	Councillor Norman Kay	A
Councillor Chas Townley *	P	Councillor Phil McAsey	A
Councillor Catherine Braun	P	Councillor Jenny Miles	P
Councillor Miranda Clifton	P	Councillor Elizabeth Peters	P
Councillor Colin Fryer	P	Councillor Tom Skinner	P
Councillor Julie Job	P	Councillor Debbie Young	P
** = Chair * = Vice Chair	P = Present	A = Absent	

Tenant Representatives

Ian Allan	P	Sadie Tazewell	P
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Other Councillors in Attendance

Councillors Steve Lydon and George Butcher

Officers in Attendance

Strategic Head (Tenant and Corporate Services) Policy Implementation Manager
Head of Housing Management Democratic Services Officer
Health & Wellbeing Development Coordinator

Councillor Mattie Ross welcomed Sadie Tazewell to her first meeting of Housing Committee as the new Tenant Representative and confirmed that both representatives would be able to participate on all items being discussed.

HC.052

APOLOGIES

Apologies of absence were received from Councillors Norman Kay and Phil McAsey.

HC.053

DECLARATIONS OF INTEREST

There were no declarations of interest.

HC.054

PUBLIC QUESTION TIME

There were none.

HC.055 **MINUTES – 24 JANUARY 2017**

RESOLVED **That the minutes of the meeting held on 24 January 2017 are confirmed and signed as a correct record.**

HC.056 **WORK PROGRAMME**

The work programme was discussed and the following items were highlighted:

- Update on Community Housing Fund – 28 March 2017
- Information Sheet - Update on small sites, garages and disposals.
- Work programme for new Civic Year 2017/18.

RESOLVED **To update the Work Programme, accordingly.**

HC.057 **PERFORMANCE MONITORING**

An update was received from Councillors Debbie Young and Catherine Braun. Councillor Young explained that the report had a new format. The targets on the report related to the HRA delivery plan.

HC.058 **THE COMBINED TENANCY AND ESTATE MANAGEMENT POLICY**

The Head of Housing Management explained that this document set out expectations for both the Council and tenants.

Members commented that this was a short, useful document which was a good point of reference for tenants.

RESOLVED **1. Adopt the revised Tenancy and Estate Policy with any amendments determined by the committee, added.**
2. The committee gives delegated authority to the Head of Housing Management to make minor amendments, as necessary, and identified by the committee to the report, and to circulate the final document to committee members.

HC.059 **AFFORDABLE HOUSING THRESHOLD FOR SMALL SITES AND RURAL DESIGNATION FOR RIGHT TO BUY**

The Policy Implementation Manager outlined the above report explaining that this is Planning Policy and Housing law which will have an effect on right to buy (RTB) sales in designated rural areas.

Members asked questions which related to S106 contributions, second homes and imposing restrictive covenants on land not under the RTB scheme.

A motion was proposed and seconded by Councillors Chas Fellows and Catherine Braun to amend point 2 of the resolution. Following discussion this was withdrawn and a new motion adding a new point 3 to the resolution was proposed by Councillor Catherine Braun and seconded by Councillor Julie Job. When being put to the vote it was unanimously carried.

- RESOLVED**
- 1. Apply to DCLG for rural designation under Section 157 of the Housing Act for qualifying rural parishes.**
 - 2. Following designation, implement s.157 restriction on Right to Buy sales and in the relevant parishes.**
 - 3. Consideration could also be given to imposing the restrictive covenant on voluntary disposals pursuant to section 32 of Housing Act 1985.**

Agenda Item 10 was taken at this point in the meeting

HC.060 **UPDATE ON THE HOUSING WHITE PAPER**

A verbal update was provided by the Policy Implementation Manager with a summary of issues given to Members. Guidance is still awaited from the Government.

RESOLVED **To note the update.**

HC.061 **OLDER PEOPLE’S HEALTH AND HOUSING PLAN**

The Health & Wellbeing Development Coordinator presented the above report explaining the work which is currently being carried out in the District and acknowledging the concern for an ageing population. Work is taking place with communities in relation to becoming a dementia friendly District and to help people over 50 have an active life.

RESOLVED **To adopt the Older People’s Health and Housing Plan**

HC.062 **UPDATE ON TENANT CONSULTATION MECHANISM**

A verbal update was provided by the Head of Housing Management. An information sheet was given out to Members and this would be published on the Council’s website. He explained how the Council was beginning to change the way it consults with its tenants.

RESOLVED **The update was noted.**

HC.063 **MEMBERS’ QUESTIONS**

A question and supplementary question was asked by Councillor George Butcher and answered by Councillor Mattie Ross. To view the questions and answers please view at [Agenda Item 12](#) and the [webcast](#) of the meeting, on the Council’s website.

The meeting closed 8.55 pm.

Chair

STROUD DISTRICT COUNCIL**AGENDA
ITEM NO****HOUSING COMMITTEE****28 MARCH 2017****5****WORK PROGRAMME**

1. This meeting is the last for the committee within the civic year 2016/17. Consequently the committee may wish to consider in anticipation of its next meeting within civic year 2017/18 (anticipated to be 20 June 2017) matters for inclusion in next year's work programme.
2. In accordance with the Council's resolved Guide to Committees (2015), the committee should discuss and resolve its work programme for the year. Although the programme needs to include matters which have to be considered as a matter of law, the content of the programme should be driven by members of the committee. The items listed below, in Table 1, are simply those which the lead officer for the committee considers, or are otherwise anticipated as matters that, will in any event need to be addressed.
3. For the avoidance of doubt the second table below records the committee's Information Sheets which have been circulated to all Members.

Table 1 – Preliminary work programme for 2017/18

Date of meeting	Matters to be considered at the meeting	Notes
20.06.17 to be confirmed	Work Programme	Leads: Chair and Strategic Head Tenant and Corporate Services
	Performance Monitoring	Leads: Councillors
	Budget Monitoring 2017/18 – Report	Lead: Accountancy Manager
	Non-Traditional Stock Action Plan (incl 28 Victory Road)	Lead: Asset Manager
	Anti-Social Behaviour Strategy, Policy and Procedure	Lead: Tenancy Operations Manager
	Tanners Piece Scheme	Lead: Business Development Manager
	Gloucester Road/Bradley Street opportunity	Lead: Head of Asset Management

Date of meeting	Matters to be considered at the meeting	Notes
26.09.17 to be confirmed	Work Programme	Leads: Chair and Strategic Head Tenant and Corporate Services
	Performance Monitoring	Leads: Councillors
	Budget Monitoring 2017/18 – Report	Lead: Accountancy Manager
	Regeneration Projects Options	Lead: Head of Housing Contracts
	Maintenance and Repairs Policy (incorporating damp and mould)	Lead: Maintenance and Voids Manager

Date of meeting	Matters to be considered at the meeting	Notes
12.12.17 to be confirmed	Work Programme	Leads: Chair and Strategic Head Tenant and Corporate Services
	Performance Monitoring	Leads: Councillors
	Budget Reports	Lead: Accountancy Manager

Date of meeting	Matters to be considered at the meeting	Notes
20.01.18 to be confirmed	Work Programme	Leads: Chair and Strategic Head Tenant and Corporate Services
	Performance Monitoring	Leads: Councillors

Date of meeting	Matters to be considered at the meeting	Notes
27.03.18 to be confirmed	Work Programme	Leads: Chair and Strategic Head Tenant and Corporate Services
	Performance Monitoring	Leads: Councillors
	Budget Reports	Lead: Accountancy Manager
	Handyperson Service – income generation opportunities	Lead: Maintenance and Voids Manager

Table 2 - Information sheets sent to Committee Members

Date sent and ref no.	Topic	Notes
16.09.2016 H-2016/17-001	Sheltered Housing Modernisation Project Update	Sheltered Housing Project Manager
27.09.2016 H-2016/17-002	Small Sites, Garages and Disposals Update	Principal Estates Surveyor
27.09.2016 H-2016/17-003	Progress Report on the Development of a Business Plan for the HRA	Head of Housing Management
05.12.2016 H-2016/17-004	Homelessness Prevention Strategy – Review 2016	Housing Advice Manager
06.12.2016 H-2016/17-005	New Homes and Regeneration Update	Business Development Manager
06.12.2016 H-2016/17-006	Sheltered Housing Modernisation Project Update	Sheltered Housing Project Manager
24.01.2017 H-2016/17-007	Update on Queens Court, Brimscombe	Head of Asset Management
21.02.2017 H-2016/17-008	Update on tenant consultation	Head of Housing Management
01.03.17 H-2016/17-009	Fire safety in blocks of flats and sheltered housing sites	Head of Housing Management
16.03.2017 H-2016/17-010	Update on small sites, garages and disposals.	Principal Estates Surveyor

HOUSING COMMITTEE

28 MARCH 2017

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Report Title	HOUSING REVENUE ACCOUNT (HRA) BUDGET MONITORING REPORT 2016/17 – REPORT 3
Purpose of Report	To inform members of the forecast 2016/17 outturn position on the Housing Revenue Account.
Decision(s)	The Committee RESOLVES: a) To note the projected outturn position on the HRA for 2016/17; b) To approve in principle the provisional capital slippage, as set out in Table 5 (subject to the final outturn position).
Consultation and Feedback	The report is based upon information provided by respective budget holders and contains a range of feedback and projections which they have provided to explain differences between budget and forecast outturn income and expenditure.
Financial Implications and Risk Assessment	The report highlights a further reduction in planned expenditure for the year of £2.082m with a corresponding increase in the projected level of HRA working balances by the end of the financial year. A significant element of the 2016/17 capital works budgets (£1.045m) are committed in the short-term with a need to review the longer term plans in terms of reprofiling and validating planned expenditure levels across the MTFP period. The report highlights the risk around the capital outturn forecast, given the current level of expenditure recorded on the council's financial system. David Stanley – Accountancy Manager Tel: 01453 754100 Email: david.staney@stroud.gov.uk
Legal Implications	This report has not been submitted to Legal Services prior to publication. The Legal Services Manager has advised that she will consider the report and update the Committee if there are any significant Legal Implications. Karen Trickey, Legal Services Manager and Monitoring Officer Tel: 01453 754356 Email: karen.trickey@stroud.gov.uk

Report Author	David Stanley – Accountancy Manager Tel: 01453 754100 Email: david.stanley@stroud.gov.uk
Performance Management Follow Up	Budgets will be monitored by budget holders, supported by Finance.
Background Papers/ Appendices	Appendices A and B

Background

1. This report provides the third financial update for the financial year. Its purpose is to notify members of any significant forecast variances to the budget, highlight any key issues and to inform members of any actions that are required to be taken.
2. The outturn forecasts are calculated based upon a combination of the actual financial performance up to the 31 January 2017 and assessments of anticipated financial performance by 31 March 2017.
3. **This report should be seen as an update following the revised estimates presented to the committee in January. Savings and deferred expenditure identified in the revised estimates have been reflected in the outturn forecasts contained within this report. The budget monitoring position also reflects a further projected underspend and slippage on a number of budget headings.**
4. **This is primarily due to slowing down several work streams and deferring some programmes into future years to ensure we deliver value for money and efficient use of available resources both financial and physical including natural efficiencies being achieved from a pragmatic approach to delivery.**

HRA Budget – forecast outturn position

5. The original HRA budget for 2016/17 was £30.229m gross expenditure less £28.563m of income and financing resulting in a transfer from (use of) balances of £1.666m. The revised budget, as approved by Council in February 2017 is £25.837 gross expenditure less £28.603m of income and financing resulting in a net transfer to (addition to) balances of £2.765m.
6. The current forecast outturn position is gross expenditure of £23.513m (£2.392m variation) less £28.361m of income and financing (£0.310m variation) resulting in a net transfer to (addition to) balances of £4.848m. **This represents a variation of £2.082m against the latest budget with £1.045m of this variation being capital slippage and will be carried into 2017/18.**
7. The variations are summarised in Table 1, with the greatest variances being underspends and slippage across capital works, revenue repairs and maintenance, and supervision and management budgets. Further information is outlined in the Report Headlines section below.

Table 1 – HRA budget position (summary)

Housing Committee	2016/17 Latest Budget (£'000)	2016/17 Actual to Date (£'000)	2016/17 Qtrly Accruals (£'000)	2016/17 Actual + Accruals (£'000)	2016/17 Outturn Forecast (£'000)	2016/17 Outturn Variance (£'000)
Expenditure						
Supervision & Management	4,774	3,633	0	3,633	4,501	(273)
Sheltered Housing	1,021	645	0	645	955	(66)
Repairs and Maintenance	3,098	1,641	445	2,085	2,744	(354)
Sheltered Housing Modernisation	426	231	0	231	311	(115)
Queen's Court	0	128	0	128	128	128
Other Income and Expenditure	3,783	2,148	0	2,148	3,783	0
Support Service Charges	322	330	0	330	330	7
Subtotal Revenue Expenditure	13,424	8,755	445	9,200	12,751	(673)
Capital Expenditure NB&D	6,957	5,425	0	5,425	7,262	305
Capital Expenditure - Works	5,280	1,080	579	1,659	3,241	(2,039)
Capital Expenditure - SH Modernisation	176	18	0	18	89	(87)
Capital Expenditure - Queen's Court	0	170	0	170	170	170
Subtotal Capital Expenditure	12,413	6,693	579	7,272	10,762	(1,651)
Gross Expenditure	25,837	15,448	1,024	16,472	23,513	(2,324)
Income (Rents & Charges)	(22,231)	(17,063)	0	(17,063)	(22,319)	(89)
Net Housing Expenditure	3,606	(1,615)	1,024	(591)	1,194	(2,413)
Funding (Borrowing, Grants)	(6,372)	(131)	(839)	(970)	(6,042)	331
TOTAL HRA	(2,766)	(1,745)	185	(1,561)	(4,848)	(2,082)

(Table contains roundings.)

8. Table 1 (above) shows actual income and expenditure to 31 January 2017. For information, the table below shows the actual income and expenditure to 28 February 2017 and 15 March 2017 as recorded on the council's financial system (Agresso).

Table 2 – Actual income and expenditure as per Agresso

Housing Committee	Actual to 31/01/17 (£'000)	Actual to 28/02/17 (£'000)	Actual to 15/03/17 (£'000)
Expenditure			
Supervision & Management	3,633	3,842	4,040
Sheltered Housing	645	706	795
Repairs and Maintenance	1,641	1,843	1,884
Sheltered Housing Modernisation	231	233	251
Queen's Court	128	128	131
Other Income and Expenditure	2,148	2,211	2,211
Support Service Charges	330	330	330
Subtotal Revenue Expenditure	8,755	9,293	9,642
Capital Expenditure NB&D	5,425	5,883	5,886
Capital Expenditure - Works	1,080	1,444	1,575
Capital Expenditure - SH Modernisation	18	18	19
Capital Expenditure - Queen's Court	170	170	170
Subtotal Capital Expenditure	6,693	7,515	7,650
Reconciliation adjs		39	74
Gross Expenditure	15,448	16,848	17,367
Income (Rents & Charges)	(17,063)	(18,761)	(18,790)
Net Housing Expenditure	(1,615)	(1,914)	(1,424)
Funding (Borrowing, Grants)	(131)	(197)	(197)
TOTAL HRA	(1,745)	(2,111)	(1,621)

(Table contains roundings; reconciliation adjs balance the table above to Agresso records)

Report Summary

9. The HRA budget was significantly revised in the year in order to maintain HRA balances over the MTFP period. Reports to Housing committee in September 2016 outlined the approach taken to protect HRA balances in the current financial year and over the medium term. A number of projects and work streams have been deferred to future years based partially on the uncertainty of the financial position and also a more robust

validation of works being carried out on planned and cyclical areas. Due diligence has been demonstrated by disputing works from contractors that were incorrect and challenging suppliers to ensure that the money spent provides the best outcome for the Council and its tenants. It is also worth highlighting that this approach ensures that HRA resources are spent in a considered and planned manner to achieve best value for tenants and the council. Given the limited resources of the HRA over the medium term plan period, budgets may not always be fully spent in a given year just to achieve budgetary targets.

10. Furthermore, the HRA delivery plan considered by Housing committee in January 2017, set out the key priorities of the HRA. The approach taken outlined above ensures that resources are directed to the priority areas.
11. The revised budget reduced the overall level of net expenditure by £4.4m. The latest outturn forecast suggests a further reduction in net expenditure of £2.082m.
12. The main variations identified in the report relate to Supervision & Management, Sheltered Housing Modernisation Project, Capital Works and Repairs and Maintenance budgets. A brief overview of the reason for these variations is set out below.
13. Expenditure of £3.241m is forecast on the Capital works budgets, significantly less than the budgeted amount. **Capital slippage of £1.045m** has been identified and will be taken into 2017/18 to ensure funding is available to support the delivery commitments already in place.
14. **Supervision and Management** forecast to **underspend by a net £273k** (£523k before a proposed transfer to a workforce planning reserve of £250k). The net £273k underspend is largely due to the recruitment freeze in the first half of the year (£100k) and challenging recruitment market for key positions. A significant element of the variation has been the difficulty to recruit competent and skilled staff to technical positions, especially within our salary structure. Given the overall level of savings in this area, it is anticipated that an HRA Workforce Planning reserve of £250k is established to help mitigate potential future costs associated with the workforce.
15. The overall variation is a mix of pay and non-pay variations (£220k staffing, £300k contingency and non-pay budgets). Certain non-pay budgets have not been spent due to the recruitment situation, with training, IT budgets and supplies and services budgets comprising the majority of the variation.
16. This variation should be seen in the context of service delivery achievements in the year. There is a need to invest in the staffing structure to ensure performance can continue in the future and the HRA Delivery plan realised. The variation in 2016/17 is a result of a recruitment freeze and difficulty in recruiting to key technical posts. Whilst the workload of the teams has been managed despite the vacancies, it is not sustainable in the longer term. Therefore, whilst there are likely to be some savings released across the MTFP period, further investment in staff, processes, and IT systems will be required.

17. **£305k additional expenditure on New Build** as a result of a number of large schemes with large monthly contract payments that span over two financial years. Work has also progressed more quickly on the Top of Town Scheme and at Chapel Street, Cam due mainly to the good weather and contractors delivering more quickly than they had anticipated.
18. **£354k underspend on revenue Repairs and Maintenance budgets** which has been achieved by a combination of: robustly changing the culture with officers instructed not to spend simply to meet a budget target and instead to spend wisely on works that are assessed and considered necessary, and putting some works into planned programmes to ensure we are carrying out more sustainable repairs at a more controlled cost. Additionally, we have introduced a strong approach to contract management including disputing and challenging suppliers and contractors specifically regarding variations to works orders.
19. It should also be noted that we have had a very light winter season which has reduced some of what we would expect in terms of expected work streams. £354k underspend on revenue Repairs and Maintenance budgets (£154k overspend on responsive repairs, £296k underspend on planned/cyclical, £120k underspend on Gas)
20. **Sheltered Housing** - variations include there being no call on out tree surgery budget and savings on the equipment and grounds maintenance budgets within Sheltered Housing during 2015/16.
21. **Financing variation** due to reduced level of expenditure across the HRA capital programme, changes in Queens Court buy-back profile from earmarked reserves, projected utilisation of HCA grant balances and gross income from renewable heating schemes.

Table 3 – Impact on HRA balances over MTFP (projected)

	2016/17 Revised	2016/17 Bud Mon (£'000)	2017/18 (£'000)	2018/19 (£'000)	2019/20 (£'000)	2020/21 (£'000)
HRA BALANCES						
General Fund Balance b/f	1,938	1,938	6,786	3,698	3,584	3,580
Change in Balances	2,766	4,848	(3,088)	(114)	(4)	851
General Fund Balance c/f	4,703	6,786	3,698	3,584	3,580	4,431
Reductions in expenditure, or increases in income, to maintain balances at £1.5m			0	0	0	0
General Fund Balances as % of Net Revenue Budget	18.16%	26.19%	13.99%	16.37%	16.49%	20.56%

22. There is a significant change in the level of balances purely as a result of the outturn forecast across the MTFP period. These are stated prior to any allocation from balances for carry forwards.
23. The table above also does not take into account the treatment of capital slippage at year end. It may be more prudent (depending on the final level of capital expenditure) to transfer capital slippage to the Major

Repairs Reserve alongside the Item 8 calculation of depreciation. This would reduce the transfer to HRA working balances and ensure adequate capital financing is available to support spend in 2017/18. Based on the provisional capital slippage requested in the report, the HRA working balance would be £1.045m lower in each year than shown in the table above.

24. Further detailed work will need to be undertaken to work through the impact on each year of any rephrasing/reprofiling of expenditure across the MTFP period and modeled within the 30 year financial plan.

Areas of risk and uncertainty

25. Whilst there will clearly be lower net expenditure this year, there remains some risk and uncertainty in the outturn forecast:
 - a. The forecast outturn position on Capital budgets require additional spend or creditor accruals of £3.1m over the remainder of the financial year (£1.666m capital works, £1.376m New Build). Whilst it is expected that some of the difference between actual spend to date and the outturn forecast can be accounted for in delays in supplier invoicing, there nevertheless remains some risk that the outturn forecast will not be achieved.
 - b. The revised budget assumes 40 right to buy sales would be completed by the end of the financial year. To date (15 March 2017), 22 sales have been achieved, although there will be applications progressing. Whilst this will not impact on the level of RTB receipts being applied to the HRA New Build and Development programme, it will affect the level of rent loss predicted in subsequent years in the MTFP. These assumptions will be reviewed when the MTFP is updated in the first half of 2017/18.

HRA Capital Programme

26. The HRA Capital programme for 2016/17 is shown in Table 3 below. For clarity, the budgets are split between work on new homes, sheltered housing modernisation programme, and capital works on existing stock. Underspends and capital slippage totaling £1.822m is expected leaving expenditure of £10.592m in the year against the revised budget of £12.413m.

Table 4 – HRA Projected Capital Outturn 2016/17

Housing Committee Capital Schemes	2016/17 Latest Budget (£'000)	2016/17 Actual to Date (£'000)	2016/17 Qtrly Accruals (£'000)	2016/17 Actual + Accruals (£'000)	2016/17 Outturn Forecast (£'000)	2016/17 Outturn Variance (£'000)
New Build & Development						
Minchinhampton	0	9	0	9	10	10
Woolaways Refurbishment	0	(2)	0	(2)	(2)	(2)
Berkeley	2	(4)	0	(4)	2	0
Chapel Street, Cam	1,112	701	0	701	1,161	49
Hillside, Coaley	352	277	0	277	359	7
Littlecombe	41	4	0	4	41	0
Southbank, Woodchester	0	1	0	1	1	1
The Corriett	110	93	0	93	131	21
Wharfdale Way	23	1	0	1	1	(22)
Development - Leonard Stanley	2,027	1,991	0	1,991	2,208	181
Development - Top of Town Phase 1	47	(22)	0	(22)	52	5
Development - Top of Town Phase 2	1,352	1,328	0	1,328	1,361	9
Development - Top of Town Phase 3	1,320	1,006	0	1,006	1,537	217
Development - Top of Town	0	(3)	0	(3)	(3)	(3)
Development - Top of Town Phase 4	360	29	0	29	365	5
Fountain Crescent	0	15	0	15	15	15
Stonehouse - Former Ship Inn site	0	0	0	0	23	23
Contingency	211	(0)	0	(0)	0	(211)
TOTAL	6,957	5,425	0	5,425	7,262	305

Housing Committee Capital Schemes	2016/17 Latest Budget (£'000)	2016/17 Actual to Date (£'000)	2016/17 Qtrly Accruals (£'000)	2016/17 Actual + Accruals (£'000)	2016/17 Outturn Forecast (£'000)	2016/17 Outturn Variance (£'000)
Central Heating	670	86	0	86	536	(134)
Disabled Adaptations	300	93	0	93	171	(129)
Estate Works	0	(0)	0	(0)	(0)	(0)
Kitchens and Bathrooms	1,240	503	0	503	936	(304)
Major Voids	500	249	0	249	350	(150)
Professional Fees	110	112	0	112	25	(85)
Roofing	0	(3)	0	(3)	(3)	(3)
Asbestos / Radon	250	130	0	130	150	(100)
Doors and Windows	500	318	0	318	408	(92)
Electrical Works	200	118	0	118	202	2
Damp Works	90	0	0	0	0	(90)
Renewable Heating	0	(579)	579	0	0	0
Non-Traditional Properties	100	26	0	26	63	(37)
Gas In-House Provider	0	1	0	1	1	1
Door entry	200	25	0	25	25	(175)
External Works	1,100	1	0	1	377	(723)
Lifts	20	0	0	0	0	(20)
TOTAL Other Schemes	5,280	1,080	579	1,659	3,241	(2,039)
Sheltered Housing Modernisation	176	18	0	18	89	(87)
Queen's Court	0	0	170	0	0	170
TOTAL Capital Expenditure	12,413	6,522	579	7,102	10,592	(1,822)

(The table contains roundings.)

Provisional Capital slippage

27. Capital slippage has been identified in the early part of the quarter, as shown in the table below.

Table 5 – Capital slippage

Capital Slippage	Capital slippage (£'000)
Damp Works/Insulation	90
Door Entry	175
External Works	723
Lift	20
Non-Traditional Properties	37
Total provisional slippage	1,045

Appendix A –Revenue and Financing variations

28. **Supervision & Management: £273k net underspend.** £523k before £250k is proposed to be allocated to a new earmarked reserve for workforce planning (as outlined in para 13). The overall variation is in addition to the HRA action plan salary savings and are predominantly due to difficulty in recruiting a number of technical posts in areas such as asbestos, mechanical & electrical and contract management across the service leading to the underspend. This is being addressed by reviewing roles and considering alternate methods of delivery in some cases
29. **Sheltered Housing: £66k net underspend** as a result of a significantly reduced call off responsive items, most significantly tree surgery, reduced grounds maintenance costs, with more of this being undertaken in house and a reduced call on the equipment budget for new purchases.
30. **Repairs & maintenance:** A robust approach to delivery has allowed efficiencies to be made across most work streams during the year. Notably we are starting to benefit from past years investments, we have changed the way works are delivered when properties become empty, and we have been more focused in the way the repairs and maintenance service is managed.
- a. **Cyclical and Planned maintenance - £297k underspend.** Cyclical painting has largely been deferred as the contract has been re-procured in year due to the performance of the incumbent contractor. We are taking the opportunity to realign this programme with future planned programmes of work to ensure synergy and value for money is achieved.
- b. **General Voids - £92k underspend.** This has been achieved by changing operating practices and moving some traditional void works into planned programmes as appropriate (unless the circumstances show otherwise, such as health and safety concerns) e.g. not replacing kitchens on voids because the programme indicates renewal, but instead assessing their condition on a case by case basis and moving them into the planned capital programme.
- c. **Gas In-House service - £120k underspend.** SDC Heating Services are showing significant efficiencies when benchmarked against the external market place. This has been achieved through greater partnership working with stakeholders, changes in working practices, negotiated improved materials costs and support servicing contract.
31. **Rent & charge income - £89k variation.** Rental and service charge income largely in-line with the revised budget, with a collection anticipated to involve a positive collection of an additional £89k over original budget.
32. This is a very pleasing outcome and can be attributed to the service's redesign where a specialist income team was formed and which has performed exceptionally well, and the impact of welfare reform changes

far less than predicted. It must be noted that major changes notably Universal Credit will be implemented during 2017/18.

33. This positive income performance is all the more reassuring, considering that the sheltered housing modernisation project has meant that two schemes are being closed, creating empty flats during 2016/17 and income loss as a result. Rent income collection is currently 98.7% which is not only higher than projected last year, but an improvement over previous years.
34. A further contribution factor to the positive variation is the delivery of new homes from the New Build programme, which are generally let at affordable rent levels.
35. **Sheltered Housing Modernisation:** The revenue variation is due to lower than forecast expenditure on decants.
36. **Queens Court:** Expenditure of £130k – See commentary in Appendix B.
37. **Funding:** There is a reduction in the level of financing from Capital receipts owing to the reduced level of expenditure within the HRA's capital programme. :
 - a. Shared ownership and other receipts - £449k variation
 - b. HCA grant received - £33k of unapplied grant from 2015/16 being utilised
 - c. Application of RTB receipts to be reviewed at year end once the final outturn position is certain.

STROUD DISTRICT COUNCIL

AGENDA

HOUSING COMMITTEE

ITEM NO

28 MARCH 2017

8

Report Title	TENANT SERVICES ENERGY STRATEGY
Purpose of Report	For Committee to approve the Strategy
Decisions	The Committee RESOLVES to adopt the Energy Strategy in Appendix 1 to the report.
Consultation and Feedback	Workshops consisting of Officers, Members, and Tenants took place on 10 October 2016 and 15 November 2016. The draft document was presented to Corporate Team 07/03/17
Financial Implications and Risk Assessment	<p>Investment in this area must represent value for money, meet affordability criteria, and be taken into account when undertaking medium term financial planning.</p> <p>Simon Merrett – Interim Principal Accountant Tel: 01453 754344 Email: simon.merrett@stroud.gov.uk</p> <p>The Strategy is a guiding principle which will allow the Council to make informed decisions based on a sound analytical approach. Adoption of the Strategy will ensure that the Council has a robust policy which addresses issues of carbon management, and fuel poverty, in accordance with its stated aims. There are specific health consequences of exposure to low temperatures and the drivers of fuel poverty are significant.</p>
Legal Implications	<p>No significant legal implications to report.</p> <p>Karen Trickey Legal Services Manager and Monitoring Officer Tel: 01453 754369 Email karen.trickey@stroud.gov.uk</p>
Report Author	<p>Joe Gordon, Asset Operations Manager Tel: 01453 754190 Email: joe.gordon@stroud.gov.uk</p>
Options	None
Performance Management Follow Up	<p>Annual review and briefing paper to members on the status and effectiveness of the strategy in light of any legislative or other impacts.</p> <p>Annual update to senior management, members and stakeholders on progress against the stated aims and objectives within the action plan.</p>

1.0 Introduction

- 1.1 Since the adoption of the Energy Strategy in October 2011, and the subsequent revision in April 2012, there have been significant changes to local and national policy, and the funding landscape. This new strategy reflects these changes, and underpins other relevant policies and strategies including the Corporate Asset Management Plan, and Environment Strategy.
- 1.2 The Strategy has a five year rolling programme, which now enables delivery of objectives to be strategically aligned to the MTFP, and supports better planning and delivery of projects over the long term.
- 1.3 We have undertaken a comprehensive exercise, in looking at the effects of past energy improvement measures carried out, and through scenario modelling evaluated what other measures can be taken to further improve the energy efficiency of our stock.
- 1.4 Ensuring the success of the strategy will require the Council to work in partnership with both the public and private sector. This strategy now includes objectives to promote behavioural change for both internal and external stakeholders because we believe everyone has a part to play in reducing energy consumption, and this cannot be achieved by simply improving the physical structure of the homes within the Councils stock in isolation.
- 1.5 There is a link between low temperatures and poor mental health, with those living at low temperatures more likely to be affected by and subject to, common mental health disorders. There are also clear links to social isolation amongst adults associated with cold homes, while there appears to be some association between cold homes, truancy, negative impacts on educational attainment and risk of anti-social behaviour amongst adolescents.
- 1.6 New and sustained focus is now required to ensure that investment is appropriate and meets the needs of existing and future customers.

2.0 Executive Summary

- 2.1 Stroud has circa 5,200 homes for rent, around 340 of them were built prior to 1930, a further 600 have non-traditional wall construction, and a significant number of the estimated 1,000 homes with uninsulated cavity walls are likely to need some specialist treatment. These groups will require significant investment to improve their thermal efficiency.
- 2.2 Around 24% of the stock currently has no mains gas connection. While around 500 of these now have modern electric heat-pump wet heating

systems, a further 700 need significant improvements to make their heating more affordable for occupants and reduce carbon emissions.

- 2.3 Most low-cost improvements have already been completed on the majority of homes where practicable; we need to have a comprehensive strategy for what else we need to do to align ourselves with our vision (as set out in the Strategy) as part of an economically viable process.
- 2.4 The Strategy has been developed following the completion of a comprehensive energy scenario modelling exercise (of the domestic portfolio) to assess the best ways for SDC to improve the energy efficiency across its housing stock portfolio.
- 2.5 The Strategy underpins the Councils guiding principles and commitment to reducing carbon, and addressing environmental issues in a responsible way. It will also refer to a new Affordable Warmth Strategy which will be developed to complement existing and future aspirational aims.

3.0 Outcomes

- 3.1 This will be the first time that the Council has:
 - An Energy Strategy which promotes the exchange and sharing of knowledge and best practice in energy management
 - Clear strategic guidance on improving our housing stock energy efficiency for Officers and Members
 - A basis on which the Council can effectively inform and consult with all stakeholders
 - A strategic decision-making and vision-sharing medium

STROUD DISTRICT COUNCIL

AGENDA

HOUSING COMMITTEE

ITEM NO

28 MARCH 2017

9

Report Title	COMMUNITY HOUSING FUND
Purpose of Report	To seek authority to allocate Community Housing Funds received from DCLG to qualifying projects.
Decision(s)	<p>The Committee RESOLVES to:</p> <p>(1) Approve the commitment of the Community Housing Fund to provide a community housing enabler; and</p> <p>(2) Delegate authority to the Policy Implementation Manager to allocate the remaining funds to community housing groups.</p>
Consultation and Feedback	DCLG has been consulted about the proposals outlined in the report and have endorsed them as being in accordance with their guidelines.
Financial Implications and Risk Assessment	<p>There are no direct financial implications arising from this report. (Any costs associated with the Community Housing Enabler will be grant funded from DCLG)</p> <p>Adele Rudkin, Accountant Tel: 01453 754109 Email: adele.rudkin@stroud.gov.uk</p> <p>Risk Assessment: The primary risk is that the project fails to deliver additional affordable housing. These risks are mitigated by using an experienced provider to host the Community Housing Enabler post.</p>
Legal Implications	<p>No legal implications arise from this report</p> <p>Alan Carr Solicitor Tel: 01453 754357 Email: alan.carr@stroud.gov.uk</p>
Report Author	<p>Pippa Stroud, Policy Implementation Manager Tel: 01453 754099 Email: pippa.stroud@stroud.gov.uk</p>
Options	<p>DCLG has produced guidelines covering the allocation of this funding. This sets out various options which are dealt with in the report.</p> <p>Further funding from DCLG is reliant on the authority providing satisfactory evidence that the money is being spent in accordance with DCLG objectives.</p>

Performance Management Follow Up	Community Housing indicators will be included in performance monitoring for Housing Committee.
Background Papers/ Appendices	Appendix 1 – Letter to Chief Executives Appendix 2 – Funding Guidelines.

1. INTRODUCTION / BACKGROUND

- 1.1 In January 2017, DCLG awarded the District Council a total of £149,478 to support community-led housing development. Half of this funding has been received to date with the second half held by DCLG, pending their formal acceptance of our proposals for utilising the funds.
- 1.2 **Community-led housing** is defined by DCLG as being about local people playing a leading and lasting role in solving local housing problems, creating genuinely affordable homes and strong communities in ways that are difficult to achieve through mainstream housing.
- 1.3 Guidance received from DCLG requires that schemes are ‘truly community-led’ but also states that routes to delivery for community-led housing schemes ‘are the same as in any other industry-standard housing scheme’, suggesting that communities may work in partnership with a local housing association or developer, or can work on standalone projects.

2. ISSUES FOR CONSIDERATION

- 2.1 We have already received an approach from a CLT group seeking some or all of the funding to support a site at Eastington. We have also received an offer from a Community Housing Fund advisor to discuss how the funds might be used; this advisor charges £400 a day for his services. Stroud Commonwealth has also approached us to ask for funding; their approach focuses on facilitating self-build.
- 2.2 £149,000 is no small sum of money but is not enough to provide significant capital funding to housing development projects, given that the average build cost of a 2 bedroom house is now over £100,000, not including land, externals or fees. As an alternative, a capacity building approach is suggested in order to maximise the use of the funding to support new community housing development in the longer term.
- 2.3 Gloucestershire Rural Housing Partnership, a consortium comprising the rural Local Authorities in Gloucestershire, local housing associations and Gloucestershire Rural Community Council has for some years jointly funded and employed a rural housing enabler who works directly with parish councils to identify housing need and support affordable housing development in those parishes.
- 2.4 It is proposed that this model is replicated by using the funding to support the part-time employment of a community housing enabler

specifically to build capacity at grassroots level and work with communities to examine the full range of suitable affordable housing development options, from conventional development routes to self-build, co-housing and housing co-operatives. This post would be hosted by Gloucestershire Rural Community Council in order to capitalise on their position as experienced and respected community capacity builders, and cost approximately £30k per annum.

- 2.5 Forest of Dean District Council is also interested in using their DCLG funding to support a community housing enabler role; as a result, there may be an opportunity to jointly fund a full-time post covering the two local authority areas which would reduce the annual cost of the post to around £25k per annum, per authority.
- 2.6 Initial conversations have been held with DCLG who have endorsed the following approach to the use of the funding:
 - Support the employment by Gloucestershire Rural Community Council (GRCC) of a 'Community Housing Enabler' on a part time basis for three years, at a cost of approximately £30k per annum. A three year commitment would be required as a minimum due to the long lead time required to build community capacity and bring forward community housing schemes.
 - Use the remaining funding to provide a small pot of grant funding for newly emerging community housing schemes such as the Eastington CLT, and for organisations such as Stroud Commonwealth to support community self-build.

3. CONCLUSION / RECOMMENDATION

- 3.1 Employing the enabler role via GRCC would allow us to shape the work of the enabler while allowing that role to maximise the established relationships that GRCC enjoys with both town and parish councils and community groups. GRCC has a strong track record of working positively and collaboratively with the District Council to deliver affordable rural housing and community projects.
- 3.2 Use of the residual funding to provide grants to newly emerging community housing groups can help those groups to attract additional external funding to support housing development. Additionally, providing support to local organisations with a broader remit, such as Stroud Commonwealth could help bring forward self-build and other community development opportunities.

STROUD DISTRICT COUNCIL

AGENDA

HOUSING COMMITTEE

ITEM NO

28 MARCH 2017

10

Report Title	TENANCY FRAUD POLICY
Purpose of Report	To present the revised tenancy fraud policy to committee.
Decisions	The Committee RESOLVES to adopt the revised tenancy fraud policy.
Financial Implications and Risk Assessment	<p>The update of this Policy will assist in the protection from fraud of the Council's income stream from its properties. It will enable the Council to continue to provide its services that are required.</p> <p>Simon Merrett – Interim Principal Accountant Tel: 01453 754 344 Email: simon.merrett@stroud.gov.uk</p> <p>The Policy is a guiding principle which will allow the Council to manage its tenancies based on housing legislation and statute. Adoption of the Policy ensures the Council has a robust approach to reducing the risk of challenge in this area. By not having clear policy can lead to Council having a greater risk of incurring financial loss and reputational damage.</p>
Legal Implications	<p>In line with advice to relevant officers, it is recommended that further work is undertaken to improve the draft policy before it is adopted, to ensure that it supports a clear and robust approach to discourage, identify and action cases of fraud.</p> <p>Karen Trickey Legal Services Manager and Monitoring Officer Email karen.trickey@stroud.gov.uk</p>
Report Author	<p>Patricia Andrade Tel: 01453 754163 Email: patricia.andrade@stroud.gov.uk</p>
Performance Management Follow Up	The detection and actions taken against cases of tenancy fraud will be reported to the performance sub group of the housing committee.
Background Papers/ Appendices	<p>Tenancy Fraud Policy – February 2013 Appendix 1 – Tenancy Fraud Policy – February 2017</p>

1.0. Introduction

- 1.1. The council has a duty to make the best use of its housing stock in order to maximise its ability to meet housing need. This means that we must ensure that occupation of its homes is by the legally entitled and rightful person(s).
- 1.2. Presently Stroud has some 5131 homes of which approximately 17% are classified as sheltered accommodation.
- 1.3. The revised tenancy fraud policy ensures SDC keeps pace with the requirements in minimise wrongful occupation of our stock. This is attached as Appendix 1.

2.0. Background

- 2.1. The current tenancy fraud policy was written in February 2013 with the expectation that it will be reviewed after 3 years. A copy of this has been provided to members through their citrix account.

3.0 Revisions

- 3.1. The Tenancy Fraud Policy has been revised and now includes and expansion within the areas of:
 - Fuller explanation of Tenancy Fraud
 - The Financial and risk Implications
 - Further explanation of prevention
 - More details on detection
 - Identifying the legal actions which can be considered
- 3.2. It is proposed now that this policy will be reviewed annually with future referral to committee only made if the review requires a significant amendment or change in policy direction.

Appendix A –Revenue and Financing variations

1. **Supervision & Management: £273k net underspend.** £523k before £250k is proposed to be allocated to a new earmarked reserve for workforce planning (as outlined in para 13). The overall variation is in addition to the HRA action plan salary savings and are predominantly due to difficulty in recruiting a number of technical posts in areas such as asbestos, mechanical & electrical and contract management across the service leading to the underspend. This is being addressed by reviewing roles and considering alternate methods of delivery in some cases
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 - c. **Gas In-House service - £120k underspend.** SDC Heating Services are showing significant efficiencies when benchmarked against the external market place. This has been achieved through greater partnership working with stakeholders, changes in working practices, negotiated improved materials costs and support servicing contract
4. **Rent & charge income - £89k variation.** Rental and service charge income largely in-line with the revised budget, with a collection anticipated to involve a positive collection of an additional £89k over original budget.
5. This is a very pleasing outcome and can be attributed to the service's redesign where a specialist income team was formed and which has performed exceptionally well, and the impact of welfare reform changes

far less than predicted. It must be noted that major changes notably Universal Credit will be implemented during 2017/18.

6. This positive income performance is all the more reassuring, considering that the sheltered housing modernisation project has meant that two schemes are being closed, creating empty flats during 2016/17 and income loss as a result. Rent income collection is currently 98.7% which is not only higher than projected last year, but an improvement over previous years.
7. A further contribution factor to the positive variation is the delivery of new homes from the New Build programme, which are generally let at affordable rent levels.
8. **Sheltered Housing Modernisation:** The revenue variation is due to lower than forecast expenditure on decants.
9. **Queens Court:** Expenditure of £130k – See commentary in Appendix B.
10. **Funding:** There is a reduction in the level of financing from Capital receipts owing to the reduced level of expenditure within the HRA's capital programme. :
 - a. Shared ownership and other receipts - £449k variation
 - b. HCA grant received - £33k of unapplied grant from 2015/16 being utilised
 - c. Application of RTB receipts to be reviewed at year end once the final outturn position is certain.

Appendix B – Capital Variations

New Homes and Regeneration £0.475m additional expenditure

1. The New Homes and Regeneration Programme continues to deliver new homes as planned. Members will recall that the budgets for the New Build schemes were reprofiled during the year to reflect the revised cashflow forecast. As noted under risks and uncertainties, additional expenditure of £1.376m is required to achieve the outturn forecasts indicated, which may be subject to some change depending on the valuation of works completed by 31 March..
2. Schemes highlighted as differing from the revised budget profile for the year.
 - a. **Leonard Stanley - £181k** of expenditure which is more in line with the original budget allocation (£2.227m)
 - b. **Top of Town - £233k** of additional expenditure (all phases)
 - c. **Contingency – (£211k)** essentially supporting these schemes has not been spent and can be netted-off against the expenditure above.

Other capital works £2.039m under budget

3. Capital works budgets were revised downward by £2.590m in December to reflect the deferment of expenditure as part of the HRA Action Plan. Further capital slippage of £1.045m is forecast. As noted under risks and uncertainties, additional expenditure of £1.666m is required to achieve the outturn forecasts indicated.
 - a. **Central Heating - £134k underspend.** Despite a high volume of critical failure works being undertaken we are dealing with those efficiently. A credit of £56k from the Central Heating Fund (CFH) was received in year.
 - b. **Disabled Adaptations - £129k underspend.** These works are demand led and there has been a lower volume of DNA referrals than in previous years.
 - c. **Kitchens and Bathrooms £304k underspend.** Works are being validated and if appropriate moved into future programmes if elements do not need replacing i.e. if a kitchen or bathroom has several years of life left they are reprofiled into future programmes
 - d. **Major Voids - £150k underspend.** This budget is demand led where there have been cost reductions, increased intelligence from pre termination inspections has assisted this process
 - e. **Asbestos/Radon - £100k underspend.** All asbestos is identified and managed safely and where appropriate removed rather than encapsulated where there is any indication of risk. In many situations leaving undisturbed asbestos may be the safest option which is then addressed through void or programmed works.
 - f. **Damp works/Insulation - £90k slippage.** Works have been deferred to future years and realigned with other planned works programmes.

- g. **Non-Traditional properties - £37k slippage.** Initial pilot programme was successfully delivered. All future financial commitment is subject to validation and financial appraisal in accordance with the approved strategy and guidance.
 - h. **Door Entry - £175k slippage** Procurement was initially deferred as this work stream had a degree of flexibility which provided some comfort to ensure resource certainty in case additional savings were required to maintain HRA balances in-year. Door entry in our properties are working correctly and this procurement will enhance and replace systems. Consequently this is not an immediate priority and as such delivery will now begin in 2017/18.
 - i. **Professional fees (reclassification of ineligible expenditure from capital to revenue).** This budget will be moved from capital to revenue in future years.
 - j. **External Works - £723k slippage.** Delays in starting on site, and the poor performance and delivery of the contractors have been a factor. This has been managed robustly by officers and outstanding works will be carried forward into future year's programmes. The aim is to ensure works are properly carried out, validated and provide value for money.
4. **Sheltered Housing Modernisation:** The main variance is on Capital due to an allowance for options appraisals that has not been required in this financial year and costs of remodelling units falling across two financial years– all of the ex-wardens properties will have been brought back into use in 2017/18.
5. **Queens Court** – Capital and Revenue combined - £130k and £170k funded from balances. It was anticipated that it would take up to 2 years to progress the project to a point where the property could be disposed on the open market. The HRA MTFP allowed for £400k of reserve funding across 2017/18 and 2018/19, but given the project has progressed more quickly, the revenue and capital buy-back costs will be funded from HRA working balances in the current financial year. A capital receipt of £1.5m to £2.0m was forecast in the MTFP in 2018/19, although this may be realised sooner given the progress to date.



Energy Strategy

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Revision record		
Date	Rev	Details
09/12/16	1_0	Incomplete draft Issued for comment
10/02/17	1_1	Complete draft issued for comment
15/02/17	1_2	Colour template changed to Stroud corporate and typo's addressed
27/02/17	1_3	Comments integrated from internal SDC consultation on v1_2

DRAFT

Executive Summary

This document sets out Stroud District Council's (SDC) Strategy for improving the energy performance of the Council's Housing Revenue Account (HRA) properties and replaces the existing Tenant Services Energy Strategy (last updated in October 2012).

The key aims of this Energy Strategy are to:

- Relieve fuel poverty and
- Maximise carbon reduction in line with the Council's existing and future agreed targets.

It applies to all dwellings that are owned and managed by SDC, including communal areas of flats and sheltered housing schemes and shops where appropriate, but excludes garages.

The Strategy has been developed following the completion of a comprehensive energy scenario modelling exercise (of the domestic portfolio) to assess the best ways for SDC to improve the energy efficiency across its housing stock portfolio.

Many of the low-cost improvements have already been completed on the majority of homes where practicable. Therefore an increasing proportion of the improvements still required in the stock are to the more challenging "Hard to Treat" homes, which will now need significant and targeted investment.

With 5,200 homes for rent, around 340 of them were built prior to 1930, a further 600 have non-traditional wall construction, and a significant number of the estimated 1,000 homes with uninsulated cavity walls are likely to need some specialist treatment. These groups will require significant investment to improve their thermal efficiency.

Around 24% of the stock currently has no mains gas connection. While around 500 of these now have modern electric heat-pump wet heating systems, a further 700 need significant improvements to make their heating more affordable for occupants and reduce carbon emissions.

Improving the energy performance of the Council's housing stock presents a major challenge. This will be achieved by targeting our resources on measures which provides the Council, and tenants with the greatest return on investment. Encouraging behavioural change (around how energy and heating systems are used) can also contribute to efficiency and affordability, so tenant, staff and stakeholder education is an important additional factor towards reaching our objectives.

A vital component of this Strategy is a detailed list of actions that will be shown in a rolling **Five Year Action Plan** (Appendix Three). These actions along with a set of overriding Aims and Objectives have been developed by a cross-department stakeholder group (Appendix One). The implementation of the action plan will be overseen by the **Energy Strategy Steering Group (ESSG)**, who will monitor its progress and ensure that any changes made to the plan are appropriate in the context of the aims and priorities of this strategy.

This Energy Strategy complements the Corporate Asset Management Strategy, and the Non-Traditional Homes Strategy, as well as other key corporate and departmental

documents which underpin the Councils guiding principles and commitment to reducing carbon, and addressing environmental issues in a responsible way. It will also refer to a new Affordable Warmth Strategy which will be developed to complement existing and future aspirational aims.

Strategy Objectives

The overall objective of the Energy Strategy is to relieve fuel poverty and maximise carbon reduction in line with the Council's existing and future agreed targets.

This Strategy complements the Corporate Asset Management Strategy, which provides direction to overall investment decisions for the Council's housing stock. Significant investment will be required to ensure the necessary improvements to the energy efficiency of the housing stock. Decisions will need to be made prioritising homes for improvement, and target those which may not be able to be brought up to acceptable standards within the boundaries of any existing or future financial or technological constraints.

Direct funding will be utilised where available, alternatively we will seek finance from external sources where appropriate. We recognise that behavioural change will be key to the long term sustainability and viability of our stock, and will help to support investment in energy improvement works. Tenants may benefit from educational, or intervention strategies to help support them where new technologies (such as Air Source Heat Pumps) are installed.

We need an Energy Strategy for the housing we own and manage in order to:

- Ensure affordable warmth for current and prospective tenants
- Achieve compliance with legal and regulatory requirements for Housing
- Make progress towards meeting carbon reduction targets
- Contribute towards improving the health and well-being of tenants
- Ensure the effective usage of diminishing energy resources
- Allow for timely response to opportunities for drawing in external assistance
- Provide a framework for officers and stakeholders to ensure investment is targeted where the greatest need is required
- Develop the Councils capacity to understand and manage demand over time by identifying and sharing learning outcomes with all stakeholders
- Developing a preventative approach and be proactive in seeking opportunities to avoid demand arising in the first place by addressing the root-causes
- Ensure requirement is aligned with maintenance programmed works development and delivery
- Underpin and support strategic investment planning decisions

Action Plan

This strategy is supported by, and implemented according to a rolling five year Action Plan designed to ensure that the overall objectives of the strategy are being delivered. This Action Plan is attached to this Strategy as Appendix Three. Objectives will additionally be supported by ensuring alignment with the Medium Term Financial Plan (MTFP) and business objectives.

To maintain momentum and direction, the progress of each action will be reviewed on a six monthly basis. These reviews would also allow for minor revisions where they would provide appropriate response to changing conditions (e.g. additional external funding becoming available for certain measures, or if funding were to be reduced, programmes could be prioritised to minimise any detrimental impact).

In order to ensure relevancy, the strategy and Action Plan will be fully reviewed every two years by the Energy Strategy Steering Group. Any proposed changes to the Strategy or Action Plan other than those driven by legislation or regulatory requirement are to be brought back before the Housing Committee or relevant authorising body for agreement and ratification. Proposed changes will be appropriate in the context of the aims and priorities of this Strategy.

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Strategy Context

The Council's housing stock accommodates some of the most vulnerable people in our community. The cost of energy is rising and the long-term security of fuel supply for the UK is a major concern for UK Government.

The largest consumption of domestic energy is for heating, followed by hot water, cooking and lighting, followed by electrical appliances. To ensure maximum impact, we will therefore need to improve our stocks thermal insulation and the efficiency of heating systems, including switching fuels where it is viable and sustainable to do so. We will also need to help tenants contribute to reducing energy consumption through changing how they use it.

Most of the low-cost insulation measures possible to be undertaken on Stroud District Council's (SDC) housing stock have already been carried out. Most of what remains are within the sub category group "Hard to Treat" (HTT) homes which includes those which are:

- Off the gas network
- Of solid wall construction (such as Victorian terraced)
- Are of non-traditional construction
- Have no loft space (Such as flats)
- Those located within restricted locations (such as conservation or areas of outstanding natural beauty)

Approximately 1,700 (30%) of Stroud District Council (SDC) homes fall into one or more of these categories and will require significant investment to improve energy efficiency. The single most significant factor preventing affordable improvement is the large number of properties which are "off gas" and heated with night storage, oil or solid fuel. For these homes renewable solutions may be a viable, affordable alternative. Where the fabric of a building has a poor thermal performance, it can cost more to overhaul it than to replace it. New homes can be designed and built to very high energy efficiency standards. The performance of buildings, property, and performance is covered within the Council's Corporate Asset Management Strategy, and New Build Development Client Brief.

Most initiatives are likely to be long term projects, but fuel poverty is an immediate concern for tenants, especially in "hard to treat" homes. The worst homes need to be prioritised but against the competing priority of maintaining and improving homes in other ways, and any significant investment on energy improvements must be measured as part of an Asset Performance Assessment as set out in the Corporate Asset Management Strategy.

The Energy Strategy will be implemented in the context of the legal and regulatory environment within which the Council operates, its strategic aims, and local and national targets to which Stroud is committed.

- The importance of physical assets in delivering organisational objectives and outcomes
- The quality of existing physical assets in terms of condition and asset performance
- The long term sustainability and viability of for Stroud, existing and future tenants

- The assets needed to meet or sustain current levels of service.

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Strategic Linkage

Environmental Policy 2017

Stroud District Council is committed to continuously improving the environment by protecting and shaping our high quality natural and built surroundings, reducing pollution, mitigating the impacts and adapting to the effects of climate change, while encouraging and supporting others to do the same, for the benefit of residents, businesses and visitors to the Stroud District.

The Council has direct powers and responsibilities in planning and land use, environmental health, waste management, housing, leisure and economic development. It is also a significant resource user and employer. It therefore recognises that its operations and service delivery have a major impact on the environment.

Stroud District Council will achieve its commitment by maintaining an environmental management system - currently EMAS (Eco-Management and Audit Scheme) - to continuously monitor progress.

The Council will also ensure compliance with all relevant environmental legislation, guidance and best practice principles to fulfil its statutory environmental responsibilities

Corporate Asset management Strategy (CAMS)

The Corporate Asset Management Strategy sets out how we will make the best use of existing assets and available resources to provide decent, affordable council housing. We provide affordable housing for many of the most vulnerable people in our communities, and statically this means that many of our tenants are likely to fall into fuel poverty. Energy efficiency needs to be a key consideration in determining the future viability of “hard to treat” properties.

It is essential therefore that there is clear and consistent process for integrating the objectives and actions from this Energy Strategy and the CAMS. A core aspect of this will be ensuring that work carried out by Stroud to model the domestic stock under different energy reduction measures; will be referenced in any asset management decisions regarding investment in the housing stock.

Non Traditional Homes Strategy (NTHS)

Properties of non-traditional construction form a significant percentage of Stroud’s overall stock make up, and are included within the sub category HTT. Stroud has redeveloped a number of sites where the worst performing units were located, however a significant number still remain within the portfolio which require attention.

Those remaining assets will require significant investment to increase the thermal properties up to an acceptable level. The NTHS has synergy and direct linkage into this strategy.

Assets

This strategy applies to all dwellings that fall within the HRA, including communal areas of flats and sheltered housing schemes and shops where appropriate, but excluding garages.

Newly built properties are constructed to current building regulations which include high energy efficiency standards and whilst they are included within the scope of this strategy they are not likely to be a priority.

A primary element of the Five Year Action Plan will be to ensure that maximum use is made of energy performance data already gathered, and that continual updating of this takes place.

Condition of Assets

The strategy requires comprehensive up-to-date information on the energy efficiency of our properties. The energy efficiency of homes can be measured using the Energy Performance Certificate rating (EPC). A higher EPC rating means a more energy efficient home. This will be used to measure the effectiveness of improvements in energy efficiency.

Energy information is currently obtained from stock condition surveys which are updated by the issue of an EPC whenever a property becomes void. The energy data will be updated for individual properties whenever they are subject to energy efficiency works either through repair/replacement of failed components or as part of a programme of works. The data will be held in the asset management system to facilitate resource planning.

In 2016 Stroud commissioned the development of an Energy Baseline and Scenario Modelling exercise with the objective of baselining the domestic portfolio using all available stock data to provide as accurate a representation as possible. Existing programmes were modelled to show the improvement in baseline, and to illustrate what might be achievable, a number of different scenarios were then modelled using the baseline as a reference point.

Figure 1 shows the baseline, broken down by average SAP, average fuel bill, average CO₂ emissions, and total CO₂ emissions. It should be noted that this is effectively a 'snapshot' in time and is only as accurate as the data used to develop it. In order to maintain an accurate picture of the existing energy performance of our domestic properties this should be reviewed regularly (ideally every year or when significant amounts of updated property data becomes available).

Average SAP	64.32
Average fuel bill	£1,105
Average CO ₂ emissions (Tonnes/yr)	3.1
Total CO ₂ emissions (Tonnes/yr)	15,620

FIGURE 1: SAP BASELINE - SDC DOMESTIC STOCK

Figure 2 shows the distribution of Stroud domestic properties in terms of SAP.

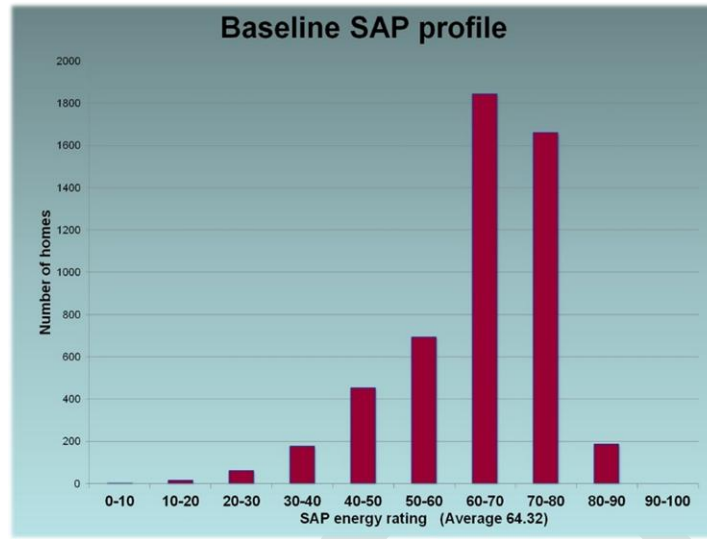


FIGURE 2: BASELINE SAP PROFILE

Drivers

Development of this Energy Strategy has involved a detailed stakeholder engagement exercise involving SDC staff (cross departmental representation), Councillors and Tenant representatives. The drivers outlined below are a summary of those identified during the stakeholders workshops in parallel with a review of the previous SDC Energy Strategy.

Fuel Poverty

Contributory factors that can create fuel poverty include:

- Low income
- High energy prices
- Poorly insulated home
- Inefficient heating systems & controls
- Under occupation

A simplified definition of fuel poverty is where a household has a low income so cannot afford to spend enough on fuel to achieve adequate “standard” temperatures in their home.

More precisely, it is defined by the Fuel Poverty Indicator England that now uses: the “Low Income High Cost” definition, which states that a household is in fuel poverty if:

- They have “standard” fuel costs that are above average (the national median level);
- Were they to spend that amount, they would be left with a residual income below the official poverty line.

Unlike the previous indicator measuring fuel poverty (10% of income), the Low Income High Cost definition is a relative measure as it compares households to the national median bill and income - thereby measuring the contemporary trends and are reflected in both these measures.

Whichever definition is used, a household at risk of fuel poverty is likely to face a difficult choice between a cold home or unaffordable fuel bills. In reducing fuel poverty, Stroud is helping residents achieve Affordable Warmth and sustaining tenancies.

Health and Wellbeing

Fuel poverty has serious implications for the health of the households and communities it affects. Each winter, mortality rates increase by 19% in England (Department of Health, 2011), and whilst not all of this can be attributable to fuel poverty, it is important to note that,

“Countries which have more energy efficient housing have lower excess winter deaths”

(Marmot Review Team, 2011, p.9)

In a cold home, there is a close correlation between excess winter deaths, cardio-vascular disease, respiratory problems and mental health. Damp conditions also encourage dust mite and mould growth and can aggravate asthma and other allergies. Children and the elderly are particularly vulnerable to cold conditions.

As well as physical health, social health is also affected as fuel poverty alleviation reduces anti-social behaviour, educational impacts and other associated social problems. Cold damp homes are less attractive to invite visitors into, tending to reinforce social isolation.

Homes with only one room being heated provide less opportunity for studying away from distractions, potentially hindering educational achievement. Poor health results in more absenteeism from school and work, having both learning and economic consequences.

In a home that is hard to heat, occupants are likely to have to choose between a cold home, and a warmer home but with high fuel bills, which can cause financial problems for households on low income. The direct financial problems of debt may also be compounded with mental health problems such as stress or depression arising from the debt.

Clearly fuel poverty can blight the lives of individual households in a number of ways, and therefore also affect the community they live in.

Sustainability

Supplies of fossil fuels are finite. The UK is already a net importer of gas and oil as North Sea reserves become increasingly depleted. Known global conventional oil reserves should meet projected demand for 20-30 years and gas reserves a little longer. Further reserves have been identified by exploration, although this will increasingly need to be in less accessible and more environmentally sensitive areas (such as US proposals to explore for oil in Antarctica).

Additional sources are potentially available but would require environmentally hazardous processes like gas from “fracking” or decimating large areas of land and inputting significant amounts of energy to extract oil from tar sands. Predictions of the global exhaustion of fossil fuels are uncertain and have regularly been revised as exploration identifies more reserves, but there is also a moral question of whether we should exploit such resources to exhaustion over a relatively short time, or leave some reserves for future generations.

Some energy will always be needed to meet our needs, but these needs can be met more sustainably in the long term by improving efficiency and shifting towards renewable energy with appropriate energy storage to compensate for any intermittency of production. As conventional fuels become scarce their price will rise. So a strategic shift towards more sustainable and renewable sources is also a long term Affordable Warmth Strategy.

We also acknowledge that due to the local topography and geology, the risk of flooding in the district is of significant concern, not only in the present day but even more so as the effects of climate change become more pronounced.

Carbon Reduction

While exploration may extend the known reserves of fossil fuels, scientists agree that burning fossil fuels on the current scale is affecting our climate, and this needs to be addressed urgently. The average global temperature is rising, giving us the rather benign sounding term “global warming”, but the effects of climate change are impacting in different and potentially catastrophic ways around the world. For example: low-lying land is prone to flooding in areas affected directly by rising sea levels.

In England we are likely to see higher risks of drought and heat stress in summer and flooding and wind-damage in winter, resulting in greater summer mortality, disruption, and insurance and repair costs. (For example, floods in autumn 2000 cost the UK £1bn whilst the August heat wave of 2003 is estimated to have resulted in 2000 deaths in England alone). Other risks which will have a direct impact on Stroud and its tenants are worsening air quality and increased subsidence as clay soils increasingly dry out in the summer months.

No single organisation has responsibility for these issues, yet we all suffer the consequences of climate change, and many organisations struggle to cope with the health and social impacts of fuel poverty.

Around 25% of energy used in the UK is used in housing and 50% of carbon emissions are generated by buildings and the processes within them. Therefore, Social Housing Landlords, who not only manage large housing stocks but also operate from large office buildings, are in a position to make a particularly significant impact.

By including lower carbon emissions as an important aim of this energy strategy, Stroud is playing its part in helping residents whilst also meeting other economic, environmental and social objectives.

Sustainable Re-investment

Stroud recognises that care needs to be taken not to re-invest in poor performing areas at the expense of all others, nor should high risk re-investment occur without due consideration, through an option appraisal. Stroud’s Obsolescence Procedure Guide sets out the framework and pathway which will need to be followed before investment is committed.

Generally investment will be prioritised with a bias toward those units identified through the appraisal process, which are considered to be low risk and high demand.

On simple analysis, when Stroud pays for improvements to its housing stock the only obvious benefit is for the tenants in the form of better thermal comfort and/or lower fuel bills. Of course, as a Social Housing Landlord, Stroud does not require strict financial “Return on Investment” to justify paying for improvements to housing stock although it is important to consider value for money. Appraisal will also take due regard of the Egan principles “Assessing Sustainable Communities”.

By providing homes people choose to, and aspire to live in, brings with it a number of indirect financial benefits, such as:

- Fewer voids and associated costs
- Fewer complaints and repairs call-outs
- Lower property maintenance costs (e.g. reduced mould/condensation damage)
- Tenants will have more disposable income to reinvest in the local economy
- Reduced rent arrears

Decent Homes Standard

When the Decent Homes Standard was introduced in 2000, it was to raise standards in social housing alone, but was later extended to vulnerable people living in private sector accommodation. The Decent Homes Standard is a technical standard which sets the minimum criteria to attain 'decency'. The criteria that make up the Decent Homes Standard are shown in Appendix Two.

The Decent Homes Standard has been a major driver for improving thermal insulation in social housing. This is important in reducing the heating energy consumption in all properties, but particularly in those that are off-gas.

Stroud has recognised that better standards of insulation are needed help improve the thermal properties of its homes, regardless of the types of primary heating systems which are installed. As a minimum, Stroud will be installing cavity wall insulation and improving the roof insulation of its homes to modern standards where it is possible to do so.

When carrying out refurbishment work on buildings owned by SDC, we will actively seek to go beyond the minimum level of insulation required to meet regulations where it is practically and economically feasible to do so.

Social Value

Social value remains an important part of our commitment to stakeholders notwithstanding the pressure of legislative changes within the Social Housing sector, and the continued drive to ensure value for money.

Social value is difficult to define as it goes beyond bricks and mortar, but we realise that the communities we work in need to be successful, economically, socially, and environmentally. We want our communities to be a place where people want to live and work as a matter of choice.

We will consider what is beneficial in the context of local needs or particular strategic objectives in determining the impact of investment decisions.

Tenant expectations

Not all the demands to improve the energy efficiency of the housing stock are derived through external drivers and internal policy. Growing competition to attract the best tenants, rising energy costs, and a more informed client has seen tenant expectations rise. Tenants are more aware of what is achievable from the information provided on Energy Performance Certificates (EPC).

Improving the energy efficiency of homes will mean that tenants will live in warmer homes with the potential to manage their energy consumption more efficiently, giving them the scope to reduce their fuel bills.

Creating jobs and stimulating economies through investment in the built environment

This strategy supports Stroud's Jobs and Growth Plan, through the delivery of local projects.

Stroud's Corporate Delivery Plan 2014-2018 has five key strands:

- **Economy:** Help local people and businesses grow the local economy and increase employment
- **Affordable Housing:** Provide affordable , decent and social housing
- **Environment:** Help the community minimize its carbon footprint, adapt to climate change and recycle more
- **Resources:** Provide value for money to taxpayers and high quality services to our customers
- **Health & Wellbeing:** Promote the health and well being of our communities and work with others to deliver the public health agenda

Helping our tenants to reduce their energy bills will enable them to have more disposable income which they may choose to spend locally. Building green and putting people first continues to prove itself important, past the immediate objectives of simply reducing costs.

Through sharing, collaboration, education, and training we aim to ensure that the energy solutions we provide are fit for the future.

Our Vision

To help meet the challenges we face both as an organisation, and for our existing and future tenants, Stroud will strive to become a leading Social Housing provider offering homes which are, warm, high quality, energy efficient, and which produce low levels of carbon in line with our overall target to reduce carbon emissions by 80% (compared to 1990 levels) as required by the 2008 Climate Change Act.

Reducing carbon through effective and efficient investment in our assets, for the benefit of tenants is a key aspiration for Stroud.

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Future Proofing

Innovation

New and emerging technologies will be a key component in transforming the UK's energy infrastructure from carbon intensive and fossil fuel focused to a less carbon intensive one that is in keeping with the CCA's 80% reduction target relative to 1990 levels. Grid electricity is likely to become less carbon intensive over time as large fossil fuelled electricity generators go off-line and the level and scale of renewables contributing to the national grid increases.

Stroud believes that the low-carbon future of heating our homes is likely to be predominantly electric with heating and hot water systems being designed so that the peak periods are smoothed out; this means less instantaneous generation and greater use of hot water storage, thermal mass and Passivhaus performance.

At a local level Stroud has a significant proportion of electrically heated dwellings that are not on main gas, and has already installed a number of electric air to water heat pumps. We will keep firmly abreast of innovations in the field of energy generation and energy efficiency and seek to apply these principles across our own building portfolio where possible.

Champions

In order to fulfil an aspiration to become one of the foremost social housing providers in providing low-carbon energy efficient homes, Stroud will need to demonstrate leadership in this area both internally to our tenants, external partners and associated organisations, but also to our peers in the social housing sector.

To do this we will actively seek out opportunities to talk and present at forums, exhibitions, conferences and produce written material about our projects and experiences. We will draw on external expertise/support where necessary but will establish a number of energy champions ourselves who can offer advice and support to our tenants in their homes about cutting out energy waste, and using existing technologies as efficiently as possible.

We are committed to working collaboratively with all stakeholders, and to ensure focus is maintained on delivery of the vision we will ensure suitable monitoring and review processes are in place.

Risks

The Energy Strategy Steering Group will be tasked with reviewing potential risks to achieving the objectives in the Energy Strategy. Specifically, this will be potential risks set out in the following section, however others may arise that cannot be foreseen and all should be reviewed on a regular (quarterly) basis in order to assess the impact on this Energy Strategy.

Policy

The overarching policy underpinning this strategy is the Climate Change Act 2008 which is referred to in our vision. This is an Act of Parliament and makes it the duty of the Secretary of State to ensure that the net UK carbon account for all six Kyoto greenhouse gases for the year 2050 is at least 80% lower than the 1990 baseline to help avoid dangerous climate change.

The Act aims to enable the UK to become a low carbon economy and gives Ministers powers to introduce measures necessary to achieve the targets. There is a risk therefore that different incentives/measures/technologies etc may or may not be introduced by the current or successive Governments in order to maintain this underlying trajectory.

Stroud should therefore keep well abreast of all Government consultations, policy statements on energy policy at a national level to ensure we are informed and can amend our own Energy Strategy accordingly.

Welfare reform

The Welfare Reform Act 2012 abolished Council Tax Benefit; in its place Councils were required to develop a local Council Tax Support Scheme (LCTS). Historical information shows a reduction in the number of individuals entitled to the LCTS thereby reducing the cost of the scheme to SDC. See Table 1.

Year	Case Count	Amount (£)
2013/14	7,116	£6,428,693
2014/15	6,891	£6,184,601
2015/16	6,582	£5,970,791
2016/17	6,343	£5,810,384

TABLE 1: LCTS HISTORICAL DATA

However there remains a risk that the costs of running the LCTS may increase in future years due to changes in council tax rates and caseload, and this may have an impact upon the financial resources SDC is able to commit elsewhere such as in implementing all objectives set out in our Energy Strategy.

Political

We would anticipate the most significant political risk over the next few years is likely to be BREXIT and this is addressed separately below. However, local elections and changes in Local and National Government all present possible risks through changes in policy and ambition primarily.

Brexit

We respect the UK's decision through a national referendum to withdraw from the European Union (EU). We will work collaboratively with the Local Government Association, District Council Network, our own Members of Parliament and others who are in direct contact with the UK Government to understand and plan for any impacts this may have on Stroud District Council.

We will also work closely with our partners in the public sector to examine the impact on public sector finances affecting all public services in the sector.

As a Local Authority, we have a primary role as community leaders and therefore a responsibility to ensure (as far as we are able to) that the economic, social, environmental and financial implications of this decision on our community and our businesses are managed well.

We understand that much will depend upon the pace and nature of negotiations between the UK Government and the EU. We are committed to the achieving the aims and objectives set out in this strategy - however we will need to review commitments in light of any decisions regarding the Government's BREXIT strategy as more information becomes available.

Review periods

The Energy Strategy Steering Group will meet twice a year as a minimum. The implementation of the Energy Strategy Action Plan will be reviewed in detail at these meetings, progress assessed against expectations, and risks discussed so a suitable risk management approach is developed.

Annually, the Energy Strategy will be reviewed in detail by the ESSG. The Energy Strategy should be considered a 'live document' and updated as required on an annual basis in order to ensure it reflects any changes that have occurred (maybe due to internal and external drivers or other influences) and have rendered a section of the document or an action as out of date.

Training for frontline staff

It will not be possible to achieve all the core aims and supporting objectives underpinning the Energy Action Plan unless awareness of energy efficiency is embedded throughout our staff structure, particularly in those that are front of house and are interacting with tenants regularly whether that is face to face, over the phone or through other indirect communications.

All front line staff will receive training to expand and develop their knowledge on reducing energy use, spotting energy saving opportunities and helping tenants to reduce their carbon footprint through behavioural change.

Behavioural change

Behavioural change is acknowledged by Stroud as being an important method of positively influencing our tenants to make changes to lifestyles to facilitate energy savings. Frontline staff that are going into tenants dwellings on a regular basis as part of normal duties have a fantastic opportunity to give advice and bring about positive change, by:

- Establishing tenant priorities and working with them to determine innovative ways to encourage lifestyle changes
- Using heating controls to provide optimum efficiency
- Understanding energy bills and where current practices could potentially be improved
- Feeding back information obtained from positive behavioural change results with tenants into the Tenants Handbook so this information is shared

Stroud understand that if we are to achieve our vision, we will need to tackle and reduce the energy use in all our buildings through a combination of direct energy saving measures and alternative methods of heat and power generation, but also through awareness raising in energy in our own staff and our tenants.

We also accept that any initiatives/programmes introduced need to be on a 'rolling' basis to reflect the fact that staff and tenants move on, and that this knowledge needs to be maintained and developed.

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Action Plan

This strategy is supported by a five year Action Plan (see Appendix) designed to ensure that the overall objectives of the strategy are being delivered. In order to ensure relevancy, the strategy and Action Plan will be reviewed and updated every 12 months by the ESSG.

The Action Plan is structured per measure as shown in Table 1.

Action	Party/Dept responsible	Start date	Finish/due date	Resources req'd	Desired outcome	Evaluation plan
<i>e.g to develop an SDC healthy homes standard to ensure correct tenant education and advice across the service</i>						

TABLE 2: ACTION PLAN FORMAT

Appendix One – Aims & Objectives

Tables 2 and 3 lists the agreed set of overarching aims and objectives that have been identified by the Energy Strategy Steering Group in order to drive the Action Plan for the next 5 years.

The aims state our intended direction and aspirations:

Aim No	Description
1	Provide healthy homes
2	Ensure effective and efficient use of council resources
3	Provide our tenants with affordable warmth
4	Reduce CO ₂ emissions in line with Government targets
5	Become a leading housing provider for energy management

TABLE 3: ENERGY STRATEGY AIMS

The objectives state how we will achieve our aims and what it will look like when we have achieved it.

Objective No	Description
1	Reduce condensation mould growth issues
2	Introduce a benchmarking and peer review scheme
3	Promote health and wellbeing
4	Increase average SAP rating of SDC SH stock
5	Identify new technologies/opportunities that can be implemented cost effectively
6	Co-ordinate across SDC to ensure joint working
7	Training and education for colleagues & customers
8	Develop an Affordable Warmth strategy
9	Adopt the 'Passivhaus' standard into new build and investigate integration into retrofit
10	Maximise funding opportunities for HRA

TABLE 4: ENERGY STRATEGY OBJECTIVES

The Action Plan shows the actions and steps we need to take in order to achieve the objectives in Table 3, and the overarching aims in Table 2.

Appendix Two – Definitions

SAP

The energy efficiency of homes can be measured using the SAP energy rating (UK Government's Standard Assessment Procedure). The SAP energy rating scale ranges from 0 to 100, where a higher rating means a more energy efficient home. It is a non-linear scale that indicates relative annual fuel costs (heating & lighting) per square metre of floor area. This scale is more useful than the SAP band A-G scale.

Although the assessment methodology is to a large extent standardised, a number of versions and revisions have come into use over the years, so it is important to ensure the same version has been used when comparing results. SDC currently uses SAP2012.

Decent Homes

The Decent Homes Standard has been a major driver for improving thermal insulation in social housing.

The four criteria which make up the Decent Homes Standard are:

- It meets the current statutory minimum standard for housing
- It is in a reasonable state of repair
- It has reasonably modern facilities and services
- It has a reasonable degree of thermal comfort

Steering Group

AIMS

- Provide healthy homes
- Ensure effective and efficient use of council resources
- Provide our tenants with affordable warmth
- Reduce CO2 Emissions in line with Government targets
- Become a Leading Housing Provider for energy management

OBJECTIVE

1. Reduce Condensation Mould Growth Issues

Action	PARTY / DEPT RESPONSIBLE	DATE TO BEGIN	DATE DUE	RESOURCES REQUIRED	DESIRED OUTCOME	EVALUATION PLAN
To develop an SDC Healthy Homes Standard to ensure correct tenant education and advice across Tenant Services						
Carry out a review of existing communications on damp & mould						
Carry out a review of training on damp & mould, and look to get damp & mould on E-Training for all staff to provide awareness on the issues we may come across						

OBJECTIVE

2. Increase the average SAP rating of SDC stock

Action	PARTY / DEPT RESPONSIBLE	DATE TO BEGIN	DATE DUE	RESOURCES REQUIRED	DESIRED OUTCOME	EVALUATION PLAN
Bring all properties where reasonably practicable to do so, up to sector average values as a minimum						

Increase the SAP by x amount, once worked out over an agreed period of x amount of years						
Fully utilize the energy module in Keystone, Quarterly reports on SAP improvements, develop planned programmes using SAP data						

OBJECTIVE

3. Training & Education for colleagues and customers

Action	PARTY / DEPT RESPONSIBLE	DATE TO BEGIN	DATE DUE	RESOURCES REQUIRED	DESIRED OUTCOME	EVALUATION PLAN
Ascertain staff training gaps						
Develop and implement training programme						
Provide Energy Angels training to key SDC staff and tenants						
Encourage behaviour change by offering tenants ongoing, high quality and easy to understand advice						

OBJECTIVE

4. Maximise funding opportunities for HRA

Action	PARTY / DEPT RESPONSIBLE	DATE TO BEGIN	DATE DUE	RESOURCES REQUIRED	DESIRED OUTCOME	EVALUATION PLAN
Carryout regular reviews of the annual Delivery Plan allowances, supply chain costs, and available grant						
Maximise resources through collaborative working with internal and external partners						

OBJECTIVE

5. Implement an energy benchmarking accreditation system (e.g. SHIFT)

Action	PARTY / DEPT RESPONSIBLE	DATE TO BEGIN	DATE DUE	RESOURCES REQUIRED	DESIRED OUTCOME	EVALUATION PLAN
Agree what areas of the service need to be benchmarked within the strategy						
Identify members to form a working/steering group						
Research which benchmarking systems are out there and recommend which one(s) to adopt						

OBJECTIVE

6. Identify new technologies/opportunities that can be implemented cost effectively

Action	PARTY / DEPT RESPONSIBLE	DATE TO BEGIN	DATE DUE	RESOURCES REQUIRED	DESIRED OUTCOME	EVALUATION PLAN
Market Research against new technologies against other housing providers						
Trials of new innovations/technologies on our stock & produce progress report to identify cost efficiencies						
Actively look for funding opportunities within energy improvement works						

OBJECTIVE

7. Develop an Affordable Warmth strategy

Action	PARTY / DEPT RESPONSIBLE	DATE TO BEGIN	DATE DUE	RESOURCES REQUIRED	DESIRED OUTCOME	EVALUATION PLAN
Investigate SDC affordable warmth policy and how it links to SDC housing						
Integrate requirements of affordable warmth strategy into housing policies						

OBJECTIVE

8. Promote health & wellbeing

Action	PARTY / DEPT RESPONSIBLE	DATE TO BEGIN	DATE DUE	RESOURCES REQUIRED	DESIRED OUTCOME	EVALUATION PLAN
To work with SDC corporate Health & Wellbeing Team to promote a consistent approach across the whole of the district/healthy housing strategy						
Identify our Health & Wellbeing priorities through the Steering Group						
Investigate what Health & Wellbeing opportunities are available through voluntary partners/stakeholders						
To be mindful of the affordable warmth strategy, some actions may involve cross working						

OBJECTIVE

9. Co-ordinate across SDC to ensure joint working

Action	PARTY / DEPT RESPONSIBLE	DATE TO BEGIN	DATE DUE	RESOURCES REQUIRED	DESIRED OUTCOME	EVALUATION PLAN
Put in place Energy Strategy Steering Group (EESG)						
Utilise internal staff as energy champions						
Set up training & briefing sessions to all client facing staff						
Procurement to all other SDC Departments & potential joint procurement ventures						

OBJECTIVE

10. Adopt the Passivhaus standard into New Build and investigate integration into retrofit

Action	PARTY / DEPT RESPONSIBLE	DATE TO BEGIN	DATE DUE	RESOURCES REQUIRED	DESIRED OUTCOME	EVALUATION PLAN
Where financially and technically practicable to do so adopt Passivhaus standards/principals for new housing and retrofit projects						

Use grants where available to help fund work streams						
Keep a watching brief on related low/zero carbon Government Policy and consultations						



Dear Chief Executive

Community Housing Fund

You may recall that, at Budget 2016, a £60 million fund was announced to support community-led housing developments in areas where the impact of second homes is particularly acute. As part of this commitment, I am pleased to inform you that your local authority has been allocated funding for 2016/17 financial year, as shown in the Annex below.

The fund will enable local community groups deliver affordable housing units of mixed tenure on sites which are likely to be of little interest to mainstream housebuilders and will thereby contribute to the overall national effort to boost housing supply. The fund will also help build collaboration, skills and supply chains at a local level to promote the sustainability of this approach to housebuilding. The fund will enable capital investment, technical support and revenue to be provided to make more schemes viable and significantly increase community groups' current delivery pipelines. The funding is allocated between local authorities proportionate to the number of holiday homes in the local area and taking account of the affordability of housing to local people.

In bringing this fund forward, the Department has worked closely with the National Community Land Trust Network and other members of the community-led housing sector. These organisations are well placed to offer advice on how the funds may be most effectively deployed (including, potentially, through registered providers of affordable housing) and are likely to get in touch with you to discuss the opportunities. The sector stakeholder groups have produced guidance to local authorities explaining what community-led housing is and how the grant funding may be used. This guidance is attached separately.

Payments of funding will be made in two tranches; the first being paid now. The second tranche will follow in early 2017 subject to your authority providing satisfactory evidence that the money is being spent in accordance with the objectives outlined in the Budget announcement. Similarly, from 2017/18 onwards, allocations will depend in part on how the 2016/17 allocation has been spent.

The Chancellor has asked that we review the outcomes achieved from the fund and the community-led housing delivery model at a later date. We would be grateful for your co-operation in helping us with that review.

Should you have any questions about this funding, please contact Nigel Kersey at: Nigel.Kersey@communities.gsi.gov.uk.

Two handwritten signatures in blue ink. The first signature on the left is 'Isobel Stephen' and the second signature on the right is 'Emma Lindsell'.

Isobel Stephen and Emma Lindsell
Director, Housing Supply Directorate

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ANNEX**Community Housing Fund - Grant Allocations to Local Authorities, 2016/17**

No.	Local Authority	Amount (£)
1	Adur	£48,819
2	Allerdale	£772,554
3	Arun	£706,119
4	Babergh	£189,741
5	Barnet	£89,083
6	Bournemouth UA	£744,369
7	Breckland	£181,689
8	Brent	£53,349
9	Brentwood	£8,053
10	Brighton and Hove	£464,539
11	Bromley	£62,408
12	Broxbourne	£7,046
13	Cambridge	£52,342
14	Camden	£134,379
15	Canterbury	£442,394
16	Castle Point	£20,132
17	Chelmsford	£20,635
18	Chichester	£1,386,067
19	Chiltern	£25,668
20	Christchurch	£417,229
21	City of London	£40,767
22	Copeland	£193,768
23	Cornwall UA	£5,117,980

24	Cotswold	£882,272
25	Craven	£605,964
26	Croydon	£43,283
27	Dacorum	£27,178
28	Derbyshire Dales	£383,509
29	Dover	£508,829
30	Ealing	£59,892
31	East Devon	£1,210,418
32	East Dorset	£158,034
33	East Hampshire	£99,652
34	East Hertfordshire	£36,237
35	East Lindsey	£2,250,723
36	East Riding of Yorkshire UA	£2,042,864
37	Eastbourne	£365,894
38	Eden	£938,640
39	Elmbridge	£44,793
40	Enfield	£29,191
41	Epping Forest	£32,211
42	Epsom and Ewell	£17,615
43	Forest of Dean	£111,228
44	Fylde	£440,381
45	Great Yarmouth	£652,770
46	Greenwich	£57,375
47	Guildford	£70,461
48	Hackney	£36,740
49	Hambleton	£195,277

50	Hammersmith & Fulham	£90,089
51	Haringey	£58,382
52	Harrogate	£585,832
53	Harrow	£37,747
54	Hart	£24,661
55	Hastings	£244,097
56	Havant	£264,228
57	Havering	£21,642
58	Herefordshire UA	£502,789
59	Hertsmere	£21,138
60	Hillingdon	£43,786
61	Horsham	£144,948
62	Hounslow	£57,375
63	Isle of Wight UA	£1,567,252
64	Isles of Scilly	£49,826
65	Islington	£74,991
66	Kensington & Chelsea	£225,978
67	Kings Lynn & West Norfolk	£1,781,152
68	Kingston upon Thames	£32,211
69	Lambeth	£87,573
70	Lancaster	£707,629
71	Lewes	£180,179
72	Lewisham	£37,747
73	Maldon	£190,748
74	Malvern Hills	£168,100
75	Merton	£39,257

76	Mid Devon	£131,359
77	Mid Suffolk	£225,475
78	Mid Sussex	£46,806
79	Mole Valley	£39,257
80	New Forest	£976,387
81	Newham	£35,230
82	North Devon	£667,869
83	North Dorset	£238,057
84	North East Lincolnshire UA	£203,833
85	North Norfolk	£2,436,942
86	Northumberland UA	£1,314,600
87	Oxford	£54,859
88	Poole UA	£765,508
89	Purbeck	£910,456
90	Redbridge	£42,780
91	Ribble Valley	£157,531
92	Richmond upon Thames	£77,507
93	Richmondshire	£493,730
94	Rochford	£16,105
95	Rother	£748,899
96	Rutland UA	£57,375
97	Ryedale	£431,322
98	Scarborough	£1,860,672
99	Sedgemoor	£485,174
100	Sevenoaks	£51,839
101	Shepway	£437,361

102	Shropshire UA	£580,296
103	South Bucks	£29,191
104	South Cambridgeshire	£50,329
105	South Hams	£1,881,307
106	South Lakeland	£2,357,421
107	South Oxfordshire	£139,915
108	South Somerset	£263,222
109	Southwark	£120,790
110	St Albans	£28,688
111	Stratford-on-Avon	£215,409
112	Stroud	£149,478
113	Suffolk Coastal	£1,524,473
114	Surrey Heath	£17,112
115	Sutton	£29,694
116	Swale	£341,232
117	Tandridge	£29,694
118	Teignbridge	£581,303
119	Tendring	£706,622
120	Thanet	£598,918
121	Three Rivers	£14,595
122	Tonbridge & Malling	£23,655
123	Torbay UA	£643,208
124	Torridge	£448,434
125	Tower Hamlets	£86,063
126	Tunbridge Wells	£66,938
127	Uttlesford	£34,224

128	Waltham Forest	£36,740
129	Wandsworth	£121,293
130	Watford	£6,040
131	Waveney	£685,484
132	Waverley	£75,997
133	Wealden	£301,472
134	West Devon	£247,620
135	West Dorset	£1,365,432
136	West Oxfordshire	£376,966
137	West Somerset	£574,760
138	Westminster	£343,245
139	Weymouth & Portland	£430,315
140	Wiltshire UA	£650,254
141	Winchester	£90,089
142	Windsor & Maidenhead UA	£103,175
143	Woking	£15,099
144	Wokingham UA	£49,826
145	Wychavon	£252,653
146	Wycombe	£115,254
147	Wyre	£377,973
148	Wyre Forest	£191,251
ENGLAND		£60,000,000

Community-led housing: What is it and what can it offer your local authority?

Guidance from the community-led housing sector

This guidance has been prepared by the community-led housing sector for officers and elected members. It:

- explains what community-led housing is;
- highlights the benefits how community-led housing can deliver on your strategic aspirations;
- highlights the availability of substantial government funding aimed at promoting the sector; and
- explains where further advice can be obtained on how to make the best use of this funding, secure the second tranche of funding, and realise the benefits of community-led housing in your area.

Community-led housing is about local people playing a leading and lasting role in solving local housing problems, creating genuinely affordable homes and strong communities in ways that are difficult to achieve through mainstream housing.

Benefits for local authorities

Community-led housing can bring significant benefits to local authorities. These include:

- mobilising public support for new homes and regeneration initiatives;
- reducing reliance on public services, for example addressing social care through building communities with mutual support for the elderly and vulnerable, and involving homeless people in the renovation of homes;
- providing a range of genuinely affordable housing in perpetuity, including rented homes that are not susceptible to the Right to Buy, and homes for those priced out of ownership;
- diversifying the local housebuilding market, and unlocking small sites and landowners that are not attractive or available to established housebuilders;
- supporting the implementation of duties such providing permissioned plots for individuals and groups on the Self and Custom Build Registers; and
- promoting community cohesion and resilience that can help tackle issues like antisocial behaviour.

Community-led housing approaches can also bring benefits to participants, including:

- skills, training and jobs, which can be targeted e.g. at care leavers and unemployed young people;
- a rewarding collective experience, improving their sense of community and connection;
- high quality and imaginatively designed homes and neighbourhoods;
- giving community organisations control over assets and revenue; and
- mutual support within communities, especially for older people and vulnerable young people.

Bringing resources into your area through community-led housing

The newly announced Community Housing Fund provides £60 million per year of revenue and capital funding for the sector. This will be a game-changing fund with significant opportunities for local authorities.

Community-led builders can access mainstream funding, such as the £3 billion Home Building Fund and money from the HCA's and GLA's affordable housing programmes.

Community-led groups have also brought in significant revenue and capital resources not accessible to other housing providers, including commercial lending, social finance, charitable funds, crowdfunding, community bond issues and labour. These cover seed-corn funding for new providers, and pre-development and development finance for schemes, as well as funds for associated aims such as skills training and community development. They can build up new resources and resilience in your communities.

Criteria for genuine community-led schemes

An alliance of community-led housing organisations has endorsed the following definition to ensure that schemes are truly community-led:

- a requirement that the community must be integrally involved throughout the process in key decisions (what, where, for who). They don't necessarily have to initiate and manage the development process, or build the homes themselves, though some may do;
- a presumption in favour of community groups that are taking a long term formal role in ownership, management or stewardship of the homes; and
- a requirement that the benefits to the local area and/or specified community must be clearly defined and legally protected in perpetuity.

Approaches to community-led housing

Community-led housing has a significant history accompanied by a range of distinctive terminology and practices. Over time a number of established approaches have developed which all have specific characteristics, yet overlap to the extent that the distinctions between them are becoming increasingly academic.

Communities can and do choose to combine approaches to meet their needs and aspirations, drawing on the principles of each approach as a component to achieve one of their aims.

The main aims that different approaches provide for are:

- **Stronger neighbourhoods, shared spaces, mutual support:** Cohousing principles can be used to achieve this. Households each have a self-contained home but residents come together to manage their community and share some facilities. Cohousing is increasingly becoming an attractive option for older people to create resilient mutual support, in both new developments and retrofit to sheltered housing, which can reduce their reliance on public services including social care.
- **Permanent affordability and local control of assets:** Community Land Trust principles offer a mechanism to provide genuinely affordable housing in perpetuity, both for rent and ownership. Rented homes are protected from the Voluntary Right to Buy, and low cost ownership homes can be designed to remain affordable even if the gap between local incomes and house prices widens.
- **Building neighbourhoods:** Group self-build and collective custom build are great ways of supporting groups of households to work together to build or directly commission their own homes. The emphasis is always on supporting one another through the process which not only creates strong communities, but also develops skills and delivers high quality housing.
- **Greater local accountability and control over housing management:** Co-operative and tenant management principles empower residents to democratically control and manage their homes, often leading to improved efficiencies and financial savings as well as increased skills and confidence within the community. Many housing cooperatives own their properties collectively which also offers opportunities to invest in wider socially beneficial activities.
- **Tackling empty properties:** Self-help housing offers people the chance to bring empty properties back into use, sometimes for their own use. It can be particularly effective in providing work experience and training to people from vulnerable backgrounds in a safe and supportive environment, and help to revitalise homes, streets and neighbourhoods. It can form part of a strategy to tackle homelessness.

Routes to delivery

For the most part, the routes to delivery for community-led housing schemes are the same as in any other industry-standard housing scheme. The difference is that the community takes central role. Communities may work in partnership with a local housing association or developer, or can work on standalone projects. They can provide affordable housing through a section 106 agreement and/or a Rural Exception Site.

There are three main ways in which community-led groups become involved in the process:

- **Group-led:** New community-led groups form in response to local housing need, or to deliver their own homes. They sometimes emerge from existing networks such as Neighbourhood Forums and parish councils. They access technical expertise to support the development and realisation of their ideas.
- **Extension of community based activity:** Existing community-based organisations with local roots decide to provide housing in addition to their current activities, accessing technical expertise to help them understand this new area of work.
- **Developer-led partnership:** A Local Authority, landowner, housing association or local developer wants to provide housing that incorporates a community-led element. They access technical expertise to recruit 'founder members' from within the community and support them to take over ownership and/or management of the homes. In this scenario it is essential that all of the community-led criteria (see below) are met to ensure genuine community benefit and involvement.

Support available for local authorities

The community-led housing sector can provide a range of technical support services for all approaches and all routes to delivery. These are best provided by local or sub-regional organisations with a strong understanding of the local housing market, and relationships and partnerships with local authorities, housing associations and developers. The Community Housing Fund can be used to create or grow this kind of enabling infrastructure in your area.

As a first step, the sector can provide you with advice and enabling services to help you make the best use of the Community Housing Fund and be in a strong position to secure the second tranche of funding. The package of specialist advice includes:

- an introductory session to understand community-led housing, how it might meet your authority's priorities, and how it can dovetail with other duties such as the Right to Build and Neighbourhood Planning;
- mapping existing community-led housing activities in your area and in neighbouring authorities, including groups, technical advisers and enabling organisations, and options for growing the sector locally and in partnership with neighbouring authorities;
- advice on internal policies, procedures and structures to best enable community-led housing and avoid unnecessary and expensive delays, such as asset disposals/leases, the planning system, local sales and lettings policies, and the use of self and custom build registers;
- nurturing a local enabling and support vehicle so that your use of the funding creates a legacy of delivery capacity within your authority and in the local community; and
- signposting further specialist support for each of these areas.

You will be signposted to appropriate online resources (existing or emerging) as part of the support on offer.

What happens next?

If you would like to arrange for an introductory session with a community-led housing adviser please send a brief email to communityledhousing@bshf.org and we will put you in contact with an appropriate specialist.

Further information about community-led housing support services, wider support organisations, and signposting to sample case studies can be found at:

<https://www.bshf.org/our-programmes/community-led-housing>

Appendix 1



**STROUD
DISTRICT
COUNCIL**
www.stroud.gov.uk

Tenancy Fraud Policy

February 2017

Tenant Services

Last updated: February 2014

Next document review by: To be Confirmed

Reviewed by: Patricia Andrade, Tenancy Management

Approved by: *To be Confirmed*

1. The Purpose of the Tenancy Fraud Policy

For the purpose of this policy, the term 'tenancy fraud' covers subletting, obtaining housing by deception, wrongful claims for succession and key selling (where a tenant is paid to pass on their keys in return for a one off payment). In addition, applications to exercise 'Rights to Buy' council housing might be subject to dishonesty leading to tenants obtaining property by deception, as opposed to tenancy fraud.

Whilst cases of tenancy fraud (including dishonesty) are relatively small in number in the Stroud district, the majority of tenants legitimately occupying council housing, tenancy fraud presents a serious challenge to the Council. It potentially hampers its ability to effectively manage its housing stock. It also prevents the Council from ensuring that as much as possible of its social housing is available for those in most housing need, which is particularly important given the Council's oversubscribed housing waiting list.

To help prevent the fraudulent use of and access to Council owned dwellings, the Council's approach to dealing with tenancy fraud is set out in this document

2. Financial & risk implications

- Tenancy fraud can impact of our ability to meet housing need, contributing to higher temporary accommodation costs, where homeless families cannot be housed without undue delay and families bidding for accommodation, whilst potential homes options are denied to them because stock is wrongfully occupied
- The costs of repossession can be high, hence the importance of prevention
- Reputational risk may be a problem, if we do not have a robust policy

3. SDC's Approach on Tenancy Fraud

In delivering an effective response to tenancy fraud, we will apply the following key principles:

3.1 Prevent it

The Council considers that preventing fraud is a cost efficient way to tackling tenancy fraud. Consequently, officers will check the accuracy of information provided by applicants for social housing. Further checks will be undertaken when tenancies are signed and during the tenancy to ensure that material changes of the tenant's household circumstances are reported to the Council.

Applicants for housing and tenants are required to provide appropriate evidence of identity and their correct household composition and membership.

In evidencing the above, the council will request verification checks at various stages, these include:

- When an application for social housing is made
- When you sign up to a new tenancy
- As part of a 'tenancy audit', (we will undertake random checks to ensure that the person(s) living in one of our homes is the true and legal tenant)
- If you apply for an assignment, exchange or succession of your tenancy

- Changes to the tenancy such as household composition or a request for an addition to the tenancy
- If you make a Right to Buy application

We will normally expect you to provide photographic evidence of identity (such as a passport or driving license), but if these are not available we will seek relevant documents such as might provide clear evidence of identity. These may include, but are not restricted to:

- Medical card with National Insurance Numbers
- P45, P60 or pay slip
- Evidence of your payment of benefits from the DWP
- Bank account details
- Birth, marriage, adoption certificates
- UK certificate of naturalisation

3.2 Detect it

We will regularly monitor information we are legally entitled to access, including that of shared data with government agencies focusing on tenancy and housing benefit fraud, credit rating and financial agencies, other social landlords and legally constituted and recognised anti fraud partnerships, such as the Gloucestershire Tenancy Fraud initiative. We will also monitor our own tenancy and property records to identify alerts, trends and issues we may point to examples of fraud.

3.3 Investigate it

We will undertake thorough investigations, where necessary, in partnership with relevant statutory agencies such as the Police, DWP, Border Agency, etc. This may include the interviewing of those being investigated, under caution, unless of course, on a case by case basis, this function is considered best held by statutory agencies such as the Police, etc.

3.4 Pursue

Where tenancy fraud has been detected and thoroughly investigated we will consider the following actions:

- Civil action by the serving of either Notice of Seeking Possession (NOSP), Notice to Quit (NTQ) and Notice of Possession Proceedings (NOPP) for the repossession of unlawfully obtained accommodation.
- Criminal action where appropriate.

We will always take enforcement action where fraud has been detected.

4. Responsibility for and review of this policy

The person accountable for the delivery of this policy is the Head of Housing Management.

This policy will be reviewed regularly with any notable changes reported to the Housing Committee for approval, as and when appropriate.