

# Housing Strategy 2015

**Consultation Report 2:  
Draft Strategy Consultation**



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## Introduction

This document reports the findings from final stage of consultation on the review draft of the new Housing Strategy 2015. The consultation ran for a period of four weeks to 16 December 2014 and focused on proposed actions that will take forward the eleven themes which had emerged from extensive consultation.

The eleven themes are as follows:

1. New Affordable Housing
2. Family Housing
3. Community land trust and co-operatives
4. Student Housing
5. Decent Warm Homes
6. Private Rented Sector
7. Houses in Multiple Occupation (HMO) Licensing
8. Housing Related Support
9. Supporting Older People
10. Supporting our Black & Minority Ethnic (BME) Communities
11. Supporting our Lesbian, Gay, Bisexual & Trans\* (LGBT) Communities

The consultation was hosted on the council's consultation portal and notification of this event was circulated via emails and letters. In addition the event was publicised on the BMECP website, LGBT HIP website and in the Community Works Newsletter with each providing a link to the council's portal

When the consultation period closed, we had received:

- 40 completed or partly responses to the consultation questionnaire
- 41 comments to the question - are there any actions missing?
- 42 comments to the questions - do you have any other comments on this theme? (2 of these were in email responses from individuals)
- 3 written responses on the review draft Housings Strategy 2015

This report provides details for the findings from this final round of consultation and has been broken down into three parts:

- Charts showing the responses to the questions of the actions
- Comments on the actions
- Written responses to the themes and actions

Please note that the views and opinions expressed in this report are those of the stakeholders responding to our consultation and do not necessarily represent the views and policies of the council.

## Consultees

The total of 40 questionnaires were completed on the Brighton & Hove City consultation portal

16 (40%) consultees reported that they had been involved in the previous stages of the consultation during the development of this review draft of the new Housing Strategy 2015.

The ages of the consultees who provided this information aged from 30 to 70 years old – 9 (23%) were aged between 30-39, 8 (20%) were aged between 40-49, 6 (15%) were aged 50-59 and 6 (15%) were aged 60 and over. 11 (28%) of consultees did not record their age

Half of all consultees identified as female, and 20% as male. 30% either did not respond or preferred not to disclose their gender

28 consultees reported their ethnicity. 62.5% of consultees identified as British White and 7.5% identified from an ethnic minority group. 30% either did not respond or preferred not to disclose their ethnic origin.

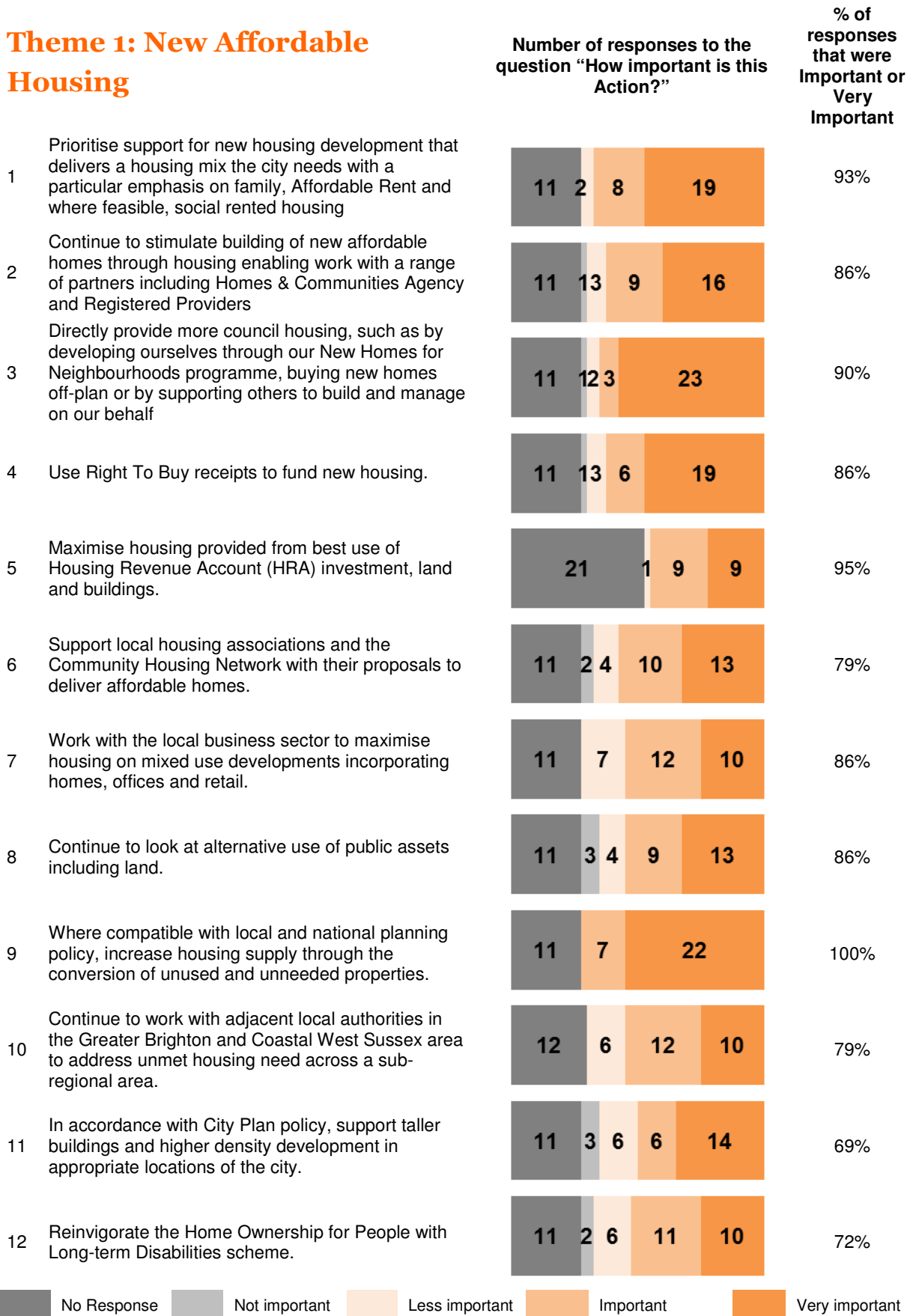
47% of consultees identified as being Heterosexual / Straight, 10% / Bisexual, 5% Lesbian / Gay woman, 3% Gay man and 3% as Other. 32% either preferred not to say or did not respond.

9 consultees reported that their day-to-day activities were limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months – 2 said their day-to-day activities were limited a lot and 7 said their day-to-day activities were limited a little

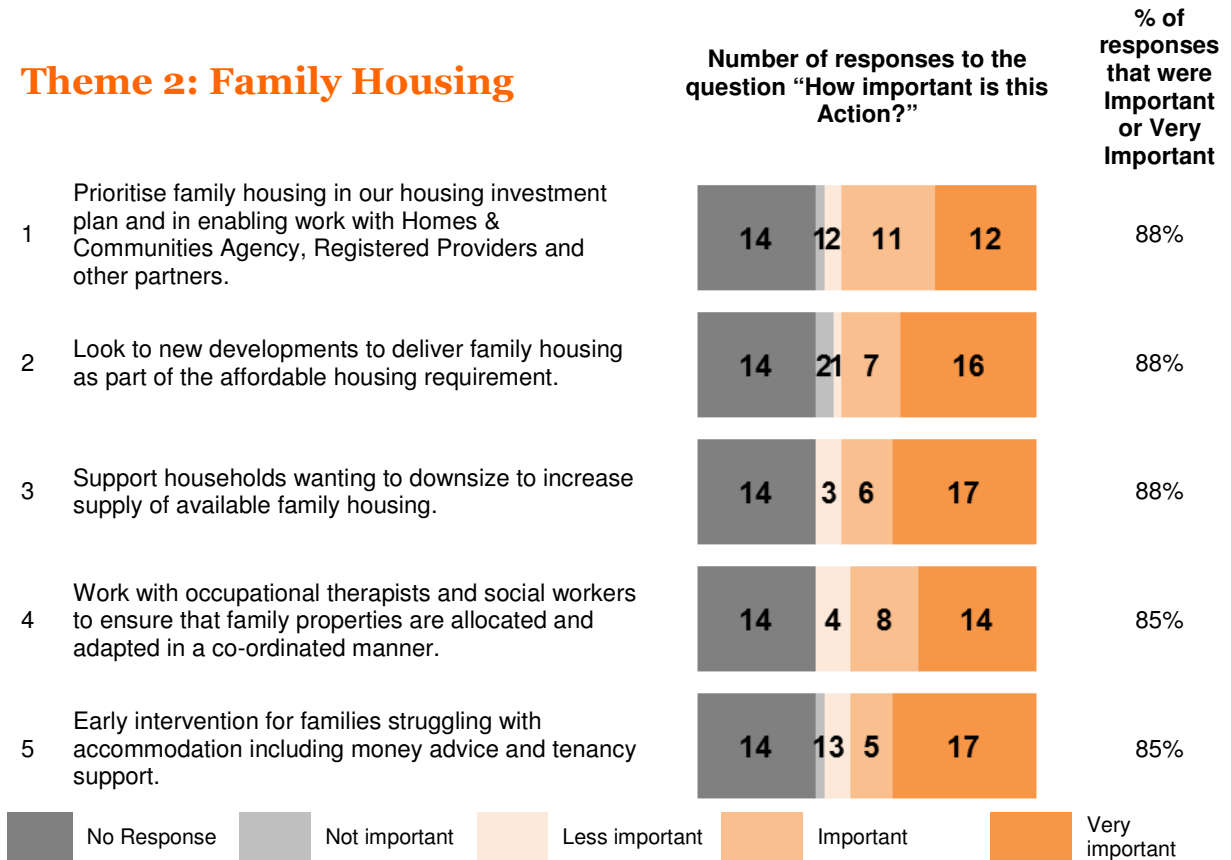
4 consultees report that they were carers – 2 were caring for partner / spouse, 1 was caring for a child with special needs and 1 was caring for someone who was not a family member or friend.

## How Important are our Actions?

### Theme 1: New Affordable Housing



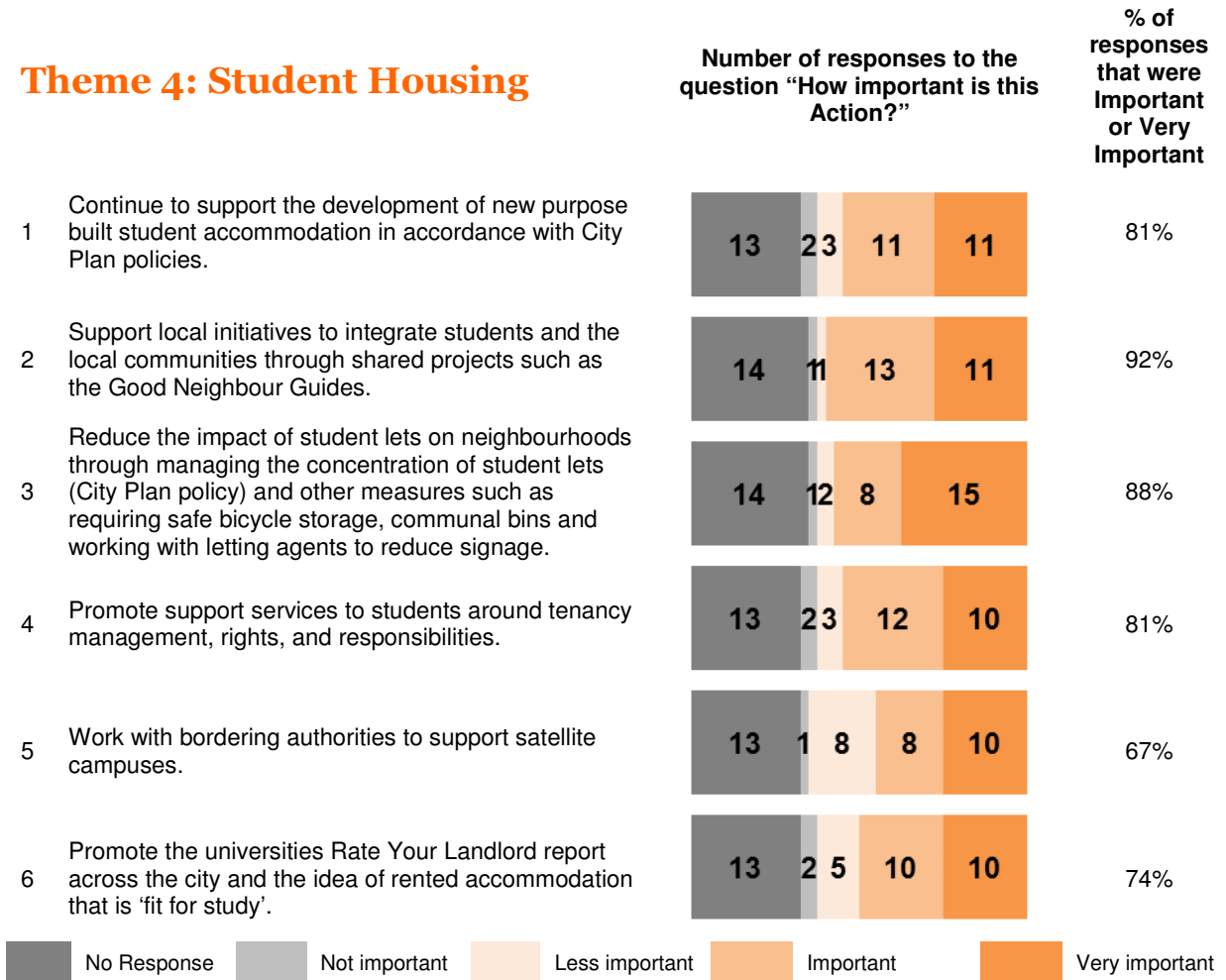
## Theme 2: Family Housing



## Theme 3: Community Land Trust and Co-operatives

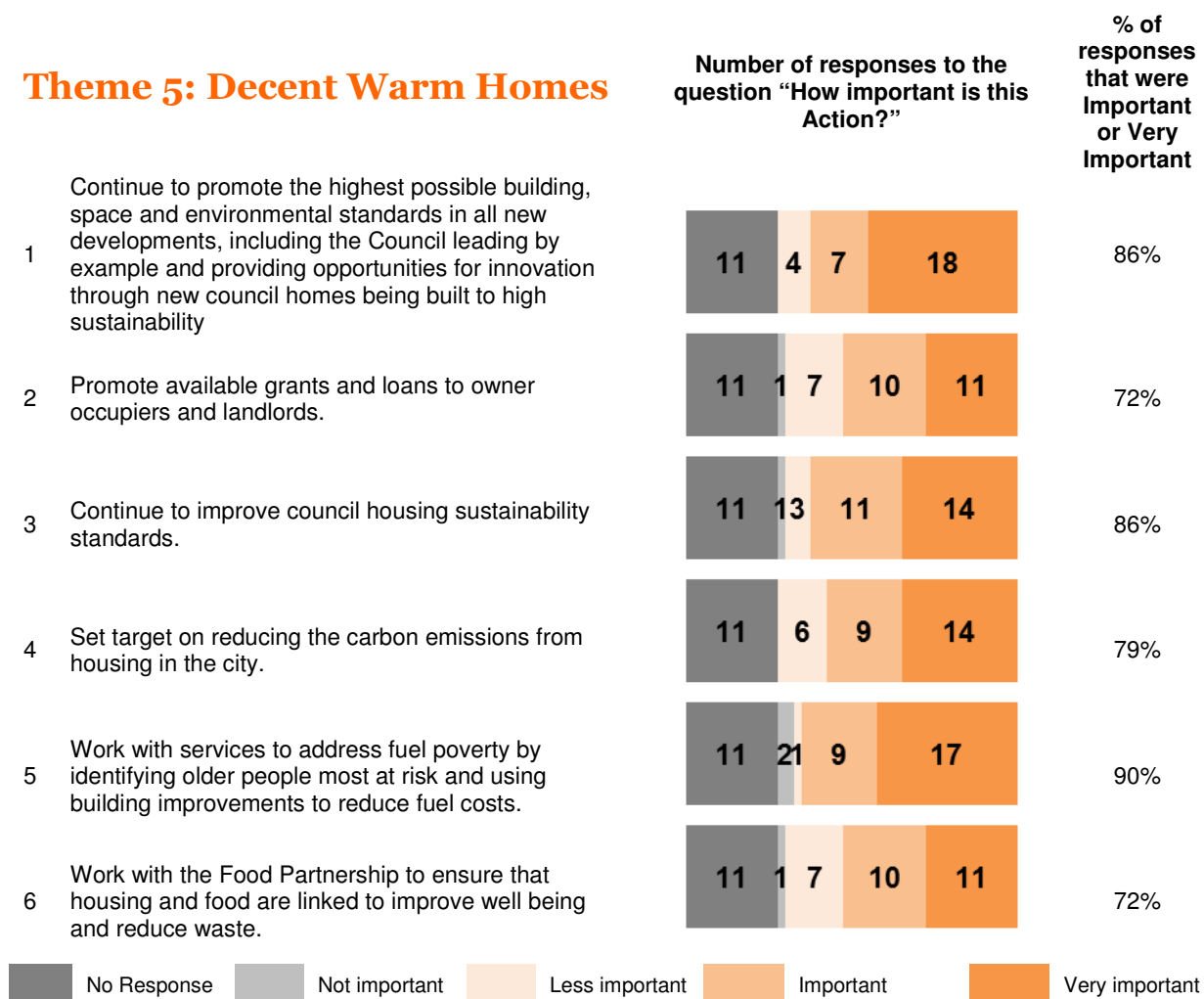


## Theme 4: Student Housing

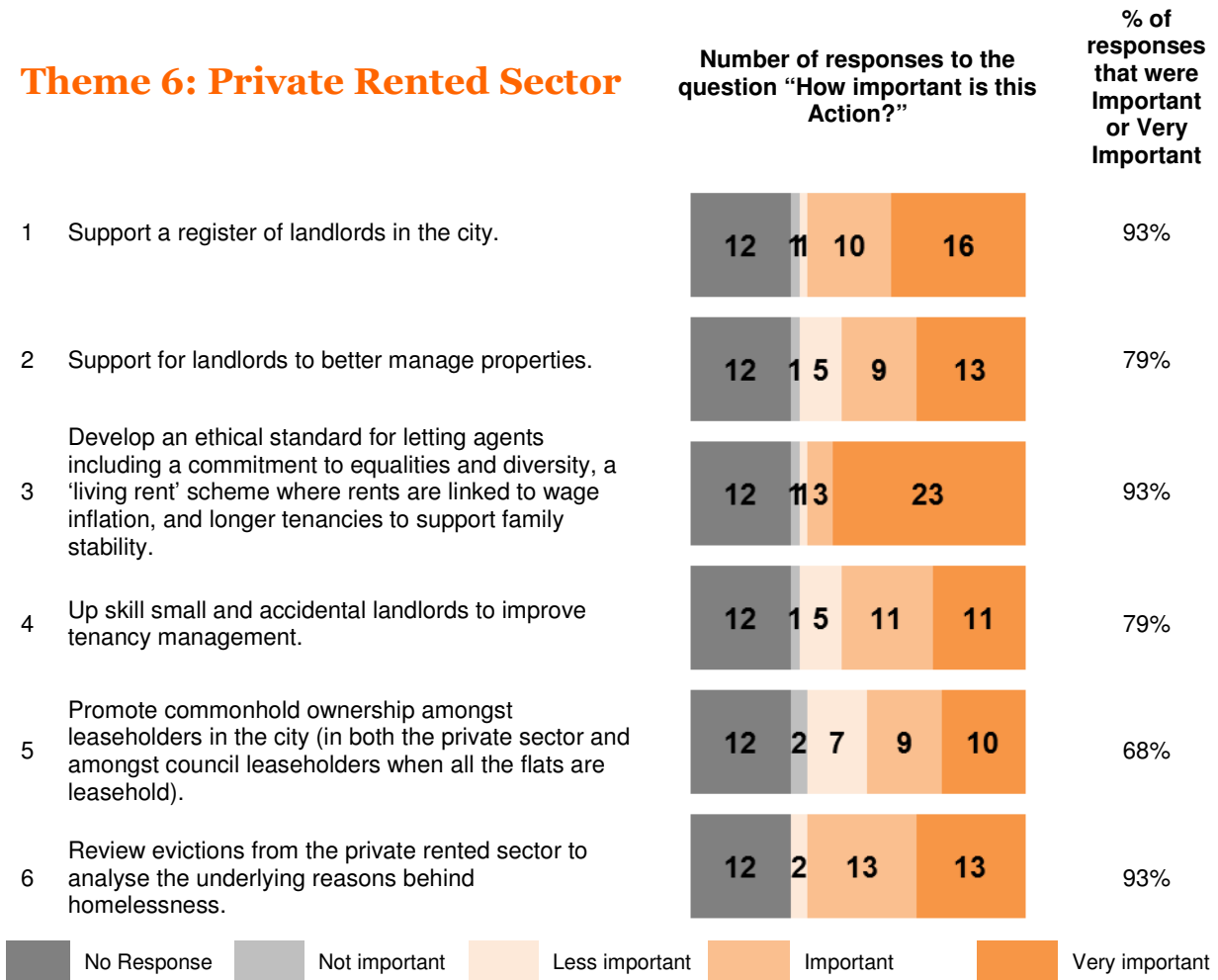




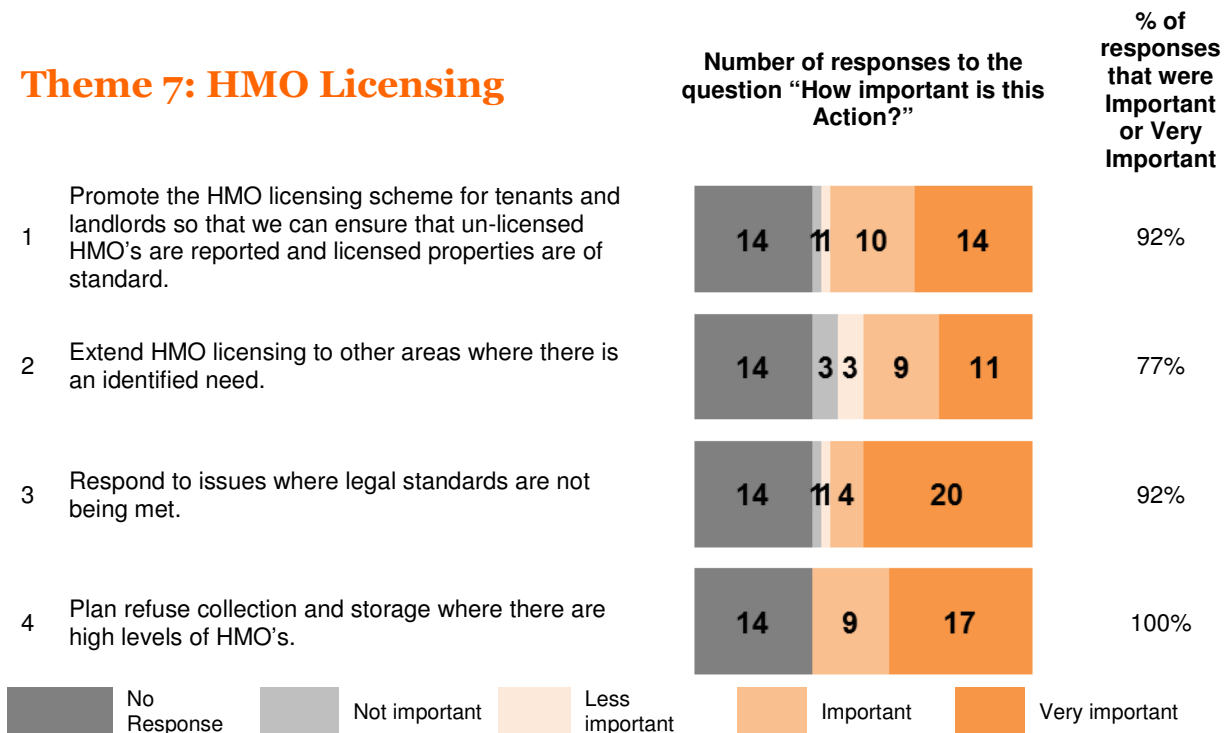
## Theme 5: Decent Warm Homes



## Theme 6: Private Rented Sector



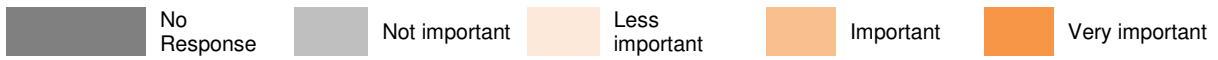
## Theme 7: HMO Licensing



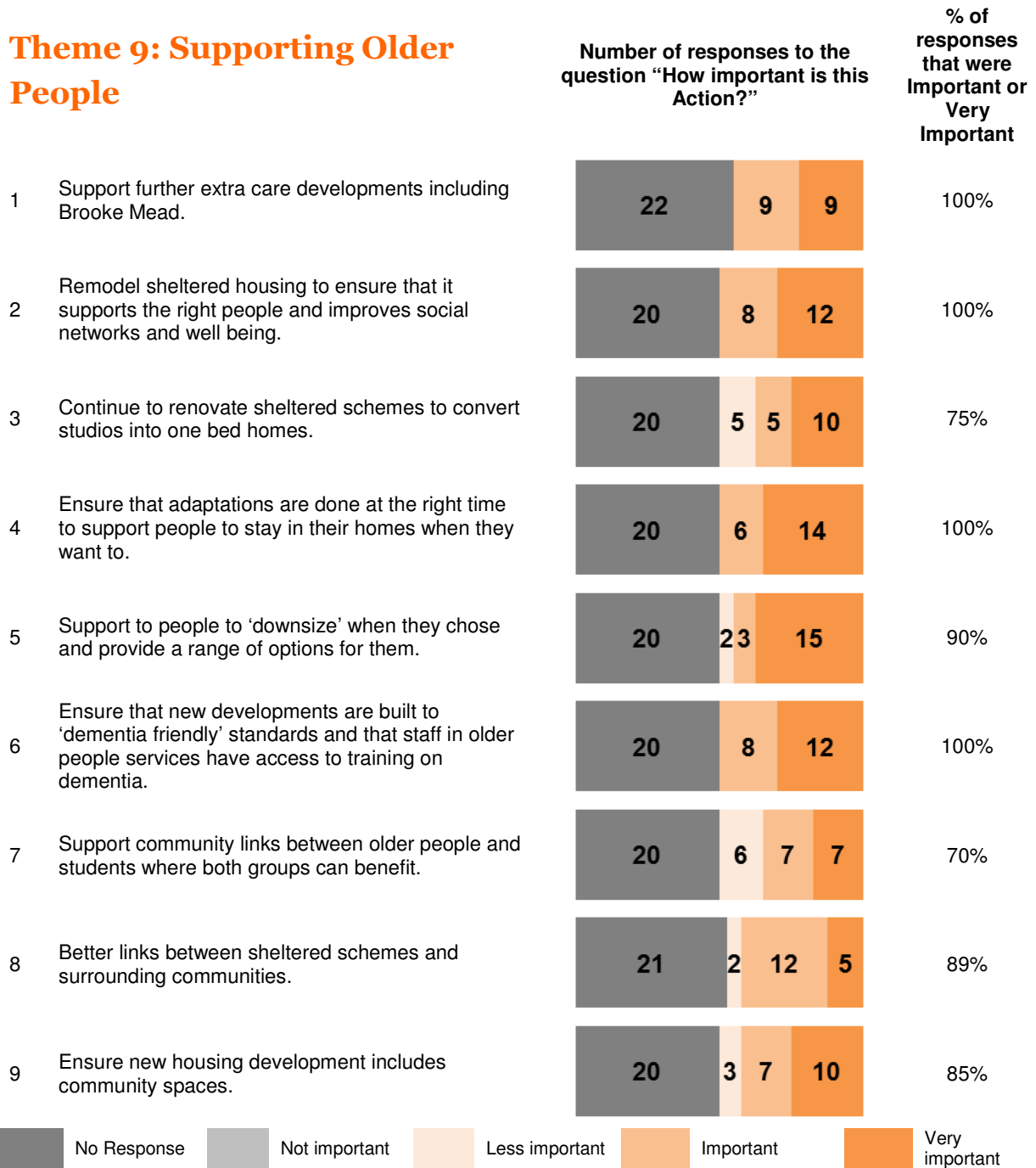
## Theme 8: Housing Related Support

		Number of responses to the question "How important is this Action?"				% of responses that were Important or Very Important
1	Review and remodel the Integrated Support Pathway for homelessness so that it can deliver a more personalised service with better outcomes for service users.	15	3	9	13	88%
2	Review where services are commissioned and funded from so that we can ensure a joined up approach to prevention.	15	5	5	15	80%
3	Support more independent accommodation to prevent long term use of hostels and reduce rough sleeping.	15	1	9	15	96%
4	Review how people access support services.	15	5	10	10	80%
5	Ensure supported housing reduces the need for acute and residential care services.	15	3	7	15	88%
6	Work with public health to manage the impact of housing on well being.	15	4	10	11	84%
7	Work with social care to ensure a joint approach to housing for people with learning disabilities.	15	2	7	16	92%
8	Review outreach, advice, and floating support services to ensure that they meet the need in the city.	15	13	7	14	84%
9	Support the early help pathway for young people and vulnerable adults who are parents.	15	2	5	18	92%
10	Ensure that services support survivors of Violence Against Women and Girls (VAWG).	15	1	6	18	96%
11	Ensure that services are accessible to people with autism.	15	2	7	16	92%
12	Investigate the benefits of women only services.	15	14	7	13	80%
13	Referral panels to promote choice and mixed communities in supported accommodation.	16	13	9	11	83%
14	Support the Mental Health Accommodation as a good practice model.	16	2	6	16	92%
15	Assess the impact of any potential future budget challenges with community groups and service users.	15	13	6	15	84%

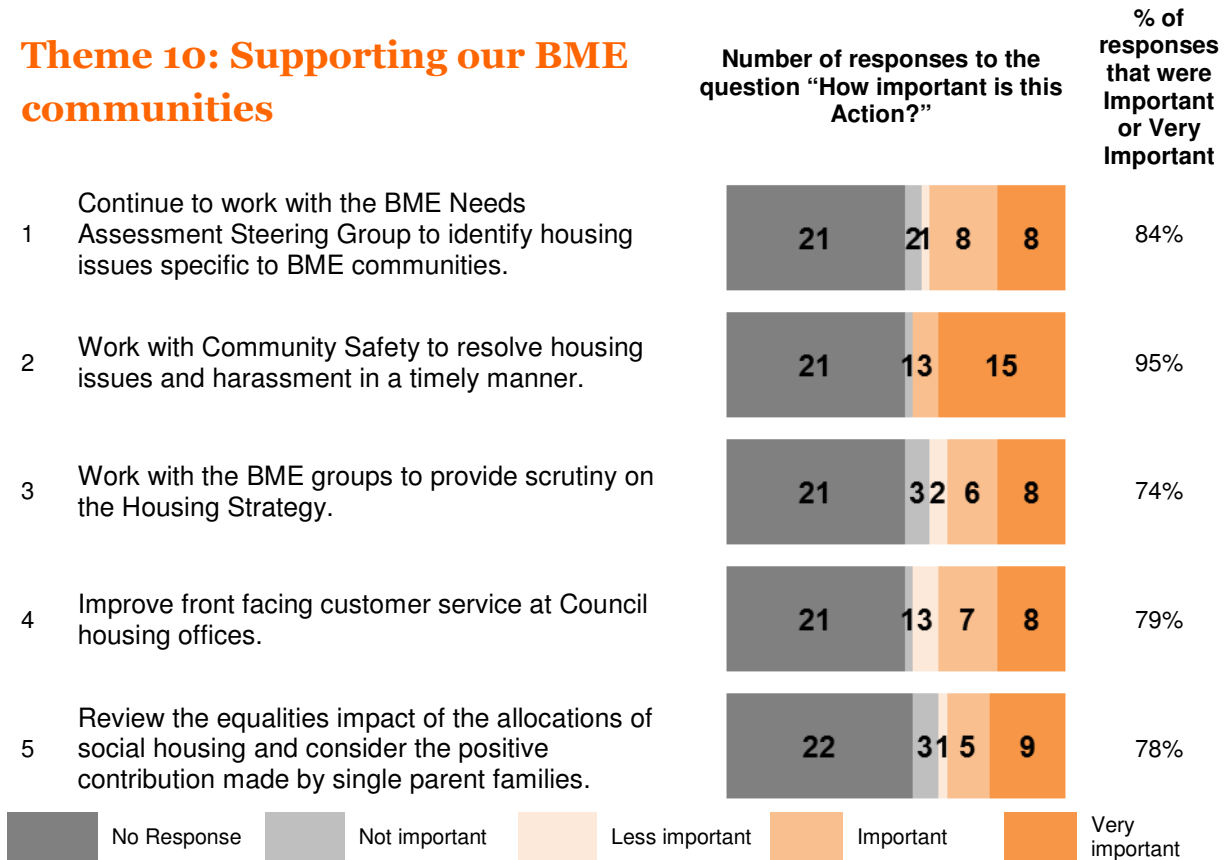
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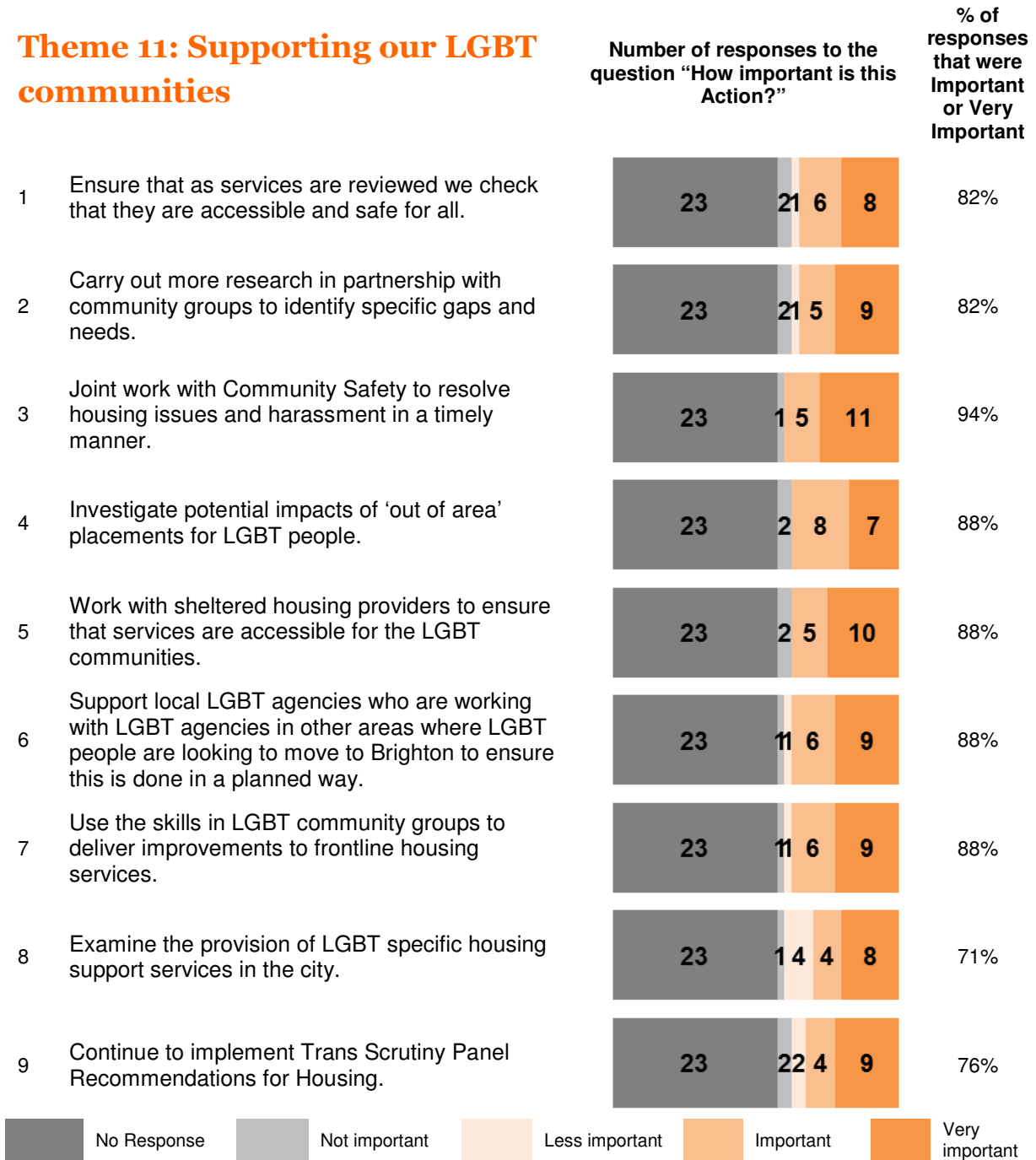
### Theme 9: Supporting Older People



## Theme 10: Supporting our BME communities



## Theme 11: Supporting our LGBT communities



## Are there any Actions Missing?

Theme	Comments on Website
<b>Theme 1: New Affordable Housing</b>	<ul style="list-style-type: none"> <li>• Promote partnership with local community housing organisations by establishing a formal engagement mechanism to provide early information of potential sites and reasonable timescales to consider their business plans.</li> <li>• Continue to stimulate building of new affordable homes through housing enabling work with a range of partners including local community housing providers.</li> <li>• Continue to look at alternative use of public assets including land making full use of powers to dispose at less than best consideration.</li> </ul> <p>Affordable (or preferably, social rented) housing needs to be for everybody, not just families, as single homelessness is becoming a huge problem and these people are often very low priority for social housing, even though they are often very vulnerable due to mental health issues and substance abuse issues. Why not a mix of 1, 2 and 3 bedroom flats on any new builds that may happen?</p> <p>Build more houses on existing council estates. Do not sell any council houses. Make it illegal for former council houses to be let, they should be for owner occupation or re purchased by the council.</p> <p>Help the working households more to get the properties they need as will pay more rent and council tax in order to pay off the Â£102m refer them to other local councils and housing associations workers should really be top priority as they work for the city and keep it this city going help workers to have more decent homes so they don't need to miss days off work for children being poorly from the property they live in</p> <p>Increase land that is available for development through relaxing of planning regulations etc.</p> <p>Look to compulsorily purchase long-term (great than 2 years) empty properties for conversion to social accommodation.</p> <p>Self build and co-operative housing</p> <p>The Strategy fails to address the fundamental aspect that, with its land-use and availability constraints, our City urgently needs BHCC to be brave enough to start work on 'Right-sizing' our City, to obtain an optimum mix of employment, residential, and tourism, whereby a key aspect will be the calculation of the type and quantity of 'Social Rented Housing' needed for the cohort of City residents, with a 'Local Connection', whom a 'Right-sized' City MUST be designed to cater for. IMHO BHCC needs to petition the Gov't to declare our City a form of 'Special Development Zone', where a free-market in land and housing is no longer permitted (whereby a derogation from EU laws on the liberty to use one's assets is likely to need to be obtained). An early manifestation of such a special policy would be that, apart from minor exceptions, Planning Consent would ONLY be granted for the building of Social Rented Housing, whereby Central Government would compulsory purchase development land not brought forward by its owners for such projects voluntarily (either for cash, or for a swap with Housing publically-owned land of equivalent value elsewhere in England) Given the Coalition's introduction of 'Affordable Social Rents' at up to 80% of market-price the funding of such housing is viable at current (PRS) Housing Benefit rates (where built on public land, so with no land cost), and at an all-in price (exclude land) in B&amp;H of about £1500 per square metre of floor area, over a term of about 25 years (include management and maintenance costs during that period). From about year 26 onward the surplus ('profit') on the rental income becomes available to help fund replacement of these homes after their 'Economic Design Lifespan' (60 years?), as well as to help fund renewal of older social housing.</p>

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Theme	Comments on Website
	There is no mention of sustainable housing, green housing Use of Brownfield and derelict sites
<b>Theme 2: Family Housing</b>	The workers and earners in this city Make housing more available in low cost areas by reducing the number of students and HMOs Balance prioritisation of social housing allocation to include low income working parents as well as vulnerable/minority groups A resident test, to prevent families arriving in Brighton and expecting to be housed.
<b>Theme 3: Community land trust and co- operatives</b>	This could use more promotion as I'm sure many people do not even realise it's an option, and Brighton & Hove is the kind of town where such schemes might be popular.
<b>Theme 4: Student Housing</b>	Build student accommodation on campus rather than in town? Enforcement of Article 4 Directions. Greedy landlords still buying properties in areas of very high concentration of HMO's, converting family homes - and getting away with it. Fund noise team 24/7 Improve refuse collection. A small bin for 4 adults is not enough and local students try to fill other people's bins and litter as they can't dispose of their rubbish (even with recycling) Minimum standards for all rented housing in the city. Penalise landlords for converting family housing and removing common room (living room). Refuse planning for use of conservatory as missing living room Reduce the number of students in the city or at least stop more coming. We do not have enough housing in the City for the ones who live here at present and certainly there is no room for more. Properly enforce the Article 4 direction and let houses revert back to family homes when HMOs are sold. In areas along the Lewis corridor, put in extra recycling and street cleaning. Put in place sanctions for students who continuously degrade an area by not dealing with their rubbish and by inflicting noise on others The need to have a limit on how many students the City can accommodate and discussions with the universities about this and their responsibility with the influx of students. We (University of Sussex Students' Union) would like to encourage the council to look to and liaise with other cities around the country with large student populations, to determine how they encourage good community relations, and promote a positive image of students. Yes; it is VITAL that BHCC urgently gets to grips with the two Universities (and maybe parts of the Gov't too) to turn-back the over-expansion of student numbers that has already occurred, and which has seriously blighted the housing prospects of so many low-income people with a local connection, especially that of young adults. Their opportunity to build a dignified life for themselves in their very own City must not be hindered any longer! It would appear that the remedy is for the unis to expand their out-of-City campuses, and or to open new ones, beyond a reasonable commuting distance from B&H (so not in Shoreham or Lewes!). Then the unis need to agree with BHCC to accommodate those undergrads and postgrads that there is space for in B&H in accommodation exclusively built on land currently held by the unis in B&H, and for the full course-length (generally 3 years), with a small proportion permitted to live in B&H off-campus in special situations (such as having been able to buy a home on the free market, but



Theme	Comments on Website
<b>Theme 5: Decent Warm Homes</b>	for a price-band above, say, £350k).
	Extend the Fuel poverty target to all vulnerable groups.
	Set a local rent cap. A studio flat should be affordable to rent on minimum wage.
	Stop proposal to remove council tax discounts from properties between rentals. This will make improvements less cost effective which will delay or remove improvements. This proposal, if implemented, will reduce the quality of rented property by effectively giving a fine to landlords who improve their properties
	The Food Partnership action should also aim to deliver sustainable, active land management of estates and improve engagement with and quality of environment on housing estates.
	This section primarily focuses on improving housing quality within council housing and in new builds in the city. While the Students' Union supports this endeavour, we believe that more needs to be done, and more funding needs to be provided, to improve the quality of housing in the private rented sector. The poor quality of private rented sector properties remain a serious issue for many Sussex students with the prevalence of mould and damp being particularly problematic. Other common problems include poor insulation, draughts and leaks, inadequate and broken heating, structural problems, infestations of rats, mice and slugs, poor electrics, faulty appliances and badly maintained gardens. In an area where there is high demand for private sector housing but an inadequate supply many students feel that they are forced into poor quality housing. 65.7% of respondents to the most recent Rate Your Landlord survey cited "poor condition of property as the main reason why they rejected a property.
<b>Theme 6: Private Rented Sector</b>	What about homes that don't even have central heating getting them put homes with mould and damp
	In the interim we (University of Sussex Students' Union) support the introduction of a register of landlords in the city, but such a scheme must be careful not to create high additional charges that might be passed on to tenants, or be so restrictive that it would discourage responsible landlords from remaining in the sector. The Students Union also supports the expansion of local accreditation schemes and more vigorous enforcement of existing housing laws as an interim measure, and calls for sufficient additional funding to be made available to local councils to administer and support these schemes. The Students Union maintains however that landlords and managing agents would be held most accountable by a national regulatory scheme and that the introduction of national regulation would therefore be the most effective way of improving property standards. We believe that the regulation of letting agents should involve a compulsory set of standards that all letting agents have to abide by including standardised regulation of fees, timescales for problem resolution and property standards. The Students' Union also believe that a free and independent service to deal with unresolved complaints by tenants against letting agents should be established as an alternative way for tenants to resolve unsettled complaints without having to go to court. Finally, we believe that more should be done to encourage property owners and managers to support green initiatives in their properties. Where the changes we feel are necessary require national regulation or implementation we call upon Brighton and Hove City Council to use their influence to lobby for these changes.
	Pilot an 'early improvers' group in anticipation of regulations to require landlords to improve the Energy Performance rating of rented properties. Include energy performance rating into the ethical standard for lettings.
	Provide support/advice for neighbours of HMOs, especially in blocks of flats
	Rents are too high, there should be action to limit rent rises and to ensure rents are affordable, which clearly they are not in our city.

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Theme	Comments on Website
<b>Theme 7: HMO Licencing</b>	<p>Minimum space standards for HMOs e.g. 10sqm per bedroom and 1 bathroom for every 2 bedrooms.</p> <p>Provide support/advice information for neighbours of HMOs where necessary, in the form of written information as well as verbal. Making advice on neighbourliness available to HMO residents is not enough - the complaint pathway needs to be identified to the neighbours at the time of licencing.</p> <p>Reduce the number of HMOs in areas where there is already saturation.</p>
<b>Theme 8: Housing Related Support</b>	<p>Agencies to work in a joined up fashion to ensure that we are delivering good quality support that is professional and does not collude with young people or workers and that working practice is transparent and works with good professional boundaries and roles. That service users are placed in their accommodation with as little time wasting as possible and clarity about what the process of supported housing is with a move on plan that is realistic and provides a route out of supported housing to stable housing.</p> <p>Need to ensure that all housing related supported is considered in context of integration and the Better Care Plans for Brighton and Hove</p> <p>Ring fence the budget so it can be continued to be monitored and not lost in other budgets use innovative models to improve outcomes for vulnerable people review in house services to ensure they are of a good standard and are strategically relevant</p> <p>Support the neighbours of vulnerable people in cases of ASB</p>
<b>Theme 9: Supporting Older People</b>	<p>The Age Friendly City Steering Groups leads the Age friendly City programme (signed up to by BHCC). They would like bullet number 63 to be amended to reflect the difficulty older people have using the existing bidding system for accessing housing. This prevents older people from having control over their housing options when compared with other client groups, as such we would ask for wording to be altered as follows: "Support older people to access housing options to downsize or better meet their housing need using accessible and age friendly mechanisms and tools" This at least shows that when older people have other housing need (whether downsizing or moving to more suitable accommodation) the systems used are designed to allow older people to participate fully. The current bidding system, for example excludes older people by the nature of how it is structured and accessed.</p>
<b>Theme 10: Supporting our BME Communities</b>	<p>No comments</p>
<b>Theme 11: Supporting our LGBT Communities</b>	<p>No comments</p>

## Do you have any other Comments on this Theme?

Theme	Comments on Website / Individual Emails
<b>Theme 1: New Affordable Housing</b>	Affordable' housing at 80% of market value in Brighton is not actually affordable for very many people at all. Yet anyone wanting to take advantage of part-buy schemes through housing associations needs to have an income of at least £30k per annum, which is actually pretty high. Why not lower the level of this to say £17k per annum, which is the income level at which one stops becoming eligible for social housing? Also, having worked for the council in housing, many disabled or older people who are under-occupying are reluctant to give up their family-sized homes because they don't wish to move to a flat which may be unsuitable for them. Why not convert some of the hundreds of garage spaces the council owns around the city to low-rise one-bed bungalows more suitable for older/disabled people? This would surely be much cheaper than building from scratch, and I would have thought it is unlikely to cause as much hassle or objection in the planning stages, as these often sit alongside existing estates.
	Can the empty shops that scatter our city be used for housing?
	Do not allow private sector landlords to let former council housing.
	just do more to help workers as they pay the wages they earn to you and the city
	Not all Disabled People can own their own home, and they may need to change housing as their condition changes. It is important that people are not pressured into initiatives that could run counter to their potential later needs.
	There are a lot of actions included here. It would be useful in the document to have more detail regarding how these actions are going to be delivered. It is clear that the city needs more affordable rented rather than LCHO homes but there are no tangible actions on how this will be achieved. Perhaps it would be better to have fewer actions but be more focussed on how these will be delivered.
	Whilst recognising that the text of the questions needed to be summarised to fit the limited space of this website the fact remains that nearly all of the propositions above have been drafted in a very 'loaded' manner, in that BHCC knows what it wants the texts to mean, but many participants will not be able to recognise the potential implications of the 'motherhood and apple-pie' style of BHCC's presentation (whilst it is also difficult, whilst on-line, to find the time to formulate all of the caveats which need to be applied to almost all of the above propositions!
<b>Theme 2: Family Housing</b>	The workers and earners in this city
	It is good to have support and advice for families who are struggling, however if rents are not affordable with the average wages and the cost of living continues to increase no matter how much budgeting that families do if they still can't afford the rents in the City then it is futile. More pressure and efforts need to be made to keep rents at a liveable cost and measures to restrict the charges that estate agents put on people such as administration fees.
	Increased support for housing families with disabled family members, and NO pressure to downsize, no reduction in Housing Benefit for having extra space when a disabled family member is resident.
	INCENTIVISE DOWNSIZING – don't waste money adapting properties and then ripping it out again - pre allocate
	Again this is a major issue but very challenging to deliver given the lack of land and housing market. it would be useful to have some detailed actions on how this will be delivered.
<b>Theme 3:</b>	Land availability is likely to be a barrier, so clarity on what could be available please

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Theme	Comments on Website / Individual Emails
<b>Community land trust and co-operatives</b>	<p>This is very challenging given land prices and lack of land in Brighton.</p> <p>Who could access these schemes? How will they be managed? What is meant by 'community housing'? What are the base lines for living conditions?</p>
<b>Theme 4: Student Housing</b>	<p>Better regulation needed</p> <p>Earlier efforts to deal with students numbers have not been properly enforced and are not having any noticeable effect. Landlords still rent out properties that should not have been given a licence and contravene the new planning regulations. Make it work!</p> <p>How do you separate out student accommodation after Halls of residence and non student accommodation? How do you monitor how many students stay on in Brighton after they finish university? How many students have some where suitable to live in the years that they are not in student halls? The impact of students needing shared houses effects local people who are struggling to live and work in the City.</p> <p>I live in the Hanover area and wish to see much better control of houses rented to students - standard of accommodation, reduction of nuisance (rubbish, noise, anti social behaviour). Registration of student lets whatever the number of tenants in a house. Management responsibility/penalties placed on landlords. Also a maximum number of student households in each street.</p> <p>It's unrealistic to expect people to make much effort to maintain a short-term, private rented property, as most students live in. But it's a good idea to work with the universities to remind them to be thoughtful and considerate of their neighbours, especially in areas like Moulsecoomb with a large proportion of family homes in the area.</p> <p>Review Article 4 Change of Use Direction. This has polarised house prices and left families trying to sell with little option but to dramatically reduce the price. By contrast, student houses have rocketed in value, as investors and landlords can only buy those properties if they want to let to students. This has caused a contrast in price by as much as £50,000 between identical houses on the same street. Also family homes are taking considerably longer to sell in the area. The council should consider allowing some areas to become student villages and then controlling those areas through some of the suggestions above like wheelie bins, plus noise patrol teams in the week and on-the-spot fines from City Clean for tenants who leave rubbish in front gardens etc. Purpose built blocks do not contain students, they concentrate the problem and this makes the impact worse on the immediate local area, as residents are disadvantaged by having hundreds of students coming and going from one building like the Co-Op site on London Road. I have a friend on Rose Hill Close who says they have had a lot of problems in recent weeks with large groups of students congregating and coming and going late at night. They have several students houses on the road, but because they are spread out, this actually dampens the effect and creates a more diverse community. Also by living amongst the community, students seem more respectable of their neighbours, whereas living in a purpose block they are in a bubble and have less regard for the immediate neighbours. Students can be a handful in the first few weeks, but once they learn how to live in the community, they settle in and there are less problems, so perhaps there should be emphasis on educating students at the beginning, the onus of which should be with the educational establishment who are unable to house them and therefore displacing them into private accommodation.</p> <p>Support services around tenancy management etc. should be provided by Universities.</p> <p>The range of options, expressed as 'Degrees of Importance' is felt to be</p>

Theme	Comments on Website / Individual Emails
	<p>deeply unhelpful to respondents. Given that we're responding to BHCC propositions we need instead to be able to select, on a scale of 10, between Agree and Disagree (hence I'm not responding to the propositions).</p> <p>While we (University of Sussex Students' Union) support the continued building of purpose built accommodation for students in Brighton, we ultimately want to retain students' right to choose where they live, be it purpose or non-purpose built accommodation. In last year's Rate Your Landlord survey we asked students if they would have preferred to stay in University managed accommodation (on or off campus) if they'd had the choice, and 60% said they would not. The top 2 reasons given for students wanting to rent in the private sector were that University managed accommodation is too expensive, and private housing is usually in a preferred location. Because many of our members express a preference for living in the private rented sector, we do not view purpose built University-managed accommodation as the sole solution to meeting increasing demand for student housing. Furthermore, it is important that purpose built accommodation is affordable for students. For example, the recently opened Abacus development on London Road charges students £175 per week for their rooms, which makes it 19% more expensive than the most expensive accommodation on Sussex University Campus, and therefore completely unaffordable for most students. It is important that high rents are not introduced in the planned purpose built accommodation. It is also important that affordable housing is enshrined in the university's master-plan - 31% of students who move out of university accommodation into town would prefer to remain on campus, but are unable to do so because of cost. Planning permission, if approved, should include affordable options, which would reduce the number of students living in town. We are also concerned that concentrating the student population into purpose built accommodation will not encourage community integration, and could dissuade students from remaining in Brighton after they have graduated. Students that remain in Brighton after University bring economic prosperity to the city, carry out a huge amount of voluntary work and create a diverse cultural community that we believe should be embraced. We are in support of local initiatives to integrate students into the local community, and would like to work with the council to improve the image of students in the community. While we recognise that there are local issues that residents are aggrieved by, we call upon Brighton and Hove City Council to recognise that not all issues are caused by students. For instance, in Strategy CP21 of Brighton's Submission City Plan it was identified that a high concentration of student lets places pressure on parking. However, last year the University of Sussex issued 840 parking permits and stated that many of these permits are for students that commute to University and do not live in central Brighton. If Brighton University is to issue a similar number of permits only 5% of the student population are assumed to have a car in Brighton. This would suggest that other factors place pressure on parking in Brighton such as the proliferation of terrace houses, and as a result, a lack of front garden parking. Other main complaints from residents about the detrimental effects of concentrated student housing (i.e. bikes chained to street furniture, overflowing rubbish and prevalent letting agent signage) are issues that cannot be resolved solely by students, so we are fully in support of other bodies working to increase cycle storage, improve refuse services and work with lettings agents to reduce signage. However, we would like to clarify that while we believe it is very important to reduce the effect of student lets through working with other bodies to solve grievances, and avoid a culture of student blaming, we have great reservations about management of the concentration of student lets through expansion of Article 4 directives. Therefore, we find it unfortunate that these two strategies were combined into one action to comment on in this consultation.</p>

Theme	Comments on Website / Individual Emails
	<p><i>Email response:</i>                      In relation to the problem of studentification of Hanover and surrounding areas where HMOs have gone a long way to destroying local community cohesion, the Strategy should address a need for some form of 'primary residence' provision, the definition of which is central to what follows. There is no doubt that the Council's measures in relation to Art.4 and a tighter definition for HMOs have put something of a brake on the spread of student-occupied HMOs. However, more needs to be done through planning policy to reinforce the measures just mentioned. The fundamental objectives should be two-fold: (1) to nullify the commercial attraction of HMO development across the city except in defined priority cases, and (b) to generate a clear message to the market and local communities affected that the supply of housing accommodation is aimed at satisfying markets which are not transitory and do not demand that communities subsidise such transitory markets. There is a considerable challenge in drafting a policy prescription along these lines. Although it is crucial that a policy of the sort described previously is suitably targeted, by definition it has to admit of exceptions. This is a matter that requires further thought but, by way of an example, there has to be some recognition of (say) the individual whose primary residence is clearly defined within the Council's area and whose student status requires a local residence, as well as the needs of local workers and families. A policy of the sort now advocated would, it is suggested, further reinforce existing measures dealing with studentification, would be politically popular, would go a long way to reassuring permanent residents that the Council is serious about halting - and reversing - the slide into studentification, and would send a strong message to the universities that city communities are no longer willing to subsidise their operations to the extent seen hitherto.</p>
<p><b>Theme 5: Decent Warm Homes</b></p>	<p>Good to remember that it's not just council tenants or older people who are affected by the 'heat or eat' dilemma!</p> <p>We (University of Sussex Students' Union) believe that it is important to improve sustainability in council housing, not only because some of our members living in council housing, but also because our institution has a strong commitment to the environment and we would encourage any measures to increase sustainability. However, the vast majority of our members live in the private rented sector, so we would like equal consideration to be given to grants to improve sustainability in the private rented sector as well. While it may not have an impact on our members, we believe it is important to address fuel poverty among the elderly as we are committed to social justice for all, not just students.</p>
<p><b>Theme 6: Private Rented Sector</b></p>	<p>We (University of Sussex Students' Union) welcome support that enables landlords to manage their property, as long as sanctions are also put in place for landlords that do not maintain their property to an acceptable standard. The Student's Union recognises that not all landlords are rogue, and actually our Rate Your Landlord survey suggests that students have better experiences renting with landlords than with lettings agents. Our results from last year's survey found that students with a landlord-managed property were more likely to rate their property condition as good than those with letting agent-managed properties. 20.1% of students with landlord-managed properties compared with 37.1% of students with letting agent-managed properties considered the property conditions as poor. Our research also found that there is a slightly greater proportion of double glazing and energy efficient white goods reported within properties managed by landlords compared with those managed by letting agents. Ultimately, the Students' Union believes there should be greater regulation of the private rented sector at a national level in order to raise standards and increase accountability amongst landlords and managing agents. We believe that the introduction of a compulsory set of standards that would be binding on all landlords and managing agents would have a positive impact on the quality of private</p>

Theme	Comments on Website / Individual Emails
	<p>sector housing on both a national and local level. A large proportion of the Students' Union's members rent in the private rented sector in and around Brighton and Hove and affordability is a major factor for those students. 34.4% of respondents to the most recent Rate Your Landlord survey cited property being too expensive as a reason why they rejected a property. Therefore, we view commitment to a 'living rent' scheme as a step in the right direction, as it would hopefully prevent landlords charging inflated rents for poor quality housing and over inflationary rent increases. However, a rent scheme that is linked to wage inflation may not assist students as much as other renters in the private sector, as many are unemployed and student loans are not guaranteed to go up year by year in line with inflation.</p> <p>Rent controls/living rent would lead to less properties available for rent as sale becomes more attractive than renting. The council doesn't link council tax rises with wage rises - the council tax rises have consistently been above average wage rises</p> <p>Incredibly important as more and more people are shunted into the private rental sector. All landlords with more than two properties should be obliged to be registered. Letting agent fees are astronomical, this needs to be tackled also, although may be more of a national government issue. But BHCC should support and promote these initiatives, and BHCC MPs should raise the issue in parliament.</p> <p>Find a way for rents to be in regulation with a living rate.</p> <p><i>Email response:</i></p> <ul style="list-style-type: none"> <li>• The strategy says that there is overwhelming support for a landlords register - to include I hope the mandate that they must have contact details outside each property.</li> <li>• The strategy says that the council will "support the creation" of such a register, or something very similar with the same level of vagueness of commitment.</li> <li>• If housing strategy are supporting, who is doing the making? Commit to making one.</li> </ul>
<p><b>Theme 7:</b> <b>HMO</b> <b>Licencing</b></p>	<p>HMO licencing has not resolved the problems that caused it come about - anti social behaviour, rubbish, impact on the community.</p> <p>HMO licencing needs to be enforced. Many properties are not currently licensed - it is effectively a tax on the honest landlord. Less honest landlords are being given a discount as they have also benefitted from the rent rises caused by HMO licence costs. Licences are also being granted where properties do not fit the criteria listed - eg. room sizes, sinks in rooms. If there are rules then they should be enforced. Alternatively the rules should be reduced</p> <p>We (University of Sussex Students' Union) welcome additional licencing that results in higher standards for our members, but do not support the expansion of planning tools such as the Article 4 direction. It is key that proper enforcement is taking place to ensure all applicable properties are licensed and to prevent unscrupulous property owners and property managers from offering properties to our members that fall below the standards required. We also welcome improved refuse collection and storage where there are high levels of HMO's. While we understand that it is tenant's responsibility to dispose of waste responsibly, improved waste and recycling collection is necessary to enable HMO occupants to correctly dispose of their waste and recycling, and this will hopefully prevent issues with overflowing bins and litter.</p>
<p><b>Theme 8:</b> <b>Housing</b></p>	<p>I think in some ways that the current system of the integrated support pathway is no longer fit for purpose because hostels for people with local connections do not meet the needs of the service users or those of the community. The amount of people who are stuck in band 2 hostels for years is a disgrace and more support needs to be provided to these people. Also,</p>

Theme	Comments on Website / Individual Emails
<p><b>Related Support</b></p>	<p>more timely decision making around intentionally homeless decisions would be more beneficial and, add to this more wide ranging adult social care provision that can be fast tracked and then the people concerned would be linked in more quickly with the correct services. Also, restricting use of a few small companies to provide temporary accommodation to homeless cases is not a good model and many people are not able to access these landlords due to previous bans from these properties. What would benefit is more variety of stock, with trained staff and preferably in smaller units. The profits being made by hostel providers and providers of houses for use as temporary accommodation is not justifiable when it so clearly does not begin to meet the needs of homeless people. Beyond what I have already suggested I do not know the answers to the very complex problems that arise from only scratching the surface of the problems that homeless people face with the interventions that are on offer. Also, the local connection policy could be reviewed because there are some people who are perhaps stuck in band 2 accommodation here and who have little prospect of moving on into a position where they can re-join society, work and contribute to society. There are other towns where these people could be relocated to (if they choose to) where there is more abundant housing and some prospects of employment. I realise that what I am writing is controversial but I see the system as so broken that the only remedy is to have a radical change because to mend the current way of doing things would be far too costly.</p> <p>Send rough sleepers back to the town they used to live in.</p> <p>Supported housing is essential in this City. The City has a duty of care to provide support for the vulnerable people who live here at the same time as empowering people to be independent and find ways to live without being dependent on services. Preventative work to keep young people in their families if possible is essential and all avenues should continue to be looked into. Supported housing is an essential resource for the City. Supported housing keeps young people and vulnerable people safe who otherwise could be homeless, causing anti-social behaviour and increased chances of street crime or drug use. supported housing supports some of the most vulnerable people in the City such as young parents. The services are fundamental to keeping our communities safe and to look after the people of our City.</p>
<p><b>Theme 9: Supporting Older People</b></p>	<p>It would be good to see the Age Friendly city agenda referenced as it is a positive and progressive programme and the authority has already signed up to it.</p> <p>Some supported schemes around the city aren't really suitable for older people, no lifts, no outdoor space etc. Maybe an overall review would be good? Also, promote better links between people in supported housing and their immediate neighbours and help older people to get online so they can make connections and perhaps feel less isolated.</p>
<p><b>Theme 10: Supporting our BME Communities</b></p>	<p>No comments</p>
<p><b>Theme 11: Supporting our LGBT Communities</b></p>	<p>Unlike many other groups Brighton a good place for lgbt people to live. I think they need to be supported in this. Gay men cannot have babies to push them up the housing list.</p>



## Written Responses from other Organisations

### Co-operative Housing in Brighton and Hove (CHIBAH)

CHIBAH welcomes the new Draft Housing Strategy which builds significantly on the previous 2008 strategy. CHIBAH is a founding member of the new Community Housing Network, and is represented on the Community Land Trust Steering Group. These two new groups, the former being focussed on advocacy, the latter on delivery, seek the greatest possible engagement with the city council in order to facilitate the development of new housing at rents within the reach of those on low incomes and benefits.

CHIBAH urges the council to do all in its power to protect the remaining commonhold land in the city, particularly in the Urban Fringe, from development by private interests, which will only exacerbate the severe shortage of housing for rent to the disadvantaged, and even those in the intermediate income range, across the whole demographic. There is cross-party support for the CLT and broad agreement around the issue of curtailing the Right To Buy. Far greater emphasis must be given to proactive liaison with community led housing providers (co-ops, cohousing, small socially minded RPs and the emerging CLT).

These aims can be achieved through the following mechanisms:

1. Appointing an officer dedicated to working closely with the community led housing sector, to establish a joint approach to community engagement on the use of land, drawing up feasibility studies, financial modeling and planning applications;
2. Joint working to explore how the Right To Buy can be minimized through any new council developments on HRA land being transferred to the CLT or not-for-profits;
3. Joint working to establish mechanisms for disposal at less than best consideration, at peppercorn rents or on long leases, to retain land in the commonhold;
4. Exploring the potential for Joint Venture partnerships;
5. Developing an effective mechanism for working with owners, landlords and associated agencies to facilitate the lease or purchase of empty properties by the community led sector;
6. Participating in community led housing conferences and opportunities for engagement, learning, and city-wide consensus on solving the housing problem in Brighton & Hove

## University of Sussex

The University of Sussex welcomes the opportunity to feed into the consultation for the forthcoming revised housing strategy. We fully support the initial opening sentence of the Student housing section and thank the city council for highlighting our recently constructed 1,105 bed-spaces in our Northfield residences. We particularly welcome the recognition that 'Our universities and students have a positive impact in the city, bringing economic growth in particular'.

We would like an additional action point inserted under the 'What is the city going to do?' section and provide the following justification based on recent research completed (December 2014) in partnership with Professor Darren Smith (author of the original studentification study), which notes a diversification of studentification, and supports the fact that the University of Sussex has doubled its managed, nominated and headleased bed-spaces over the past six years to 5,004 (2014/15). We are now able to house on campus more students than ever before, and housing more students collectively than those Sussex students who currently reside in the five surrounding wards: Hanover and Elm Grove, Moulsecoomb and Bevendean, St. Peter's and North Laine, Hollingdean and Stanmer and Queen's Park

### ***Proposed additional actions***

28. Recognise that the University of Sussex is keen to house a large proportion of its students on campus, taking pressure off the city and has a student housing strategy at the core of its strategy for growth.

### ***Supporting research:***

In November 2014, the University of Sussex completed research into the addresses in the city of our students. Using a combination of Royal Mail address and University record sources, Oct-Nov 2014, we have placed Sussex student household composition in the context of all households from residential data from the five key wards:

- I. Hanover and Elm Grove
- II. Moulsecoomb and Bevendean
- III. St. Peter's and North Laine
- IV. Hollingdean and Stanmer
- V. Queen's Park

As noted in Fig. 1 below, the proportion of Sussex students residing in households in these wards is comparatively low and that others, e.g. young professionals are likely to be residing in the properties as well as and instead.

Fig 1. Sussex household address analysis

Ward	Total number of addresses (Royal Mail)	Total Sussex households	Total Sussex students
Hanover and Elm Grove (HE)	5,652	513	1,385
Moulsecoomb and Bevendean (BE)	5,419	551	1,584
St Peter's and North Laine (SN)	5,539	615	1,273
Hollingdean and Stanmer (HS)	4,547	242	564
Queen's Park (QP)	2,973	176	282

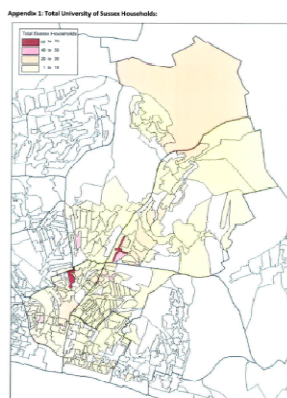
Produced by Professor Darren Smith, maps in the Appendix , highlight that across the five wards, the percentage of Sussex Households in the context of all households is low, and range from 5.3% to 11.2% (5.3% HS, 5.9% QP, 8.6% HE, 10% BE, 11.2% SN). We continue to work on the development of this data and will share the outcomes with the city council.

**Additional commentary**

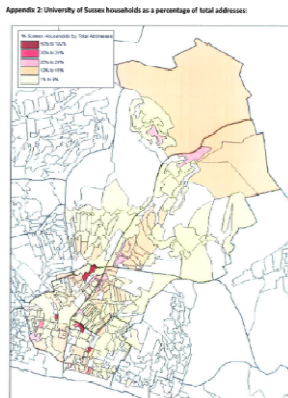
The fourth paragraph of the Student Housing section should be amended to refer to the scope of further developments on or campus to read: *“Further new purpose built student housing is currently proposed at the University of Sussex campus and on identified sites in the city”*.

We propose that action point 22 is expanded, to read: *“Continue to support the development of new affordable purpose built student accommodation in a range of locations within the city in accordance with City Plan policies, including on-campus, in close proximity to campus and appropriate locations elsewhere in the city”*

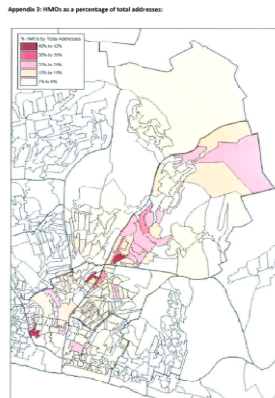
**UoS Households**



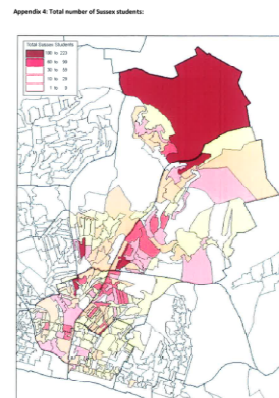
**UoS Households as a % of all households**



**HMOs as a % of total homes**



**UoS Students**



## Community Housing Network

### Suggested amendments to Our Housing Challenges

It is estimated that an additional 18,038 affordable homes are needed by 2017 however high land values are pushing up the cost of building **highlighting the need to think creatively** making it difficult to develop sound business cases that balance the need for affordable housing against the cost of development

***To summarise, Brighton & Hove faces significant challenges over the coming years to meet its affordable housing targets with high demand across all tenures, significantly reduced subsidy and limited space available for development. Meeting these targets requires an ambitious regeneration and capital programme that cannot be fully delivered by traditional approaches to housing development. This strategy seeks to open up existing partnerships and prioritise new and innovative delivery models that meet the city's housing aims.***

### Suggested amendments to New Affordable Housing

Since April 2009 a total of 553 new affordable homes have been completed and funded through our the Affordable Housing Programme in partnership with the Homes & Communities Agency and Registered Providers in the City. ***These homes include part owned (shared ownership) and homes let at 'affordable' rents (i.e. rents at 80% of market rent or local housing allowance, whichever is the lower).*** In addition ***Also, the Affordable Housing Programme has*** there are seven schemes on-site and ***that*** are estimated to complete in 2014/15 providing a further 371 homes ***(of which 222 (62%) will be shared ownership with 137 (38%) provided at 'affordable' rents).***

***In addition, a further 463 new social homes for rent have the provided by the community housing sector over the past 3 years, 100% of which have been provided without any grant funding. This includes:***

- ***416 empty properties brought back into use by Brighton Hove Seaside Community Homes to provide temporary accommodation for homeless people without the need for grant funding***
- ***36 new homes developed by Brighton Housing Trust to provide much needed self-contained accommodation for people moving on from homeless hostels***
- ***11 studio flats for homeless people financed and developed by Brighton YMCA***

**However, due to a reduction in government subsidy only 75 new homes are planned by housing associations in the next Affordable Housing Programme. Of the 75, only 14 (19%) of the homes will be for Affordable Rent with 61 (81%) homes for shared ownership.**

~~With Housing Associations reducing their building due to a reduction in government subsidy it is important that we make the best use of our local authority resources to fill this gap, however, developing social rented housing in the current financial climate will be a challenge.~~ **This context highlights the increasing gap in affordable housing for rent and the need to embrace local, community-based providers that offer innovative funding models to deliver social housing at genuinely affordable rents.**

2. Continue to stimulate building of new affordable homes through housing enabling work with a range of partners including Homes & Communities Agency, and Registered Providers **and local community housing providers**
- ~~6.~~ Support **Promote partnership with** local Housing Associations and the community housing Network with their proposals **organisations by establishing a formal engagement mechanism to provide early information of potential sites and reasonable timescales to consider their business plans** to deliver affordable homes
- ~~8.~~ Continue to look at alternative use of public assets including land **making full use of powers to dispose at less than best consideration**

# Housing Strategy Team

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