**EXECUTIVE SUMMARY:**

This report seeks agreement to invest monies from the Enabling Fund to support the continuation of the Elmbridge Homeownership Assistance Scheme (EHOAS) with Catalyst Housing and the Perfect Fit scheme with Paragon Community Housing Group (PCHG), recognising the contributions that both schemes make in meeting local housing need. The report proposes that the Council allocates a further amount of £425,000 into EHOAS, on the understanding that Catalyst commits a further £400,000. The report also proposes that £160,000 is allocated to support the continuation of the Perfect Fit up to the end of March 2018, with authority delegated to Officers to enter into agreements with the respective housing associations in relation to the additional funding.

**RECOMMENDED: THAT**

(A) CABINET AGREES A FURTHER ALLOCATION OF £425,000 FROM THE ENABLING FUND TO EXTEND THE ELMBRIDGE HOMEOWNERSHIP ASSISTANCE SCHEME (EHOAS) ON THE UNDERSTANDING THAT CATALYST HOUSING COMMITS A FURTHER £400,000, TO SUPPORT APPROXIMATELY 11 ADDITIONAL CASES;

(B) CABINET AGREES THE ALLOCATION OF £160,000 FROM THE ENABLING FUND TO PROVIDE CAPITAL FUNDING TO PARAGON COMMUNITY HOUSING GROUP (PCHG) TO SUPPORT THE DELIVERY OF APPROXIMATELY 60 ADDITIONAL MOVES THROUGH THE CONTINUATION OF THE SCHEME IN 2016/17 AND 2017/18; AND

(C) CABINET DELEGATES AUTHORITY TO THE HEADS OF HOUSING, FINANCE AND LEGAL SERVICES TO VARY THE EXISTING LEGAL AGREEMENT WITH CATALYST HOUSING TO REFLECT THE ADDITIONAL FUNDING PROVIDED TO EHOAS AND TO ENTER INTO A NEW FUNDING AGREEMENT WITH PCHG TO CONTINUE THE PERFECT FIT SCHEME TO THE END OF MARCH 2018, INCORPORATING REVISIONS TO THE OPERATION OF THE SCHEME TO ENSURE ITS CONTINUED EFFECTIVENESS.
REPORT:

1. The Elmbridge Homeownership Assistance Scheme – Background

1.1 In April 2010, the Council agreed to set up the Elmbridge Homeownership Assistance Scheme (EHOAS) with Catalyst Housing Group and committed £530,000 from the Enabling Fund to launch the scheme. £500,000 of this was to be made available for equity loans, with £30,000 sets aside to cover the administration fees payable to Catalyst for managing the scheme. Catalyst agreed to provide £500,000 match-funding into the loan scheme and a target of helping 14 households into home ownership was agreed. A legal agreement was established between the two parties that set out the scheme eligibility criteria and the financial arrangements to be followed. The Council also agreed that loan repayments made to the Council be earmarked for the Enabling Fund to support the delivery of affordable housing in the future.

1.2 The scheme commenced in April 2011 and further funding has been committed at two points since, resulting in a loan pot of £2.2m, capable of supporting around 33 purchases. The loan funding is provided on a 50/50 basis between the Council and Catalyst.

1.3 The scheme helps households who are living and / or working in Elmbridge and who aspire to become home-owners to achieve this, where otherwise they would not be able to afford to. Applicants must have a gross household income of less than £60,000 per annum and priority is given to housing association tenants resident in the borough, who by buying a home on the open market, free up a home for re-letting. The primary target group comprises first-time buyers, although in certain circumstances existing or previous home-owners can be helped, where for example, they have undergone a significant change in their circumstances affecting their housing need.

1.4 The scheme offers a low-interest (2.5%) equity loan of up to £90,000 to bridge the gap between what a household can raise through a deposit and mortgage and the purchase price, with purchasers from April 2015 benefitting from not facing charges on the loan for the first two years. Catalyst is paid £1,800 per completed purchase in fees to cover the cost of delivering the service and is also permitted to keep the interest payments to cover its own borrowing costs.

1.5 The following figures demonstrate how the scheme is working (as at November 2015):

- 29 purchases completed
- £1.842m of the £2.2m loan pot spent, at an average of £63,500 per loan
- £358,000 remaining in the loan pot which could support in the region of 4 to 6 loans.
- Four of the completed purchases assisted Paragon tenants to move into home-ownership making available all four properties for re-letting
- 18 of the purchasers were renting privately at the point of application and seven were living with friends or family
- 27 of the 29 purchasers were resident in the Elmbridge with the other two were working here, but resident elsewhere
The average purchase price of a property brought through the scheme is £220,000, ranging from £165,000 through to £290,000.

The gross average household income of those helped through the scheme was £40,000, with the average deposit put down being £17,000.

All of the purchasers were in work at the point of making an application and between 8 and 10 could be considered to be key workers in terms of either being employed in the public sector and/or being in occupations such as teaching, nursing etc.

There are 25 eligible applicants who are recorded as “out looking for homes”

The scheme was set up as a response to the local housing market conditions, most specifically the difficulties that many aspiring home-owners faced in being able to afford to buy a home of their own locally and the potential knock-on effects for the local economy and public services in terms of difficulties in recruiting and retaining a workforce. These affordability challenges have intensified since, with local property prices rising faster than incomes and as such, the rationale for the scheme remains.

As an equity loan, rather than a grant, half of the value of redeemed loans will be returned to the Council, reflecting our original share of the investment. The scheme has now been running long enough where loans have been redeemed as people sell up or they stay put and pay off the loan. Since summer 2014, seven loans have been redeemed. The Council’s share of the original loans on these payments was just under £230,000 but with house price inflation, the Council has received back just over £290,000. Taking account of the administration fees paid on these purchases, this represents a return on investment of around 21%. The payments received by the Council have been paid back into the Enabling Fund, although it has not been specifically ring-fenced for use in this scheme.

Officers have been in discussion about replenishing the loan-pot so as to allow more households to be assisted in the scheme. Catalyst staff have indicated that, given the scheme’s success to date, that Catalyst would be willing to invest a further £400,000 into the loan-pot, subject to the Council matching this commitment.

Whilst the remaining funds may help up to six more households to purchase a home, if early agreement for the additional funding can be secured then it can be simply added to the remaining balance so that the scheme can continue seamlessly. The alternative would entail having to advise applicants that the scheme has been suspended pending a decision on providing funds. Such uncertainty would be unhelpful to applicants and could lead them to incurring abortive costs, in terms of legal fees and the like.

It is proposed that, on top of a £400,000 addition to the loan-pot, that a further £25,000 be added to the fund to cover the administration fees payable to Catalyst. Assuming an average loan of £70,000, the combined £800,000 would support 11 additional loans, which would incur £19,800 in fees (at £1,800 per case) but it would be prudent to build in some contingency should the number assisted be higher.

It is proposed to draw investment of £425,000 from the Enabling Fund to support the extension of the scheme.
1.13 The commitment of both parties to provide additional funding would be formalised through a Deed of Variation to the original legal agreement adopted in 2011.

1.14 The Affordable Housing Member Panel was briefed on this proposal at its last meeting in November 2015 and gave its support to further investment being committed.

2. The Perfect Fit Scheme

2.1 The security of tenure enjoyed by most housing association tenants within Elmbridge means that there is no legal right to seek repossession of a property on the basis that it is under-occupied. National reforms introduced by the Coalition Government have seen a significant shift towards housing associations and councils granting “fixed-term” tenancies to new tenants. These changes were not applied retrospectively, meaning that existing social housing tenants did not see their security of tenure altered. This means that in Elmbridge there remain a significant number of housing association tenants with periodic tenancies, which will run from week to week for as long as they abide by their tenancy conditions.

2.2 Whilst security of tenure has advantages, it does not facilitate the best use of the limited social housing stock. It restricts the ability of the council and housing associations to meet the needs of family-sized accommodation, for example those whom are over-crowded and can leave tenants in accommodation that is too large for them to manage.

2.3 The Perfect Fit scheme was launched as a year-long pilot in April 2012 to encourage Elmbridge Housing Trust (EHT) tenants under-occupying their homes to downsize so as to free up the property for a family needing accommodation of that size. The scheme offers payments of up to £4,000 to tenants freeing up two or more bedrooms and up to £2,500 for those giving up one bedroom. The scheme was extended following a successful pilot and the current funding agreement runs from April 2014 to March 2016.

2.4 Under the partnership arrangements in place, PCHG established a post to work with under-occupying tenants and provide one-to-one support to help with moving. PCHG also bear the void costs (in terms of both the costs incurred in work undertaken to bring vacated properties back up to a lettable standard and the rent loss whilst the properties are vacant). The Council’s funding covers the provision of financial incentives to encourage under-occupiers to move. Under the current scheme, payments of up to £4,000 are offered to tenants freeing up two or more bedrooms and up to £2,500 to those giving up one bedroom. The individual grants are paid by Paragon and can be paid in full to the applicant or used flexibly to cover the costs of paying for removals and / or to pay off outstanding debts to the landlord. At least three-quarters of resultant vacancies are made available to applicants on the Council’s Housing Register, with a local connection to Elmbridge. The scheme is intended to increase the availability of family-sized affordable housing for rent in a locality where land values are high and the opportunities to develop such accommodation is limited.
2.5 Whilst the concept and launch of Perfect Fit pre-dated the introduction of many of the Coalition Government’s welfare reforms, it has assisted a number of households affected by it. Changes to the entitlement for housing benefit amongst under-occupying social tenants of working age were introduced in April. This reform reduced entitlement to housing benefit by up to 25% of the rent for eligible claimants by two or more bedrooms or 14% for those under-occupying by one bedroom. This meant that households were likely to accrue rent arrears and either have to make up a shortfall in their rent or look to move to smaller accommodation where they would qualify for a larger proportion of housing benefit to cover all or part of their rent.

2.6 As at October 2015, there were 244 households in Elmbridge affected by this reform. This number has been gradually falling and 51 of the 92 moves occurring since April 2013 related to households affected by this reform.

2.7 In the three and a half years from April 2012 to September 2015, a total of 124 households have downsized, meaning that 248 households have benefitted as a whole, once those moving into the vacated properties are counted. Table 1 below provides a breakdown of the moves so far, showing the number of moves from one size of property to another (in terms of bedroom numbers).

Table 1 Breakdown of Perfect Fit moves (April 2012 – September 2015)

<table>
<thead>
<tr>
<th>Number of bedrooms moved from</th>
<th>Homes released</th>
<th>Number of bedrooms moved to</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
<td>5</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>4</td>
<td>6</td>
<td>4</td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>16</td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2.8 The following sets out the headlines around activity, costs and outcomes

- By the end of September 2015, 124 households had downsized at a cost to the Council of £389,500, releasing 189 bedrooms. This is an average cost of £3,140 per move or £2,060 per bedroom released.
- Thirty-two of the households downsizing moved into sheltered accommodation (freeing up family homes), with the other 92 staying within general-needs accommodation.
- 32 moves occurred in 2012/13; 46 in 2013/14; 33 in 2014/15 and 13 moves took place in the first six months of 2015/16.
- 78 of the 124 moves that have taken place involved tenants of working-age, with the other 46 involving pensioner households.
- As at the end of September 2015, there were 52 applicants on the waiting list, who had been accepted onto the scheme and were waiting for a suitable property.
- PCHG undertakes regular satisfaction surveys of tenants who have moved through the scheme and consistently high satisfaction ratings are reported. The returns from those who have moved since April 2014 reported 100% satisfaction ratings with both the overall process and the new homes.
2.9 Through increasing the turnover of family homes for re-letting, the scheme has helped limit the number of homeless households in temporary accommodation, boosted homeless prevention and helped limit the associated costs to the Council of providing emergency bed and breakfast accommodation for homeless households.

2.10 The scheme is cost-effective, with cost per property released comparing favourably with the typical levels of public subsidy invested by the Homes and Communities Agency to support the development of new affordable housing, which typically equates to around £17,000 per rented home in the wider region. The scheme is cast in an even more favourable light if compared against the total indicative cost of developing a new affordable home, with the build costs being in the region of £150,000 to £200,000.

2.11 In March 2014, Cabinet approved a commitment of £260,000 to support the delivery of up to 80 additional moves through Perfect Fit between April 2014 and March 2016, subject to a funding agreement being put in place between the two organisations. An under-spend from 2013/14 of £20,000 was carried forward, resulting in a starting balance of £280,000 being available at April 2014. After eighteen months of the two-year agreement, 46 moves had taken place at a cost of £140,000, leaving another £140,000 as yet unspent. It is difficult to anticipate the number of moves that will occur in the remaining months (and the related costs) but it has been assumed that no more than £70,000 will be spent, leaving a balance of at least £70,000.

2.12 It is unlikely that the aspiration of 80 moves over the two years to March 2016 will be achieved, but the number of moves depends on a number of factors, including having a sufficient pool of tenants wanting to downsize combined with the availability of the right type of properties in the right place at the right time and capacity to both administer the scheme and manage and fund the voids work. Essentially there remains an underlying demand and there remains scope to assist more people and release more homes.

2.13 Given the success and cost-effectiveness of the scheme, Cabinet is asked to endorse its continuation through the next two financial years (i.e. to 31 March 2018).

2.14 PCHG has confirmed its willingness to continue to both run the scheme and to continue to commit staff resources to administer the scheme and provide support to residents as part of its wider objectives around making best use of its stock.

2.15 It is proposed that any remaining unspent funds relating to the current agreement will be carried forward, subject to the continuation of the scheme being agreed and on the assumption that this will be in the region of £70,000, it is proposed that a further commitment of £160,000 should be more than sufficient to support the scheme for the next two years. The aim is to achieve 30 moves per year, a number which reflects the average number of moves achieved per year to date, the capacity and costs to PCHG of running the scheme and dealing with the voids and the fact that a good number of those who wanted to move have done so and that there may be more work ahead to identify, engage and encourage those households who will move in the future.
2.16 The Council and PCHG have entered into a series of agreements covering the operation of the scheme and the conditions attached to the funding provided by the Council. These arrangements have been broadly similar, reflecting the fact that the scheme has remained largely unchanged since its launch in 2012. Whilst it is anticipated that the proposed agreement for 2016/18 will be based on the current agreement, officers are proposing to make a number of revisions to the scheme, both in light of lessons learnt and changes in the need for particular sizes of property.

2.17 For a variety of reasons, including the interplay of welfare reforms and changes to our Housing Allocations Policy, the greatest mismatch around supply and demand now concerns two-bedroom homes, rather than for three and four bedrooms as was the case when Perfect Fit was launched. A snapshot taken from the Housing Register in early December recorded 578 applications seeking two-bedroom homes, compared with 180 seeking three-bedroom homes and 28 seeking four-bedroom houses.

2.18 Officers are therefore proposing to make a number of changes to the operation of the scheme both to promote the release of a greater number of two-bedroom properties (along with some larger homes) and to refine the target group the scheme is aimed at. These changes include reforms to the package of incentives, moving the focus from the number of bedrooms released to the property that the household is moving to, with the expectation that this will increase the number of two-bedroom homes released. The main changes proposed are as follows:

- To target the scheme more closely at those with a one-bedroom need, which should boost the number of two-bedroom homes released. This will be achieved by providing assistance up to the value of £2,500 for qualifying households moving into a one-bedroom general-needs tenancy, regardless of how many bedrooms they are giving up. Qualifying households downsizing into retirement housing will be eligible for assistance up to £4,000.
- In exceptional circumstances, households needing two or more bedrooms will be able to be helped through the scheme, with support up to £2,500, for example, if they have a live-in carer, or the property to be vacated is in very limited supply (such as a property with extensive adaptations or with five bedrooms)
- To refine the eligibility criteria somewhat so as to avoid the scenario whereby a household may downsize through the scheme only to then seek a transfer to larger accommodation as a result of a subsequent and possibly foreseen increase in their household size.

2.19 Whilst the proposed changes to the incentives may reduce the value of the benefit to certain households, it may increase the incentives available to others (particularly those who will move to retirement accommodation). The proposed larger incentive available to those moving to retirement housing reflects the fact that some prospective down-sizers are reluctant to give this option serious consideration, but a more substantial offer might make a difference. All things considered, officers believe that it should still be possible to deliver a continued flow of moves under the
revised scheme, as with welfare reform, in particular, tenants may have other motivations to move. Officers would build in a review of the operation of the scheme before the half-way point and could then look to introduce changes in the light of this evaluation, should it be apparent that the changes have had unintended consequences.

2.20 In order to support PCHG in continuing to promote the scheme and recognising that PCHG has borne the costs of marketing to date, it is proposed that the Council will provide up to £5,000 to Paragon as a contribution to these costs. This would be wrapped up in the £160,000 commitment and be considered to be reasonable on-costs.

2.21 It is felt that a two-year agreement gives greater certainty to both parties and demonstrates a commitment to continuing with a scheme which has an established track record and where there is scope to do more. It is proposed that Cabinet delegates authority to the Head of Housing Services to conclude a funding agreement to run until 31 March 2018.

3. Funding the proposals

3.1 It is proposed to draw on the Council’s Affordable Housing Enabling Fund to support additional investment in the Elmbridge Homeownership Assistance Scheme and Perfect Fit. This is a fund set aside for delivering affordable housing in Elmbridge and meeting local housing need. The current balance, net of existing commitments, stands at just under £5m, as demonstrated by Table 2.

3.2 The table shows that the majority of the fund’s income is derived from Section 106 contributions from smaller residential schemes or in lieu of onsite delivery. The balance has been topped up by payments from the New Homes Bonus Scheme along with various capital receipts. Given that the combined commitment sought for the two proposals is £585,000 and the balance of the fund stands at over £4.9m, it is clear that there is sufficient monies available to support the proposals whilst also leaving a remaining balance of over £4.40m for use on other projects.

3.3 There is a twin-track process in place concerning the approval of payments from the Enabling Fund, depending on whether the sum sought is below £75,000 or not.

- For sums below £75,000, delegated authority has been given to the Portfolio Holder for Housing together with the Leader of the Council or Portfolio Holder for Resources, in consultation with the Chairman of the Overview and Scrutiny Committee and in conjunction with Officers, where the projects meet the priorities endorsed by the Affordable Housing Member Panel.
- For sums above £75,000, it is for Cabinet to determine recommendations for funding of affordable housing projects from the Housing Enabling Fund directly from the Portfolio Holder for Housing, in consultation with the Chairman of Overview and Scrutiny Committee and in conjunction with Officers where the project meets the priorities endorsed by the Affordable Housing Member Panel.
3.4 As it is now proposed to commit more than £75,000 from the Enabling Fund, Cabinet approval is now sought.

### Table 2 Enabling Fund working balance – December 2015

<table>
<thead>
<tr>
<th>Scheme</th>
<th>Income</th>
<th>Committed spend</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>April 2011 – Opening balance £1,096,000 (A)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Additions</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>S106 contributions (various schemes)</td>
<td>6,051,163</td>
<td></td>
</tr>
<tr>
<td>New Homes Bonus (2012/13 – 15/16)</td>
<td>318,640</td>
<td></td>
</tr>
<tr>
<td>EHAS loan redemptions – earmarked capital receipts</td>
<td>290,413</td>
<td></td>
</tr>
<tr>
<td>British Legion disposal – earmarked capital receipts</td>
<td>311,662</td>
<td></td>
</tr>
<tr>
<td><strong>Total Additions (B)</strong></td>
<td>6,971,878</td>
<td></td>
</tr>
<tr>
<td><strong>Committed Spend</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elmbridge Homeownership Assistance Scheme</td>
<td>1,165,000</td>
<td></td>
</tr>
<tr>
<td>Imber Cross</td>
<td>300,000</td>
<td></td>
</tr>
<tr>
<td>Empty Homes Purchase Programme</td>
<td>100,000</td>
<td></td>
</tr>
<tr>
<td>Perfect Fit (years 1 to 4)</td>
<td>530,000</td>
<td></td>
</tr>
<tr>
<td>YP Housing scheme – grant to Transform</td>
<td>70,000</td>
<td></td>
</tr>
<tr>
<td>Acquisition of British Legion Site</td>
<td>839,485</td>
<td></td>
</tr>
<tr>
<td>THP House (Walton Charity)</td>
<td>70,000</td>
<td></td>
</tr>
<tr>
<td><strong>Total Committed Spend (C)</strong></td>
<td><strong>3,074,485</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Enabling Fund Balance: (A) + (B) – (C)</strong></td>
<td></td>
<td><strong>4,993,393</strong></td>
</tr>
</tbody>
</table>

4. Use of the remaining funds

4.1 Officers are currently working with the Portfolio Holder, the Affordable Housing Member Panel and partner housing associations on a number of potential proposals for use of the remaining funds to help meet housing need. These range from projects to support housing associations to both increase the supply of affordable housing through new-build and to raise the quality and quantity of supported housing provision within Elmbridge to more innovative ways of delivering affordable housing. As and when proposals are suitably progressed, they will be brought to Members for consideration.

**Financial implications:**

The proposal to commit a further £425,000 to the Elmbridge Homeownership Assistance Scheme will mean that a total of £1,590,000 has been committed to the Elmbridge Homeownership Assistance Scheme. Payments to Catalyst Housing will be made as required on a loan-by-loan basis. The loans will be secured as a second charge on the property, ranking after the mortgage. Therefore, there is the possibility that a default on the mortgage and the equity loan will result in a proportion of the loan or the entire loan not being recovered by the Council.
The equity loan will be expressed as a percentage of the property price and will be liable for repayment as a percentage of the property price at the time of sale. The amount returned to the Council after the sale of the property is therefore dependent on house prices at the time of the sale. If house prices have fallen between the date of the loan and the sale then the Council will receive less than the original loan. If the value of the property rises then the Council will receive a return on the loan.

The repayment of the loan is dependent on the person selling the property or staying there and paying the loan back in situ. In any event, the latest that the loan will be paid back will be 25 years after it was given. To date, seven of the 29 loans given have been redeemed, all yielding a return on the original investment.

The proposal to commit a further £160,000 from the Perfect Fit scheme will mean that a total of £690,000 has been committed to this project.

The Enabling Fund is funded in part by Section 106 contributions. It should be noted that some of these funds are time-limited and could be repayable to the developer if not expended within a specified time.

The balance of the Enabling Fund stands at over £4.5 million. If the proposals to commit a combined sum of £585,000 to the two schemes are agreed, then the remaining, uncommitted balance of the fund will stand at over £3.94 million.

**Environmental/Sustainability Implications:**
None for the purposes of this report.

**Legal implications:**
The proposals in this report would give effect to the Council’s power to assist in the provision of affordable housing. The Enabling Fund comprises money lawfully obtained for this purpose.

Both schemes are discretionary. The Council will not have a direct legal relationship with the households applying or taking up the schemes, with the respective housing associations taking on this role.

In respect of the Elmbridge Homeownership Assistance Scheme, the Council already has a legal agreement with Catalyst covering our respective roles and responsibilities and a Deed of Variation would need to be entered into to incorporate any uplift in the investment made.

In relation to the Perfect Fit scheme, should the continuation of the scheme be agreed and the additional funding committed, then a new funding agreement with PCHG will be agreed, largely based on the current document.

**Equality Implications:**
Increasing the supply of affordable housing and making best use of it should help the Council contribute to its objectives around equality and diversity.
**Risk Implications:**
There are financial risks to the Council in relation to the Elmbridge Homeownership Assistance Scheme, in so much as the return on its investment will depend on the timing of the loan repayments and changes in property prices, but it should be noted that if the Council paid a grant to a housing association for an affordable housing scheme, then there would be no return on investment. The risk of loan defaults will be minimised by the Catalyst implementing robust assessments of applicant’s finance before agreeing to loans. The legal agreement between the Council and Catalyst and any operational protocols identify and minimise risks. There is a potential reputational risk for both the Council and Catalyst concerning any future suspension or winding down of the scheme, should funding run out whilst there are applicants still seeking properties, but this will be mitigated by Catalyst managing cases and expectations carefully.

In terms of the Perfect Fit scheme, there is a potential reputational risk for both the Council and PCHG in relation to the implementation of any changes to the scheme and / or its termination in the future, but these risks will be mitigated by PCHG managing cases and expectations carefully.

**Community Safety Implications:**
None identified for the purposes of this report.

**Principal Consultees:**
Head of Legal Services; Head of Finance; Chairman of O&S; Council Management Board.

**Background papers:**
None.

**Enclosures/Appendices:**
None.

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Colin Waters (Strategy & Enabling Manager) – 01372 474631 – cwaters@elmbridge.gov.uk