

Housing Strategy 2022 - 2027

June 2022

Contents

1 Housing Strategy

01 Introduction and vision

02 Local context

03 Priority 1: Making best use of existing homes, improving housing quality and sustainability

04 Priority 2: Improving housing options and opportunities to prevent homelessness

05 Priority 3: Delivering the homes our residents need in the places they are needed

06 Priority 4: Working in partnership

2 Tenancy Strategy

3 Consultation statement

4 Action plan: year 1 (2022-2023)

5 Appendix A: Context information

6 Appendix B: Consultation responses.

1 Housing Strategy 2022-2027

1. Introduction and vision

This Strategy sets out the Borough's plans for housing services for 2022-2027. The vision for the Strategy is for Tonbridge and Malling residents to have access to good quality and affordable homes that meet their needs, whether renting or buying. There are four priorities which are fundamental to providing good quality affordable housing.

To achieve this vision the Strategy has four priorities:

1. Making best use of existing homes, improving housing quality and sustainability
2. Improving housing options and opportunities to prevent homelessness
3. Delivering the homes our residents need in the places they are needed
4. Working in partnership.

The Housing Strategy sits under the Tonbridge and Malling Borough Council [Corporate Strategy 2020 – 2023](#) and works alongside other strategic plans such as the [Economic Recovery Strategy 2021 – 2023](#) and [Climate Change Strategy 2020 - 2030](#). This Strategy encompasses an updated Tenancy Strategy.

The provision of quality, affordable homes contribute to delivering the ambitions of other adopted Borough strategies and priorities of the Corporate Plan.

The Strategy has been developed in consultation with stakeholders including residents and local partner organisations [reference to Appendix with consultation statement].

It's likely there will continue to be significant changes to the national policy, the housing market, local communities and the local government sector over the lifetime of the Housing Strategy, and it needs to be flexible to respond to changes. To enable this flexibility and responsiveness the action plans to deliver the Housing Strategy will be made annually. The action plan 2022 – 23 outlines delivery for year one.

Partnership working is vital to delivering the ambitions of this Strategy and the success of the annual action plans will be the result of joint efforts across statutory, voluntary and community agencies. Effective partnership working is key across all housing services and it is important we build on the success of existing partnerships as well as seeking to develop new ones.

2. Local context

Local policy context

Our [Corporate Strategy](#) includes the importance of embracing effective partnership working and funding, achieving efficiency and, valuing the environment and sustainable growth. Key outcomes of the corporate strategy include supporting those in need of housing support and delivering a new Local Plan to meet growth targets for new development to 2039.

The [Climate Change Strategy 2020 – 2030](#) sets out the Council's commitment to local action on climate change, biodiversity protection and enhancement and our approach to partnership working, driven forward through an annual climate change action plan. The Strategy acknowledges the importance of sustainable development through the planning process and national Building Regulations and forthcoming Future Homes Standard. The Strategy includes measures to reduce carbon emissions from residential homes, including

retrofitting insulation measures and efficient heating, and supporting the decarbonisation of energy supply through low carbon electricity.

The Council's focus is to improve existing housing condition ensuring homes are safe and warm by encouraging and supporting the installation of energy conservation and efficiency measures. Our housing improvement team adopt a whole house approach considering energy conservation, efficiency and renewable energy options. By improving the energy efficiency of homes residents benefit from reduced energy consumption, with lower bills, and improved thermal comfort and well-being.

Tonbridge and Malling housing development policy and requirements

Tonbridge and Malling has a new homes delivery target of 839 homes per year set by the Standard Methodology, with an affordable housing policy CP17 in the [Core Strategy](#) setting out a policy requirement of 40% affordable housing for sites of 15 dwellings or above, or 0.5ha or above). Within affordable housing provision CP17 requires a 70/30 split of affordable homes for rent (which could be either social rents or affordable rents) and 30% intermediate tenures, such as shared ownership, in line with the definition of affordable housing in the NPPF.

Alongside this national and local policy context the Strategy is also informed by data and information about our local housing market, including the BRE Housing Stock Modelling 2020, Housing Register data, housing advice and private sector databases.

Additional evidence of housing need is shown through the 1279 households currently accepted onto our Housing Register for social housing, with average waiting times of between 15 months and 3 years for various property sizes (Source: Housing Register data for 2020-21, Locata) and the increasing number of people seeking housing advice. The continued high numbers on the Housing Register and increasing Housing advice and homeless prevention cases shows the pressing need for affordable housing in the Borough, reflective of the national situation with demand outstripping supply.

Key housing achievements



Local Housing context

Tonbridge and Malling Borough is in West Kent, covering an area of around 93 square miles from the North Downs at Burham and Snodland in the north to the town of Tonbridge in the south. The remainder of the borough is dotted with villages and smaller towns. Three motorways pass through the north of the Borough and there are good rail connections to London and the South East. Local employment and rail links to London combined with attractive countryside make West Kent a highly desirable place to live which influences the housing market.

Tonbridge and Malling has an estimated population of 132,571 (2020) (Source: ONS mid-2020 population estimates). The Borough is largely rural with Tonbridge in the south being the main town and home to around 40,000 residents.

The Borough has an estimated total of 55,184 dwellings, with 71% owner occupied, 13% private rented and 16% social housing (2019 ONS estimates).

The majority of homes in the borough are warm and safe but a significant minority, 8%, have serious hazards including risk of falls and being cold and 2% of homes suffer from more general disrepair (Source: BRE Client Report, BRE Integrated Dwelling Level Housing Stock Modelling and Database for Tonbridge and Malling Borough Council 2020).

There are 29 Registered Providers (RP) with social stock in the area, providing 9,505 homes of a variety of tenures: 7,697 general needs, 1,070 low cost homes ownership (such as shared ownership), 604 older peoples housing and 134 supported housing (source: Regulator of Social Housing Statistical Data Return (SDR) 2020). The largest stock holding RP is Clarion Housing Association with 7,010 homes (74% of the total social housing stock).

There is a supported living scheme for residents with Learning disabilities in East Malling with Housing21 and two supported accommodation schemes provided by Look Ahead in Tonbridge (commissioned by Kent County Council (KCC)), New Wharf provides supported housing for young people and care leavers and another scheme in the Tonbridge area provides accommodation for those with complex needs. The West Kent YMCA have two properties in Tonbridge providing supported accommodation in share housing for single homeless adults with low to medium support needs. The Royal British Legion has homes in Aylesford and provides a range of support, employment and housing services.

There are three extra care schemes across the Borough in Tonbridge, Larkfield and Watlingbury provided by Rapport Housing and offering homes for rent and ownership (market sale and older persons shared ownership).

We want to ensure the assessed need for market and affordable homes is delivered while encouraging housing provision that contributes to the sustainability of communities and environmental sustainability.

Housing Strategy Priorities

3. Priority 1: Making best use of existing homes, improving housing quality and sustainability

Why this priority is important

- The quality and efficient use of existing homes is key to providing decent homes for residents in the borough.

- It's important existing social housing is used efficiently, with 1279 households currently on the housing register (Housing Register data September 2021).
- Improving the energy efficiency of existing homes will help reduce fuel bills and energy use
- Over 800 properties were registered as empty as at September 2021, and 383 have been empty for more than six months (TMBC Council Tax data records).
- 43% of the private sector stock in the borough could benefit from energy efficiency improvements with 21% having un-insulated cavity walls, 15% having less than 100mm loft insulation and 7% having no loft insulation (BRE Client Report 2020).
- An estimated 5.8% of private rented properties (508 homes) have an EPC below band E and so do not meet the minimum energy efficiency standard to be rented out (BRE Client Report 2020).
- An estimated 4424 (8%) of all homes have a serious health hazard in line with the Housing Health and Safety Rating System (HHSRS) (BRE Client Report 2020).
- New licensing requirements means there are an estimated 171 licensable HMOs.
- Adaptations can enable people to continue to live independently in their own home.

Our objectives are to:

- Ensure efficient use of existing housing stock
- Improve property conditions to provide safe, healthy homes
- Improve energy efficiency of housing stock to alleviate fuel poverty and help address climate change
- Support residents to have a suitable home that meets their needs and where they can live independently.

What we will do to meet our objectives:

Ensure efficient use of existing housing stock:

- Continue our work to bring empty properties back into use: focussing our limited resources on problematic long term empty homes and liaising with Registered Providers about their empty homes
- Review our Housing Allocations Policy to ensure households in greatest need receive sufficient priority and to facilitate transfers (e.g. households who wish to downsize)
- Consider occupation levels of existing homes and options to address under-occupation, with particular focus on larger family homes with Registered Providers
- Outline our views on tenancy types and use of existing social housing stock for Registered Providers through our updated Tenancy Strategy – Appendix A
- Use Local Lettings Plans for affordable housing on new developments to reflect local needs and priorities
- Develop and implement a framework of engagement with Registered Provider partners to deliver and monitor use of existing social housing stock and the communities living in these homes
- Consider options to monitor and influence the sale of intermediate tenure homes in partnership with the Government's appointed Help to Buy zone agent and Registered Providers.

Improve property conditions to provide safe, healthy homes:

- Improve conditions in the private rented sector by implementing HMO licensing requirements, enforcement measures and assistance through grants and loan work as outlined in our housing assistance policy
- Take enforcement action where necessary.

Improve energy efficiency of housing stock to alleviate fuel poverty and help address climate change:

- Work in partnership to support the delivery of objectives in the Fuel Poverty Strategy for Kent and take actions to increase energy efficiency and assist those in fuel poverty
- Continue to seek funding opportunities to enable energy efficiency improvements to properties of different tenures, working with Registered Providers and landlords and residents
- Assist at least ten households to improve the energy efficiency of their homes towards meeting our Climate Change Strategy commitments

- Encourage the use of energy efficiency measures in new build homes, including a fabric first approach and the passivhaus standard
- Explore options to improve the energy efficiency of Council owned temporary accommodation.

Support residents to have a suitable home where they can live independently:

- Continue to support and meet the demand for adaptations using mandatory DFGs to help older and disabled people to live independently and remain in their homes
- Continue to fund the Health & Housing Coordinators within hospital settings to facilitate discharge to a safe and suitable home
- Actively engage and contribute to partnerships with Health and Care services, including through the West Kent Health and Care Partnership
- Work with Kent County Council and use insight from the housing needs research to understand any gaps in existing provision in services and housing development and explore options to address identified needs (this links to Priority 3)
- Encourage and influence housebuilders and Registered Providers to account for accessibility in new build homes and consider accessibility when developing planning policies.

4. Priority 2: Improving housing options and opportunities to prevent homelessness

Why this priority is important

- This Strategy sets out how we will continue to tackle homelessness and rough sleeping, addressing the long-term housing challenges households face in securing a home.
- We are required to have a homelessness strategy & rough sleeping strategy: the Homelessness Act 2002 requires local housing authorities to carry out a homelessness review for their district and publish a homelessness strategy based on the results every five years. The Ministry of Housing, Communities and Local Government (MCHLG) Rough Sleeping Strategy 2018 delivery plan requires a rough sleeping element to be included in local authority homelessness strategies, with annual action plans.
- The Homelessness Reduction Act 2017 strengthened the duty for local authorities to prevent homelessness.
- Our focus is on prevention and early intervention providing advice and access to a range of housing solutions as well as emergency assistance and accommodation.
- Housing costs and house prices are high, meaning many local households face affordability issues: median house prices are 11.3 times the median earnings (ONS 2020).
- Affordable private rented accommodation is in short supply in the borough. The 'LHA gap' which is shortfall between market rents and Local Housing Allowance adds to affordability issues for some households, ranging from 10% to 50% (source: analysis of 2020 Local Housing Allowance rates and average market rents ONS private rental market data 2019-2020).
- Demand for affordable housing outstrips supply – with approximately 16% of housing stock being social housing, low turnover combined with the number of households waiting for social housing shows unmet need. Within social housing provision new build delivery has focussed on social homes at Affordable Rents over recent years rather than social rents.
- Partnership working and the importance of the links between housing and wellbeing have been highlighted further through the response to the Covid-19 pandemic and implementing the 'Everyone In' initiative.
- The Housing Solutions Team are dealing with an increase in cases from a wide range of customers, all in need of housing advice: 1267 cases were opened during 2020-21, 23% increase from 1029 in the previous year (source: internal housing advice data records, Locata).
- The three most frequent reasons households become homeless or are threatened with homelessness in 2020-21 were a private rented tenancy being ended (22.7% of prevention duties owed) and family or friends no longer willing or able to accommodate (33% of prevention duties owed) and non-violent

relationship breakdown with partner (10.3% of prevention duties owed) (source: MHCLG Live tables on homelessness online at www.gov.uk).

- Rough sleeping – although we have low numbers of rough sleepers it is vital to continue with proactive prevention and support measures. There were an estimated 6 rough sleepers in the borough at the annual estimate in November 2020, with outreach work bringing this down further since the estimate.
- Ongoing impact of welfare reform and benefit claim levels – the number of new claims for Universal Credit increased during 2020 – 2021 linked to the COVID-19 pandemic. Changes in income and employment status are likely to effect local households and may impact on their wellbeing and ability to meet housing costs.
- The number of households in temporary accommodation has increased from an average of 29 placements in 2017/18 to 119 for 2020/21 and 150 so far for 2021/22, leading to a significant increase in costs.
- Over half of homeless acceptances were deemed to be in priority need because the household included dependent children (64.8%) in 2020-21 and priority need because of vulnerability due to physical disability or ill health was the second most common reason at 14.1%. The number of acceptances with priority need due to vulnerability due to mental health has increased, from 5.2% in 2018-19 to 12.7% in 2020-21 (source: MHCLG Live tables on homelessness online at www.gov.uk, priority need of households owed a main duty).

Our objectives are to:

- Provide housing options advice focussing on homeless prevention through a personalised approach
- Work with voluntary and statutory partners to help rough sleepers off the streets and into settled accommodation and prevent people from rough sleeping
- Ensure vulnerable groups and those with complex needs have access to support to maintain their tenancy
- Improve links with landlords in the private rented sector to work together to prevent homelessness and increase housing options.
- Minimise the use of nightly paid accommodation to manage temporary accommodation costs and seek alternative provision including property purchase or development.

What we will do to meet our objectives

Provide housing options advice focussing on homeless prevention and intervention through a personalised approach:

- Develop a Homelessness and Rough Sleeping Strategy and action plan with relevant partner agencies
- Ensure personalised housing plans improve the resilience of customers and identify any support needed, to become more independent and resilient
- Improve the range of housing options and prevention interventions, including mediation services and accessing the private rented sector where possible
- Maximise use of funding options available to help households access the private rented sector
- Ensure agencies who have the duty to refer are aware of this and know how to refer those at risk of homelessness or rough sleeping
- Develop partnerships to enable new initiatives and longer-term housing solutions over the life of this strategy
- Engage with customers to learn from their experience and use feedback on services to shape provision.

Work with voluntary and statutory partners to help rough sleepers off the streets and into settled accommodation:

- Continue our strong partnership working approach to tackling rough sleeping in the Borough, through responsive outreach services and future initiatives
- Continue to seek funding available for homeless related services, including the current Next steps accommodation programme, Rough Sleeping Initiative (RSI) funding and any future initiatives of funding

streams to enable homeless prevention initiatives and support provision

- Continue our Housing First project as a housing led approach to tackling homelessness.

Ensure vulnerable groups and those with complex needs have access to support to maintain their tenancy:

- Work with partner agencies to address the support, education, training and employment needs of vulnerable people and continue collaborative working to secure resources and identify funding opportunities for new initiatives and projects
- Ensure vulnerable groups have access to support through tenancy sustainment services
- Continue our commitment to the UK resettlement schemes along with appropriate support provision in partnership with Kent County Council
- Keep protocols under review to enable efficient, safe and effective working, including 16-17 year old protocol, and those relating to complex needs, including mental health problems.

Improve links with landlords in the private rented sector and encourage them to work with us to prevent homelessness and increase housing options through developing our landlord offer:

- Continue to facilitate the West Kent Landlord Forum in partnership with neighbouring authorities and the NRLA, and develop local engagement options such as networking gatherings or workshops, to keep landlords informed of legislative changes and requirements, discuss particular topics and share our landlord offer
- Continue to review and develop our private landlord offer, including 'golden hello' incentive payments and rent guarantee and promote it through the Landlord Forum
- Engage with private landlords through the West Kent Landlord Forum partnership and seek to overcome any issues for existing tenancies and/or making them reluctant to let homes to households facing homelessness. We will work to improve perceptions of those in receipt of welfare benefits and promote awareness of duties under the Equalities Act 2010, including indirect discrimination if landlords refuse to let a home to those in receipt of welfare benefits.
- Investigate options to improve access to the private rented sector, including a social lettings agency or leasing scheme.

Minimise the use of nightly paid accommodation to manage temporary accommodation costs and seek alternative provision including property purchase or development:

- Explore alternatives to nightly paid temporary accommodation and ways to help households secure suitable alternative accommodation, for example purchasing property or developing provision, and leasing schemes
- Use Council and Registered Provider options for temporary accommodation where possible
- Improve the housing options for households at risk of homelessness and assist households to resolve their housing need before the crisis point of homelessness.

5. Priority 3: Delivering the homes our residents need in the places they are needed

Why this is important

- We need to respond to a wide range of housing needs from smaller homes for young people and people looking to downsize, to larger family homes
- 839 new homes are needed in Tonbridge and Malling per year, including 40% affordable homes
- Home ownership is out of reach for many average and low income households with median house prices 11.3 times the median earnings (ONS affordability ratio data 2020)
- Social rent is the only genuinely affordable housing option for many households and there is a lack of new

supply of homes for social rent

- Although housing delivery has met new build targets in recent years the affordable housing delivered as part of this isn't sufficient to meet affordable housing need alone; demand continues to outstrip supply with 1279 households currently on our Housing Register. The market on its own does not deliver the amount and range of affordable housing needed.
- It is important to understand the housing need of communities and areas in the Borough, including rural areas.

Our objectives are to:

- Understand local housing need with up to date information on affordable and specialist housing need for a range of housing (including type, tenure and location) to inform decision making and housing priorities.
- Provide housing choice by encouraging housing of different types, size and tenure in suitable locations, at a range of prices to be within reach of different household financial capacities.
- Ensure a range of specialist and/or accessible housing to meet identified needs of vulnerable groups.
- Work in partnership with Registered Providers, private developers and Homes England to gain greater influence and control over affordable housing delivery and make best use of financial resources and assets.
- Consider options for the Council to influence and take a pro-active role in housing delivery, including through a Local Housing Company.

What we plan to do to meet our objectives

Understand local housing need, with up to date information on affordable and specialist housing need for a range of housing (including type, tenure and location) to inform decision making and housing priorities:

- Improve our understanding of housing needs through carrying out local housing needs research
- Improve our understanding of specific housing needs by capturing and analysing our own internal data and intelligence and information held by our partners
- Work with health partners and Kent County Council to understand and respond to current and future housing needs of older people and other vulnerable groups that require specialist housing.

Provide housing choice by encouraging housing of different types, size and tenure in suitable locations, at a range of prices to be within reach of different household financial capacities:

- Use findings and information from the Housing needs research to establish priorities for housing provision across the Borough for affordable homes for rent and intermediate housing, for example shared ownership and intermediate rent
- Work with landowners and developers to deliver affordable homes on allocated sites reflective of housing need in line with the Affordable Housing Statement
- Explore the viability of delivering more social rent homes within new developments
- Explore options to provide affordable housing for keyworkers
- Encourage adaptable and accessible housing that can respond to the changing needs of residents, supported by housing needs information and planning policy
- Diversify the provision of affordable housing through partnership working and innovation, such as community-led schemes and self-build.

Ensure a range of specialist and/or accessible housing to meet identified needs of vulnerable groups:

- Use findings and information from the Housing needs research to understand any gaps in provision and emerging need for specialist or accessible housing
- Formulate actions to address any need and work in partnership with developers, Homes England and Registered Providers to deliver required homes
- Explore opportunities to deliver required provision and seek to enable delivery, including re-provision of existing social housing stock, whole site affordable housing developments and consideration of the use of S106 contributions.

Consider options and work in partnership with registered providers, private developers and Homes England to gain greater influence/control and be involved in affordable housing delivery, making best use of financial resources and assets:

- Explore the options for the Council to take a more pro-active and direct approach to affordable housing delivery, such as a Local Housing Company
- Take a more proactive approach to working with Private Registered Providers to encourage them to come forward with land-led developments and consider joint initiatives
- Develop options and priorities for the use of S106 contributions to facilitate affordable housing provision
- Work closely with Homes England and other partners to identify and bring forward sites for development.

Consider options for the Council to influence and take a pro-active role in housing delivery, including through a Local Housing Company:

- Research options for the Council to take a pro-active approach to housing delivery through measures such as establishing a Local Housing Company, joint ventures with private developers, Registered Providers or long lease models.

6. Priority 4: Working in partnership

Why this priority is important

- Limited resources and budget restrictions mean partnership working is vital to delivering the aims of this Strategy and delivering well rounded services to residents
- We need to harness the expertise and experience of partners to deliver excellent services
- Joining up services and cross sector working is important to successful delivery of housing services shown through the hospital discharge co-ordinator role and delivery of the rough sleeper action plan
- Housing has an important role in health and delivering/facilitating integrated services. Integrated services which take account of individual needs are key to improving health needs; people with mental and physical disabilities, complex needs, long-term conditions and terminal illness need access to different health care, social care, housing and other services such as education
- Membership and active engagement in Kent Housing Group enables collaborative working; sharing learning, best practice and shared projects to make best use of limited resources.

Our objectives are to:

- Work in partnership with local authorities and partner organisations through active membership and engagement in Kent Housing Group to share best practice, learning and resources.
- Engage with Registered Providers and private developers through regular strategic and management/liaison meetings to ensure efficient and effective delivery of services.
- Work with health colleagues and organisations to ensure preventative focussed work and improve health through links between services
- Maximise our joint working with local commissioned organisations and third sector partners to add value to our housing services.

What we plan to do to meet our objectives

Work in partnership with local authorities and partner organisations including active membership and engagement in Kent Housing Group to share best practice, learning and resources:

- Continue with our membership to Kent Housing Group and our active role in this partnership.
- Continue to work in partnership with other local authorities.

Engage with Registered Providers and private developers through regular strategic and management/liason meetings to ensure efficient and effective delivery of services:

- Develop an approach to regular engagement with Registered providers and private developers to influence housing delivery in the borough
- Continue to meet with providers of social housing to monitor use and management homes after delivery, ensuring positive occupancy, customer service and neighbourhood management and foster positive working relationships with teams across partners, including Community Safety and Housing Benefits.

Work with health colleagues and organisations to ensure preventative focussed work and improve health through links between services:

- Continue to take an active role in cross sector initiatives and projects with Health Services
- Continue with partnership working with health and social care partners
- Work with health partners to ensure the Complex Care Nurse and the Mental Health services continue
- Work in partnership with Kent County Council's Joint Health and Wellbeing Board to support delivery of the Better Care programme and priorities of the Kent Joint Health and Wellbeing Strategy developing preventative and integrated services to improve outcomes for residents by maximising people's independence and promoting personalisation.
- Continue to raise awareness of housing and the services we offer to ensure a joined-up approach to supporting residents especially vulnerable people.

Maximise our joint working with local commissioned organisations and third sector partners to add value to our housing services:

- Work with KCC commissioned services on wellbeing and older persons to ensure services link into the support available and share information.

2 Tenancy Strategy

1. Introduction

This Tenancy Strategy outlines Tonbridge and Malling's position on the types and use of tenancies for social housing in the Borough. Registered Providers must have regard to this Strategy when developing their policies and approach to the tenure and rents for stock in the Borough.

Section 150 of the Localism Act 2011 requires local authorities to prepare and publish a Tenancy Strategy setting out matters providers of social housing are to have regard in formulating policies relating to:

- The types of tenancy they will grant
- When a type of tenancy will be granted
- The length of fixed term tenancies
- The expectations about reviewing fixed term tenancies and the circumstances when another tenancy will be granted on the expiry of a fixed-term tenancy.

2. Aims

- Outline the Council's view on the types and use of tenancies for social housing, informing the approach of Registered Providers in the Borough.
- To ensure a consistent approach to the types of tenancies issued across all providers of social housing
- To ensure tenancies provide the right level of stability for households and support sustainable communities.

3. Tenancy types and length

Starter/introductory tenancies

Providers must be clear to prospective tenants about the type of tenancy they will be granted at the end of the Starter/Introductory period, their rights and responsibilities during the Starter/Introductory period, the process at the end of the period including reasons a tenancy may not be converted or issued.

Providers should use the starter/introductory period to identify any issues that affect tenancy sustainment and work with the tenant to resolve them.

Starter /Introductory tenancies may be extended if there are serious tenancy breaches during the starter period, for a maximum of 6 months. Providers need to ensure the tenant understands the reasons for an extension and agree a plan to resolve any issues, with a view to issuing a more secure tenancy at the end of the extension period to prevent homelessness.

Starter/Introductory tenancies should not be used for existing tenants, including tenants transferring from another social home or moving through a mutual exchange.

Lifetime tenancies: secure and periodic assured tenancies

The Council encourages all providers of social housing to use secure or assured tenancies to help build successful and sustainable communities through enabling residents to settle in their home and establish social networks.

Fixed term tenancies

The Council appreciates Registered Providers may choose to use fixed term tenancies. Where fixed term tenancies are used the primary objective should be to enable the best use of available housing in terms of under occupation and adaptations.

Fixed term tenancies should be for a minimum of five years, with longer fixed terms considered where a household's circumstances are unlikely to change over time, for example, households with young children or people with long term health conditions.

Shorter term tenancies, i.e. two years, should only be used in exceptional circumstances (for example when accommodation is linked to specific criteria or is planned for redevelopment) and should be discussed with the Council on a case by case basis.

All prospective tenants should be given clear information about the type of tenancy being offered, the reasons for this and how the tenancy will be reviewed, at the point of signing a tenancy agreement. Registered Providers need to include information explaining the review process for fixed term tenancies in their Tenancy Policy.

The Council expects fixed term tenancies to be re-issued at the end of the term unless there is a change of circumstances or serious tenancy breach as defined in the relevant Registered Provider's Tenancy Policy.

Tenancy reviews and any related possession action need to include engagement with other agencies to meet the household's needs where appropriate, for example, social services.

Support, information, and advice must be provided to tenants to help them understand their housing options at the end of the fixed term and enable them to move on to suitable housing. Registered Providers should consider extending a tenancy until alternative suitable accommodation can be found if necessary.

Decisions to end a fixed term tenancy should be proportionate and tenants must be provided with clear, accessible information about the internal appeal process.

Registered Providers must inform the Council's Housing Solutions team when a decision has been taken to end a tenancy, in accordance with the Homelessness Reduction Act (2017). Early engagement with the Council and other agencies is important to enable joint working to prevent homelessness and any other negative outcomes.

Licences: non-secure tenancies and excluded licences

The Council has accommodation for use as Temporary Accommodation (TA) to accommodate households being assisted under Part 7 Housing Act 1996. The Council will only issue licences in relation to emergency or temporary accommodation.

Excluded licence agreements are issued to households accommodated while enquiries are made into what duty is owed under homelessness legislation. Where a main housing duty is owed weekly periodic non-secure tenancies are issued for temporary accommodation provided.

Existing and transferring tenants

Registered Providers must ensure existing tenants understand any changes to security of tenure, tenancy security and rights (such as RTB) and rent when they are moving to another property.

Registered providers should consider granting a tenancy with the same security of tenure and rent as the tenancy they are giving up through, even if they are not legally required to.

3 Consultation statement

1. Drafting

Workshops with housing staff to discuss the proposed priorities and objectives of the Housing Strategy were held in September 2021. Member engagement workshops were held on 28 and 29 September 2021 and 7 October 2021 to discuss the draft vision, priorities and objectives of the Strategy.

The member engagement workshops were led by the Cabinet Member for Housing, Kim Tanner, and a total of 23 Members attended across the three workshops. Key matters highlighted included long term empty properties within Registered Provider housing stock, the importance of helping existing residents find homes local to them (for example, children being able to find a home of their own), importance of having strong relationships with Registered Providers and the delivery of services to their tenants, and interest in ways the Council could take a more pro-active role in relation to housing delivery such as a Local Housing Company.

2. Public consultation

Summary of responses to the Housing Strategy consultation online questionnaire

The consultation on the draft Housing Strategy 2022 – 2027 was open from 2 March to 13 April 2022. The consultation was available online and promoted on social media via the Council’s Facebook and Twitter accounts. Partner organisations and Stakeholders were invited to respond to the consultation by email on 2 March (list of stakeholders contacted is at the end of this summary).

29 responses were submitted, of which 24 were complete and 5 incomplete. Incomplete survey responses mean that not all questions were answered. Responses generally expressed support for the priorities of the draft Housing Strategy.

The action plan sets out various projects and areas of work for the first year of the Strategy (2022-2023). Actions include a project to develop our approach to empty homes and enforcement, revision of the Housing Allocations Scheme, explore options to encourage downsizing and establishing engagement and monitoring with Registered Providers.

Some consultation comments related to the planning process and policies, while this strategy sets out our aims and objectives in relation to delivering additional homes in the Borough, including affordable housing for local people, any development will be subject to the planning process and policies. The [Local Plan](#) Regulation 18 consultation will take place in Autumn 2022.

Feedback referring to planning policy will be shared with the planning department for their consideration.

A summary of the responses to the consultation can be found in Appendix B to this Strategy.

3. Stakeholders contacted by email inviting them to respond to the consultation

The public consultation was open for responses from anyone who chose to complete the questionnaire. Parish Councils, Landlords (via the list held for our Private Landlord Forum) and stakeholders, across the following organisations and companies were invited to respond to the consultation:

- Registered Providers with stock in the Borough
- Kent Housing Group
- Local authorities – Maidstone, Sevenoaks, Tunbridge Wells, Gravesham and Medway
- West Kent YMCA
- Porchlight
- Age UK
- Crosslight
- Lookahead
- KSAS
- RBLI
- Peabody
- Rural Kent Action with Communities and Kent Community Housing Hub
- Developers
- Public sector bodies and organisations such as NHS, Kent Fire and Rescue, Ministry of Justice and KCC
- Hadlow college.

4 Year 1 Action Plan

TMBC Housing Strategy Action Plan Year 1, 2022-23		
Action	Notes and 2022-23 target	Lead
Priority 1: Making best use of existing homes, improving housing quality and sustainability		
1.1 Ensure efficient use of existing housing stock		
Review Housing Allocations Policy	Policy review to be completed by end of 2022-23	Housing Solutions Manager
Investigate occupation levels (under-occupation and overcrowding) to inform projects to encourage and enable downsizing or mutual exchanges	Analyse information from Registered Providers, the housing register and housing needs research and consider options to address under-occupation. Update members through an information report during 2022-23 and consider in future allocations policy review. Investigate a pilot project in partnership with Clarion and support agency.	<i>Housing Strategy and Enabling Manager and Housing Solutions Manager</i>
Bring empty homes back into use; identify empty homes and use a range of interventions to bring them back into use, using enforcement action where appropriate	Work with Registered Provider partners to understand the extent of empty properties within existing social housing stock and explore options to address this. Agree a performance indicator for empty homes within the engagement framework. Monitor progress through annual reports to members.	Housing Improvement Manager
	Promote the No Use Empty Scheme in partnership with Kent County Council	Housing Improvement Manager
	Consider altering the Council's approach to tackling Empty homes: report exploring the subject of Empty homes and possible changes to approach to be taken to members to provide steer and form the basis for an Empty Homes Policy to be developed. Empty Homes Policy to be developed and adopted in year 2 (2023-2024).	Housing Improvement Manager
1.2 Improve property conditions to provide safe, healthy homes		
Develop a programme of targeted interventions to improve standards informed by the stock condition survey	Review the stock modelling report and integrated database to identify the least energy efficient private rented stock to inform priority areas of work and targeted use of resources and enforcement action. Develop an action plan for 2022-2023 to implement programme.	Housing Improvement Manager

	Provide advice and assistance to owners of homes that do not reach a minimum energy efficiency standard (MEES) of Energy Performance Certificate band E and take appropriate enforcement action where necessary for rental properties.	Housing Improvement Manager
Fulfil requirements under extended HMO licensing scheme	Inspect additional HMO needing licenses as a result of the new scheme and process or enforce as necessary.	Housing Improvement Manager
Use powers to impose financial penalties in line with our Private Sector Housing Enforcement Policy	Each offence will be assessed on a case-by-case basis. The council will seek to impose a financial penalty for a relevant offence, unless there are circumstances relating to the offence that advocate pursuing a criminal prosecution instead.	Housing Improvement Manager
1.3 Improve the energy efficiency of housing stock to alleviate fuel poverty and help address climate change		
Continue to bid for decarbonisation funding to bring investment into improving existing housing stock, in partnership with other local authorities and Registered Providers as appropriate	Continue retrofitting project with Clarion	Housing Improvement Manager
Identify and promote services and initiatives to improve energy efficiency; including warm homes, energy efficiency and retro-fit technologies	Promote services and initiatives through effective media campaigns and pro-active targeted promotion as appropriate to maximise the opportunity for take-up.	Housing Improvement Manager
	Work in partnership with the Kent Energy Efficiency Partnership (KEEP) to support and contribute to the delivery of actions in the Fuel Poverty Strategy for Kent.	Housing Improvement Manager
Assist households to improve the energy efficiency of their homes	Help a minimum of 10 households with energy efficiency improvements in line with our commitment in the Climate Change Strategy Explore and apply for funding opportunities throughout the year to help deliver energy efficiency improvements to existing homes.	Housing Improvement Manager
1.4 Support residents to have a suitable home where they can live independently		
Continue delivery of mandatory Disabled Facilities Grant (DFG)	Maximise use of Disabled Facilities Grants for adaptations to support residents to continue living in their own home. Explore use of trusted assessors. Revised Housing Assistance Policy by end of 2022-23, for adoption in Year 2 (2023-24).	Housing Improvement Manager

Priority 2: Improving housing options and opportunities to prevent homelessness		
2.1 Develop a Homelessness and Rough Sleeping Strategy and action plan		
Use local intelligence and data to develop a Homelessness and Rough Sleeping Strategy	Strategy and action plan developed and approved by end of 2022-23	Housing Solutions Manager
2.2 Provide housing options advice focussing on homeless prevention through a personalised approach		
Investigate the use of the Policy and Practice LIFT and Xantura tools within our homelessness prevention work	Prepare a proposal to Management Team by end of December 2022 regarding the use of the prevention tools and the available funding to progress this work.	Head of Housing and Health
Continue to develop a focus on homeless prevention services and interventions, and implement ways of working to support this	Embed Prevention Officer roles within the Housing Solutions team Improve online information and advice tools to enable customers to self-serve and help manage expectations	Housing Solutions Manager
Seek customer feedback to inform service provision and improve customer experience	Ensure people feel supported and listened to when accessing services and that they can access services with ease. Ensure collaborative working across teams to provide consistent efficient services	Housing Solutions Manager
Maximise use of existing funding and take up new opportunities to help households access the private rented sector	Use funding such as Contain Outbreak Management Fund (COMF), Accommodation for Offenders Funding (AFO), Rough Sleepers Initiative and Discretionary Housing Payments to help households access the private rented sector and sustain tenancies. Links to objective 2.4 below.	Housing Solutions Manager
Promote and improve awareness of duty to refer and improve monitoring of referrals	Deliver informal training to partners about the duty to refer and promote it through attending meeting for relevant organisations to share and improve understanding of the duty to refer. Improve our data collection and monitoring of cases resulting from a duty to refer.	Housing Solutions Manager
Continue with our commitment for the resettlement of 12 families as part of the UK resettlement scheme and deliver our commitment to the Afghan citizens resettlement scheme and Homes for Ukraine scheme.	Work with KCC to help as many households as we can under both the UK resettlement scheme, Afghan citizens resettlement scheme and Homes for Ukraine scheme.	Housing Solutions Manager

2.3 Work with voluntary and statutory partners to help rough sleepers off the streets into settled accommodation and prevent rough sleeping		
Continue with and develop our Rough Sleeper action plan and task force meetings	Continue to identify rough sleepers and find ways to move them away from rough sleeping, finding accommodation solutions along with prevention work	Housing Solutions Manager
	Continue collaborative working to tackle rough sleeping using responsive outreach work for any rough sleepers identified.	
	We will continue to monitor rough sleeping and improve our intelligence about rough sleepers in the borough through robust procedures, ensuring people are verified before they are placed in accommodation.	
Expand and continue to develop Housing First	Expand the scheme by another 7 units, to <i>total 14, by [date]</i> in partnership with Look Ahead, Porchlight and Clarion Housing Association.	Housing Solutions Manager
	Work with Jobcentre Plus and other voluntary agencies to explore ways to maximise opportunities for those with complex needs to access education, training and employment or support needs, with a view to enable withdrawal of Housing First tenancy support services for existing cases.	
2.4 Ensure vulnerable groups and those with complex needs have access to support to maintain their tenancy		
Work with partners to ensure vulnerable people have the support they need	Continue to work with KCC homeless connect for tenancy sustainment services	Housing Solutions Manager
	Investigate a pilot project with KCC and the Home Improvement Agency to support our approach to working with hoarding cases. Project proposal to be completed by end of 2022-23.	Housing Improvement Manager
	Continue to use Rough Sleeper Initiative funding for the supported lettings project with Look Ahead	Housing Solutions Manager
2.5 Improve links with landlords in the private rented sector to work together to prevent homelessness and increase housing options		
Continue to develop our Private Landlord offer to make it effective in engaging landlords to work with us to prevent homelessness	Review pilot 'golden hello' incentive and rent guarantee within an options appraisal for the Private Landlord offer. Options report for Landlord Offer to members, March 2023.	Housing Improvement Manager
Develop positive working relationships with local lettings agents and landlords	The Housing Solutions Officers and Accommodation Officers will build relationships with lettings agents and landlords to find tenancy opportunities in line with the Discharge of Duty into the Private Rented Sector Policy	Housing Solutions Manager and Housing Improvement Manager
Improve and extend engagement with private landlords	Continue our work with neighbouring authorities to deliver the West Kent Landlord Forum events and information.	Housing Strategy and Enabling Manager

	Host at least 1 event during 2022-23 (online or in person).	
	Develop and trial local engagement options such as networking gatherings or workshops; hold local event/s during 2022-23 and gather feedback to inform future approach.	
2.6 Minimise the use of nightly paid accommodation to manage temporary accommodation costs and seek alternative provision, including property purchase or development		
Research and consider options for alternative provision such as property acquisitions and options to lease properties	Carry out options assessment to establish preferred option/s and provide a report to members by end of 2022-23. Seek Cabinet approval for implementation and required resources, NB this may be in year 2 of this action plan. Secure 30-40 units the Council has control of and access to for use of for temporary accommodation.	Housing Strategy and Enabling Manager
Reduce use of nightly paid Temporary Accommodation	Increase homelessness prevention, in turn reducing use of temporary accommodation.	Housing Solutions Manager
Increase the supply of self-contained homes in council control for use as temporary accommodation	Explore option to lease properties - assess options including a cost benefit analysis, and report to members by end of 2022-23 as above. Complete project to alter 4 council owned properties in Tonbridge to provide 2 properties as HMO temporary accommodation and consider outcomes of this to inform approach to remaining 2 properties.	Housing Strategy and Enabling Manager Property Services Team and Housing Services
Priority 3: Delivering the homes our residents need in the places they are needed		
3.1 Understand local housing need with up to date information on affordable and specialist housing need for a range of housing (including type, tenure and location) to inform decision making and priorities		
Research and analyse local housing needs to inform affordable housing delivery.	Carry out Housing Needs Research and report; due to complete June 2022. This research will analyse local housing need across areas of the borough, for a range of tenures and consider affordability thresholds for various tenures including for rented homes and affordable home ownership.	Housing Strategy and Enabling Manager
	Use insight into housing needs provided by the research to inform work towards achieving Priority 3 of this Strategy and inform projects and policy decisions, including the Affordable Housing Statement and new Local Plan.	Head of Housing and Health and Housing Strategy and Enabling Manager and Planning team
3.2 Provide housing choice by encouraging housing of different types, size and tenure in suitable locations, at a range of prices to be within reach of different		

household financial capacities		
Research types of affordable home ownership, for example living rent and rent to buy	Consider options for affordable home ownership other than shared ownership, informed by local housing needs research and information from Registered Providers in the Borough. Present an information report to members by end of 2022-23.	Housing Strategy and Enabling Manager
Monitor the tenure and mix of homes delivered to inform future policy	Monitor delivery through the Annual Authority Monitoring Report and additional monitoring of affordable housing provision, as a percentage of overall delivery and recording tenure and mix information.	Planning Team & Housing Strategy and Enabling Manager
3.3 Consider options for the Council to influence and take a pro-active role in housing delivery, including through a Local Housing Company.		
Consider use of council owned assets for use to deliver affordable housing	Review of council owned assets through the internal Assets Group and consider their use to delivery new affordable housing units through joint working with Registered Providers. Establish an agreed way forward for identified sites that could deliver affordable housing by end of 2022-23.	Head of Housing and Health
Priority 4: Working in partnership		
4.1 Work in partnership with local authorities and partner organisations including active membership and engagement in Kent Housing Group to share best practice, learning and resources		
Continue our membership to Kent Housing Group	Actively contribute and engage with partners of the Group.	Head of Housing and Health & service representatives of each sub-group
4.2 Engage with Registered Providers and private developers through regular strategic and management/liaison meetings to ensure efficient and effective delivery of services		
Work with Registered Providers to maintain and improve housing management services and joint working with the Council and other agencies	Develop and agree an approach to monitoring and engagement between Registered Providers and the Council; including meetings to share staff and service updates, review specific cases and any areas of concern. Links to Priority 1 objectives	Head of Housing and Health
	Monitoring will require data, management and performance information, including customer satisfaction and steps being taken to implement the 'Charter for social housing residents' as set out in the Social Housing White Paper 2020.	

Develop an approach for regular engagement with Registered Providers to influence housing delivery in the borough	Set up strategic meetings with Registered Providers: bi-annual meetings with Registered Providers with large amounts of stock in the Borough, and annual meetings with Registered Providers with lower amount of stock. First meetings to be in 2022-23.	Housing Strategy and Enabling Manager
4.3 Work with health colleagues and organisations to ensure preventative focussed work and improve wellbeing through links between services		
Work in partnership with Health Services to provide integrated services taking account of individual needs	Take an active role in partnership working with health providers to address the health needs of residents with more integrated services through representation at the West Kent Integrated Care Partnership and associated health forums.	Head of Housing and Health
Continue to take an active role in cross sector initiatives and projects with Health Services	Work with health partners to ensure that housing continues to play a key role in supporting timely and safe discharge from hospital. Continue to review relevance and focus of the hospital discharge service to inform future commitment.	Housing Improvement Manager
4.4 Maximise our joint working with local commissioned organisations and third sector partners to add value to our housing services		
Work with KCC commissioned services on wellbeing and older persons	Ensure housing related services link into available support through partnership meetings to have an open dialogue and share information.	Head of Housing and Health

5 Appendix A: National and regional policy context

The Strategy is informed by a wide legislative and policy context, with many changes to the national policy framework for housing and planning since the previous West Kent Housing Strategy 2016 – 2021 key areas are outlined in this section.

Homelessness Reduction Act 2017

The Homelessness Reduction Act 2017 took effect on 3 April 2018, placing new duties on councils to work with homeless families to prevent or relieve homelessness before a main homeless duty is accepted. The main changes brought in by the Homelessness Reduction Act 2017 are as follows:

- Work to prevent homelessness of all eligible applicants likely to be homeless in 56 days
- Work to relieve homelessness of all eligible applicants who become homeless
- Take reasonable steps to secure accommodation for those who approach for assistance
- New ‘Duty to Refer’ for public bodies working with homeless households to the Council homelessness team.

The Government announced a new [Rough Sleeping Strategy in 2018](#), with the aim of halving rough sleeping by 2022 and end it by 2027, now brought forward to 2025. Funding has been provided through the Rough Sleeping Initiative and Rapid Rehousing Pathway for Councils to reduce rough sleeping.

The Government announced the ‘Everyone In’ initiative in response to the Covid-19 pandemic in March 2020, instructing local authorities to bring rough sleepers in from the streets and give them access to emergency accommodation.

The [Welfare Reform and Work Act 2016](#) introduced welfare policy reforms building on the [Welfare Reform Act 2012](#) including:

- Restricting Local Housing Allowance rates; including changing the basis LHA rates are set on from the median to the 30th percentile of market rents within a Broad Rental Market Area (BRMA), applying national caps to LHA rates and abolishing the five bed rate
- Benefit cap reduction, from £26,000 per year to £23,000
- A 1% reduction in social rents for 4 years from 2016.

Domestic Abuse Act 2021

The [Domestic Abuse Act 2021](#) includes measures to promote awareness of domestic abuse, protect and support victims (including a new Domestic Abuse Protection Notice and Order), transform the justice response by helping victims give evidence through screens and other special measures, and improve performance with a Domestic Abuse Commissioner to help drive improvements in the responses to domestic abuse. Under the Act all eligible homeless victims of domestic abuse automatically have a priority need for homelessness assistance. The Council has received funding to assist in us fulfilling our new duties under the Act and are working in partnership with other local authorities and Kent County Council to develop and deliver our response.

The Social Housing Green Paper 2018: A new deal for social housing and Social Housing White Paper 2020: The Charter for Social Housing Residents

[A new deal for social housing proposes](#) a rebalancing of the relationship between residents, addressing stigma associated with social housing, the need for landlords to listen to residents and the desire for a culture of accountability and respect.

Five principles underpin the new deal for social housing residents:

- a safe and decent home which is fundamental to a sense of security and our ability to get on in life;
- improving and speeding up how complaints are resolved;
- empowering residents and ensuring their voices are heard so that landlords are held to account;
- tackling stigma and celebrating thriving communities, challenging the stereotypes that exist about residents and their communities; and,
- building the social homes that we need and ensuring that those homes can act as a springboard to home ownership.

The Social Housing White Paper provides a framework for reform, setting out how ‘transformational’ change for social housing residents will be achieved through a new Charter for social housing residents and changes to the regulatory regime. The new Charter sets out what every social housing resident should be able to expect:

1. **To be safe in your home.** We [*the Government*] will work with industry and landlords to ensure every home is safe and secure.
2. **To know how your landlord is performing,** including on repairs, complaints and safety, and how it spends its money, so you can hold it to account.
3. **To have your complaints dealt with promptly and fairly,** with access to a strong ombudsman who will give you swift and fair redress when needed.
4. **To be treated with respect,** backed by a strong consumer regulator and improved consumer standards for tenants.
5. **To have your voice heard by your landlord,** for example through regular meetings, scrutiny panels or being on its Board. The government will provide help, if you want it, to give you the tools to ensure your landlord listens.
6. **To have a good quality home and neighbourhood to live in,** with your landlord keeping your home in good repair.
7. **To be supported to take your first step to ownership,** so it is a ladder to other opportunities, should your circumstances allow.

The Energy Act 2011

The Energy Act has three principal objectives:

1. Tackling barriers to investment in energy efficiency
2. Enhancing energy security
3. Enabling investment in low carbon energy supplies.

The Act includes key provisions relating to the Green Deal, the private rent sector and the Energy Company Obligation (ECO). The Green Deal created a new financing framework to enable the provision of fixed improvements to the energy efficiency with improvements funded by a charge on energy bills, avoiding the need for consumers to pay upfront costs.

The Act includes provisions to ensure private residential landlords are unable to refuse a tenant’s reasonable request for consent to carry out energy efficiency improvements from April 2016 where a finance package (such as the Green Deal or the Energy Company Obligation) is available. The Act also meant it became

unlawful for landlords to grant a new tenancy or renew existing tenancies for properties that do not meet the minimum energy efficiency standard (MEES) of Energy Performance Certificate (EPC) rating E from 2018, extending to all domestic rented properties from April 2020.

The Act amends existing powers enabling the creation of a new Energy Company Obligation to:

- Take over from existing obligations to reduce carbon emissions that expired in 2012
- Work alongside the Green Deal finance offer by targeting measures to households likely to need additional support, including vulnerable people on low incomes.

Heat and Buildings Strategy (October 2021)

The [Heat and Buildings Strategy](#) sets out government plans to decarbonise homes and commercial, industrial and public sector buildings, towards achieving net zero by 2050. The Strategy outlines five core principles to guide action over the next decade and longer-term transformation to Net Zero:

1. A whole buildings and whole-system approach needs to be taken to minimise costs of decarbonisation
2. Innovation is essential to driving down costs, improving options and informing future decisions
3. 'No- and low-regrets' action need to be accelerated now – prioritising actions to improve the energy performance of buildings, including retrofitting, fabric first approach for improved building thermal efficiency and build the market by developing technical expertise, growing the workforce and the UK's manufacturing capacity and capability. This includes building the market for hydronic heat pumps
4. Balance certainty and flexibility to provide stability for investment and an enabling environment for different approaches to be taken to address different buildings
5. Government will target support to enable action for those most in need.

The Strategy confirms additional funding through the Social Housing Decarbonisation Fund (investing £800 million over 2022/23 to 2024/25) and Home Upgrade Grant (investing £950 million over 2022/23 to 2024/25) to improve the energy performance of low income households' homes, support low-carbon heat installations, help reduce fuel poverty and build the green retrofitting sector.

The [Housing and Planning Act 2016](#) introduced legislation for a number of measures intended to promote home ownership and boost housebuilding in England (such as the sale of higher value local authority homes, starter homes, pay to stay) along with measures to help tackle rogue landlords in the private rented sector.

The Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018 reformed the mandatory HMO licensing regime, applying mandatory licensing to HMO properties which are less than 3 storeys high.

Regional policy context

The [Kent and Medway Housing Strategy 2020-2025](#) 'A Place People want to call Home' sets out key housing related ambitions for Kent and Medway focused across five themes to compliment and support the work of Kent Housing Group members to meet their local and countrywide objectives through a collective voice and ambition. The themes are:

- Health and Wellbeing
- Working Together for Safer Homes
- Infrastructure First
- Accelerating Housing Delivery
- Affordability.

A key message throughout the Strategy is that access to decent, safe, secure, warm, healthy and affordable homes across all tenures should be possible for everyone in Kent and Medway.

[Delivering Affordable Warmth: A Fuel Poverty Strategy for Kent](#), developed by the Kent Energy Efficiency Partnership (KEEP), sets out a commitment to reduce the negative impact of fuel poverty and cold homes upon the health and wellbeing of the County's residents. Fuel poor households are more likely to live in energy inefficient homes and this is not tenure specific, it's a problem across all tenures that include social housing, private rented and owner-occupied properties. Just over 64,000 households in Kent and Medway were affected by fuel poverty in 2013. The Strategy highlights national targets and identifies local targets set out in the Kent Environment Strategy and Climate Local Kent, which partners will work to achieve, through the four key priorities of the Strategy:

Priority 1: Information gathering and sharing

Priority 2: Improving energy efficiency

Priority 3: Reducing fuel costs

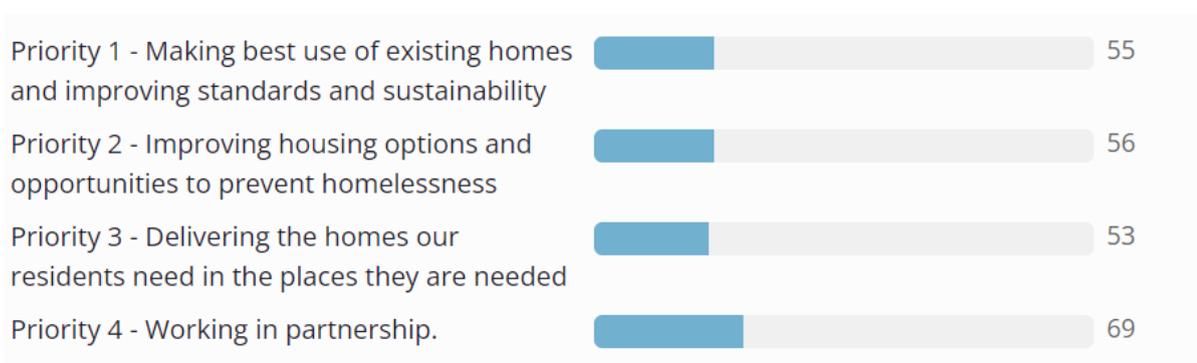
Priority 4: Increase income – support vulnerable households to maximise income.

The [Kent Joint Health and Wellbeing Strategy: outcomes for Kent](#) outlines the priority areas and how we would like to work together to improve people's health and reduce health inequalities in the county, with a vision "To improve health and wellbeing outcomes, deliver better coordination quality care, improve the public's experience of integrated health and social care services, and ensure that the individual is involved and at the heart of everything we do." The Kent and Medway Joint Health and Wellbeing Board and Transformation Partnership has agreed the [Case for Change](#) plan about how services need to change to focus on the priorities in the Strategy and achieve the right care for people.

6 Appendix B: consultation responses

Summary of responses to the consultation questions

1. Which housing issues do you think are most important for us to priorities and focus resources on? Please rank the priorities in order, with 1 being the most important and 4 being the least important.



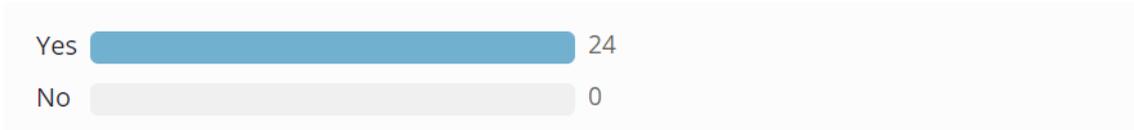
Priorities 1, 2 and 3 were all considered important, with respondents ranking them as follows:
 Priority 1 - 8 respondents ranked this most important, rank 1, 6 respondents ranked it as 2, 5 respondents as 3 and 5 as least important with a rank of 4.
 Priority 2 - 6 respondents ranked this most important, rank 1, 7 respondents ranked it as 2, 8 as 3, and 3 as least important with a rank of 4.
 Priority 3 - 8 respondents ranked this most important (rank 1), 8 respondents ranked it as 2, 3 as 3, and 5 as least important with a rank of 4.
 Priority 4 - 6 respondents ranked this most important (rank 1, and zero have been included), 2 respondents ranked it as 2, 3 as 3 and 13 as least important with a rank of 4.

2. How important do you view the priorities in the draft Strategy to be?

	Very important	Important	Neutral	Less important	Not important
Priority 1 - Making best use of existing homes, improving housing quality and sustainability	18	5	1		
Priority 2 - Improving housing options and opportunities to prevent homelessness	15	7	2		
Priority 3 - Delivering the homes our residents need in the places they are needed	13	8	1	2	
Priority 4 - Working in partnership	4	10	6	2	2

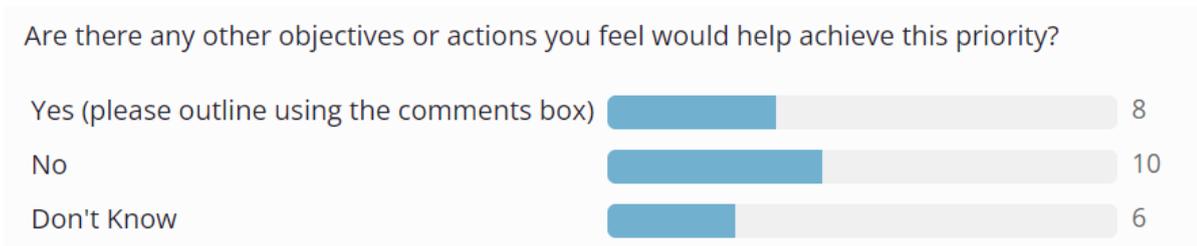
Priority 1 received the most responses stating it to be very important (18), closely followed by Priority 2, with 15 responses. Priority 4 received the most responses stating it to be important.

3. Do you agree with Priority 1?



All respondents indicated agreement with priority 1.

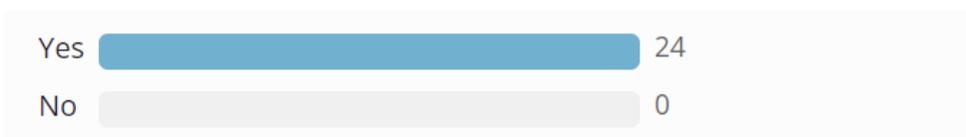
4. Are there any other objectives or actions you feel would help achieve this priority?



Comments provided for question 4 (relating to priority 1):

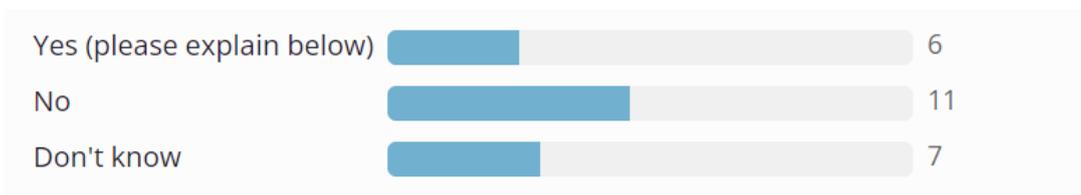
- Take more control of housing associations, like Clarion, that have houses sitting empty and cannot transition people between different houses. New builds should have eco min. requirements.
- Raise the standard required of developers at the point of build.
- Long term, cross political party planning rather than short term fixes.
- Adopt sustainable solutions. For example, sealing old houses will reduce heat loss but is liable to result in damp and mould. Best solutions and competent contractors need to be identified.
- We should be using brownfield sites for houses and not orchards & other fields.
- Registered Provider comments:
 - The strategy mentions helping 10 households improve their energy efficiency – [Registered Provider name] would be happy to help assist you with this with our in-house expertise.
 - With 800 units empty – this seems at odds with the increasing number of people in temporary accommodation. How will you be enforcing empty homes?
 - The Housing Strategy needs to connect with the Local Lettings Plan.

5. Do you agree with priority 2?



All respondents indicated agreement with priority 2.

6. Are there any other objectives or actions that would help achieve this priority?



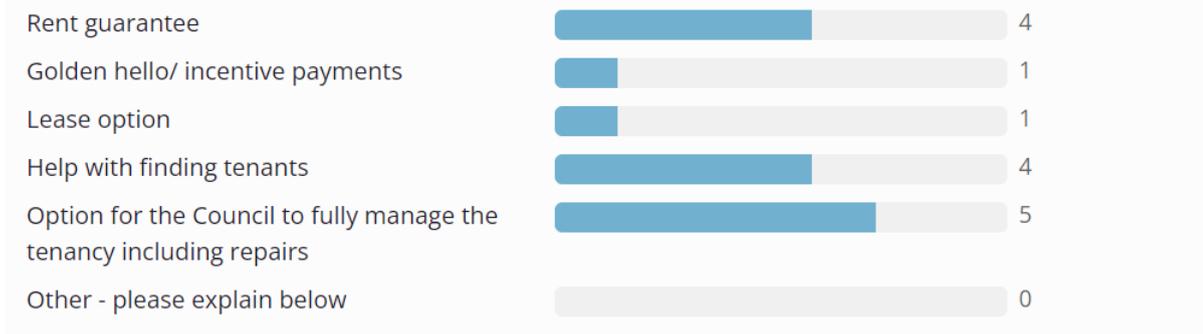
Comments submitted for question 6:

- Get communities more involved in solutions
- Registered Provider:
 - Will you be considering including Ukrainians as part of the resettlement scheme?
 - How do you propose to move residents? Will this be incentivized at all?
 - As and when we got notifications of tenancy changes then we can fill need around direct lets to move people out of temporary accommodation
 - Make sure that the Local Lettings Plan includes allowance for supporting homelessness.

- Build properly affordable housing
- Bring back prefab housing
- Parish Council: Making housing more affordable, encouraging landlords to have house shares by relaxing not tightening the rules, fix estate agent fees and rent limits based on size within the average income means.
- Parish Council: Work with private landlords to ensure they aren't profiteering and that homes are affordable
- Neighbouring local authority: More affordable houses and more houses on offer.

7.

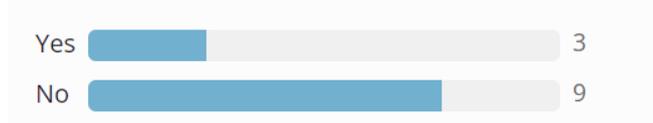
7a. If you are a private landlord or letting agent what would you like to see from the Council to support you?



Comments submitted for question 7a:

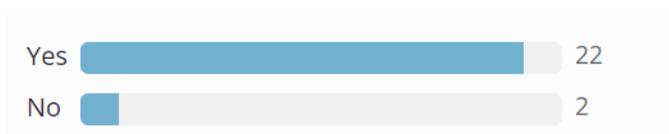
- A lease option to the Council would be ideal to reduce management issues
- Don't over-regulate private landlords. Cost and complexity will drive them out of the market, but not necessarily provide more affordable housing
- Work with Maidstone BC. Would be happy to work with TMBC although all our properties are currently let and are in Medway.

7b. If you would be interested in working with us in relation to properties you have for rent and are happy for us to contact you using the information you have given for your account on this consultation portal please tick yes below



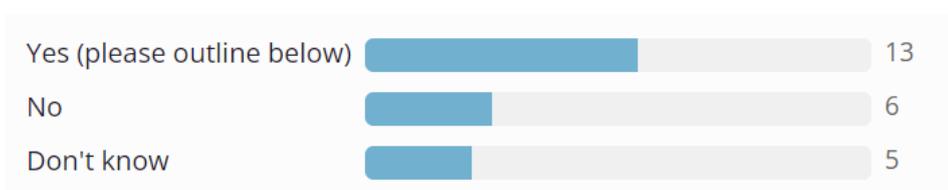
One Registered Provider of social housing answered yes to this question along with two others who are likely to be private landlords. The Housing team will contact the three respondents who agreed to being contacted.

8. Do you agree with priority 3?



Most respondents agree with priority 3, only 2 respondents stated they do not agree with the priority.

9. Are there any other objectives or actions you feel would help achieve this priority?



Comments for question 9:

- Clarify with Government the need for locally determined targets
- Build the road infrastructure before blindly giving planning permission. Look at parking facilities on any new developments. Revisit mistakes made at Holborough lakes
- More diversification in housing options inc. custom and self build plots, community-led housing like cohousing, community land trusts and cooperative housing models like in Europe and elsewhere.
- Ensure all developments include a suitable proportion of affordable homes
- Council housing owned by TMBC and run by TMBC.
- Registered Provider – We welcome the priority of delivering more affordable homes. How will RPs be assisted to deliver more affordable homes in a very competitive market?
- Ensure developers build affordable housing before other houses in new developments so that they cannot back out of agreements.
- Nice 1 bed properties option for those single persons living in 3 bed housing
- Parish Council: Ensure whatever provisions are put in place actually cater for local people and not to just encourage growth of commuter towns just to drive council tax income
- Parish Council: Who is living in the existing housing? Older single people in 3 beds in EP that would like to move to bungalows in the village but there aren't any. Young people can't afford to get on property ladder
- Parish Council: Create a task role to work with representatives of the borough who need / understand the need for affordable homes along with charities
- Neighbouring local authority: More housing needs to be provided
- Developer: [Developer name] particularly support (i) Priority 3; Delivering the homes residents need in the places they are needed, and (ii) the statement that 'we want to ensure the assessed need for market and affordable homes is delivered while encouraging housing provision that contributes to the sustainability of communities and environmental sustainability' (p4).

When considering Priority 3 in more detail, the draft Strategy states that housing delivery has met new build targets in recent years (p12). [Developer name] considers that this does not reflect the actual position of significant under-delivery of housing in recent years within the district, and that this statement is therefore mis-leading. In not acknowledging the level of under provision within the draft Housing Strategy, Priority 3 does not fully explore the reasons for this or seek to address the situation.

There has been an historic under provision of housing within Tonbridge and Malling over recent years, and this has had a significant impact on the number of affordable units being delivered across the district. This under-provision is evident in:

Annual Monitoring Report

The 2017 AMR shows that between 2009/10 and 2014/15 there was an under delivery of housing every year, which ranged from 6 units through to 209 units. The average was 90 dwellings per year.

Housing Delivery Test

- HDT 2020 – 91% of required housing delivery, and Action Plan required
- HBT 2021 – 63% of required housing provision and presumption in favour of development introduced.

Housing Land Supply Position

- 2020 – 1 April 2020 to 31 March 2025 – 2.93 years of housing land supply (with a 5% buffer)
- 2021 – 1 April 2021 to 31 March 2026 – 3.17 years of housing land supply (with a 20% buffer).

It should be noted that this level of under provision is now so great that under the HDT 2021 a presumption in favour of affordable housing applies for the determination of residential planning applications.

There is no reference in the draft Strategy under Priority 3 to the relationship between the delivery of affordable housing and planning. There is no recognition of the significant delays at the planning stage in the determination of residential planning applications submitted to Tonbridge and Malling Borough Council that applicants have experienced over recent years. This omission means that no solutions are proposed.

[Developer name] can cite examples of at least three residential planning applications all of varying sizes, which officers are fully aware of, where in their view there have been unacceptable delays in determining

the planning applications, and this has then affected their ability to deliver housing, both market and affordable. There have been a number of issues ranging from changes to planning protocol and the introduction of a PPA policy mid-way through the planning application process, through to a lack of officer understanding on the implementation of these, and fundamental staff resourcing issues despite PPA's being in place. The delays to date on two of the applications currently stand at over two years.

10. If you are a Registered Provider what can the Council do to help you delivery more affordable homes?

Two respondents provided comments, as follows:

Registered Provider:

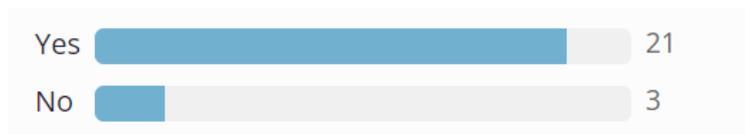
- Bringing forward more schemes with a high focus on affordable housing.
- Working closely with RPs to ensure new affordable schemes can be brought forward.
- 100% affordable schemes
- Working with our needs for local lettings plans.

Neighbouring local authority:

- Work with housing associations to ensure affordable housing
- Caps on service charges are required
- More houses need to be built
- More partnerships with private landlords.

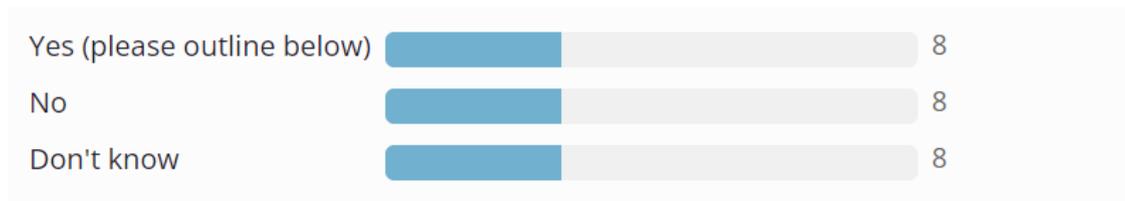
Priority 4: Working in partnership

11. Do you agree with priority 4?



Most respondents are with priority 4. Three respondents said they do not agree with priority 4.

12. Are there any other objectives or actions you feel would help achieve this priority?

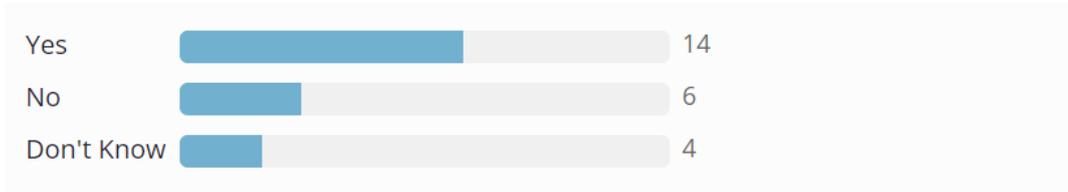


Comments given for question 12 about priority 4:

- Make building partnerships provide correct infrastructure before passing
- More diversification in housing options inc. custom and self build plots, community-led housing like cohousing, community land trusts and cooperative housing models like in Europe and elsewhere.
- Medway invites us to landlords forums and Maidstone phones me if we have a vacancy
- Council houses run by TMBC
- Parish Council: Fund drs surgeries, enforce rules for infrastructure (drs, school spaces), survey types of houses and no of residents, make housing affordable to buy, not "affordable housing" meaning social.
- Registered Provider:
 - If the council requires any support managing existing stock then Golding can assist with this
 - Having an overarching Nominations Agreement with a bespoke Local Lettings Plan for each new build scheme
 - It would be helpful to understand the live information on homelessness so we can create a balanced mix for each scheme

- It would be good to see how the housing strategy could connect and make reference to other wider economic and tenancy sustainment strategies the local authority may have or other partners may have in the TMBC area. This is so housing needs can align with household support needs to help sustain tenancies, prevent homelessness, and support those moving from temporary accommodation into permanent housing and help manage household bills and rent responsibilities.
- Developer - Working in partnership, paragraph 4.2 states that in order to meet the objectives the Council will engage with registered providers and private developers through regular strategic and management / liaison meetings to ensure efficient and effective delivery of services. [Developer name] would welcome such an approach and consider that it should be introduced as a priority. However, to be fully effective and actually make a difference to the delivery rate of affordable (and market) housing, the Council will need to ensure that meaningful changes are made to the way in which planning applications are dealt with in terms of process and timescales.

13. Looking at the Strategy as a whole, do you think it has the right priorities?



Comments submitted for question 13:

- Not clear whether or how the matters in my additional comments are incorporated in the objectives
- Why must Kent absorb incoming population from around the UK? We are building executive homes on Green Belt that help our young and homeless not at all. Resist unrealistic top-down Government targets at all costs. Thank you.
- This strategy does nothing to make the life of current residents better, it's all about making them worse. More people, more congestion, greater demand on local services, destruction of the countryside, loss of farm land forever.
- Parish Council: engage with more providers (not just Clarion) and work with PCs and orgs on the ground - porch light, Community Wardens, Parish council, youth clubs, old folks clubs
- Parish Council: I think the stated strategy is good, however I personally feel the strategy as stated and this consultation is swayed to support the current stated objectives of the council rather than actually seek opinions to form a strategy going forward.
- Parish Council: You are avoiding the most crucial question, do we give developers the chance to use the strategy to carpet the Borough with speculative mass housing, without proper infrastructure, to catch the lucrative internal migration market, completely missing
- Neighbouring local authority: Tmbc desperately need more social housing. And no one should be homeless in a western country in 2022. Domestic abuse is on the rise and security within your own home is highly important.
- Registered Provider: [provider name] does not use fixed term tenancies.

TMBC.GOV.UK

Serving our community

Tonbridge and Malling Borough Council
Gibson Building
Gibson Drive
Kings Hill
West Malling
Kent
ME19 4LZ