

Local Lettings Plan (LLP) Policy update

1 Summary and Purpose of Report

- 1.1 This report provides an update on the implementation of the Local Lettings Plans Policy, with information on the use and outcomes of Local Lettings Plans.

2 Corporate Strategy Priority Area

- 2.1 Improving housing options for local people whilst protecting our outdoor areas of importance.
- 2.2 Within local lettings plans we prioritise households with a local connection to the area immediate to a housing development.

3 Introduction and Background

- 3.1 Local Lettings Plans (LLPs) give a framework for allocating homes outside the Housing Allocation Scheme to address local priorities or issues. A report outlining an approach to using LLPs went to members in February 2020, including prioritisation of households with a local connection to the area immediate to developments and an aim of 50% of lettings to economically active households. A Local Lettings Plan Policy was considered by Members in May 2025.

- 3.2 Requirements for Local Lettings Plans are now included in S106 agreements for developments due to provide 10 or more affordable homes.

There may be circumstances where this is not appropriate or an existing S106 does not include the requirement, which are handled on a case by case basis by the Planning case officer and Housing Strategy and Enabling Manager.

- 3.3 The Housing Allocation Scheme refers to local lettings policies in section 5 setting out they may be used to make affordable housing available to a range of priority bandings across the register towards creating mixed and sustainable communities rather than concentrations of those with support needs.
- 3.4 The approach to Affordable home ownership sales is also captured in the LLP seeking to prioritise local households wherever possible.
- 3.5 LLPs have been agreed with a number of RPs over recent years including Town and Country Housing, Moat Homes, Orbit, Golding Homes and West Kent Housing Association.
- 3.6 The process of agreeing LLPs and applying them to the occupation of new homes has given insight into the results of LLPs and how they interact with a

range of factors including volume of delivery, demand and register numbers. This report provides an update on the use of LLPs and their outcomes relating to recent affordable homes delivery.

4 LLP implementation update

4.1 Winterfield Lane development with Moat: remaining affordable housing delivery up to October 2025

- 4.1.1 An LLP was agreed with Moat [LLP agreed with Moat](#) for the 100 affordable homes at this development, 70 provided as Affordable Rent and 30 for Shared Ownership sale. During 2024-25 31 rented homes (20 flats and 11 houses) and 12 Shared Ownership homes completed with the LLP outcomes for these homes reported to members in May 2025.

There have been 39 homes for rent and 22 for shared ownership sale (mix of 2 and 3 bed houses) since the last update.

- 4.1.2 Rented provision: two more blocks of flats with a mix of 1 and 2bed flats, 12 x 1bed flats and 8 x 2bed flats along with 19 houses comprising 11 x 2beds and 8 x 3beds.

- 4.1.3 The 19 houses were advertised across three date groupings, in July and September. All adverts generated shortlists with sufficient bids for nominations from one advertising round, with ten households having priority through local connection to the specified wards. Nominations to the other nine houses were made in application date and band order. One household with a nomination due to local connection priority was later refused by the applicant – the numbers above take account of this. Eight households were economically active and eleven were not economically active, with five households in receipt of carers allowance.

- 4.1.4 The two blocks of flats were advertised on Kent Home Choice at the same time, offering 20 flats in total, with 12 x 1bed flats and 8 x 2bed flats. Key points of shortlisting process as follows:

- first advertising round resulted in 6 of the 20 flats being nominated to, none of which were households with local connection priority under the LLP. 3 of the six nominations were economically active households.
- second advertising round resulted in a further 2 flats being nominated to, no local connection priority, both economically active. With flats remaining available, a third round of adverts were published.
- third advertising round led to 5 more nominations, including 1 household who had priority due to local connection and economically active. Direct nominations were made to six flats, all of which were households in temporary accommodation.

- economic activity summary: 6 of the 20 households were economically active, 8 were not economically active and the economic activity status is unknown for 6 households.

4.1.5 Shared ownership sales: of four shared ownership house sales one had local connection. The other three homes were sold to households with no existing connection to the area. A further update on all shared ownership sales at this site will be sought.

4.2 Hermitage Park (Land South of Barming Station) development: phase 1 with Orbit Homes

4.2.1 There is an LLP agreed with Orbit for 81 affordable homes at this development, comprising of 50 homes for Affordable Rent and 31 for Shared Ownership sale. 17 flats for rent (11 x 2bed flats and 6 x 1bed flats) were ready for advertising in August/September 2025.

4.2.2 All 17 flats were advertised on Kent Home Choice, with each group of adverts receiving about 5 to 18 bids and no households met the LLP local connection criteria, so nominations were made by reverting to the top of the shortlist in application date and band order.

4.2.3 A shortlisting and nominations summary is as follows:

- **1 bed flats, six available across two blocks of flats:**

- In the first round of advertising there were 10-18 bids for the 1bed flats available. Four flats were nominated to after the first round of advertising. No LLP local connection priority. Three of the nominated households were open to us as homeless cases, with some in temporary accommodation. One household was economically active and two households were not economically active.

- **2bed flats, 11 available across two blocks of flats:**

- One flat was nominated to from the first round of adverts– the household was economically active and not open to us as a homeless case. The first round of advertising saw 5-6 bids for the 2bed flats available.

- The remaining 10 flats were advertised three more times, during this process 2 flats were nominated to after the second advert, both economically active households not open to the homeless team. And on the fourth round a further nomination was made for an economically active household, not open to the homeless team.

- With shortlists exhausted from four rounds of advertising, direct nominations were made to the remaining available flats – seven direct nominations were made, three of which were economically active and

open to the homeless team, four were not economically active and open to the homeless team.

4.2.4 Further delivery of 24 flats across three blocks is underway and local connection priority is being monitored and will be reported to Members in a future report.

4.3 Hermitage Park development: phase 2 with Golding Homes

4.3.1 There is an [LLP agreed with Golding Homes](#) for 51 affordable homes being delivered as part of this development, consisting of 31 Affordable Rent homes and 20 for Shared Ownership sale.

4.3.2 Three 4bed homes for rent have been delivered to date, lettings summary as follows:

- All three available homes nominated to after first advertising round
- 17 bids
- two households nominated had local connection priority in line with the LLP, one household not economically active and not open to the homeless team, the other was economically active and not open to the homeless team.
- with all local connection priority accounted for the third remaining home was allocated by reverting to the top of the shortlist in application band and date order and a household nominated, not economically active and not open to the homeless team.

4.3.3 Six Shared Ownership homes have been released for sale (due to complete in May 2026), at last update in January 2026 five homes were sold/reserved with local connection information as follows:

- Three homes sold to households with the ward connection as set out in the LLP prioritisation
- Two homes sold to households with connection to Tonbridge and Malling borough.

4.4 Barden Croft development with Clarion Housing

Clarion is the Registered Provider for the 50 affordable housing within this Cala development in Tonbridge. The 50 affordable homes comprise of 35 Affordable Rent homes and 15 for Shared Ownership sale. An [LLP has been agreed with Clarion](#) for this site and the first homes completed in 2025.

4.5 The first round of rented homes delivered consisted of 12 Affordable Rent homes, with a lettings and nominations summary as follows:

4.5.1 Four 4bed houses: three homes were advertised on Kent Home Choice and one was used for a direct nomination for a household in Temporary Accommodation. For the three advertised homes nominations were made

after 1 round of advertising from shortlist of 12 bids, with all three having local connection priority in line with the LLP criteria and 1 economically active household. During the nominations process one household from the shortlist, with local connection priority, was rejected by Clarion due to affordability. Officers therefore made a further nomination (this household also had the LLP local connection priority). The first household nominated for the direct nomination house was also rejected due to affordability, and another nomination was made.

4.5.2 Two x 2bed houses: all homes were advertised through Kent Home Choice once with shortlists showing 30 bids. Both nominations were households with local connection priority under the LLP, one economically active and one not economically active.

4.5.3 Six x 2bed flats: the block of flats were advertised through Kent Home Choice three times from October 2025, with the following key points:

- Five flats were nominated from shortlists, one was nominated to as a direct nomination to a household open to the homelessness team.
- One flat was nominated to after the first round of advertising, this household met the priority local connection criteria of the LLP, not economically active.
- One flat was nominated to after the second round of advertising, with local connection priority in line with the LLP, economically active
- Three flats were nominated to after the third round of advertising, two households met the local connection prioritisation of the LLP and one did not. One of the three households was economically active, two were not.

4.5.4 Eight Shared Ownership homes have been delivered in 2025 so far, four 3bed houses and four 2bed houses, all of which had a lot of interest and applications from prospective buyers through Clarion's shared ownership sales team – all the houses have been allocated to buyers with local connection priority under the LLP.

4.6 The examples illustrate the range of scenarios that can occur when a Local Lettings Plan (LLP) is in place. Factors such as supply, the number of households active on the Housing Register, demand, affordability, and preferences for houses over flats all interact. In some cases, shortlists show demand exceeding supply, with priority applied in line with the LLP to achieve a mix of nominations. In other instances, not all available homes were successfully nominated to, requiring multiple rounds of advertising with supply exceeding the number of bids.

4.7 An LLP has been agreed and is in the process of being finalised with West Kent for their forthcoming affordable homes delivery at Castor Park. LLPs are also being agreed with Golding Homes for two sites in Hermitage Lane. Work with Clarion on the implementation of the LLP for Barden Croft will continue as the affordable housing delivery continues throughout the year. Other LLPs

for active delivery of affordable homes include Orbit at Ditton Edge (also known as Orchard Mill).

5 Conclusion/summary

- 5.1 The examples show the range of scenarios that can play out with a LLP in place, with supply, numbers active on the Housing Register, demand and preference for houses rather than flats and affordability all interplaying factors. Some shortlists demonstrate demand outstripping supply and priority in line with the LLP applying to mix nominations, and other shortlists not resulting in nominations to all available homes and so were advertised several times, with few or no households meeting the LLP and supply outweighing the number of bids.

6 Financial and Value for Money Considerations

- 6.1 The approach using LLPs has a resource implication of staff time throughout the process from agreeing and getting LLPs in place for new developments through to carrying out criteria checks to prioritise shortlists to make nominations to available homes and summarising LLP outcomes through manual records and checks. This can be quite involved particularly when a number of homes complete at a similar time or if the Registered Provider has queries about the LLP approach.

7 Legal Implications

- 7.1 Section 166A(6)(b) of the 1996 Act enables the allocation of particular accommodation to people of a particular description, whether or not they fall within the reasonable preference categories, provided that overall the authority is able to demonstrate compliance with the requirements of Section 166A(3) (to give overall priority to people in the reasonable preference categories). This gives the statutory basis for local lettings policies.
- 7.2 Legal Services advice about an option to charge developers for the administration of LLPs is being sought.

8 Consultation and Communications

- 8.1 LLPs are published on the Council's website.

9 Implementation

- 9.1 LLPs are included in S106 agreements and are discussed and agreed where affordable housing is part of a development.