

06 June 2022 at 7.00 pm

Council Chamber, Argyle Road, Sevenoaks

Published: 23.05.22

This meeting will be livestreamed to YouTube here:

[https://www.youtube.com/channel/UCIT1f\\_F5OfvTzxjZk6Zqn6g](https://www.youtube.com/channel/UCIT1f_F5OfvTzxjZk6Zqn6g). Mask wearing and social distancing are at the Public's discretion. For health and safety reasons, access may be limited and will be on a first come first served basis.



# Housing & Health Advisory Committee

## Membership:

Chairman TBC

Cllrs. Bonin, Bulford, Dr. Canet, Clack, Perry Cole, G. Darrington, Edwards-Winsler, Esler, Griffiths, Maskell and Harrison

## Agenda

There are no fire drills planned. If the fire alarm is activated, which is a continuous siren with a flashing red light, please leave the building immediately, following the fire exit signs.

	Pages	Contact
Apologies for Absence		
1. Appointment of Chairman		
2. Appointment of Vice-Chairman		
3. Minutes To agree the Minutes of the meeting of the Committee held on 17 January 2022, as a correct record.	(Pages 1 - 12)	
4. Declarations of Interest Any interests not already registered		
5. Actions from Previous Meetings (if any)		
6. Referrals from Cabinet or the Audit Committee (if any)		
7. Update from Portfolio Holder		
8. Quercus Housing - Increasing delivery of affordable housing in the district	(Pages 13 - 20)	Sarah Robson Tel: 01732227129
9. Draft Housing Strategy 2022 - 2027	(Pages 21 - 46)	Sharon Donald

10. **Sevenoaks District Housing Register Allocation Scheme 2022 - 2027** (Pages 47 - 96) Sharon Donald
11. **Sevenoaks District Council Out of Area Placement Policy** (Pages 97 - 124) Sharon Donald
12. **Rough Sleeper Initiative update** (Pages 125 - 134) Sharon Donald
13. **Homelessness out of hours service update** (Pages 135 - 144) Sarah Robson  
Tel: 01732227129
14. **To note minutes of the Health Liaison Board**  
To note the minutes of the meeting of the Health Liaison Board held on 25 May 2022.  
  
(To follow)
15. **Work Plan** (Pages 145 - 146)

#### EXEMPT INFORMATION

At the time of preparing this agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public.

If you wish to obtain further factual information on any of the agenda items listed above, please contact the named officer prior to the day of the meeting.

Should you need this agenda or any of the reports in a different format, or have any other queries concerning this agenda or the meeting please contact Democratic Services on 01732 227000 or [democratic.services@sevenoaks.gov.uk](mailto:democratic.services@sevenoaks.gov.uk).

**HOUSING & HEALTH ADVISORY COMMITTEE**

Minutes of the meeting held on 17 January 2022 commencing at 5.30 pm

Present: Cllr. Maskell (Chairman)

Cllr. Coleman (Vice-Chairman)

Cllrs. Dr. Canet, Perry Cole, G. Darrington, Edwards-Winser and Harrison.

Cllrs. Bonin and Parkin were present via a virtual media platform which does not constitute attendance as recognised via The Local Government Act 1972.

Apologies for absence were received from Cllrs. Clack and Griffiths

Cllr. P. Darrington was also present.

36. Minutes

Resolved: That the minutes of the meeting held on 23 November 2021 be agreed and signed by the Chairman as a correct record.

37. Declarations of Interest

There were none.

38. Actions from Previous Meetings

There were none.

39. Update from Portfolio Holder

The Chairman and Portfolio Holder gave an update to the Committee, with particular emphasis to the tabled Green Homes Grant.

The Green Homes Grant project had been progressing well. Phase 1A of the Green Homes was offered to local authorities in September 2020 to help upgrade the energy efficiency of around 10,000 low-income households across all areas in England, with all bids to be assessed on merit and funding allocated accordingly. Various measures were considered including ground source heat pumps and PV (Photovoltaic) solar electricity installations.

The team applied for and were awarded £688,190 to carry out the scheme.

## Agenda Item 3

### Housing & Health Advisory Committee - 17 January 2022

As a result, the housing conditions of 48 homes in the Sevenoaks District had been vastly improved, not only offering a benefit in carbon saving (almost a thousand tonnes of CO2 over the predicted lifespan of the measures) and financial terms (approximately £200,000 saved on heating bills) but also offering a significant improvement in the quality of life and well-being of some of Sevenoaks District's most vulnerable residents.

Members discussed the update and asked questions of clarification.

#### 40. Referrals from Cabinet or the Audit Committee

There were none.

#### CHANGE IN ORDER OF AGENDA ITEMS

The Chairman, with the committee's agreement, brought forward consideration of item 7 The Health and Wellbeing Action Plan Update and Quarter 2 report (minute 41).

#### 41. Health and Wellbeing Action Plan Update and Quarter 2 Report

The Health and Communities Manager presented the report which set out the half year progress of the action plan, which was a multi-agency action plan. Good progress was being made, with 77% of targets had been given green status.

Members discussed the report and noted that GP referrals were down. It was confirmed that officers were attempting to increase GP referrals to field suites and partnership meetings were ongoing in order to tackle this problem.

#### Public Sector Equality Duty

Members gave consideration to impacts under the Public Sector Equality Duty

Resolved: that the report be noted

#### 42. Health and Wellbeing Action Plan

The Health and Communities Manager and the Health Team Leader presented the report which set out the Action Plan which collated the available data on health and wellbeing and used this data to target specific actions aimed to improve the health and wellbeing of Sevenoaks District residents. This Action Plan would determine focus, attendees and multi-agency partnership work undertaken in the district.

Members discussed the report.

In response to questions it was explained that the predicted increase in residents over 65 would contribute to a decrease in working age residents but an increase in available housing as populaces looked to downsize.

The Committee congratulated the team for their hard work and co-ordination on this project.

#### Public Sector Equality Duty

Members gave consideration to impacts under the Public Sector Equality Duty

Resolved: That it be recommended to Cabinet that the Health and Wellbeing Plan for 2022/23 be approved.

#### 43. One You Programme Update

The Health Team Leader set out the report which updated the committee on how “One You” services were performing in Sevenoaks District. “One You” was a national Public Health England branded campaign, synonymous with behaviour change and health improvement.

Members discussed the report.

In response to questions the Health Team Leader confirmed that the funding received from Kent County Council was annual to deliver the service for the whole of Sevenoaks District and that he was liaising with KCC to provide more funding to tackle this problem. The funding came from Public Health England via Kent Public Health’s Health Improvement grant.

The Health Team, through funding from Public Health England were in the process of recruiting a Specialist Weight Management Officer to help people on a weight programme but it was re-iterated that this required referral from GPs and that the One You Team were liaising with their partners to resolve this problem.

In response to a question the Health Team Leader highlighted that the problems would change depending on circumstances and that Health Teams would have to adapt to the inactive, often isolated lifestyles generated by the Covid-19 pandemic.

Resolved: That the report be noted.

#### 44. Quercus Housing Update

The Chief Officer (People and Places) presented the report which outlined the progress of Quercus Housing.

The Quercus Housing Business Plan covered the period April 2021 to March 2022.

## Agenda Item 3

### Housing & Health Advisory Committee - 17 January 2022

A target had been set for Quercus Housing to provide 10 'genuinely affordable' homes each year.

In September 2021, the Quercus Housing Business Plan was revised, which would enable the company to undertake prudential borrowing, for example, through the Public Works Loan Board, via the Council, where appropriate and subject to the usual approval mechanisms, including the review of the financial compliance aspects and scheme viability in consultation with the Quercus Housing Guarantor Board.

In September 2019, Quercus Housing purchased the freehold of Gladedale House in Westerham, a property newly-converted into residential use. The property was made up of 14 one and two bedroom flats. Five of the units had been leased to Quercus 7 for market rent, 5 units conformed to the new 'genuinely affordable' definition as they were within the Local Housing Allowance rate and the remaining 4 units were 'intermediate rent', in that they were 80% of market rate and offered to local essential workers. This spread of affordability supported the Council's Housing strategy. All of the flats were occupied.

The total cost of the project was £3.771m, with £2.481 million funded from S106 affordable housing contributions and the remainder of the cost, paid for by Quercus 7, for its leasehold properties.

Heads of Terms were agreed in December 2020 to acquire the freehold of 11- 13 High Street, Swanley for £3,600,000 (15 flats at £240,000 per flat on average). The property was in the course of development and comprises 12 two bed flats and 3 one bed flats. The shops were to be retained by the developer on a 999 year lease at a peppercorn ground rent.

The Chief Officer was due to perform a site visit of 11-13 High Street on 25 January 2022 and would circulate photos to the Committee.

Quercus Housing was progressing a potential project to develop Abbey Court in West Kingsdown providing self-contained affordable flats.

Investment opportunities continued to be actively pursued with the aim of having a pipeline of schemes that continued to meet the financial plan within the Business Plan approved by the Guarantor Board

There was some concern raised over the waiting list for social housing via housing associations. The refresh of the Council's Allocations Policy would help address these issues.

Members expressed an interest in visiting 11-13 High Street. The Chief Officer would look into this possibility. It was noted that this would be dependent upon Covid- safety compliance and upon the need to fill the vacancies of the new site.

Resolved: that the report be noted

#### 45. Green Homes Grant Project

Due to an administrative error, the report was not published with the agenda and the Chairman updated the Committee on the project under his Portfolio Holder update (Minute 39).

46. Summary of the Sevenoaks District emerging Housing Strategy

The Housing Strategy Manager presented the report which sets out a summary of the key priorities and themes of Sevenoaks District Council's emerging housing strategy.

The Council appointed recognised consultants, Arc4 and Campbell Tickell, to work with officers to support the collation of the evidence base, consultation and drafting of the strategy. The Strategy represented the emerging objectives and key priorities for Sevenoaks District.

Further consultation would help shape the new Housing Strategy which would identify how the Council would manage and deliver its strategic housing role and provide an overarching framework that would feed into the Local Plan and help to formulate other policies on housing issues.

Members discussed the report and stressed the lack of options for first time buyers. It was noted that the draft timetable would be amended as public consultation would be extended into April 2022.

Parish Councils were to be contacted and consulted as required.

Public Sector Equality Duty

Members noted that consideration had been given to impacts under the Public Sector Equality Duty.

Resolved: it be recommended to Cabinet that public consultation be undertaken.

47. Sevenoaks District Housing Register Allocations Scheme

The Housing Strategy Manager presented the report which laid out that the scheme would require approval by Full Council so that it may be adopted as Council policy. Following adoption, it would apply to all applicants seeking social housing in the District and the allocation of vacant social housing stock.

The Housing Register Allocations Policy directed applications for, and the allocation of, vacant social housing in the District. It applied to approximately

## Agenda Item 3

### Housing & Health Advisory Committee - 17 January 2022

6,500 homes. The Policy was used in conjunction with the local choice based lettings scheme - Kent Homechoice - and was followed by the District Council's Housing Accommodation Team and the Council's housing provider partners, including Quercus Housing.

The new Scheme had been drafted to ensure that access to social housing supported the needs of residents and the corporate aims of the Council, as well as reflecting legislation. There was an extremely limited supply of social housing within the Sevenoaks District and this scheme was designed to work with the Council's housing providers to make the best use of the stock available and promote Sevenoaks District as an attractive place to live.

It was noted that the proposed all-member consultation prior to consideration by Cabinet was due to be held on 19 January.

It was noted that the draft timetable would be amended as public consultation would be extended into April 2022.

Members discussed the report.

#### Public Sector Equality Duty

Members noted that consideration had been given to impacts under the Public Sector Equality Duty.

Resolved: That it be recommended to Cabinet that

- (a) the proposed main headline revisions to the new Sevenoaks District Housing Register Allocations Scheme be considered;
- (b) a full public consultation be approved.

#### 48. Bevan Place, Swanley Development Proposal

The Strategic Head of Commercial and Property presented the report which outlined the Council's plans to redevelop the former Swanley Working Men's Club site and adjacent car park at Bevan Place.

It was noted that paragraph 4 of the report should be altered to read as: "The proposed scheme included up to 93 homes."

The scheme would also incorporate retail uses along the High Street, a communal garden and landscaped surface car-parking for residents. The scheme would include the highest environmental and sustainability standards possible to ensure the scheme was not only an exemplar benchmark scheme for Swanley, but would also enhance residents' well-being.

Officers were seeking approval to progress the scheme, applying for planning permission and procuring a lead design and build contractor to deliver the scheme subject to obtaining all the necessary statutory consents. Practical completion was envisaged by 2024.

Members discussed the report.

In response to questions it was confirmed that the gardens access to sunlight was being looked at and flood-risks were being investigated.

Some concern was expressed as to the loss of trade and infrastructure in Swanley due to the new site.

It was confirmed that this was a strategic site and the project team were in discussions with KCC in order to provide adequate access and egress from the site. A sustainable Travel plan was also being prepared.

#### Public Sector Equality Duty

Members noted that consideration had been given to impacts under the Public Sector Equality Duty.

Resolved that:

- a) The advisory committee endorse the redevelopment of the site to deliver a new residential-led development.
- b) That it be recommended to Cabinet that the recommendations below be endorsed:
  - (i) Cabinet endorses the development of a new residential-led scheme on this site which will deliver up to 93 new homes, retail uses, communal and public garden, resident car parking and highway improvements to Bevan Place;
  - (ii) Cabinet notes the viability challenges this site and scheme presents and approves the delivery of this scheme using an income-based financing model (rent model) that will result in the Council retaining housing and retail stock to generate income to repay the cost of the development;
  - (iii) Cabinet recommends to Council the provision of £26,575,836 in the 2022/23 - 2024/25 Capital Programme to deliver the scheme within

## Agenda Item 3

### Housing & Health Advisory Committee - 17 January 2022

the parameters set in Section 57 of this report and notes that this is in addition to the previously approved amount of £730,000 in the 2021/22 Capital Programme for this project;

- (iv) Cabinet approves the acquisition/inclusion of the adjacent West Kent Housing Association land and buildings, known as 1-12 Bevan Place, Swanley, and to enter into a development agreement with West Kent Housing Association that will result in 14 residential units being transferred to West Kent Housing Association on a leasehold basis, the terms of which are outlined in the draft Heads of Terms in Appendix C and delegates authority to the Strategic Head of Property and Commercial Services and the Chief Officer Finance and Trading following consultation with the Cabinet Member for Finance & Investment to agree and finalise necessary agreements with West Kent Housing Association;
- (v) Cabinet recommends to Council to authorise officers to acquire any outstanding legal interests that may not be in the Council's ownership, which may include using its statutory powers, such as the use of compulsory purchase orders;
- (vi) Subject to Council's approval of the capital provision of £26,575,836 in the 2022/23 - 2024/25 Capital Programme, Cabinet delegates authority to the Strategic Head of Property and Commercial and the Chief Officer Finance and Trading, following consultation with the Cabinet Member for Finance & Investment to undertake further detailed design and feasibility work and to proceed with the scheme subject to final scheme viability and in accordance with financial parameters set in Section 57; and
- (vii) Subject to Council's approval of the capital provision of £26,575,836 in the 2022/23 - 2024/25 Capital Programme, Cabinet delegates authority to the Strategic Head of Property and Commercial in consultation with the Chief Officer Finance and Trading and the Head of Legal Services to submit a planning application and to enter into any necessary contracts to facilitate the development and construction of the proposed scheme in accordance with the Council's Contracts Procedure Rules and for the disposal of the residential units to be developed.
- (viii) Subject to Council's approval of the capital provision of £26,575,836 in the 2022/23 - 2024/25 Capital Programme, Cabinet delegates authority to the Strategic Head of Property and Commercial following consultation with the Chief Officer Finance and Trading and the Cabinet Member for Finance & Investment to prepare appropriate

contractual arrangements to set up an appropriate delivery vehicle for the scheme and to return to Cabinet at a later date to approve the appropriate delivery vehicle.

- c) That it be recommended to Council that Council notes the proposed development scheme and financial model and approves the provision of £26,575,836 in the 2022/23 Capital Programme to deliver the scheme within the parameters set in Section 57 and detailed in Appendix D.
- d) And That Council authorises officers to acquire any outstanding legal interests that may not be in the Council's ownership, which may include using its statutory powers, such as the use of compulsory purchase orders and return to Cabinet or Council to resolve invoking such powers if needed.

49. White Oak Leisure Centre Residential Quarter, Swanley Development Proposal

The Strategic Head of Property and Commercial presented the report that gave an update for phase 3 of the redevelopment of the White Oak Leisure centre complex in Swanley.

Work on Phase 1, construction of the new leisure centre, had commenced and work was progressing well. Phase 2, demolition of the existing leisure centre, was on track to begin in February 2022. The report sought approval to proceed with Phase 3, the residential element of the scheme. A hybrid planning application was granted permission in October 2019 with full permission granted to redevelop the leisure centre and outline permission granted for this element. This was to provide a new residential quarter of up to 41 new dwellings on the northern part of the site where the old leisure centre and car park were at the time sited.

It was envisaged that a full planning application would be submitted by July 2022 and, subject to planning being obtained, works could commence in early 2023.

The proposed development aimed to provide:

- New homes including both flats and houses with private gardens
- Communal green space
- Car parking
- Trees
- Enhancement of the urban fabric surrounding the new leisure centre

Members discussed the report. It was suggested that flats would generate a transient population which would not encourage residents to lay down roots in

## Agenda Item 3

### Housing & Health Advisory Committee - 17 January 2022

Swanley and that the sight should provide more family sized homes. The Strategic Head of Property and Commercial explained that the unit mix and size was based on the local housing needs assessment, the strategic housing market assessment, and based on discussions with local estate agents and research undertaken.

In response to a question it was confirmed that the initial 41 units that had been suggested were no longer financially viable. The Strategic Head of Property and Commercial explained that the cost and valuation assumptions needed to be revised to reflect current market conditions and site conditions The lack of affordable housing was also questioned and in this was explained within the context of having to re-provide a new state of the art leisure centre

The Strategic Head of Property and Commercial explained that he would remain in consultation with Swanley Town Council and was happy to liaise with Members as required.

#### Public Sector Equality Duty

Members noted that consideration had been given to impacts under the Public Sector Equality Duty.

Resolved: That

- (a) the Advisory Committee endorse the redevelopment of the site to deliver a new residential development;
- (b) the Advisory Committees endorse the proposed recommendations to Cabinet and Council as set out below:
  - (I) Cabinet notes the viability issues associated with this site and endorses the development of a new residential scheme on this site which will deliver 81 new homes;
  - (II) Cabinet recommends to Council the provision of £20,189,137 in the Capital Programme to deliver the scheme;
  - (III) subject to Council's approval of the capital provision of £20,189,137 in the Capital Programme, Cabinet delegates authority to the Strategic Head of Property and Commercial and the Chief Officer Finance and Trading, following consultation with the Cabinet Member for Finance & Investments to undertake further detailed design and feasibility work and to proceed with the scheme subject to final scheme viability; and
  - (IV) Cabinet delegates authority to the Strategic Head of Property and Commercial in consultation with the Chief Officer Finance and Trading and the Head of Legal Services to submit a planning application and to enter into any necessary contracts to facilitate the development and construction of the

proposed scheme in accordance with the Council's Contracts Procedure Rules and for the disposal of the residential units to be developed.

- (V) that it be recommended to Council that the provision of £20,189,137 in the Capital Programme to deliver the scheme which is to be funded as noted in the Financial Implications be approved.

50. Work Plan

The Work Plan was noted with the following additions:

Summer 2022

- Housing Strategy 2022-2026
- Update on Empty Homes Action Plan
- Rough Sleep Initiative Update
- Out of Area Placement Policy

Autumn 2022

- 

THE MEETING WAS CONCLUDED AT 19:46

CHAIRMAN

This page is intentionally left blank

**QUERCUS HOUSING - INCREASING THE DELIVERY OF AFFORDABLE HOUSING IN THE SEVENOAKS DISTRICT**

**Housing & Health Advisory Committee - 6 June 2022**

**Report of:** Sarah Robson, Deputy Chief Executive, Chief Officer People & Places

**Status:** For Decision

**Also considered by:**

- Cabinet - 7 July 2022
- Council - 19 July 2022

**Key Decision:** No

**Executive Summary:** Reliable access to decent housing is fundamental to improving life chances and reducing dependency on wider social support systems. In Sevenoaks District there is a shortfall between the demand for and supply of new affordable homes. This report sets out a proposal.

**This report supports the Key Aim of:** the Council's Housing Strategy.

**Portfolio Holder:** Cllr. Kevin Maskell

**Contact Officer(s):** Sarah Robson, Ext 7129

**Recommendation to Housing and Health Advisory Committee:**

That recommendations (a) to (b) below be recommended to Cabinet to be recommended to Council.

**Recommendation to Cabinet:**

That recommendations (a) to (b) below be recommended to Council.

**Recommendation to Council:**

- To approve a financial facility of up to £15m to be drawn down by Quercus Housing over a 10-year period from prudential borrowing obtained by the Council and to be used for the purpose of delivering affordable housing.
- To delegate authority to the Deputy S151 Officer in consultation with the Chief Executive, to agree the terms of any borrowing to be determined at the point of draw down.

## Agenda Item 8

### Introduction and Background

- 1 Sevenoaks District Council is taking a pro-active approach to ensure and influence the supply of new homes in a sustainable way that protects the character of and improves the fabric and public realm of the district.
- 2 However, there remains a shortfall between the demand and supply of new affordable homes in Sevenoaks District, both in absolute terms as viability issues result in below policy delivery, and in specific specialist tenures especially in the provision of affordable rental housing, older people's housing, specialist accessible housing and social rented housing for large families.
- 3 The lack of affordable housing has contributed to a rise in homelessness. Given the Council's statutory responsibility to assist homeless residents, this is creating a greater financial burden and placing significant pressures on the Council's annual Revenue Budget. These pressures are not expected to reduce over the short-to-medium terms.
- 4 The provision of affordable homes has historically been planning led with reliance on Planning Obligations, i.e. through Section 106 (s106) agreements to deliver affordable homes in the district or through the provision of commuted sums.
- 5 With 90% of the district designated as rural belt and 60% as AONB, developable land is in short supply. The Council recognises the importance of Rural Exception Sites in providing affordable housing to areas that need them and continues to promote the opportunities they will bring in providing affordable housing to rural areas.
- 6 The Council is already looking at how it can use its own land assets more effectively to deliver additional housing to assist the Council in satisfying the housing demand caused by the failure of the market to deliver in these areas, whilst at the same time retaining asset value and providing greater control of what is built.
- 7 Limited land supply and the high cost of land in the District makes it difficult for our private Registered Provider (RP) partners, also known as housing associations, to acquire land for building new affordable housing themselves. To make the most cost effective use of s106 commuted sums, the Council has subsidised new developments that could not proceed without some assistance. For example, we are currently working with West Kent Housing Association to subsidise the delivery of 7 new supported housing flats for rough sleepers, using commuted sums at Vine Court Road. Supporting this proposal through the use of s106 commuted sums is an appropriate use of the funding, particularly as this type of supported housing would not otherwise be delivered by our RP partners.
- 8 Intervening in the housing market through direct delivery also offers opportunities to deliver a wider housing offer in areas and tenures that reduces demand elsewhere on the Council's service provision.

### **Quercus Housing - overview**

- 9 Sevenoaks District Council is a non-stock holding Council. Therefore in 2019, the Council established Quercus Housing, a Local Authority Trading Company, to support the delivery of affordable homes in the district.
- 10 £6 million in s106 commuted sums for affordable housing was allocated to support the delivery of the Quercus Housing Business Plan. The funding has been provided by developers where affordable housing could not be delivered on-site. The funding has been used to deliver affordable housing in the Sevenoaks district.
- 11 Until 2021, Quercus Housing's business model was reliant on receiving s106 commuted sums for affordable housing, which impacted its ongoing financial scope to provide an annual programme of affordable housing delivery in line with its Business Plan. This is because the amount of commuted sums is dependent on private sector schemes entering the planning system, being granted planning consent, and S106s being agreed.
- 12 However, at its meeting on 16 September 2021, the Quercus Housing Guarantor Board approved amendments to its Business Plan to enable the company to undertake prudential borrowing via the Council. Any borrowing would be subject to the usual approval mechanisms, including the review of the financial compliance aspects and scheme viability in consultation with the Quercus Housing Guarantor Board.
- 13 Most local authorities opt to borrow, generally from the Public Works Loan Board (PWLB), at rates lower than Quercus Housing could obtain themselves and then on-lend to their subsidiary companies. There is an exemption from Subsidy Control (State Aid) compliance for non-commercial purposes, thus in the case of Quercus Housing, this approach is possible.

### **Quercus Housing - completed investments**

- 14 In 2019, Quercus Housing purchased Gladedale House in Westerham. 5 units conform to the new 'genuinely affordable' definition in that they are within the Local Housing Allowance rate and the remaining 4 units are 'intermediate rent', in that they are 80% of market rent and offered to local essential workers. Five of the units have been leased to Quercus 7 for market rent. The total cost of the project was £3.771m, with £2.481m funded from S106 affordable housing contributions and the remainder of the cost, paid for by Quercus 7, for its leasehold properties.
- 15 Quercus Housing has recently completed the purchase of the freehold of 11-13 High Street in Swanley, which comprises 12 two-bed flats and 3 one-bed flats. 10 units are within Local Housing Allowance and 5 are at 80% of market rent. The development has provided a good opportunity to invest the remaining s106 monies available to Quercus Housing, assisting affordable housing requirements in a single block investment in an area which is popular with renters.

## Agenda Item 8

16 All available s106 monies have now been spent or allocated.

### **Quercus Housing - future pipeline**

17 Quercus Housing remains ambitious in achieving the delivery of affordable homes in the Sevenoaks District and is seeking a longer term position to support this ambition and develop a project pipeline for the next 10 years.

18 Although the Council has limited land holdings, exploration of using these sites to maximise affordable housing is imperative. The Council has identified sites as suitable for housing development, including Stangrove, White Oak and Farmstead Drive.

19 These sites would enable Quercus Housing to meet its 'massive small' delivery ambitions to support small sites to play a more meaningful role in the District's affordable housing delivery, including Council-owned sites.

20 The table below, provides an indicative pipeline of projects for the next three years, which will continue to be reviewed and updated over the next 10 years, being presented to Quercus Housing Guarantor Board and at the annual Quercus Housing AGM, when it presents to full Council.

21 A future pipeline of projects could potentially include, subject to the usual due diligence and securing relevant permissions, such as planning, the following sites:

- Abbey Court, West Kingsdown
- Abbeyfield, St Marys, Riverhead
- Stangrove Estate, Edenbridge
- White Oak Leisure Centre residential, Swanley
- Farmstead Drive, Edenbridge

22 Projects costs, financial viability assessment and borrowing requirements will be impacted by current inflation levels and will therefore be undertaken on a site by site basis.

### **Financial Facility**

23 Quercus Housing is therefore seeking Council approve for a financial facility of up to £15m to assist with the delivery of affordable housing. This facility would be funded from prudential borrowing (for example, PWLB) obtained by the Council. The financial facility would be made available to Quercus Housing to support the delivery of the Quercus Housing Business Plan as approved by the Quercus Housing Guarantor Board. Quercus Housing would draw funds from this facility on a case-by-case basis and would be subject to appropriate due diligence being undertaken and subject to the Deputy S151 Officer's approval in consultation with the Chief Executive.

- 24 The headline terms of the proposed financial facility are summarised as follows:
- a. Total facility amount of £15m (which can be extended subject to further Council approval), with a loan repayment over a 30-50 year period, subject to financial assessment and viability
  - b. The facility is to be drawn down by Quercus Housing in ad hoc tranches over a term not exceeding 10 years from the date of Council approval.
  - c. The facility is to be used to support the provision of affordable housing in accordance with the Quercus Housing Business Plan approved by the Guarantor Board, which will review the business plan annually;
  - d. A minimum notice period of 1 month is to be given to the Deputy S151 Officer for a withdrawal from the facility, using an agreed Withdrawal Notice Form. The Withdrawal Notice Form will specify:
    - i. The amount required, its term and repayment details;
    - ii. The scheme against which the withdrawal amount is required;
    - iii. Confirmation from the Quercus Housing Board that:
      - it has approved the scheme and has undertaken necessary due diligence to determine the viability and feasibility of the scheme;
      - it has undertaken Anti-Money Laundering regulatory compliance checks, and;
      - The Council will be granted a registered charge (principal) against the assets to be created.
  - e. Having received a completed Withdrawal Notice, the Deputy S151 Officer will assess the Withdrawal Notice and will have discretion, in consultation with the Chief Executive, as to whether or not to grant the loan and will confirm his decision and release funding if deemed appropriate within 3 weeks of having received a notice or as otherwise agreed with Quercus Housing.
  - f. The facility is also conditional upon:
    - i. Quercus Housing ensuring its schemes, where viable, seek to comply with the Council's Net Zero Carbon Strategy and sustainability policies;
    - ii. The Quercus Housing scheme being compliant with all statutory provisions;

## Agenda Item 8

- iii. Secondary charges against the real assets of the organisation are subject to the Council's agreement, and;
- iv. In the event of Quercus Housing ceasing to trade for whatever reason, the assets of the organisation will revert to the Council.

### Prudential Borrowing

- 34 The Prudential Borrowing Capital Finance system was introduced in 2004, allowing councils to borrow without Government consent. A council can invest in "any purpose relevant to its functions under any enactment, or for the purposes of the prudent management of its financial affairs". There are Government and CIPFA guidelines which councils must follow and they must adopt an investment strategy on an annual basis. Councils are also required to set aside a minimum revenue provision against any investment. As local authority borrowing contributes to the public sector debt, its overall level of borrowing and future constraints on such have to be considered.
- 35 In principle the Council can use prudential borrowing to support affordable housing development. The great advantage is that the Council is able to borrow from Public Works Loans Board (PWLB) at very competitive rates. For the Council, affordable housing can represent a safe return on investment and it can take security over the properties acquired or developed. The Council has to consider the amount it can lend and what bodies it can lend to within the context of its investment strategy and prudential limits.

### Other Options Considered and/or Rejected

- 36 **Option 1:** If Council approves the recommendations in the summary of this report, it will enable Quercus Housing to develop a long-term ambition to deliver affordable housing in the District over the next 10 years.
- 37 **Option 2:** Status Quo - the Council could decide not to approve the recommendations, which would restrict Quercus Housing's financial ability to deliver affordable housing in the district. This would impact homeless households remaining in temporary nightly paid accommodation due to the limited availability affordable move on accommodation in the district, which would have a knock on effect on budget pressures created as a result of the cost of nightly paid accommodation.

## Key Implications

### Resource (non-financial)

None. Utilising existing staff resources.

### Financial

New Public Works Loan Board (PWLB) guidance issued in August 2021 specifically mentions that it can be used for housing schemes including on-lending to a wholly owned housing company. The guidance goes on to state: “Housing can include all spending on delivering new homes, maintaining or improving existing homes, and purchasing built homes to deliver housing services. This is the case irrespective of the financial arrangements of the housing project or housing delivery. However, the government expects that the location and value of any housing expenditure be appropriate to meet the local authority’s housing needs.”

Finance will advise whether Minimum Revenue Provision (MRP) may need to be considered to help facilitate any loan. It is important that Finance advises on what the MRP impact is on the Revenue Account. Auditors will need to advise on the MRP percentage to be applied and if they are willing to have this partially collateralised through the properties acquired.

This borrowing would then be forwarded to Quercus Housing who would repay the Council from the rental income received.

### Legal Implications and Risk Assessment Statement

Areas for consideration by Legal include the legality for the Council in terms of providing borrowing via PWLB to Quercus Housing, for example, the defaults and duty of the Council as a lender and default position of the assets held by Quercus Housing (this is particularly important for the auditors in determining MRP).

The Council as principal funder and shareholder should have set-in rights for each development in the event of a default. The assets should be retained as collateral (first charge) against which the loan is secured until such time the loan is repaid. Any insolvency risk should result in the collateralisation of assets to Council. Quercus Housing will work in partnership with the Strategic Head of Commercial and Property regarding any responsibilities under the Environment Act need to be noted in the event of default.

The Quercus Housing Business Plan is reviewed annually and approved by Guarantor Board. The company’s Risk Management Strategy and Assessment will continue to be reviewed and updated to incorporate any future risks and mitigation of borrowing. Detailed budget monitoring is completed on a monthly basis where all variances are explained.

Quercus Housing will need to ensure it has the appropriate governance within to manage the loan facility. All investment decisions resulting in draw-down will have undergone the appropriate due diligence and approved by Quercus Guarantor Board and the S151 Officer.

## Agenda Item 8

### Net Zero Implications

The decisions recommended through this paper have a remote or low relevance to the council's ambition to be Net Zero by 2030. There is no perceived impact regarding either an increase or decrease in carbon emissions in the district, or supporting the resilience of the natural environment.

Where possible, Quercus Housing will seek to align with the Council's net zero ambitions, embedding sustainability measures into any new development, subject to viability.

### Equality Assessment

The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

### **Conclusion**

Sevenoaks District is the least affordable area in Kent, with a median house price to median income (workplace based) factor of 12.59, compared with 9.82 in Kent. The factor for lower quartile house prices to lower quartile incomes (workplace based) is 12.92 compared with 10.41 across Kent. (ONS data, March 2020).

Quercus Housing places a high priority on delivering decent affordable housing meeting residents need, and, if the recommendations in this report are approved, will enable the Council through Quercus Housing to proactively and directly provide appropriate affordable housing for local residents.

Quercus Housing would benefit from an ongoing income stream on assets that should go up in value over time, which reduces the financial risk.

If approved, Quercus Housing will continue to build affordable housing in addition to those provided through the planning system, and housing associations utilising their Homes England grant money in the district.

#### **Appendices**

None

#### **Background paper**

None

**DRAFT HOUSING STRATEGY 2022-2027**

**Housing & Health Advisory Committee - 6 June 2022**

**Report of:** Deputy Chief Executive and Chief Officer People & Places

**Status:** For Comment

**Also considered by:**

- Cabinet - 7 July 2022
- Council - 19 July 2022

**Key Decision:** No

**Executive Summary:** Local authorities are not required by Government to have a formal housing strategy, but they are expected to adopt a strategic approach to housing in their local areas to deliver a thriving housing market and address local needs. This report presents the outcome of a public consultation and the resultant draft Housing Strategy for consideration. The final Housing Strategy document will require approval by Full Council so that it may be adopted.

**This report supports the Key Aim of:** delivering a sustainable economy where people can live, work and travel more easily and are empowered to shape their communities.

**Portfolio Holder:** Cllr. Kevin Maskell

**Contact Officer(s):** Sharon Donald, Ext. 7131

Liz Crockford, Ext. 7482

**Recommendation to Housing & Health Advisory Committee:**

- (a) To note the feedback received from the public consultation;
- (b) To consider and recommend to Cabinet that it be recommended to Council that the draft Housing Strategy 2022-2027 be adopted;

**Recommendation to Cabinet:**

- (a) To note the feedback received from the public consultation;
- (b) To consider the draft Housing Strategy 2022-2027;
- (c) To recommend to Council that the Housing Strategy 2022-27 be adopted

**Recommendation to Council:**

- (a) To note the feedback received from the public consultation;
- (b) That, subject to any amendments by Cabinet, the Housing Strategy 2022-2027 be adopted.

**Reason for recommendation:** The Housing Strategy is a key document that details the Council's priorities for enabling and delivering new homes, ensuring good quality homes in the private sector, and enabling vulnerable residents to remain in their homes.

**Introduction and Background**

1. The themes contained in the draft Housing Strategy 2022 - 2027 were subject to public consultation between 14 February and 18 April 2022. Over 140 responses were received and the results, by theme, are summarised below. NB. "In agreement" refers to those respondents who either strongly agreed, or agreed.

2. Theme 1 - Developing Sevenoaks District's housing offer: building new affordable homes

What we asked - *How strongly do you agree or disagree that new housing developments should include a proportion of affordable housing for local people?*

The response was - **In agreement 85.8%**

What we asked - *How strongly do you agree or disagree that Sevenoaks District Council should consider building and owning social housing?*

The response was - **In agreement 75.9%**

3. Theme 2 - Promoting quality and optimising suitability of homes

What we asked - *How strongly do you agree or disagree that we should work with housing associations and developers to deliver a range of homes that meet our residents' needs for example, family homes and homes for older and disabled people?*

The response was - **In agreement 92%**

What we asked - *How strongly do you agree or disagree that we should make it easier for residents in socially rented homes with spare rooms to downsize so their property could be made available for families or bigger households?*

The response was - **In agreement 81.1%**

What we asked - *How strongly do you agree or disagree that we should fund home adaptations for older or disabled residents so they can live independently in their own home for as long as possible?*

The response was - **In agreement 86.2%**

**4** Theme 3 - Reducing homelessness and improving routes into permanent accommodation

What we asked - *How strongly do you agree or disagree that we should increase the support we provide to people at risk of becoming homeless and in some circumstances helping with rent?*

The response was - **In agreement 75.7%**

What we asked - *How strongly do you agree or disagree that we should offer support, help and incentives to landlords to make their property available to homeless people on our waiting lists?*

The response was - **In agreement 77.2%**

**5** Theme 4 - Healthy people, homes and places

What we asked - *How strongly do you agree or disagree that, wherever possible housing delivery meets the needs of current and future residents in Sevenoaks District?*

The response was - **In agreement 80.4%**

What we asked - *How strongly do you agree or disagree that new developments should include a mix of housing tenures including homes for market sale or rent, affordable homes available for rent for those on the Housing Register and affordable Home Ownership options such as shared-ownership?*

The response was - **In agreement 79.6%**

What we asked - *How strongly do you agree or disagree that new developments should include a mix of housing for people from different age groups, backgrounds and incomes?*

The response was - **In agreement 70.6%**

## Agenda Item 9

What we asked - *How strongly do you agree or disagree that the effects of climate change are considered at every stage of housing delivery; from the design of new homes, how they are constructed and how energy efficient and easy to use they are for occupants?*

The response was - **In agreement 85.7%**

What we asked - *How strongly do you agree or disagree that we should look to secure external funding to pay for home energy efficiency improvements in residents' homes to tackle climate change?*

The response was - **In agreement 80.4%**

What we asked - *How strongly do you agree or disagree that new developments should have access to existing or new communal services such as schools, health and leisure provision, public transport, community halls and play facilities?*

The response was - **In agreement 90.2%**

6 Respondents were invited to provide further comments on the themes and suggest how SDC might achieve its housing ambitions. Comments fall into a number of broad categories as shown below:

- New build - There were competing issues here, i.e. protect the Green Belt versus build on some areas of Green Belt due to level of unmet need; small developments not large; infrastructure and parking are key; houses/bungalows, not more flats; engage with existing residents; green energy - solar panels heat pumps, water recycling, electric vehicle charging points; build below (above?) surface car parks
- Affordable housing - more homes needed; need more affordable homes for rent to serve wider than the Housing Register; SDC to build homes; help needed by young people, those with disabilities and older people; hand holding for those looking to move/downsize; retain designated older persons' housing
- Existing stock - improve existing homes to tackle poor conditions; provide assistance to older and vulnerable residents to insulate homes and generally make them more energy efficient, including providing practical advice; return empty homes to use; combat anti-social behaviour.

Some of the points raised under “New Build”, provide useful commentary but go beyond the remit of the Housing Strategy. They pick up themes that have greater relevance to the emerging Local Plan, which will go out to consultation later this year, asking residents what it ought to contain. One area where the Housing Strategy could precede the emerging Local Plan is by encouraging the showcasing of exemplar design standards. This may be appropriate where the District Council uses its own land to develop new

housing, particularly 100% affordable housing schemes where these are developed by Quercus Housing (or the District Council itself, if it gains Registered Provider status).

Many of the points raised under “Affordable Housing”, will be addressed through the Sevenoaks District Housing Register Allocations Scheme (subject to approval and adoption) and a proposed under-occupation initiative in partnership with our Registered Providers (subject to approval). The Build to Rent tenure may assist those who require affordable homes to rent, but are not eligible to join the Housing Register.

Our ability to influence and improve the existing stock is extremely limited due to funding constraints. However, as detailed within the Council’s Housing Assistance Policy, funding is available to eligible households through the Better Care Fund to deliver both mandatory disabled facility grants (DFGs) and other discretionary grants which are principally aimed at enabling residents to continue to reside safely in their own homes. The Council has also sought external funding to help deliver energy efficiency improvements to eligible households. This has included external wall insulation to park homes across the District, grants for solar installations and replacement windows. We also work with owners of empty homes to find ways to bring them back into use such as arranging interest free loans for essential works through the KCC initiative, Kent No Use Empty. Anti Social Behaviour (ASB) can be reported to the Police or the District Council and the Community Safety Unit meets daily to address ASB that has been reported.

7 The consultation demonstrates there is strong support for the proposed themes of the new Strategy. Based on this, our consultants, arc4, have developed a draft Housing Strategy 2022-2027, attached at Appendix 1.

8 It is considered that a broad range of participants responded to the consultation. Access to the consultation did not discriminate against any group or section of society. However, it is noted that over 65% of respondents were female, which is not representative of the local population.

Subsequent to the consultation, it remains the case that officers believe the themes of the Housing Strategy address the housing needs and aspirations of local people, whatever their background. An equality impact assessment is attached at Appendix 2.

9 A review mechanism is proposed, so that minor adjustments may be made to the Strategy and its accompanying Action Plan (through delegated authority to the Chief Officer People & Places in consultation with the Portfolio Holder for Housing & Health), to ensure it retains its relevance and robustness.

#### **Other options Considered and/or rejected**

None.

## Agenda Item 9

### **Key Implications**

#### Financial

Activity identified under the action plan will be considered for feasibility within the normal yearly budgeting activity.

#### Resource (non financial)

There are no additional resource requirements arising from the approval of the Strategy. Activity identified under the action plan will be considered for feasibility within the annual Housing Service Plan.

#### Legal Implications and Risk Assessment Statement.

The Council has a range of statutory duties relating to housing, homelessness, and reviewing housing conditions. This strategy will assist the Council in meeting those duties.

#### Equality Assessment

The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users. An equality impact assessment is attached at Appendix 2.

#### Net Zero Implications

The decisions recommended through this paper have a remote or low relevance to the council's ambition to be Net Zero by 2030. There is no perceived impact regarding either an increase or decrease in carbon emissions in the district, or supporting the resilience of the natural environment.

### **Conclusions**

Whilst there is no statutory requirement for the Council to have a Housing Strategy, the Council's constitution includes a Policy Framework that references a Housing Strategy as a key strategy or plan that should set out the Council's priorities for housing. The Housing Strategy 2022-2027 will fulfil this role.

**Appendices**

Appendix 1 - Draft Housing Strategy 2022-2027

Appendix 2 - Equality Impact Assessment

**Background Papers**

None.

**Sarah Robson**

**Deputy Chief Executive and Chief Officer - People & Places**

This page is intentionally left blank



## Sevenoaks District Housing Strategy 2022-2027

### Foreword

Access to good quality housing is the foundation upon which people can build happy and successful lives and is essential to allow communities to thrive. Housing is not just about bricks and mortar, it's about the quality of the home, the services provided and the positive impact good housing has on communities and the local economy. All agencies, including the NHS, Public Health and Social Care are impacted by housing - its availability, quality and suitability.

While the District has much to offer, the Council is not being complacent. COVID-19 has brought changes that affect how we all see our homes. It has driven a 'race for space', a desire for flexible home working spaces and a focus on the quality of our residential environments.

Strategic planning for the continued and effective provision of housing and related services in the Sevenoaks District is therefore a key priority. However, budgets are under pressure, with demand for our services on the increase. At the same time, we have to be realistic about the challenges that we face and prioritise the limited resources that we have. These and other factors, such as the growing and ageing population, are likely to increase the demand for services while simultaneously reducing resources. Nevertheless, the challenge - and our intention - remains to maximise the supply and quality of suitable homes across tenures, while supporting broader goals around health and wellbeing, tackling climate change and protecting the Green Belt.

Whilst Sevenoaks District Council has a broad role to play in supporting and facilitating the delivery of new homes and tackling the housing challenges of the district, it cannot achieve these on its own. Registered Providers, developers, Government agencies, the NHS, social care and the voluntary and community sector all have important roles to play. Much of what is in the strategy is aspirational and can only be delivered with our partners and with investment. As such it is more important than ever to have effective partnerships built on trust and mutual respect.

The strategy sets a positive context for driving our ambitions forward and demonstrates the commitment we have to always doing the best for our communities.

**Cllr Kevin Maskell**  
Cabinet Member for Housing and Health

## Agenda Item 9

### APPENDIX - 1

#### Introduction

Sevenoaks District is a very popular place to live and access to good housing is fundamental to happy, successful residents and thriving communities.

The District's many compelling features include its rural setting in a high-quality landscape with areas of Outstanding Natural Beauty, characterful historic towns and villages, a commitment to conservation and a rich heritage offering interesting places to visit. Its strong rural economy, its proximity to Greater London providing easy access to all the Capital has to offer and its well-developed rail infrastructure and proximity to major road, rail and air links, including to the continent, make Sevenoaks a highly connected place. All this makes Sevenoaks District a very buoyant place economically, with high skills and employment levels. It does, however, make it difficult for some to afford to live in the District and makes it easy to overlook pockets of deep deprivation; we need to pay attention to these so that all our residents can live well and share in the district's prosperity.

Sevenoaks District Council aims to shape a housing market that meets a broad range of needs and ambitions for housing - including both market homes and those for rent and to purchase at less-than-market levels - so that more households can find a suitable home to meet their housing needs and aspirations at a price they can afford. It will do this both through influencing the provision of new homes and by helping people to access a home that is suitable for them at their stage in life. Doing this creates opportunities for a more dynamic housing market with more movement and where more people can find a suitable home that meets their general and specific needs.

This strategy builds upon our previous housing strategy in which we have made significant progress in addressing our key housing issues. The following are some of the key achievements since 2017:

#### Successes

- Significant sums raised through s106 planning obligations on new housing development have enabled us to fund a range of affordable housing projects, including an enhanced offer to private sector landlords to house those in housing need and 24 new affordable homes for rent through Quercus Housing, the Council's not-for-profit housing company.
- Over 370 new affordable homes have been delivered in the district.
- Our Rural Exceptions Site policies have helped to secure 17 new affordable homes for rent that will stay affordable for local people forever.
- Our hospital to home scheme ensures people are properly supported to settle back into their home to help promote their recovery.
- We have worked with residents to successfully gain their support on a number of large development sites, including approval to redevelop a large brownfield site at Fort Halstead for a mixed use development including 635 homes, a village centre, primary school and commercial space.
- We have enhanced our approach to rough sleeping through partnerships with support agencies Porchlight and Look Ahead and have successfully secured Government funding to work with West Kent Housing Association to deliver rough sleeper and single homelessness supported accommodation.

APPENDIX - 1

- We improved the insulation and efficiency of 68 park homes, helping to reduce fuel bills and offering a significant improvement in the quality of life and well-being of some of our most vulnerable residents.
- Over 470 Disabled Facilities Grant adaptations were completed, which have enabled people to stay safely in their home. This number would have been higher, but was impacted by Covid restrictions.
- We have continued to work in partnership with West Kent HA to fund an incentive scheme for tenants who wish to “rightsize”, thereby freeing up social housing for other families in need.
- Over 75 enforcement notices were issued in the private rented sector, requiring landlords to take action to ensure their properties provide safe and secure housing.

**Challenges and Risks**

- Sevenoaks District is one of the least affordable places in England for housing. In 2021, average (median) house prices were more than 14 times local average (median) incomes (workplace based).
- Social housing provided at Social Rent is often the only affordable option available to residents on low incomes.
- Affordable Rents set at 80% of Open Market Rent (OMR) remain unaffordable for many working people due to the high market rent levels in the District. When capped at the Local Housing Allowance levels (which is the local policy), the Affordable Rent is covered for those who are eligible for housing benefit/housing support through Universal Credit. However, affordability remains an issue for those who are not eligible to receive these benefits.
- High land prices and other planning constraints (e.g. 93% of the district is in the Green Belt and 60% is within Areas of Outstanding Natural Beauty) make delivery of new affordable housing very difficult.
- Government policies that do not go far enough in supporting the provision of genuinely affordable homes for local people e.g. National Planning Policy Guidance.
- Changes to the national policy has made it more difficult for the Council to secure new affordable homes through the planning system (s106 planning obligation). S106 monies have therefore diminished significantly.
- Homelessness has been rising since 2018 as a result of welfare reform, reduced Government funding, the impact of Covid-19 and the rising cost of living.
- The number of households in temporary accommodation has increased significantly due to the lack of affordable move on and rented accommodation in the district.
- Economic uncertainty increasingly due to world events and linked to the COVID-19, the energy crisis, rising inflation and cost of living, affects the housing market.
- The Government’s Levelling Up paper includes plans for a landlord register. Without sufficient financial or other incentives to support property improvement, this could make renting a less attractive investment, potentially reducing the already small size of the private rented sector.
- Pressure will be placed on the development sector in order to achieve the Council’s ambition of achieving Net Zero by 2030 and this may, in turn, put further pressure on the delivery of new affordable and specialised housing.

**Opportunities**

- Housing represents a good long-term investment for Quercus Housing due to the District’s buoyant market. This makes it possible to secure money from a range of

## Agenda Item 9

### APPENDIX - 1

sources - including institutional investors, borrowing from Public Loans Works Board and cross-subsidy from commercial operations.

- Registered Providers that have homes in and around Sevenoaks District can draw upon government grants to develop more affordable housing in the District.
- The Council can choose to utilise land that is in its ownership, for the development of housing, including affordable housing, and showcase exemplar new build standards in advance of the Local Plan requirements.
- New development by Quercus Housing can help to fill gaps in the market, by considering the full range of options for additional modest-scale housing development in appropriate locations, supporting delivery of homes that the market isn't providing, including specialist housing, homes for 'right-sizing' and temporary accommodation.
- A variety of grants are available to improve energy efficiency, alleviate fuel poverty and support the shift to low carbon homes.
- The Council has recently recruited to several new specialist housing posts, bringing new expertise and insights to bear to address the challenges.

### Sevenoaks District Profile

#### Population and household trends; implications for housing in Sevenoaks

There were 121,415 people living in Sevenoaks District in 2020. The population is projected to increase to 129,442 by 2040, an overall increase of 8,027 or 6.6% over the 20 year period. This increase is not projected to be even across the population: there is projected to be a very small decline in the younger population (0.7% between 0-39 age groups) while the older population will rise, with those aged 75 years and over projected to increase by 43.3% over the same period<sup>1</sup>.

This population increase equates to 5,821 new households over the period from 2020 - 2040<sup>3</sup> with a trend towards smaller and older households. Using the standard methodology for calculating housing need as set out in the Planning Practice Guidance there is a need for 714 new homes per year.

#### Affordable housing requirements and the challenge of 'genuine affordability'

There is an overall affordable housing need of 423 units per year in Sevenoaks District, as set out in the Targeted Review of Local Housing Needs (TRLHN 2022). Some of the needs will be met through existing affordable homes being re-let, affordable home ownership resales and new-build, but the unmet need remains high; as of April 2022 there were 795 applicants on the Council's waiting list for social housing.

To be genuinely affordable, a rent should cost no more than 35% of gross income. This equates to someone on an income of £45k (median income) paying a monthly rent of no more than £1,312. In 2020, rents in the lowest quartile (the lowest 25% of rents) across Sevenoaks District were £1,001, making it necessary for most people earning average incomes, to access some form of affordable housing. House prices are well in excess of the 3.5 times household incomes that is considered to be 'genuinely affordable',

---

<sup>1</sup> ONS, 2018-based population projections, March 2020

<sup>3</sup> ONS, 2018-based household projections, June 2020

### **The need for homes at varied price-points**

High house prices across the District mean that, in addition to the need for genuinely affordable housing identified above, many other households also need some form of assistance to access a suitable home.

The main forms of financial assistance to rent or buy a home include:

- *Social housing* - available from a council or Registered Provider at a rent which, on average, is 50-60% of the open market rent (Social Rent and capped Affordable Rent);
- *Housing support through Universal Credit* - which is available as a top-up for low wage-earners as well as those who do not have paid employment
- *rents at lower-than-market levels* - whether this is Affordable Rent available at 80% of the open market rent or another 'intermediate rent', such as that which is possible through Build to Rent
- *Assisted home purchase* - including through government-backed schemes such as First Homes, shared ownership and Help to Buy equity loans.

### **Identifying and meeting the need for affordable homes in rural areas**

Sevenoaks District Council has commissioned Action with Communities in Rural Kent to undertake a series of housing needs surveys that will include all 31 parishes and town council areas over the 5-year period to 2025. The surveys identify parish-level needs - the level of affordable housing required and the needs of older home owners who wish to "rightsize" to more suitable housing. Rural Kent works with Parish Councils and the Council to actively identify suitable sites for "rural exceptions" affordable homes to meet locally identified needs - which can include homes for rent, shared ownership or through assisted purchase. We use S106 planning obligations to ensure homes developed through this route are affordable for future occupiers and are available to meet local needs in perpetuity.

### **Delivery targets on new housing developments**

The emerging Local Plan will identify the overall housing requirement for the District, and will allocate sites to meet this. It will ensure that the right types and sizes of homes are delivered in the right places to meet identified needs, as well as boosting the delivery of affordable homes and promoting rural exceptions housing. It will also specifically address the District's ageing population, ensuring that there is choice in the market for people wishing to rightsize and will set ambitious targets for the delivery of homes suitable for those with disabilities.

### **Gaps in the housing market**

We feel there are three key gaps in the local housing market:

## Agenda Item 9

### APPENDIX - 1

- 1. Suitable accommodation for young people to move into independence:** A shortage of suitable rented options for young, mainly single people starting out in life, coupled with high numbers of homeless cases due to ‘exclusions from the family home’ suggest that young people may be outstaying their welcome, yet unable to find a place to move to. We will work to meet the needs of young people to enable them to move into independence. This might include, for example: ‘Co-Living’ accommodation with some private space and some shared spaces; innovative housing solutions such as the ZEDpod, a low cost prefabricated super energy-efficient micro home; Homeshare<sup>2</sup> where a young person shares accommodation with an older person who has a spare room in their home; and giving a degree of priority to selected homes on new build developments to young people accepted onto the Council’s housing waiting list.
- 2. Homes for purchase or rent by essential workers:** Sevenoaks District needs a better range of housing options for ‘essential workers’ including sub-market rents and assisted purchase options<sup>3</sup>. This would help to ensure the District had a more sustainable economy by attracting and retaining businesses and employment through the provision of affordable housing for those workers providing essential services to the community. Sevenoaks District Council will adopt a local definition for an essential worker. It is proposed that this will be included in the new Sevenoaks District Housing Register Allocations Scheme 2022-2027. Priority will be given to local essential workers under the local First Homes policy.
- 3. Older people:** Sevenoaks District has an ageing population. The recent Sevenoaks Older Person’s Housing Study (2022) shows that, while 67% of older people want to stay living in their existing home with help and support when needed, there are also significant numbers (24%) who would like to move to a more suitable home - in a suitable location with access to transport, broadband, shops, healthcare and other amenities - if one were available. There is huge diversity in what older people are looking for and many could afford to buy on the open market. However, there is a big gap in supply for affordable housing/provision for middle market households. We intend to continue to diversify the range of older persons’ housing while at the same time upgrading the support we offer older people in the process of finding a suitable home and managing the moving process. This is of particular value in the social housing sector where our assistance may free up much needed family housing.

#### Targets for specialist homes

The Older Person’s Housing Study (2022) shows that just over a quarter of older people intend to move home although people are more likely to move before they are 75.

---

<sup>2</sup> <https://homeshareuk.org/>

<sup>3</sup> Intelligence gathered from the Survey of Employers’ Housing Needs in 2017

Strongest preferences are for town centre locations, neighbourhoods where people currently live, including village locations, bungalows/level access homes and properties in mixed developments of houses, flats and bungalows. Across the social housing sector, the “offer” to older people needs a rethink, including providing larger units of accommodation (not bedsits which are unpopular). More generally, the needs of older people are highly diverse and moving to a smaller property is not a universal ambition - households tend to need at least two bedrooms. The Sevenoaks District Housing Register Allocations Scheme 2022-2027 seeks to help rectify this in the social housing sector.

As set out in the Targeted Review of Local Housing Needs (2022), based on population projections there is a need for 1,345 additional units of specialist older persons’ accommodation by 2043. This breaks down to 928 C3 dwellings for older people (40 each year) - which is part of the overall housing need identified for Sevenoaks District - and an additional 418 C2 residential units/bedspaces (or 18 each year) to 2043<sup>4</sup>.

On the basis of available evidence, which takes into account the requirements of Planning Policy Guidance, it is recommended that 5% of new homes should be wheelchair accessible (Building Regulation M4(3)(b)) to support people with disabilities. All such homes should be provided as affordable housing for rent (social housing). All remaining new homes should be built to M4(2) accessible and adaptable standards, to take account of the ageing demographics of the district. This will ensure that new homes can be occupied and also visited by people needing accessible/adaptable living.

There are currently 169 households on the self-build register for Sevenoaks District as at July 2021. Strongest preferences are for detached properties and properties with 4 or more bedrooms. As at March 2020 planning permissions for 111 serviced plots suitable for self/custom build properties had been granted.

#### **Condition of private homes**

Of the 50,947 dwellings in Sevenoaks District (in 2020), 73% are owner occupied, 12% are privately rented and 15% are affordable housing. Of those that are privately owned, 5,351 (13%) have a category 1 hazard<sup>5</sup> - which means that property presents a serious and immediate risk to a person’s health and safety - the majority of which are due to excess cold. Also, 4,380 of Sevenoaks’ households (around 9%) are living in fuel poverty<sup>6</sup>.

While social housing is home to the highest number of low-income households, 22% of private renters are on low incomes, compared to just 7% homeowners. Also, 19% of tenants renting privately are living in ‘fuel poverty’ compared to 8% of homeowners. These households have above average fuel costs that leave them with a residual income below the official poverty line.

---

<sup>4</sup> SDC Local Housing Needs Evidence Base: Older Persons’ Housing Study

<sup>5</sup> Housing Health and Safety Rating System (HHSRS) Category 1 hazard

<sup>6</sup> BRE Integrated Dwelling Level Housing Stock Modelling and Database; Sevenoaks – April 2020

## Agenda Item 9

### APPENDIX - 1

The number of private sector dwellings with an energy EPC rating (A is the highest rating and G the lowest) at below band E is estimated to be 4,729 or 11.2%, which is double the England average of 5.4%. For private rented dwellings, the number with a rating of band F or G is estimated to be 647 (10.2%) which is also very high compared to the England average of 6.3%.

A recent analysis from the Building Research Establishment (BRE) shows that the highest levels of category 1 hazards, fuel poverty, excess cold, and dwellings with F and G EPC ratings, within the private rented sector, occur in the same wards in the district: Cowden and Hever, Penhurst and Fordcombe and Chiddingstone. The BRE recommends that interventions to improve disrepair or to improve the energy efficiency levels should therefore be focused, initially, in these wards.

### **Net zero**

The Council has committed to working towards achieving net zero carbon emissions by 2030. This means that we have pledged to reach net zero carbon emissions produced by us and our assets, by 2030. We also have an ambition to assist the District to become net zero by working closely with local communities to improve the resilience of the District to a changing climate. As part of our commitment, we are encouraging and supporting sustainable new homes and renewable energy generation. We will also be looking at how to reduce carbon emissions in our procurement and supply chains, and encourage sustainable practice in construction and development using recognised environmental standards such as ISO14001, the Kent STEM Scheme, or EMAS. We will also continue to explore funding to build on the council's successful retrofit projects in order to save energy and extend the life of homes in the district.

### **Our Strategic priorities in Sevenoaks District**

This Strategy establishes our vision for housing in the Sevenoaks District. It sets out four major themes and under each one, the priorities and objectives that we want to achieve. We consulted on the themes in early 2022 and there was widespread support for them.

#### **Theme 1: Developing Sevenoaks District's housing offer: building new affordable homes**

##### **Summary Objectives**

- Enhance our understanding of the full range of housing, particularly affordable and specialist housing, required in the district, including type, tenure and location.
- A greater number and range of affordable homes to meet the housing needs of our communities including the needs of specific groups.
- Enhance and develop partnerships with registered providers, local landowners and private developers to enable the delivery of housing and maximise the delivery of new affordable housing.

##### **How we plan to achieve our objectives**

## APPENDIX - 1

- Ensure that the emerging Local Plan contains policies that optimise the delivery of a range of affordable homes through the planning system;
- Maximise the level funding that can be accessed from Homes England funding programmes, by raising the profile of our affordable housing needs and ambitions with them and appraising the benefit of Quercus Housing and/or the District Council becoming Registered Providers;
- Review Council owned land for disposal and development of housing, including affordable housing;
- Undertake prudential borrowing, using Public Works Loans Board or other lending mechanisms;
- Continue the acquisition and delivery of affordable homes through Quercus Housing and consider a complementary role of direct provision for specialist housing by the District Council itself;
- Continue to develop strategic development partnerships with Registered Providers;
- Continue to work with the Rural Housing Enabler (Rural Kent), parish councils and community groups to undertake a programme of local housing needs surveys across the district and to facilitate the delivery of new rural exceptions housing where needs are identified;
- Continue to work with the NHS and Kent County Council to understand the current and future housing needs of older people and other vulnerable groups that require housing with care, including a range of specialist housing types.
- Work with private developers and registered providers to encourage delivery of new homes through Modern Methods of Construction.
- Seek to enable more housing, including affordable housing, through the diversification of provision i.e. self & custom build, community-led housing and co-housing schemes.
- Consider adopting a local definition of affordability, based on local incomes and prices, to ensure no one in affordable housing pays more than 35% of their income towards housing costs.

## **Theme 2: Promoting quality and optimising range and suitability of new and existing homes**

### **Summary Objectives**

- High quality new and existing homes.
- Environmentally friendly, well-designed new homes that are affordable to run, integrating low carbon design and resilience (e.g. flood resilience) in anticipation of the Futures Homes Standard.
- Better choice of housing options in the private rented sector.
- Fewer empty homes.
- A range of new homes that meet the needs of older and disabled people.
- Older and disabled people enabled to continue to live independently in their own home for longer.

### **How we plan to achieve our objectives**

## Agenda Item 9

### APPENDIX - 1

- Engage with Registered Provider partners to encourage the inclusion of age-appropriate homes within their development programme.
- Include provisions in the emerging Local Plan to deliver accessible and wheelchair adapted housing.
- Consider the inclusion of a specific older persons' housing policy within the emerging Local Plan.
- Work with the NHS and Kent County Council to explore the need for, and enable the delivery of, both specialist accommodation as well as adapted and wheelchair general needs housing.
- Support for older people either to stay living in their existing home or to find and move to a more suitable home, including co-housing.
- Refurbishing, extending or repurposing of dwellings to make better use of them.
- Broaden the engagement with Private Landlords through a Help to Rent Plus service
- Where scheme viability permits, seek to showcase exemplar building standards in new homes built by Quercus Housing and the District Council, in advance of Local Plan policy.
- Review the allocations policy to support better matching of homes, including right-sizing, to particular needs to improve residents' lives.
- Seek to introduce an enhanced rightsizing incentive scheme for social housing tenants.
- Continue to maximise the use of Better Care Fund funding to provide adaptations for older people and people with disabilities.
- Support owners of empty homes through the Council's membership of Kent No Use Empty, to create a downward trend in the number of long term empty homes.

### **Theme 3: Reducing homelessness and improving routes into permanent accommodation**

#### **Summary Objectives**

- Increased support and prevention for homeless people by providing excellent customer service, a range of housing options and good quality temporary accommodation
- Better access to the private rented sector for households who are homeless or threatened with homelessness.
- Explore and optimise opportunities to support vulnerable residents in maintaining accommodation and reduce instances of repeat homelessness.

#### **How we plan to achieve our objectives**

- Create a coalition of temporary and move-on accommodation landlords to provide sustainable, reliable, cost-effective temporary accommodation to support homeless households into long-term solutions.

## APPENDIX - 1

- Continue regular landlord forums to ensure relationships with local landlords are strengthened and maximise the potential for the placement of homeless households.
- Promote our private rented sector offer 'Help to Let Plus' and ensure the offer is comparable with our neighbouring authorities to encourage more landlords to let to previously homeless households.
- Consider Quercus Housing providing its own stock of temporary accommodation.
- Consider the purchase of units of quality temporary accommodation to replace those leased from the private sector.
- Optimise revenue available to create new services by monitoring funding opportunities and bidding for funding where this could fill gaps in service provision.
- Use data technology to improve the early intervention and prevention of homelessness and clearly demonstrate outcomes.
- Through the Council's HERO team, work to identify those likely to be affected by welfare reform and the pandemic, offering proactive advice and support.
- Work with our Registered Provider partners to enable them to support us with temporary accommodation needs for homeless households.
- Deliver and implement a new five year Homelessness Strategy in 2022/23.

#### **Theme 4: Healthy people, homes and places**

##### **Summary Objectives**

- Use development to drive positive physical and social regeneration, maximise health and social outcomes.
- Identify the most effective interventions to improve conditions and energy efficiency in private sector housing.
- Reduced health inequalities through the use of green technology and innovative built environments.
- Enhanced access to a range of amenities and facilities close to homes, and digital access, through our town centre plans and partnerships
- Work towards meeting our commitment for the council and its assets to be Net Zero by 2030, and work with Kent County Council and other partners towards our ambition for the district to be Net Zero by the same date.
- Implement the priorities and actions in the Council's Movement Strategy for sustainable movement and transport for the District. This includes reducing the need to travel, promoting active travel, improving the cycling and walking network, encouraging the use of low emission vehicles and making it easier to access and use public transport.

##### **How we plan to achieve our objectives**

## Agenda Item 9

### APPENDIX - 1

- Work to improve the conditions of the homes let by private landlords, particularly those in areas highlighted through BRE evidence.
- Increase awareness of council services and initiatives in relation to warm homes, energy efficiency and retro-fit technologies.
- Take a targeted approach to areas of high social and economic deprivation through regeneration, which improves the built environment and supports better education, employment and housing outcomes for existing and future residents.
- Encourage developers to bring forward schemes that support our commitment for the council and its assets to be Net Zero by 2030, and our ambition for the district to be Net Zero by 2030. This includes supporting carbon-neutral and carbon-positive technologies in new homes, without diminishing the level of affordable homes provided.
- Introduce a new environmental sustainability standard for all our new developments
- Work with private landlords and Registered Providers to retrofit existing stock with zero carbon technologies, particularly with the least sustainable stock.
- Tackle digital inequality and digital poverty by working with Registered Providers to improve opportunities for their residents to benefit from super-fast broadband.

#### **Monitoring and updating the strategy**

This strategy has been developed in partnership and sets out a 5-year plan. During this period, new priorities may emerge, and new national policy landscapes may be introduced. Whilst we can anticipate that key themes will remain relevant during this period, the way we deliver them may need to change. For this reason, it is important that the Housing Strategy is reviewed annually, so that it is kept up to date.

#### **The Action Plan**

We will only be able to deliver on our Housing Strategy with the assistance of our partners and communities, who have already assisted us to develop the Housing Strategy through the consultation process. An action plan will be developed for the Housing Strategy in the Autumn of 2022.

The action plan will be reviewed annually and published on the Council's website. It will set out the achievements and the challenges of the preceding year, along with any significant recommended changes that may arise.

APPENDIX - 1

**Additional Appendices**

**Appendix 1.1:** Data sources for local housing need

**Appendix 1.2:** Affordable Housing Glossary

(To follow)

DRAFT

This page is intentionally left blank

This template should be completed alongside proposals that will be subject to decision by Councillors.

<b>Summary of decision to be made:</b>		Draft Housing Strategy 2022 - 2027	
<b>Lead Officer (job title):</b>		Liz Crockford, Interim Housing Strategy Manager /Sharon Donald, Interim Head of Housing	
<b>Date the final decision is due to be made:</b>		19/07/2022	<b>Date this assessment commenced:</b> 13/04/2022
<b>Is the decision relevant to the aims of the Public Sector Equality Duty?</b>			Yes / No
Eliminate discrimination, harassment and victimisation			Yes / No
Advance equality of opportunity			Yes / No
Foster good relations			Yes / No
If the answer is yes to any of the above, proceed with the assessment. If the answer is no, please say why and summarise any evidence:			
For each of the following characteristics, summarise any existing data, consultation activity, interpretation of the impacts and actions that can be taken to reduce or mitigate any negative impacts:			
Characteristic:	Data and consultation	Summary of impact	Actions
Disability	Sevenoaks District Housing Needs Survey 2017, Targeted Review of Local Housing Needs 2021, 2011 Census, Sevenoaks District Housing Register Allocations Scheme 2022-2027 (emerging), Older Persons' Housing Study 2022, public consultation February to April 2022.	Strategy establishes the need for accessible housing, including a small proportion of wheelchair homes. Specific actions are included in the Action Plan, e.g. development of the District Council's own land to deliver the type of housing not being provided by the market, e.g. disabled adapted and bungalow housing. Through synergy with the Sevenoaks District Housing Register Allocations Scheme 2022-2027, to give highest priority for tenants vacating adapted homes. This will facilitate the potential for more suitable homes becoming available to meet the needs of disabled Housing Register applicants.	WKEP Aim: <a href="#">Other actions as a service provider</a>

Appendix 2

Carers	As above	Through synergy with the Sevenoaks District Housing Register Allocations Scheme 2022-2027, to ensure carers with a journey time of at least one hour, have priority.	WKEP Aim: <a href="#">Other actions as a service provider</a>
Race	As above	None - the Housing Strategy aims to treat all equally, irrespective of race	WKEP Aim: <a href="#">Other actions as a service provider</a>
Gender	As above	None - the Housing Strategy aims to treat all equally, irrespective of gender	WKEP Aim: <a href="#">Other actions as a service provider</a>
Age	As above	The Housing Strategy recognises the specific difficulties (high property prices and low incomes/zero hours contracts) faced by young people wishing to establish their first independent home. It also recognises the specific needs of older people wishing to downsize/move to more suitable housing. Specific actions are put forward in the Action Plan and linked Sevenoaks District Housing Register Allocations Scheme.	WKEP Aim: <a href="#">Other actions as a service provider</a>
Religion / Belief	As above	None - the Housing Strategy aims to treat all equally, irrespective of religion/belief	WKEP Aim: <a href="#">Other actions as a service provider</a>
Sexual Orientation	As above	None - the Housing Strategy aims to treat all equally, irrespective of sexual orientation	WKEP Aim: <a href="#">Other actions as a service provider</a>

Pregnancy / Maternity	As above	None - the Housing Strategy aims to treat all equally, irrespective of pregnancy	WKEP Aim: <a href="#">Other actions as a service provider</a>	
Marital or Civil Partnership Status	As above	None - the Housing Strategy aims to treat all equally, irrespective of marital/civil partnership status	WKEP Aim: <a href="#">Other actions as a service provider</a>	
Gender reassignment	As above	None - the Housing Strategy aims to treat all equally, irrespective of gender reassignment	WKEP Aim: <a href="#">Other actions as a service provider</a>	
<b>Summary of impacts :</b> (to be included in committee reports)	<p>Under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The impact has been analysed and does not vary between groups of people.</p> <p>The decisions recommended through this paper will result in the adoption of an inclusive and accessible Housing Strategy for Sevenoaks District. The Housing Strategy establishes the priorities for housing and related services within the District, applying for the 5 year period 2022-2027.</p> <p>A review mechanism is proposed, so that minor adjustments may be made to the Strategy and Action Plan (through delegated authority to the Chief Officer People &amp; Places in consultation with the Portfolio Holder for Housing &amp; Health) to ensure it retains its relevance and robustness.</p>			
Please tick the outcome of this assessment:	No impact	<del>Adjust the policy</del>	<del>Continue the policy</del>	<del>Stop and remove the policy</del>
Date assessment will be reviewed:	07/07/2022			

This page is intentionally left blank

**SEVENOAKS DISTRICT HOUSING REGISTER ALLOCATIONS SCHEME 2022-2027**

**Housing & Health Advisory Committee - 6 June 2022**

**Report of:** Deputy Chief Executive and Chief Officer People & Places

**Status:** For Comment

**Also considered by:**

- Cabinet - 7 July 2022
- Council - 19 July 2022

**Key Decision:** No

Significant in terms of its effects on the communities living or working in an area comprising of 2 or more wards in the District.

**Executive Summary:** As a Local Housing Authority, Sevenoaks District Council has a statutory duty to publish a Housing Allocations Scheme for assessing and prioritising applications for social housing to determine who can join the housing register and the criteria to determine the priority banding of each application. Making changes to the Housing Allocations Scheme requires a period of consultation. This report presents a second draft of the Housing Register Allocations Scheme 2022-2027, which has been refined in light of feedback received from the recent public consultation. The final Housing Allocation Scheme document will require approval by Full Council so that it may be adopted.

**This report supports the Key Aim of:**

Caring Communities - to help people live safe, independent and fulfilling lives and meeting the needs of vulnerable and low income households - by helping those in housing need to have fair and proportionate access to suitable homes in the social housing sector.

Sustainable Economies- provide a good mix of decent and affordable housing - by ensuring local people have priority for social housing in the District and awarding high priority to social housing tenants who wish to downsize, thereby freeing up family size housing for others in housing need.

**Portfolio Holder:** Cllr. Kevin Maskell

**Contact Officers:** Sharon Donald, Ext. 7131

Liz Crockford, Ext. 7482

**Recommendation to Housing & Health Advisory Committee:**

- (a) To note the feedback received from the public consultation;
- (b) To consider and recommend to Cabinet to recommend to Council that the second draft of the Sevenoaks District Housing Register Allocations Scheme 2022-2027 be adopted;

**Recommendation to Cabinet:**

- (a) To note the feedback received from the public consultation;
- (b) To consider the draft Sevenoaks District Housing Register Allocation Scheme 2022-2027;
- (c) To recommend to Council that the Sevenoaks District Housing Register Allocation Scheme 2022 - 2027 be adopted.

**Recommendation to Council:**

- (a) To note the feedback received from the public consultation;
- (b) That, subject to any amendments by Cabinet, the Sevenoaks District Housing Register Allocation Scheme 2022-2027 be adopted.

**Reason for recommendation:** To ensure the District Council has a Housing Register Allocations Scheme that complies with statutory provisions, and which treats all applicants for social housing in a fair and equitable manner.

## Introduction and Background

- 1 Housing, health, wellbeing and life-chances are inextricably linked. A comprehensive, fair, transparent and flexible allocations scheme enables the Council to manage expectations, make the best use of current housing stock and plan for future housing supply across all tenures to meet the needs and aspirations of its current and future residents.
- 2 Covid-19 has brought into sharp focus the need for key workers to ensure the local economy and local services continue to function. Many key workers have families with young children or are single people, often on low incomes, at the start of their career or are returning to work and need affordable local housing to sustain employment and deliver essential services in the district. A key element of the policy is a revised local connection, to enable homes in the district to be prioritised for local residents with a housing need, who can demonstrate continued residency and employment within the Sevenoaks district.
- 3 The Sevenoaks District Housing Register Allocations Scheme enables the Council and its partners to work together to ensure we prioritise those in most need of affordable housing. The Council operates a Choice Based Letting Scheme and the Housing Register Allocations Scheme sets out a framework that describes how to register, the assessment process and property allocation process.
- 4 The recommendations within this review have all been subject to a comprehensive two-stage public consultation exercise which included; bite-size briefings, webinars, workshops, surveys, on-line questionnaires, small meetings and one to one conversation.
- 5 The Council is legally required to consult with Housing Providers operating within the district, but it has also been important to seek views and feedback from other partners, stakeholders and residents. The feedback received has enabled amendments to be considered for inclusion within the policy ahead of a final version being considered by Cabinet and full Council in July 2022. The consultation feedback also enables the completion of a thorough equalities impact assessment.
- 6 The draft Sevenoaks District Housing Register Allocations Scheme 2022-2027 was subject to public consultation between 14 February and 18 April 2022. Over 500 responses were received and the results are summarised, by question, below. NB. "In agreement" refers to those respondents who either strongly agreed, or agreed.
- 7 What we asked - Question 1.

*We want to offer greater support to local people.*

*We are proposing to give priority to housing register applicants who have lived or worked in the Sevenoaks District for a minimum of three years.*

## Agenda Item 10

*Currently applicants are given priority if they have lived or worked in the District for a minimum of six months.*

The response was - **In agreement 78.9%**

**Recommendation:** It is recommended to approve this proposal, as the 3 year local connection period was broadly supported in the public consultation. A revised local connection will enable homes in the district to be prioritised for local residents with a housing need, who can demonstrate continued residency and employment within the Sevenoaks district.

### 8 What we asked - Question 2.

*As there is not enough social housing to help everyone, we need to prioritise the most urgent cases. We propose to rank applications on the Housing Register into four Bands. Band A will be the highest and will include:*

- *People with an urgent medical need;*
- *Those living in hazardous housing;*
- *Tenants who want to move out of a home that has become too large for them;*
- *Tenants who want to move out of a home that is adapted for someone who uses a wheelchair.*

*Applicants in Band A will have the greatest chance of being allocated social housing, with Bands B to D having less opportunity.*

The response was - **In agreement 61%**

**Recommendation:** It is recommended to approve this proposal, as the banding and outline for Band A (urgent need to move) was broadly supported in the consultation.

### 9 What we asked - Question 3.

*Social housing is provided for those who cannot afford to buy or rent a suitable home on the open market. We want to set income caps so that only those with limited incomes are eligible to join the Housing Register. We are proposing to set a higher income cap for families and a lower income cap for applicants without children.*

The response was - **In agreement 62.5%**

**Recommendation:** It is recommended to approve this proposal, as the proposed increase to the income cap to reflect local housing costs and their impact on different sized households, was supported in the public consultation. The revised thresholds will be as follows:

Up to and including 1 bedroom need - £40,000 (current: £30,000)

2 bedroom need - £50,000 (current: £40,000)

3 or more bedroom need - £60,000 (current: £40,000)

10 What we asked - Question 4

*Because of the high number of people seeking our help and the very limited supply of social housing, we intend to maintain a “one offer only” policy for most applicants. This means applicants who successfully bid for a property that meets their needs, cannot bid for another.*

The response was - **In agreement 53.6%**

**Recommendation:** It is recommended to maintain our current policy, due to the demand for social housing being much higher than the numbers of suitable properties being available.

11 What we asked - Question 5

*We want to help people who receive care and people who care for others. This could include where the carer and person receiving care need to live together in a larger home. It could also include when a carer needs to live in a home that is close to the person they are caring for. Care can mean many things and can be given in many forms. Housing Register applications under this category can be very difficult to assess in a fair and consistent way. Therefore, to ensure clarity and consistency with other local housing authorities, we are proposing that people who provide care must claim a ‘Carer Allowance’ or be providing unpaid care of at least 35 hours per week. Either the person receiving care or the person giving support, must be currently living outside the District.*

The response was - **In agreement 55.7%**

**Recommendation:** The public consultation was broadly supportive for applicants who undertake formal care of dependents and are in receipt of Disability Living Allowance at the higher rate for care or its equivalent, or are in receipt of Carers Allowance. The consultation supported unpaid carers providing at least 35 hours unpaid care per week, which would need to be evidenced by a medical assessment of the dependent. The consultation also broadly supported ‘in District’ applications, where the one-way journey time is over 1 hour’s duration. This would make the position equitable with those located outside the District.

12 Overall, the consultation shows there is positive public support for the draft revised Scheme, which is attached at Appendix 1.

13 General comments

## Agenda Item 10

- A few respondents commented on the difficulties faced by young people who wanted to move to their first independent home, but are impacted by high property prices and rents combined with low wages/zero hour contracts. As currently drafted, people sharing facilities (e.g. young people still living at home with their parents and sharing cooking and bathing facilities, who want to live independently), are not classed as having a housing need and are not eligible to join the Housing Register. It is recommended that an additional category be added in Band D (low priority) and create a Local Lettings Plan to give an element of priority, which will be agreed on a site by site basis, to this category of applicant on selected schemes.
- The current scheme does not require applicants to disclose whether they are staff or Members of the Council or related to, partner of, or living with staff or Members of the Council. It is recommended that this requirement be introduced to protect the Council's interest and that of its employees and elected Members. It is recommended that their status will be flagged on the Council's computer system, and failure to disclose this information may result in the application being suspended or cancelled as determined by the designated manager
- It is recommended that applicants for vacant pitches on the Hever Road traveller site are required to join the Housing Register, in the same way that all other applicants requiring housing assistance are required to do. It is suggested that a bespoke allocations policy is prepared for the letting of pitches on Hever Road.

14 It is considered that a broad range of participants responded to the consultation, including approximately 20% of respondents who were already on, or in the process of joining, the Housing Register. Access to the consultation did not discriminate against any group or section of society. However, it is noted that 79% of respondents were female. From the comments received, it can be seen that:

- there are lots of “carers” (31% of all respondents, look after or give support);
- there are a number of references to domestic abuse;
- there are also references to overcrowding and adult children still living at home not being able to access their own accommodation

Without stereotyping, it is not unreasonable to think that there will be more women than men who have an interest in the Allocations Scheme, as they belong to, or identify with, one or more of the categories above.

Subsequent to the consultation, it remains the case that officers believe the draft Sevenoaks District Housing Register Allocations Scheme will help to

address the housing needs of local people, whatever their background. An equality impact assessment is attached at Appendix 2.

- 15 Periodic reviews of the Scheme are allowed for, whereby minor amendments (which do not represent a major change of Scheme), may be made. This is delegated to the Chief Officer (People & Places) in consultation with the Portfolio Holder for Housing & Health. Through this mechanism, it is intended the Scheme will retain its relevance and robustness throughout its five year lifespan.
- 16 The proposed changes ensures that the Scheme works to make the most effective use of the social housing that becomes available. This is important because the supply of homes is limited and the district can only meet a small amount of the demand each year

#### **Other options Considered and/or rejected**

None.

#### **Key Implications**

##### Financial

There will be a cost for updating the Kent Homechoice Locata system as well as overtime costs for staff as detailed above. It is anticipated that this can be covered from existing grant funding.

##### Resource (non financial)

The new Allocations Scheme will assist the Accommodation Team in making and defending decisions, thereby freeing up officer time for other duties. When first implemented, the Accommodation Team will encounter additional work when transferring applicants over. It is felt this work can be managed through agreed overtime, ensuring the new Scheme is up and running by 30 September 2022.

##### Legal Implications and Risk Assessment Statement.

The District Council is required to have a Scheme that complies with the statutory provisions contained in the Housing Act 1996 (as amended). Failure to have a lawful scheme will lead to legal challenges that the authority would not be in a position to defend.

## Agenda Item 10

### Equality Assessment

Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The decisions recommended through this paper directly impact on end users. The impact has been analysed and varies between groups of people. The results of this analysis are set out in Appendix 2.

### Net Zero Implications

The decisions recommended through this paper have a remote or low relevance to the council's ambition to be Net Zero by 2030. There is no perceived impact regarding either an increase or decrease in carbon emissions in the district, or supporting the resilience of the natural environment.

### Safeguarding Children and Vulnerable Adults.

The new Allocations Scheme will be operated by the Accommodation Team who are fully conversant with our responsibility to safeguard children and vulnerable adults. If the Team has any concerns, the District Council's policy of, "if you see it, say it", will continue to be followed and taken up by a Safeguarding Designated Officer.

### Human Rights

Section 5 of the new Allocations Scheme recognises the needs of those seeking our help due to humanitarian and human rights abuses.

### Wellbeing

The new Allocations Scheme will promote wellbeing by assisting applicants into homes that are best suited to their needs, including homes that are accessible to those with disabilities and housing with support.

### **Conclusions**

The District Council is required to have an Allocations Scheme that complies with the statutory provisions contained in the Housing Act 1996 (as amended). The current policy has identified deficiencies, which the new Sevenoaks District Housing Register Allocations Scheme 2022-2027 will rectify.

**Appendices**

Appendix 1 - second draft of the Sevenoaks District Housing Register Allocations Scheme 2022-2027

Appendix 2 - Equality Impact Assessment (EIA)

**Background Papers**

None

**Sarah Robson**

**Deputy Chief Executive and Chief Officer - People & Places**

This page is intentionally left blank

Appendix 1



**Sevenoaks District Housing Register  
Allocations Scheme 2022 - 2027  
Second draft May 2022**

# Agenda Item 10

Appendix 1

## Contents

1. Introduction .....	3
2. Aims and objectives.....	4
3. Local Connection Criteria.....	4
5. Ineligible due to immigration status.....	6
6. Unacceptable Behaviour .....	7
7. Assessment of Need – the banding system .....	7
8. Medical and Welfare Priority .....	13
9. Suitable Size of Accommodation .....	15
10. Shared responsibilities for children .....	16
11. Carers .....	16
12. Exceptional Priority .....	17
13. Direct Lets .....	18
14. One offer/refusals .....	18
15. Determining Priority.....	19
16. Property Condition .....	22
17. Financial Criteria .....	23
18. Outstanding housing related debt.....	24
19. Allocations exceptions .....	24
20. Making an application .....	25
22. How homes are let/allocated .....	29
23. Keeping the register up to date .....	30
24. Local Lettings Plans .....	31
25. Housing Register Panel.....	31
26. Consideration of offers and refusals.....	31
27. Reinstatement of exceptional cases.....	32
28. Ineligible or disqualified from the register .....	32
29. Inaccurate information provided .....	32
30. Right to review .....	33
31. Equality and diversity .....	34
32. Scheme maintenance .....	34
Appendix 1.1 – definition of Local Essential Worker .....	35

Appendix 1

## 1. Introduction

This Scheme sets out the Council’s priorities for how social housing in Sevenoaks District is allocated and the guidelines that determine entitlement and eligibility to join the Housing Register. This will supersede any existing and former scheme relating to the allocation of housing and is in accordance with the requirements of Section 167 of the Housing Act 1996 (as amended).

The Scheme explains what help people can expect from the Council in meeting their housing needs and sets out the system and processes by which social homes are allocated and information on nomination agreements with housing owned and managed by housing associations and other approved Providers.

If an applicant does not meet any of the priority criteria set out within this Scheme, they will be excluded from joining the Housing Register because they have no identified housing need for social housing. If an applicant’s circumstances change, they will need to submit a new application.

The Council will consider all applications for social housing in accordance with this scheme, which sets out:

- who qualifies to be included on the register
- how to apply to get on the register
- how we determine an applicant’s priority on the register
- how to bid for available properties
- how available properties are allocated
- how we keep the register up to date
- how applicants can seek a review of decisions made regarding the application assessment and allocation process

The demand for housing from people in need of social housing in Sevenoaks, or wishing to move to Sevenoaks, is significantly higher than the number of homes available. There is an insufficient supply of social housing owned by housing associations to offer a home to everyone who would want it, or even to everyone who needs a home.

This allocation scheme ensures that we allocate the limited number of social homes available as fairly as possible and to those in the greatest need. The scheme is designed to ensure we comply with our legal obligations and to support the objectives of the Sevenoaks Housing Strategy.

Some homes have a Local Lettings Plan applying or they may be located on a Rural Exceptions Housing Scheme. This means these homes may not be to those in greatest housing need.

Specific allocation policies may be implemented and apply to supported housing schemes or other specialised accommodation.

**Commented [LC1]:** e.g. the Council’s traveller site at Hever Road

# Agenda Item 10

Appendix 1

## 2. Aims and objectives

The broad objectives of the scheme are to:

- to ensure we are letting properties in line with housing law
- determine the priority of applicants in a clear, transparent and consistent way
- ensure that homes are allocated fairly and to those in greatest need
- provide accurate and timely advice and information to allow applicants to make informed choices about their housing options
- create sustainable communities by the use of local lettings plans
- make the best use of the housing stock within Sevenoaks, working with our housing association partners to ensure that vacant homes are let quickly and efficiently
- to give applicants a choice of housing accommodation, or the opportunity to express preferences about housing accommodation, where this is reasonably practicable, by using choice-based lettings through Kent Homechoice

## 3. Local Connection Criteria

You will not be able to join the Housing Register if you do not have a local connection with the Sevenoaks District. A local connection under this scheme means you are:

- currently living in the District and have been resident for a continuous period of three years at the point of application. This does not include households placed in temporary accommodation under the homelessness legislation or Children Act 1989;
- currently employed in the District, and your place of work is within the District and you have been working within the District continuously for the last three years at the point of application;
- self-employed, where documentary evidence shows at least 50% of your work is within the District, and this has been the case continuously for the last three years at the point of application;
- an applicant for whom we have accepted the main housing duty under the homelessness legislation (s193 Housing Act 1996);
- a serving member of the Regular Armed Forces or a former member within five years of discharge (or a bereaved or separated spouse or civil partner of such a member);
- a serving or former member of the Reserve Armed Forces within five years of discharge who needs to move because of a serious injury, medical condition or disability sustained as a result of their service.

Commented [LC2]: Clarification for applicants

In exceptional circumstances, applicants will not need to demonstrate a local connection. This can include (but is not limited to) applicants who:

- have had a break in the period of continuous residence or employment due to circumstances beyond their control. For example, a temporary move to escape

Appendix 1

violence or threats of violence, or a temporary change to their usual place of work;

- are currently residing outside Sevenoaks District but need to move into the District to provide or receive significant and ongoing care or support to, or from, a close family member (i.e. children, parents or siblings, only). A care giver/receiver must currently live a minimum one hour’s journey time away. This is measured by shortest car journey or, if the applicant does not have access to private transport, the shortest timetabled public transport route
- need to move to receive significant and ongoing care or support from regulated providers
- are at risk of violence or harassment (including domestic abuse or hate crime) and that risk would be substantially reduced by a move to a permanent home in the District
- have fled from another local authority due to domestic abuse and are currently placed in a refuge or other form of temporary accommodation by the District Council
- are Sevenoaks residents temporarily displaced because they are currently residing in a supported housing or rehabilitation scheme outside the district
- are aged 55 years or over and wish to apply for ~~have been assessed as suitable for housing within a designated older persons’ housing scheme~~
- applicants who are unable to demonstrate a local connection because they are travellers who have been pursuing a nomadic lifestyle in accordance with their cultural tradition

**Commented [LC3]:** Clarification of position for those fleeing DV.

**Commented [LC4]:** There is no specific assessment of need, except for Extra Care housing.

Different local connection criteria will apply to new social housing provided on Rural Exceptions Housing schemes and other schemes in rural parishes where local needs nomination arrangements have been approved by the District Council. Here, priority will be given to applicants with a local connection to the host Parish. Full criteria is set out in the legal agreement applying to each scheme. Details of these schemes and the local connection criteria applying, can be obtained from [housing.policy@sevenoaks.gov.uk](mailto:housing.policy@sevenoaks.gov.uk)

**4. Qualifying Persons**

Section 160ZA Housing Act 1996 (as amended) gives power to Local Authorities to define classes of applicants that will be considered as qualifying persons. Qualification must be met at both point of application and point of offer. The Secretary of State may prescribe who are or who are not, qualifying persons.

**Commented [LC5]:** Statutory definition

Anyone aged 16 or above is able to join the Housing Register, unless they are ineligible or disqualified. You will be ineligible if you are a person the Government says cannot be on the list (this includes people who are subject to immigration control and do not have permission to be in the United Kingdom (UK), or whose immigration status does not allow them to benefit from government help)

# Agenda Item 10

Appendix 1

## 5. Ineligible due to immigration status

The Government states that normally we will not be able to allocate social housing to persons who are not already social housing tenants and who need leave to enter or remain in the UK. This applies to all persons except British citizens or persons with a right to reside in the UK under the Withdrawal Agreement entered into between the UK and the EU.

If you need leave to enter or remain in the UK (regardless of whether you have leave) you will only be eligible to join the housing list if you are a person who falls into one of the following:

- recorded by the Secretary of State as a refugee
- granted Exceptional Leave to Remain outside of the Immigration Rules who is not subject to a condition of non-recourse to public funds
- granted unconditional and unlimited leave to remain in the UK, is habitually resident in the Common Travel Area (UK, Channel Islands, Isle of Man or Republic of Ireland) unless they are sponsored, have been resident for less than 5 years and at least one sponsor is still alive
- granted Humanitarian Protection
- granted limited leave to enter or remain in the UK on family or private life grounds under Article 8 of the European Convention of Human Rights under 12 paragraph 276BE (1) or 276DG or Appendix FM of the Immigration Rules who is not subject to a condition of non-recourse to public funds
- habitually resident in the Common Travel Area and who has been transferred to the United Kingdom under section 67 of the Immigration Act 2016 and has limited leave to remain under paragraph 352ZH of the Immigration Rules
- habitually resident in the Common Travel Area and who has Calais leave to remain under paragraph 352J of the Immigration Rules (Effective from 1 November 2018.)
- limited leave to enter and remain in the UK as the family member of a 'relevant person of Northern Ireland' by virtue of Appendix EU of the Immigration Rules
- habitually resident in the Common Travel Area and who has limited leave to remain in the UK as a stateless person under paragraph 405 of the Immigration Rules
- has limited leave to enter or remain in the United Kingdom by virtue of Appendix Hong Kong British National (Overseas) of the Immigration Rules, is not subject to a condition of non-recourse to public funds and is habitually resident in the Common Travel Area
- has been granted leave to enter or remain under the Afghan Relocations and Assistance Policy or the previous scheme for locally-employed staff in Afghanistan
- has leave to enter or remain who left Afghanistan in connection with the collapse of the Afghan government, but not if not subject to a condition of non-recourse to public funds or if the person has been given leave to enter or remain in the United Kingdom upon an undertaking given by their sponsor

**Commented [LC6]:** Section 5 clarification as per advice from Legal Services

Appendix 1

and has been resident in the Common Travel Area for less than five years and whose sponsors have not died

The Government also states that we cannot allocate housing to anyone unless they are habitually resident in the Common Travel Area, subject to certain exceptions for persons with rights of residence under the Withdrawal Agreement and persons who are in the UK as a result of being deported or expelled from another country.

The Government also states that we cannot allocate housing to a person from abroad whose only right to reside in the UK is based on their status as a jobseeker or an initial three months' right of residence, or is a derivative right of residence based on being the principal carer for a British citizen.

The Council is not allowed to allocate housing to an ineligible person by granting them a joint tenancy with another eligible person.

These rules do not apply to a person who is already a Secure or Introductory Tenant or an Assured Tenant of a Private Registered Provider. In that case, you are free to apply for a transfer regardless of your immigration status.

The detailed provisions of these rules are complex and the above is only a summary of them. They are also subject to change by statutory instruments issued by Government from time to time.

## 6. Unacceptable Behaviour

Unacceptable behaviour is behaviour that is sufficiently serious enough for us to consider you to be unsuitable to be a social housing tenant. You will not usually qualify to be included on the Housing Register if you or a member of your household, has behaved in an unacceptable manner in the preceding two years on the date of your application.

Examples of unacceptable behaviour include, but are not limited to the following:

- eviction or otherwise lost accommodation as a result of anti-social behaviour or rent arrears
- conviction of criminal offences in or near your home and we are satisfied you still pose a threat to neighbours or the wider community
- threatening or aggressive behaviour towards our staff or contractors
- racial, sexual or homophobic harassment, or harassment due to sexual orientation.

The decision to disqualify you will be made by the Housing Register Panel. They will take into account any supporting information from you, your current or previous landlords, and the police, the Community Safety Unit, Probation or any other relevant professional body

## 7. Assessment of Need – the banding system

# Agenda Item 10

## Appendix 1

To be as fair as possible in deciding who should be offered social housing, we use a banding system to determine priority for re-housing. Assessment is based on an applicant's housing circumstances, suitability of the property and any long-term medical problems.

Persons eligible to join the housing register will have their application assessed by the District Council's Accommodation Team and placed into one of four bands, in accordance with the 'fair and flexible' statutory guidance. The bands are referred to as 'A, B, C and D'. Applications in band A will be given the highest priority for re-housing, band B the next highest, then C with band D applicants having the lowest priority.

All references to "transfer applicant" means, existing tenants of a housing association partner/Provider who are currently living in social housing the District.

### **Band A**

Applicants in Band A have the highest priority for social housing. However, other housing options may still need to be considered so that Applicants can move more quickly and the Housing Advice Team will discuss this with you.

This band includes the following:

- Those with an urgent need to move as their current accommodation is unsuitable for their medical or disability needs and due to this they are unable to be discharged home from hospital or other clinical or respite facilities (e.g. "bed blocking");
- Where an applicant has a terminal illness and the current accommodation is unsuitable for their medical needs and end-of-life care or cannot be suitably adapted (such suitability/capability is as assessed by KCC Occupational Therapy and/or the District Council's Private Sector Housing team);
- Where an applicant or a member of their household has an urgent medical condition or there is an emergency medical situation, and the current home is not suitable for their medical needs or is not capable of being adapted to be able to meet these needs (such suitability/capability is as assessed by KCC Occupational Therapy and/or the District Council's Private Sector Housing team);
- Transfer applicants currently living in a designated wheelchair accessible home or a home with significant and useable adaptations (as assessed by the landlord housing association/Provider) but those adaptations are not required by any member of the household;
- Transfer applicants who need to move because their home is scheduled for redevelopment;
- Applicants who have been assessed by the Housing Register Panel as needing a move under the National Witness Mobility Programme (NWMP) or other similar vulnerable person protection scheme;
- Where the Private Sector Housing Team have assessed there are one or more Category 1 hazards (as assessed under the Housing Health and Safety

Appendix 1

Rating Scheme) or other severe property conditions that impose an imminent risk of harm to the occupants and remedial action is considered unreasonable or impractical for cost or other reasons;

- Applicants who have been assessed by the Housing Register Panel as needing a move due to an immediate, urgent or exceptional need;
- Where there is a rehousing obligation because a demolition, prohibition or compulsory purchase order has been served in respect of the applicant's current accommodation;
- Transfer applicants who are looking to downsize and move to a home with at least one bedroom fewer than in their current home;
- Applicants who have been assessed as requiring 3 more bedrooms to meet the needs of their household and are classed as statutory overcrowded;
- Serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service;
- The bereaved spouse or civil partner of a member of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner;
- A member of the Armed Forces who is a tenant occupying HM Forces service accommodation, who is threatened with homelessness because they have been served with a valid notice to vacate their tenancy, or those who are otherwise leaving said service accommodation;
- An applicant who is being made redundant from, or is retiring from, a job that includes tied accommodation and their departure from the job means they are required to give up their tenancy;
- Homeless applicants who are fleeing domestic violence or abuse, where we have accepted the full rehousing duty to secure accommodation under part 7 of the Housing Act 1996, and who are assessed by the Housing Register Panel as being at imminent risk of harm in their current accommodation (such current accommodation may include temporary accommodation arranged by the District Council);
- Homeless applicants (including those who are fleeing domestic violence or abuse and who are assessed by the Housing Register Panel as not being at imminent risk of harm in their current accommodation) where we have accepted the full rehousing duty to secure accommodation under part 7 of the Housing Act 1996 and who have been placed by the District Council in nightly paid accommodation for a period of at least 6 months (or other period that may be set by the District Council) and where no suitable accommodation (including private sector accommodation) has been identified by the Accommodation Team during this period in order to discharge the council's homelessness duty;
- Applicants who have been assessed by the District Council's Private Sector Housing Team as statutory overcrowded (Housing Act 1985) and requiring an additional bedroom(s) to meet the needs of their household in accordance with "suitable size of accommodation (Section 9); ;

**Commented [LC7]:** This category is being cross checked for consistency

**Commented [LC8]:** Moved from Band C as essentially Service Accommodation = tied accommodation. This is equitable with the category below

**Commented [LC9]:** A new category for those fleeing DV and who are at imminent risk based on their current accommodation

**Commented [LC10]:** Clarifying position for those fleeing DV who are not at imminent risk, i.e. SDC has placed them in safe temporary accommodation

**Commented [LC11]:** Statutory overcrowding is a set at a very high bar and represents a position of extreme overcrowding. Reference to number of bedrooms required has been deleted. Very few cases of overcrowding meet this high bar.

# Agenda Item 10

## Appendix 1

### Band B

Applicants in Band B have a high priority but are still likely to have to wait some time to be re-housed. Alternative housing options should therefore be discussed with the Housing Advice Team.

This band includes the following:

- Homeless applicants where we have accepted the full rehousing duty to secure accommodation under part 7 of the Housing Act 1996 and they have the following additional needs:
  - Long-term health conditions that are unlikely to improve as assessed by the Housing Register Panel,
  - Households where there is a need to place them in Sevenoaks due to Child Protection Plans under Children Act 1989,
  - Households with children who have an Educational Health and Care Plan;
- Homeless applicants (including applicants fleeing domestic violence or abuse, who are assessed by the Housing Register Panel as not being under imminent threat of violence in their current accommodation) where we have accepted the full rehousing duty to secure accommodation under part 7 of the Housing Act 1996 and who have been placed in temporary accommodation other than nightly paid accommodation, for a period of at least 6 months (or other period that may be set by the District Council) and where no suitable accommodation (including private sector accommodation) has been identified by the Accommodation Team during this period in order to discharge the council's homelessness duty;
- Homeless applicants (including applicants fleeing domestic violence or abuse, who are assessed by the Housing Register Panel as not being under imminent threat of violence in their current accommodation) where we have accepted the full rehousing duty to secure accommodation under part 7 of the Housing Act 1996 and this duty has been in existence for a period of at least 12 months (or other period that may be set by the District Council), who have not been placed by the District Council in any form of temporary accommodation, and where no suitable accommodation (including private sector accommodation) has been identified by the Accommodation Team during this period in order to discharge the council's homelessness duty;
- Where an applicant or a member of their household has a high medical condition and the current home is not suitable for their medical needs or is not capable of being adapted to be able to meet these needs (such suitability/capability is as assessed by KCC Occupational Therapy and/or the District Council's Private Sector Housing Team);
- Where the Private Sector Housing Team have assessed that there are one or more Category 1 hazards (as assessed under the Housing Health and Safety Rating Scheme) which are having a negative impact on the medical, disability

**Commented [LC12]:** Clarifying position for those fleeing DV who are not at imminent risk

**Commented [LC13]:** Clarifying position for those fleeing DV who are not at imminent risk

## Appendix 1

or welfare needs of a member of the household and remedial action is considered unreasonable or impractical for cost or other reasons;

- Applicants living in supported housing schemes within the District (or temporarily displaced to a supported housing scheme in another borough or district) who have been assessed as ready to move on into independent living;
- Young people (16 – 25 year olds) in care accommodation and considered ready to move out of care by KCC Social Services;
- Young people (16 -17 year olds) who are threatened with homelessness;

**Commented [LC14]:** This category is being cross checked for consistency.

## Band C

Applicants in Band C can expect to wait a long time to be re-housed. They should proactively look at other housing options to resolve their housing difficulties.

This band includes the following:

- Homeless applicants (including applicants fleeing domestic violence or abuse, who are assessed by the Housing Register Panel as not being under imminent threat of violence in their current accommodation) where we have accepted the full rehousing duty to secure accommodation under part 7 of the Housing Act 1996 but who are not assessed as having additional needs;
- Applicants who are lacking a bedroom(s) and require an additional bedroom(s) to meet the needs of their household in accordance with “suitable size of accommodation (Section 9);
- Verified rough sleepers who have a local connection to Sevenoaks;
- Where an applicant or a member of their household has a medical condition (“other condition”) and the current home is not suitable for their medical needs or is not capable of being adapted to be able to meet these needs (such suitability/capability is as assessed by KCC Occupational Therapy and/or the District Council’s Private Sector Housing Team);
- Households where one or more members are awarded a priority on medical, disability or welfare grounds, as the current housing conditions are having a negative impact on the medical, disability or welfare needs of a member of the household. This includes where care is given or received (See Section 11);

**Commented [LC15]:** Clarifying position for those fleeing DV who are not at imminent risk

**Commented [LC16]:** Lacking in bedrooms is a less serious form of overcrowding compared with statutory overcrowding. Reference to number of bedrooms lacking has been removed. Retain at Band C

# Agenda Item 10

Appendix 1

## Band D

Applicants in Band D can expect to wait a very long time to be re-housed, unless they are applying for **designated older person's housing**. They may wish to look at other housing options to resolve their housing difficulties.

This band includes the following:

- Homeless applicants who have a housing need but where we do not owe a duty to secure accommodation, such as:-
  - non-priority homeless households or
  - households assessed as having become homeless intentionally;
- Applicants who meet none of the criteria in Bands A – **C** above, but are eligible, only, to be considered for properties on rural exception sites or accommodation in rural parishes where local needs housing nomination arrangements have been agreed by the Council;

*Explanatory note: Applicants will only be eligible to bid for the above categories of **rural housing** and then only for vacancies that arise in their local parish **or specified neighbouring parishes**. They will not be eligible to bid for any other social housing. Their inclusion on the Housing Register means the District Council does not need to hold a separate register for local needs rural housing. We know that applicants and Providers, as well as our own Housing staff, value the benefit and fairness of a single point of application for social housing.*

- Applicants **age 55 years and over who wish to be considered for designated older persons' housing, and who are not currently residing in such accommodation, and who may, or may not have, a local connection to Sevenoaks District.**

*Explanatory note: A local connection is not necessarily required for **designated older persons' housing**. This is to ensure there is a ready pool of eligible applicants for whenever vacancies arise. Traditionally, vacancies occur more frequently in older persons' housing and lettings tend to take longer. Wherever possible, the District Council wants to ensure vacant homes are re-let as quickly as possible, as this makes the most efficient use of the social housing stock. **If applicants age 55 years and over have a local connection to the District and have other housing needs, they will be placed in the highest Band applying. Applicants who do not have a local connection to the District will only be eligible to be placed in Band D.***

**Commented [LC17]:** Reference to "assessed as needing such accommodation" has been removed. As per Older Persons' Housing Study, we wish to assist older people to downsize and move to more suitable accommodation, whatever their level of need.

**Commented [LC18]:** Clarifying higher banding may apply for those with a local connection if additional housing need demonstrated.

Appendix 1

## 8. Medical and Welfare Priority

The level of medical need, urgent, high or other, will be assessed and determined by the Accommodation Team. The assessment will be based on:

- **Band A (Urgent medical need):** A person will be awarded Band A if the household contains one or more members with a currently life-threatening illness or disability, and whose housing circumstances are affecting their health very severely.
- **Band B (High medical need):** A person will be awarded Band B if one member of the household or more has a serious illness or disability and their present living conditions are affecting their health to a marked degree and where a move is recommended to improve the health of the individual.
- **Band C (Other medical need):** A person will be awarded Band C if one or more of the household has an illness or disability of a moderate nature which is affected adversely by their living conditions, and where a move is recommended to improve the health of the individual.

Our assessment is not based on the nature or severity of any medical condition or disability but is focused on the direct impact that the current housing has on any condition or disability, and whether this could be alleviated by a move to a more suitable home.

For example, priority may be awarded if you have mobility issues which make it difficult for you to climb stairs and you are unable to access your bedroom or bathroom facilities on a different floor as these are only accessible by stairs. In this situation, you would benefit from a move to a property that provides level living. We will only assess your priority on medical and/or welfare grounds if there is evidence that your current housing impacts directly on your medical condition, disability, or welfare. We will not usually assess your priority on medical or welfare grounds if your household is already in Band A as an assessment cannot increase your priority.

Priority on medical or welfare grounds is assessed based on the information you submit. If you consider that anyone in your household has a medical condition that is adversely affected by your current housing, you must provide independent verification. This may be from your GP, Nurse, Hospital Consultant, Occupational Therapist or other health care professional. In welfare cases you should provide independent verification of your circumstances from your Social Worker, Support Worker or other professional involved in your case. For medical cases we may ask you to provide further evidence or refer your case for independent medical advice. For welfare assessments we may ask you to provide further evidence or (where appropriate) we may make a joint assessment with Social Services, or an appropriate support agency.

We assess your priority by looking at your current housing. If it meets the medical and welfare needs of you and all members of your household there will be no change in your housing priority. We look at whether your current housing makes a medical condition or disability worse, and whether it is possible to make relevant adaptations, such as providing a stair lift or wet room to your home. In mobility cases we look at

# Agenda Item 10

## Appendix 1

the severity of your difficulties in relation to your property. Factors such as the number of steps inside and leading to a property, width of internal doorways and circulation space, and whether you have a lift or ramp may be relevant. The assessment will consider whether a move to more suitable housing would either improve the medical condition or substantially improve your quality of life. If you have medical needs, but a move would not significantly improve the situation, there will be no change in priority based on medical grounds.

Overcrowding may impact on the health and well-being of some or all members of your household and/or the needs of any dependent children. This is taken into account in the banding priority awarded due to overcrowding, and usually no further priority will be awarded.

Similarly, when assessing priority on welfare grounds we will consult with other people involved in your care, as this may identify ways to help you stay in your current home with appropriate ongoing support. If this resolves your support needs, you will not be awarded any priority on welfare grounds. Otherwise, we look at whether your needs are made worse by your current housing. If so, we will consider whether a move to more suitable housing would improve things for you. If you have welfare needs, but a move would not significantly improve the situation, there will be no change in priority on welfare grounds.

If you need to move into the district in order to provide or receive significant and ongoing care or support to or from a close family member (children, parents, or siblings, only) you will need to meet to satisfy the conditions given in section 11. You will not normally be eligible to join the housing register if you want to move within the district to provide or receive significant and ongoing care or support to or from a close family member.

If you are currently living in supported housing (including refuge) and have been assessed by the support provider as ready to move on into independent living, you will usually be awarded Band A priority on welfare grounds.

If you are experiencing difficulties in accessing your home due to non-medical matters such as carrying children, shopping, prams or pushchairs on external or communal stairs or do not have access to a private garden, you will not usually be awarded any change in priority based on medical or welfare grounds.

Appendix 1

## 9. Suitable Size of Accommodation

Generally, social housing is offered in line with the following guide:

*Table of suitable size accommodation depending on household*

Household composition	Type and size of home
A single person	<ul style="list-style-type: none"> <li>▪ Shared accommodation</li> <li>▪ Bedsit</li> <li>▪ Studio flat</li> <li>▪ One bedroom flat/house</li> <li>▪ Or designated older persons' housing, if appropriate</li> </ul>
A couple	<ul style="list-style-type: none"> <li>▪ One bedroom flat, house or bungalow</li> <li>▪ Or designated older persons' housing, if appropriate</li> </ul>
Two adults (or couple with verified need for separate bedrooms)	<ul style="list-style-type: none"> <li>▪ Two bedroom flat, house or bungalow</li> <li>▪ Or designated older persons' housing, if appropriate</li> </ul>
A couple or single parent with one child	<ul style="list-style-type: none"> <li>▪ Two bedroom flat, house or bungalow</li> </ul>
A couple or single parent with two children	<ul style="list-style-type: none"> <li>▪ Two or three bedroom flat, house or bungalow (depending on the age/sex of children)</li> </ul>
A couple or single parent with three or more children	<ul style="list-style-type: none"> <li>▪ Three or four bedroom house (depending on the age/sex of children)</li> </ul>

Exceptions to this guide, depending on individual circumstances, which include (but are not limited to) applicants where:

There is a medical recommendation for a bigger home for example:

- To meet a medical or disability need for an extra bedroom;
- To accommodate a carer;
- The available home has special adaptations which you need and there are no other applicants of the correct household size available that need those adaptations.

Other reasons include:

- The home is offered as the result of an emergency;

# Agenda Item 10

## Appendix 1

- The home is offered to a homeless applicant as temporary accommodation;
- The home is offered under the specific terms of a Local Lettings Plan;
- The home is offered to a Band A transfer applicant, where the applicant has reached the qualifying age for Pension Credit (i.e. the under-occupation restriction, or “Bedroom Tax”, does not apply) and the applicant is downsizing from a home with at least 3 bedrooms, then such applicant is eligible to be considered for a 2 bedroom home or less, irrespective of the size of their household.

Bungalows will usually only be allocated to households where the applicant or a member of their household has been assessed as needing single level living accommodation.

## 10. Shared responsibilities for children

We acknowledge that many separated or divorced parents continue to share responsibilities for their children including providing a home for them. Where any dependent children live with you some of the time and at other times with their other parent/guardian at a separate address, we will assess whether your address is their main home so that they can be included as members of your household.

We will consider the following:

- the financial support you receive including Child Benefit, Universal Credit/tax credits, disability benefits (if appropriate) and maintenance from their other parent/guardian
- any Family Court Order(s) under the Children Act (1989) in respect of parental responsibility, contact or residency
- supporting evidence from Social Services in respect of fostering, guardianship or adoption placements. Whether the children currently reside with someone else for all or part of each week

Regardless of the amount of time that your children spend with you, if we decide that their main home is not with you, they will not be included on your Housing Register application; and they will not be considered when assessing overcrowding/under-occupation or the size of property (number of bedrooms) that you can apply for or be offered under this scheme.

## 11. Carers

A carer is someone who looks after and supports a partner, friend, relative or neighbour who would not be able to manage without their help. This could be due to age, physical or mental illness or disability. It does not mean a professional care worker or personal assistant who gets paid for their work.

In terms of this Scheme, a care giver/receiver can be only be a partner/spouse, sibling or child. A care giver/receiver must currently live outside the District and be a minimum of one hour's journey time away by car, for each one-way journey, or, if

**Commented [LC19]:** Clarification for applicants

## Appendix 1

they do not have access to private transport, the journey time will be measured by the shortest timetabled public transport route.

To be considered for Band C priority due to care needs, the care giver must be in receipt of Carer's Allowance or can demonstrate they provide care for at least 35 hours per week (this will be assessed by the Housing Register Panel) and the care receiver must be in receipt of at least one of the following;

- Disability Living Allowance (Care component);
- Personal Independence Payment (Daily living component);
- Attendance Allowance;
- Industrial Injuries Disablement Benefit;
- Employment and Support Allowance.

If you have requested to be re-housed in order to provide a bedroom for your carer, this will be considered by the Housing Register Panel who will take into account the following:

- whether your care needs have been assessed as including overnight support
- whether you have been awarded benefits because of illness or disability including
- the level of care that you need and whether this is likely to change in the future
- the ability of your carer to provide the level of care required
- your current accommodation, and where your carer currently resides

## 12. Exceptional Priority

To assist the national police force to tackle serious crime and to support witnesses in the legal process, the council works in partnership with colleagues in the National Witness Mobility Programme (NWMS) and will, as required, accept referrals from this source.

Such cases will have been assessed and verified by the NWMS managers and referrals will only be accepted with the agreement of the Service Manager (Housing Options). There are confidentiality considerations for such cases and no personal information will be taken until the applicant accepts a direct offer of accommodation in the district. Any proposed offer will be checked for suitability by the NWMS before the offer is made and details of successful lettings may not subsequently be made available to the public.

# Agenda Item 10

Appendix 1

## 13. Direct Lets

Certain properties are excluded from choice-based letting (bidding) and are allocated by making a direct offer to an applicant. This includes (but is not limited to) the following applicants:

- with an immediate need to move on health or welfare grounds, where the current home is unsuitable, or where there is an immediate threat of violence
- who are subject to current multi-agency public protection arrangements (MAPPAs), and who pose a very serious risk to the community, where the type or location of properties that are suitable may need to be restricted
- who have been temporarily decanted from their current housing to enable demolition or redevelopment work and who need to transfer to a suitable property within the new development
- with a need for a bespoke adapted/wheelchair accessible home which is to be provided within a new development (as agreed assessed by the Housing Register Panel)
- to discharge our duty to provide accommodation to some homeless households under the Housing Act 1996 (as amended)

Wherever possible the direct letting of a property will match the applicant's assessed need in terms of number of bedrooms needed or floor level, and any essential requirements on health and welfare grounds. Other factors such as non-essential preferences regarding the location or type of housing will not normally be considered.

## 14. One offer/refusals

Only one offer of housing will be made to applicants under this Scheme, except in the case of applicants who are applying for designated older persons housing or for existing social housing tenants who are seeking to downsize. which applicants will be expected to accept.

Homeless applicants will only receive one suitable offer of accommodation and this will be the final offer.

Where we have accepted a homelessness duty, the offer of accommodation could be a property the applicant has bid through Kent Homechoice, or a property bid for by a Housing Officer on behalf of the applicant, or a direct offer made to end the Council's homelessness duty. The final offer will be confirmed in writing stating that the Council's duty to the applicant under part VII of the 1996 Housing Act (as amended) will be ended. Every homeless applicant has the right to request a review of suitability of the accommodation offered in discharge of the Council's Part VII duty.

**Commented [LC20]:** Clarification on how a final offer may be given to end homelessness duty.

Auto bidding on Kent Home Choice is automatically enabled for all homeless applicants and can be arranged for any other applicant on request. Any successful bids through auto bidding by this method will count as the final offer of accommodation.

Appendix 1

An offer of suitable accommodation, which is arranged by way of a nomination to a housing association or private sector property, will be considered to be a reasonable offer. ~~and will discharge the Council's homelessness duty.~~

In all cases, offers will be seen as suitable if they reasonably meet the housing and medical needs of the household. Factors taken into account include property size, location, affordability and, where predetermined by the Accommodation Team, any areas that are considered unsafe. In considering suitability, the Council will give regard to the overall supply and availability of accommodation and the demands placed on it by all priority groups.

Commented [LC21]: Clarification on suitability

If an offer is refused, the reasons for refusal will be considered by the Housing Register Panel who will decide if the property offered was suitable. If the property offered was unsuitable, then one further offer will be made. However, if the property offered was suitable then no further allocation will be made, and the applicant will be removed from the Housing Register and disqualified for 12 months.

See Section 26 for how to ask for a review of an offer if you feel the property is unsuitable for you.

## 15. Determining Priority

### Assessment and Priority List Date

We assess all of the information you provide to support your application and may ask you to provide further evidence to support your application.

If you are eligible and not disqualified, the two main factors that determine priority on the register are your assessed need (Bands A to D) and your priority date. Your priority date will usually be the date that your online application is verified, unless your application is rejected if you fail to provide the information we need to assess it within 28 days of applying.

Where there is a subsequent relevant change in your circumstances that affects your priority band assessment, your priority date will usually be changed to the date we were notified of the change. We will email to tell you whether or not you have been included on the register. If you have been included, we will tell you the size of property you are eligible to bid for and in which priority band you have been placed. You have the right to request a review of the facts of your case that we have used in this assessment.

You must tell us of any change in your circumstances within 14 days of the change. We will email you to let you know if the change affects your level of housing need and/or your priority band. The banding reflects broad levels of housing need, so some changes in your circumstances may make no difference to the band you are in. However, sometimes a significant change in circumstances, such as a move to

# Agenda Item 10

## Appendix 1

another address, the birth of another child, a change to your household income or savings or a substantial change in mobility may result in a reassessment of your priority. Your application will usually be suspended and you will not be able to bid for any properties until you have provided enough written evidence to allow us to verify the change and reassess your priority, regardless as to whether your priority banding actually changes.

Your household will be placed in the appropriate band according to its highest need, not the accumulation of its needs. For example, if you are awarded priority on the grounds of overcrowding and are lacking two or more bedrooms, you will be placed into Band B regardless of whether you also have another need such as a non-essential medical or welfare reason for moving.

### Overcrowding/Under Occupation

We assess overcrowding and under-occupation by comparing the number of bedrooms in your home against your household's needs and in acknowledgement of the minimum standards set out in the Allocations Code of Guidance. You will be assessed as needing one bedroom for the following:

- Every adult couple
- Any other adult aged 18 or over
- Any two children of the same sex aged under 18
- Any two children under aged 10

Households will also be assessed as needing one bedroom for each of the following if they are assessed by the Accommodation Team as being included as part of the household:

- A member of your household who is temporarily absent from your home because they are attending a full time University or higher education course;
- A tenant requiring a non-resident overnight carer - It must be demonstrated that it is essential that applicants require both day and night care. This will be assessed by the Accommodation Team based on a care needs assessment provided by Kent County Council adult social services;
- A disabled child who cannot share a bedroom with their sibling due to their disability - to award this we will require confirmation of the need for an additional bedroom from a medical professional and proof of Disability Living Allowance with care awarded at middle or high rate. The Accommodation Team will assess the information provided and their decision will be final;
- An adult child who is serving away with the armed forces;
- A room for a foster child or children - only one room will be awarded and is subject to confirmation of approved foster status from Kent County Council. Children who are on weekend or holiday visits do not count as being fostered;

**Commented [LC22]:** Detailed clarification to assist applicants

Appendix 1

- Pregnancy will be included in the room calculation from 22 weeks gestation, although it will not be included in any overcrowding calculation until the baby is born.

A bedroom is defined as any room intended to be used as a bedroom, in line with what is stated on any tenancy agreement and to reflect the level of rent charged. If your current home has two separate living/reception rooms it is probable that one of these could be considered as suitable for use as a bedroom.

For the purposes of assessing overcrowding:

- Two children of the same sex would be expected to share a bedroom until the eldest reaches 18 years of age
- Two children of the opposite sex would be expected to share a bedroom until the eldest reaches 10 years of age
- A couple or single parent would not be expected to share their bedroom with a child
- A room measuring less than 50 sq. ft. (4.65 sq. m) would not be treated as a bedroom.

**Deliberately worsening circumstances**

If we consider that an applicant has acted unreasonably to make their housing circumstances deliberately worse in their previous accommodation without good reason, or with the aim of qualifying for a higher banding, no additional priority will be awarded.

This applies where an applicant or member of their household has committed anti-social behaviour that would render them unsuitable for re-housing. Cases will be reviewed once the applicant can demonstrate that this behaviour has been addressed. Where applicable, applicants will retain the banding and priority they held before worsening their circumstances.

**Commented [LC23]:** Additional section to better inform applicants

# Agenda Item 10

Appendix 1

## 16. Property Condition

If you rent your current home from a private landlord and you state that your reason for seeking social housing is due to problems with the condition of your home, a member of our Private Sector Housing team will contact you and your landlord or managing agent responsible for the property. You must cooperate with this and any subsequent property inspection that may be required. No priority will be awarded if you withhold your consent to allow us to contact your landlord or prevent works being carried out, for example by refusing to let contractors into your home to undertake the works.

If a visit is determined necessary by the Private Sector Housing team, they will inspect and assess your home using the Housing Health and Safety Rating System (HHSRS). We use this to identify and categorise any hazards to health and safety. A crowding and space hazard is included within the housing needs assessment of overcrowding and, if present, no additional priority will be awarded under property condition grounds.

Band A priority will only be awarded to applicants who currently occupy a property which has at least one Category 1 hazard (excluding crowding and space) where the conditions present an immediate threat of serious injury or are life threatening and where remedial action is considered unreasonable or impractical for cost or other reasons.

Examples of where remedial action is considered unreasonable or impractical is where:

- Work cannot be carried out to remedy a serious hazard with the applicant in residence and no alternative accommodation is available to the applicant to assist in progressing remedial works.
- The risk from the hazard in the property is greater because of being an elderly person or having a young child but the property would be relatively safe for occupation by others.

Band B priority will only be awarded to applicants who occupy a property which has at least one Category 1 hazard (excluding crowding and space) where:

- The hazard(s) identified pose a threat to the health and wellbeing of the occupants but where there is no immediate danger or it is not life-threatening, and remedial action is considered unreasonable or impractical.
- You do not have access to one or more of the basic facilities: bathroom, kitchen, inside toilet, cold or hot water supplies, or gas/electricity and this cannot be remedied within a reasonable timescale. (This does not apply if you live in shared accommodation and share facilities with another household.)

**Commented [LC24]:** This area is being cross checked for consistency.

Any priority awarded on the grounds of property condition will be removed if the necessary remedial works are completed before you are offered social housing.

Appendix 1

## 17. Financial Criteria

If you have a total household income or capital (including savings) above the thresholds described below, you will not usually be included on the Housing Register. The current thresholds for households are:

- Without dependent children, a total gross annual income of up to £40,000
- With dependent children, a total gross annual income of up to £56,000
- Total capital assets or savings of £16,000 or more, except where the applicant is a Band A transfer applicant who is downsizing from a home that is too large for their needs or is freeing up a wheelchair-adapted home, or is an applicant from any Band who is moving a Band D applicant, who is applying for designated older persons' housing, in which case the total capital assets or savings threshold is £50,000 or more.

When looking at gross income, everything will be taken into account including earnings, overtime payments, benefits, child maintenance and any other relevant income. The gross income level and the asset level will be based on average private rents or the level of deposit required to buy an average priced property in the area and will be reviewed as part of the annual review of this Scheme

**Commented [LC25]:** Further clarification to assist applicants

Current payments of the following are disregarded as income for the purposes of this assessment:

- Disability living allowance
- Attendance allowance and any benefit treated as attendance allowance
- Personal Independence Payments (PIP)
- Armed Forces Independence Payment
- War pensioner's mobility supplement
- Payments in compensation for non-receipt of the above

The financial thresholds do not apply to homeless persons to whom the Council owes the main housing duty under section 193 of Housing Act 1996 or transfer applications from Secure Tenants/Assured Tenants of housing associations e.g. tenants who wish to downsize.

If you own, or jointly own a property (including under a shared ownership arrangement), whether or not you currently live there, you will not usually be eligible to join the Housing Register. Homeowners who need to move on medical or welfare grounds, or grounds relating to a disability, may be eligible to join the Housing Register if their needs cannot be met by the purchase of a suitable property, funded by the proceeds of the sale of their current property or by using their current income and capital, including savings. All applications from home owners will be considered by the Housing Register Panel.

**Commented [LC26]:** Clarification for home owners

If you exceed the income/savings limits but wish to apply to join the Housing Register due to exceptional circumstances, all such cases will be considered by the Housing Register Panel. If you are unable to join the Housing Register, you may wish to

**Commented [LC27]:** Clarification re. exceptional circumstances applications

# Agenda Item 10

Appendix 1

consider alternative affordable housing options. For information on First Homes and Help to Buy options, such as shared ownership, view our [affordable homes webpage](#).

## 18. Outstanding housing related debt

It is essential for our partner housing association landlords and private sector landlords to collect rent and other housing-related debt.

Applicants who have an outstanding housing-related debt owed to another Council, housing association or private sector landlord, including, but not limited to, rent arrears, council tax arrears, Housing Benefit or Universal Credit over-payments and rent deposit scheme arrears, will usually be disqualified from joining the Housing Register, unless they have entered into a repayment plan and have made continuous repayments in accordance with the plan for a minimum period of six months. In assessing an application to join the Housing Register, the Council will take into account the size of the debt, the means to pay and the degree of need.

Once their application has been accepted onto the Housing Register, repayments should continue to be made on a regular and sustained basis until the debt is cleared. If the applicant breaches their repayment plan, they will be suspended from receiving any offer of accommodation. If the applicant is successful in bidding for a social home, any outstanding debts must usually be cleared in full before a property will be allocated.

In some cases where an applicant would otherwise be offered accommodation but for such a debt and where it is considered that although regular repayments are in place there is no reasonable prospect of them repaying the debt within the time frame required because they are unable to gain employment because of physical or mental illness, learning or physical disability, or are considered to be unable to adequately manage their finances due to health or disability reasons, the offer may still be agreed. This decision will be made by the Housing Register Panel.

Applicants who have been cautioned or convicted of housing or welfare benefits related fraud where that conviction is unspent under the Rehabilitation of Offenders Act 1974, will usually be disqualified from joining the Housing Register. Any person may apply to join once this conviction is spent.

Commented [LC28]: Clarification for applicants

## 19. Allocations exceptions

The allocation of housing by a local housing authority (Sevenoaks District Council) is defined in s.159 of the Housing Act 1996 and includes nominating a person to be an assured tenant of housing accommodation held by a registered social landlord / Registered Provider/Housing Association.

Appendix 1

The following are not “allocations” under this Scheme:

**Commented [LC29]:** Legal clarification

- An offer of accommodation to an existing social housing tenant (transfer applicant) with no reasonable preference. Under the Localism Act 2011 such cases are no longer subject to the Allocation rules set by section 166 of the Housing act 1996 Part 6:
  - Succession to a tenancy on an existing social housing tenant's death pursuant to s89 Housing Act 1985, or
  - Assignment of a tenancy to a person qualified to succeed to the tenancy on the tenants death, or
  - Transfer of the tenancy by a court order under family law provisions or under the Civil Partnership Act 2004, or
  - An introductory tenancy becoming a secure tenancy. or
  - Mutual exchanges (a swap of homes), unless these relate to Rural Exceptions Housing or accommodation in rural parishes where local needs housing nomination arrangements have been agreed by the Council.
- A housing association initiated transfer (e.g. decant to alternative accommodation to allow for major works).
- Provision of non-secure temporary accommodation in discharge of any homelessness duty or power.
- Allocations which housing associations make outside of their nomination agreement commitments with Sevenoaks District Council.
- Allocations where there may be public protection risks
- Where a Court makes a decision about a tenancy (such as an order under the Children Act).
- Where we let a property directly to someone as temporary accommodation only:
  - Where the tenant is returning to the property after refurbishment or improvement.
  - Tenancies granted under section 39 of the Land Compensation Act 1973 or sections 554 and 555 of the Housing Act 1985.
- ~~Allocation of pitches on traveller sites within the district.~~

**Commented [LC30]:** Deleted as proposal to Members seeking approval to require applicants for vacant pitches to apply under the Housing Register Scheme with allocations made according to a bespoke policy.

## 20. Making an application

Everyone who wants to be considered for inclusion on our Housing Register must carry out the application process set out below:

- Follow instructions on how to apply for housing on the online application form.
- Provide original documents to verify your identify and current housing circumstances
- Complete any supplementary forms that we may send or answer further questions that we ask you.

This process ensures that all applicants are assessed in a transparent and consistent manner. That we have all the information needed about your household and current circumstances to determine whether you qualify to join the Housing Register and if so, what priority banding is appropriate.

# Agenda Item 10

## Appendix 1

You can complete an assessment form to record your household's housing needs if you are 16 years of age or over. You can be included on only one application for housing in this district. This can either be your own personal application or you can be included as a household member in another person's application.

You must complete the assessment form fully and accurately. We will use it to decide your priority on the Housing Register so that housing can be allocated fairly on the basis of the greatest need. We will carry out home visits and interviews to confirm housing needs.

If you are between 16 and 18 years of age, before you are offered social housing, your ability to manage a tenancy will be assessed, usually via a referral to Social Services or other support services, to identify any need for support. You will need a guarantor, usually your parent, legal guardian or other relative as any tenancy granted will be held in trust until you reach 18 years of age.

You are required to sign declarations to confirm that you:

- Have provided true, accurate and complete information
- Will notify us of any change in your circumstances within 14 days of the change.
- Understand that information given on the assessment form will be shared with housing association landlords, other council departments, data matching companies and other relevant parties.
- Consent to us making relevant enquiries to verify the information given on the assessment form.
- Consent to the disclosure of relevant information by third parties to us, or by us to third parties.
- Understand that information provided may be used to help in the detection and prevention of fraud.

If you do not have access to the internet, the Accommodation Team can help you make an application.

### **Who can be included on your application?**

You can include members of your household who are currently living together with you, including:

- Your partner, whether you are married, in a civil partnership or cohabiting
- You and your partner's dependent children under the age of 18, including adopted children
- Relatives, which under this Scheme means adult children, parents or sibling, who have a need to live with you for which evidence is provided.
- Someone who currently lives with you as your caregiver.

We will also consider including partners, carers and dependents who are not currently living with you if you are:

Appendix 1

- No longer able to live independently because you need care and support that they can provide (or they need care and support that you can provide) and you are unable to live together as your current accommodation does not meet any needs arising from a disability (see Section 10).
- Unable to live together as neither you nor any other member of your household have accommodation available which is large enough to accommodate your whole household together
- Where you are applying to set up an independent home for and your household

**Advice and information about your application**

If you are homeless or threatened with homelessness, you should contact [housing@sevenoaks.gov.uk](mailto:housing@sevenoaks.gov.uk) for immediate advice and assistance. Further information can be found on our website [www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk).

Advice and information about your application to join the housing register can be obtained by emailing [accommodationteam@sevenoaks.gov.uk](mailto:accommodationteam@sevenoaks.gov.uk). All applicants accepted onto the Housing Register are entitled to see their registration and receive a copy of their application. An applicant also has the right to request general information to assess how their application is likely to be treated under this housing allocation scheme and whether and when housing appropriate to his/her needs is likely to become available.

Waiting times depend on number of factors:

- Your personal circumstances including your priority banding and the size and type of property needed to meet your household's need
- The number of properties available for letting
- the number of bids placed on each property
- Changes in the law, regulations or guidance, or the rules of this Housing Allocation Scheme.

Only a very general indication can be given as to how long an applicant may have to wait to be successful by using historical allocations data. There is no guarantee of housing by a certain date regardless of the priority band awarded. Households with a relatively low need are likely to wait a very long time and many have no realistic prospect of receiving an offer of social housing.

**21. How to Bid**

Social housing within the Sevenoaks District is allocated through the Kent HomeChoice (Choice Based Lettings) scheme <http://www.kenthomechoice.org.uk/choice/>. Our housing association partners are members of Kent Homechoice, which is a partnership of local councils and housing associations in Kent.

Applicants who are eligible to join the housing register can express a preference over the area and type of accommodation in which they would like to live.

**Commented [LC31]:** Clarification/information for applicants

# Agenda Item 10

## Appendix 1

When properties are advertised on the Kent Home Choice website, applicants are able to express an interest (bid) for the appropriate size of home but with type and location of their choosing. CBL enables applicants to apply for suitable housing in their district via an online bidding process.

After a property is let, feedback about the number of households that made a bid, the priority band of the successful applicant, and their priority date is available to view to bidders on Kent Homechoice. This helps applicants to understand the availability of suitable properties, their likelihood of success when applying and to gain an indication of the time they could be waiting.

Using CBL is in accordance with the District Council's partners' policies of offering people who are to be allocated housing accommodation; a choice of housing accommodation, or the opportunity to express preferences about housing accommodation, where this is practicable.

When your application has been accepted onto our Housing Register you will receive confirmation of your priority banding and details of how to access the Kent Homechoice bidding process. All housing offered by our housing association partners within the district is generally advertised on Kent Homechoice and each property will be available for applicants to place bids for a period of five calendar days.

The advertisements show photographs and give basic details of the properties including:

- The area
- Number of bedrooms
- Floor levels
- Mobility levels
- Weekly rent
- Service charges
- Any pet or age restrictions
- Any specific criteria e.g. Rural Exception Housing and/or Local Lettings Plans

There are no restrictions on the number of properties that you can bid for and you can place bids on any property that meet your household's needs as and when they are advertised.

If you prefer, we can set up auto-bidding on your account which means that a bid will automatically be placed on all properties that meet your needs by the close of bidding so that you will be included on all of the relevant shortlists and do not miss any opportunities to be offered affordable housing. Auto Bidding will be set up for all homeless applicants.

If you do not have access to the internet, the Accommodation Team can help you place bids.

## Appendix 1

Certain properties will not be advertised on Kent Homechoice and will be offered as direct lets, or will only be open for bids from certain applicants, e.g. designated older persons' housing and properties that have been adapted for wheelchair users, including direct lets. Properties that have been adapted for wheelchair users and those within designated older persons' housing schemes, are usually offered only to those who would benefit from them. Properties made available under local lettings plans, Rural Exception Sites or accommodation in rural parishes where local needs housing nomination arrangements have been agreed by the Council, will be open to general bidding but will only be allocated to applicants meeting the specific criteria set.

## 22. How homes are let/allocated

After an advertisement closes on Kent Homechoice, a shortlist is produced. In most cases, the property is offered to the household on the shortlist with the highest position in the highest band. This ranks all the bids placed in priority order, with applicants in Band A first, Band B second and so on. Within each band, the order of bids is ranked by the applicant's date of registration on the housing register, starting with the earliest. The more type and area choices an applicant makes the greater the chance the applicant will be successfully housed.

Different shortlisting rules apply to Rural Exception Sites or accommodation in rural parishes where local needs housing nomination arrangements have been agreed by the Council. In these cases, the applicant's local connection to the host Parish is considered first, followed by Band order and date of registration. An applicant's local connection to the Parish will be verified by the host Parish Council (this will be done in anonymised form).

**Commented [LC32]:** Additional information for applicants. Important in relation to GDPR.

If two or more applicants share the same priority date within the priority band, the system will place them in order of priority. The applicant at the top of the shortlist will be verified to check that the information they have given is correct and that the property is suitable. Once verified, the highest priority applicant will usually be offered the property, subject to any additional criteria that apply such as a local lettings plan, age restriction or suitability. If an applicant is not verified, does not respond to an offer or the offer is refused, the property will be offered to the next applicant in the shortlist, and so on, until the property is successfully let.

The relative position of bidders on the shortlist for a property may change between the close of bidding and when the property is offered. This will only happen where there is a change in the priority band awarded for one or more bidders on the shortlist, this would normally be as a result of the verification process. In such cases, the property will usually be offered to the applicant with the highest priority at the time the offer is made.

If there are no successful bidders the property will usually be re-advertised or it may be offered as a direct allocation to another applicant on the Housing Register. Once you are shortlisted and nominated for a property you will not be considered for any other properties that you have placed a bid on.

# Agenda Item 10

Appendix 1

Our housing association partners may have their own lettings policies which prevent a property being offered to an applicant.

Specific allocation policies may apply to supported housing schemes and other specialist accommodation, and these will determine how such homes are let/allocated.

In exceptional circumstances, we may decide to restrict bidding and allocations to certain categories of applicant, e.g. homeless households. This restriction will be time limited and our website will show how long it will remain in force before it is reviewed. The decision to impose restrictions will be made by the Portfolio Holder for Housing & Health.

## 23. Keeping the register up to date

It is our intention to renew all applications annually, or earlier as and when required. Failure to respond within 28 days to a request to renew your application, will result in your application being removed. If good reason can be shown why there was a failure to respond, then your application may be reinstated at the discretion of the Accommodation Team.

**Commented [LC33]:** Clarification/information for applicants

We will also remind you to tell us about any changes in your circumstances. If you fail to respond, or fail to provide any further information we ask for within 28 days, we will assume that you no longer wish to be on the register, and your application will be removed. If you notify us of a change of circumstances, you must also supply evidence of the change within 28 days so we can reassess your application.

Your application will be removed from the Housing Register if you:

- Accept an offer of accommodation made from the Housing Register
- Accept a private sector tenancy, including when we have provided financial assistance by way of a rent deposit, and no longer have a qualifying housing need
- Do not respond to the annual review
- Do not respond to correspondence from the Council asking you to provide information
- Are no longer eligible to be included on the register
- No longer wish to be re-housed
- Have left temporary accommodation that we arranged for you and we do not have your forwarding address
- Have moved without notifying us of your new address

Appendix 1

## 24. Local Lettings Plans

National and regional policies encourage new housing schemes to be mixed tenure, catering for a range of needs and aspirations. Alongside this we may use Local Lettings Plans to make social housing available to a wider range and variety of households, rather than concentrations of those with particular support needs, to contribute towards balanced and sustainable communities. This may include giving priority to Local Essential Workers (see Appendix 1) **or other categories of applicant.**

Local lettings plans will set out the criteria and priorities for letting homes within a specific housing development or area. Local Lettings Plans have to be approved by Portfolio Holder for Housing and Health and confirmed by the Head of Housing and the partner housing association.

## 25. Housing Register Panel

The Housing Register Panel comprises a group of three or more officers with at least one representative from the Accommodation Team, the Housing Options Team and an independent senior manager from the District Council who is not connected to Housing Services. They will meet on a regular basis to make and review decisions. The Panel will normally be chaired by a senior manager who will be responsible for notifying the applicant of the outcome.

The panel may also invite other relevant partners to attend, including but not limited to, the Community Safety Team and partner housing associations landlords. There is no right to review a decision made by the Housing Register Panel.

## 26. Consideration of offers and refusals

After the shortlisting and checking processes, the successful bidder will be contacted to arrange for them to view the property and attend a verification interview. If you are offered a home, then you would normally be expected to accept or refuse it within 24 hours of the viewing.

If you refuse an offer, your application will be removed from the Housing Register and you will be disqualified for 12 months. **You may apply to join the Housing Register again after 12 months.** See section 14 for more details.

If you feel the property you have been offered does not meet your needs, you can ask for a review as to the suitability of the property and you will need to provide detailed reasons for your refusal.

Your request will be considered by the Housing Register Panel who will consider the suitability of the offer in accordance with your assessed needs taking into account (but not limited to):

# Agenda Item 10

## Appendix 1

- The size, floor level, space and arrangement of the property, and whether it meets the housing needs of the household
- Any medical or welfare grounds for re-housing
- Any risk of domestic or other violence.

We will not hold the property for you during the review period; it will be immediately re-offered to another applicant and you will not receive any further offers during this time. If the review confirms the property was suitable your refusal will result in your application being removed from the Housing Register and you being disqualified for 12 months. If your reasons for refusal are accepted by the Housing Register Panel and the property offered is considered to be unsuitable for your needs, you will be able to continue bidding without any penalty.

### **27. Reinstatement of exceptional cases**

In exceptional circumstances the Council may reinstate applications which have been disqualified or suspended for a particular reason. Applicants should write to the Housing Register Panel who may reinstate the applicant or make an offer if they are satisfied, and it can be proved that disqualification from the Housing Register would cause exceptional hardship to the applicant and their household. There will be no further right of review of the decision of the Housing Register Panel.

The effect of a decision to reinstate a disqualified application on the grounds of exceptional hardship will be that the application is treated as having been made on the date it was originally made, not the date on which it was reinstated.

### **28. Ineligible or disqualified from the register**

We will write to you to notify you if we decide that you are not eligible or disqualified from the housing register. You have a right to review the decision, details of how we carry out the review can be found at Section 30 of this Scheme.

### **29. Inaccurate information provided**

The Council is under a duty to protect the public funds it administers and to this end may use the information you provide for the prevention and detection of fraud. It may also share this information with other Council departments, other local authorities, Government agencies and credit referencing agencies for the detection and prevention of crime.

It is an offence under the Housing Act 1996 and/or the Fraud Act 2006 for anyone seeking help from the Council to:

- give false or misleading information
- withhold information that we have asked for on an assessment form or other correspondence

## Appendix 1

- fail to tell us of a relevant change in circumstances which could affect the priority of housing awarded

This may result in prosecution, your application being suspended or cancelled and/or any tenancy granted to you being terminated. Prosecution by the Council could result in a sentence of up to ten years in prison.

It is your responsibility to inform us of any change that could affect the priority that has been awarded. If we offer affordable housing to you and, on further investigation, it appears that your circumstances had changed before the offer in a way that affected your housing priority, we reserve the right to withdraw the offer. While the investigation is ongoing the property will not usually be held for you and will be reallocated to the next person on the shortlist.

When housing has been allocated on the basis of false or misleading information, legal action may be taken to obtain possession of the property. We will decide when these provisions apply and when to begin criminal proceedings.

The Housing Register is registered under the current data protection legislation. Information on it is received, held, and disclosed only for registered purposes. For Rural Exceptions Housing schemes and accommodation in rural parishes where local needs housing nomination arrangements have been agreed by the Council, applicant details may be shared with the host Parish Council prior to an offer of housing being made.

Applicants have the right to see information on their file relating to their application except where this involves confidential third-party information. If an applicant is not eligible or does not meet the qualifying criteria for inclusion on the register or respond to an annual review of their entry on the register or is otherwise removed from the register, their records will be kept for five years before being confidentially deleted.

### **30. Right to review**

You have the right to request a review of any decision:

- To treat you as ineligible because of your immigration status
- To exclude or suspend you from the register because you do not qualify
- Setting out the facts of your case which have been, or are likely to be, considered in determining your priority on the register.

The notification of the decision will give clear grounds for the decision based on the relevant facts of your case. To request a review of a decision you must make a request in writing within 21 days of receiving it and clearly state why you do not agree with the decision. We may ask you to provide more information and/or attend an interview. Reviews will usually be carried out by the Housing Register Panel.

The review will look at your case based on the rules in our Scheme, any legal requirements and all relevant information. This includes information you have

# Agenda Item 10

## Appendix 1

provided and any changes since the original decision was made, for example paying off arrears or setting up a repayment plan, or where someone responsible for anti-social behaviour has left your household. We will not carry out a further review of the decision unless there is a material change in your circumstances.

### 31. Equality and diversity

Sevenoaks is a diverse district and home to people from a wide range of backgrounds and communities. We are committed to all our residents having the opportunity to reach their potential and seek to ensure our services meet all their needs.

We seek to ensure that no section of our community is excluded from the benefits and opportunities available and that we always have regard to the need to eliminate discrimination, harassment, and victimisation.

This housing allocation scheme will be applied consistently to everyone who applies to or is on the housing register, regardless of race, gender, disability, age, sexuality, sexual orientation, religion or belief.

### 32. Scheme maintenance

**The Scheme will remain in place and in operation for 5 years from the date of adoption.**

Sevenoaks District Council's Housing Service is responsible for this Scheme and will review its operation every 12 months and follow any changes to the relevant legislation or regulations.

It may sometimes be necessary to make minor amendments, which do not represent a major change of Scheme. This will include an annual review of income thresholds. Authority to introduce such minor amendments is delegated to the Chief Officer - People and Places, in consultation with the Portfolio Holder for Housing and Health.

We will seek to inform all applicants of any changes to this scheme by publicising details on our website and on Kent Homechoice.

**Commented [LC34]:** Review period recommended on an annual basis.

Appendix 1

**Appendix 1.1 – definition of Local Essential Worker**

A Local Essential Worker is defined as someone employed/**self employed** in the Sevenoaks District (as set out in Section 3) and who works in one of the following occupations:

- Public sector employees providing frontline services in areas including health, education and community safety, including NHS staff, teachers, police, firefighters, military personnel, social care and childcare workers;
- School support staff in the public sector;
- District Council employees who provide frontline services;
- Kent County Council and Town/Parish Council employees (from the 31 Town/Parishes located within the District) who provide frontline services;
- Private sector employees and the self-employed\*, providing frontline services in care, including teachers and school support staff, health care, social care and childcare workers;
- Private sector employees and the self-employed who provide frontline services in amenities, including cleaners, kitchen/catering staff, shop workers, hairdressers, local transport, food processing/production and agriculture; and
- Any other frontline occupational group experiencing recruitment or retention issues - such issues being first evidenced to the satisfaction of the District Council.

Any changes to the definition will be at the sole discretion of the District Council, as approved by the Portfolio Holder for Housing & Health. Any changes will be shown on the District Council's website.

This page is intentionally left blank

## Equality Impact Assessment

### Appendix 2- Sevenoaks District Housing Register Allocations Scheme

<b>Summary of decision to be made:</b>	2 <sup>nd</sup> Draft of the Sevenoaks District Housing Register Allocation Scheme		
<b>Lead Officer (job title):</b>	Liz Crockford, Interim Housing Strategy Manager /Sharon Donald, Interim Head of Housing		
<b>Date the final decision is due to be made:</b>	19/07/2022	<b>Date this assessment commenced:</b>	13/4/22
<b>Is the decision relevant to the aims of the Public Sector Equality Duty?</b>			<b>Yes / No</b>
Eliminate discrimination, harassment and victimisation			<b>Yes / No</b>
Advance equality of opportunity			<b>Yes / No</b>
Foster good relations			<b>Yes / No</b>
If the answer is yes to any of the above, proceed with the assessment. If the answer is no, please say why and summarise any evidence:			
For each of the following characteristics, summarise any existing data, consultation activity, interpretation of the impacts and actions that can be taken to reduce or mitigate any negative impacts:			
<b>Characteristic:</b>	<b>Data and consultation</b>	<b>Summary of impact</b>	<b>Actions</b>
Disability	Sevenoaks District Housing Needs Survey 2017, Targeted Review of Local Housing Needs 2021, 2011 Census, Sevenoaks District Housing Strategy 2022 - 2027 (emerging), Older Persons' Housing Study 2022, public consultation February to April 2022.	Highest priority proposed for tenants vacating adapted homes. This will facilitate the potential for more suitable homes becoming available to meet the needs of disabled Housing Register applicants. See also Carers.	WKEP Aim: <a href="#">Other actions as a service provider</a>
Carers	As above	Reasonable travel distances now stipulated as a factor when determining priority. This will ensure applicants experiencing unsustainable journeys to give/receive care, will have priority.	WKEP Aim: <a href="#">Other actions as a service provider</a>
Race	As above	None - the allocations policy aims to treat all applicants equally irrespective of race	WKEP Aim: <a href="#">Other actions as a service provider</a>
Gender	As above	None - the allocations policy aims to treat all applicants equally irrespective of gender .	WKEP Aim: <a href="#">Other actions as a service provider</a>
Age	As above	Highest priority proposed for tenants	

## Equality Impact Assessment

		vacating larger family-size properties and downsizing to homes with fewer bedrooms. This will facilitate more family-size homes becoming available to meet the needs of other Housing Register applicants. Applicants age 55 years or over and wishing to live in designated older persons' housing will not need to demonstrate a local connection.	WKEP Aim: <a href="#">Other actions as a service provider</a>
Religion / Belief	As above	None - the allocations policy aims to treat all applicants equally irrespective of religion or belief	WKEP Aim: <a href="#">Other actions as a service provider</a>
Sexual Orientation	As above	None - the allocations policy aims to treat all applicants equally irrespective of sexual orientation	WKEP Aim: <a href="#">Other actions as a service provider</a>
Pregnancy / Maternity	As above	The draft scheme prioritises pregnancy and maternity as a protected characteristic.	WKEP Aim: <a href="#">Other actions as a service provider</a>
Marital or Civil Partnership Status	As above	The allocations policy aims to treat all applicants equally irrespective of this status	WKEP Aim: <a href="#">Other actions as a service provider</a>
Gender reassignment	As above	The allocations policy aims to treat all applicants equally irrespective of gender reassignment	WKEP Aim: <a href="#">Other actions as a service provider</a>
<b>Summary of impacts :</b> (to be included in committee reports)	<p>Under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The impact has been analysed and does not vary between groups of people.</p> <p>The decisions recommended through this paper will result in clearer definitions and transparency within the new Sevenoaks District Housing Allocations Scheme. The Scheme determines eligibility for, and the allocation of, social housing within the District. Social housing is owned by Registered Provider partners</p>		

## Equality Impact Assessment

	<p>as well as other Providers, including Quercus Housing. The Scheme will provide greater opportunities for people with a genuine local connection and an identified housing need, including those in reasonable preference groups and with protected characteristics, to join the Sevenoaks District Housing Register. The Scheme ensures priority is given to those in the greatest housing need, except where homes are delivered on Rural Exceptions Sites or where a Local Lettings Plan has been approved.</p> <p>A review mechanism is proposed, so that minor adjustments to the Allocations Scheme may be made (through delegated authority to the Chief Officer People &amp; Places, in consultation with the Portfolio Holder for Housing &amp; Health) to ensure the Scheme retains its relevance and robustness.</p>			
Please tick the outcome of this assessment:	<del>No impact</del>	<b>Adjust the policy</b>	<del>Continue the policy</del>	<del>Stop and remove the policy</del>
Date assessment will be reviewed:	07/07/2022			

This page is intentionally left blank

**SEVENOAKS DISTRICT COUNCIL OUT OF AREA PLACEMENT POLICY**

**Housing and Health Advisory Committee - 6 June 2022**

**Report of:** Sarah Robson, Deputy Chief Executive and Chief Officer - People and Places

**Status:** For Decision

**Also considered by:**

- Cabinet - 7 July 2022

**Key Decision:** No

**Executive Summary:** In order for Sevenoaks District to adhere to relevant case law and good practice the Homelessness prevention service has developed an Out of Area Placement Policy (Appendix 1) which gives a framework and structure to the allocation of both temporary accommodation and Private Rented Sector Offers to homeless applicants who have approached for housing assistance.

**This report supports the Key Aim of:** the Council's Housing and Health Strategy.

**Portfolio Holder:** Cllr. Kevin Maskell

**Contact Officer:** Sharon Donald, Interim Head of Housing, x 7131

**Recommendation to Housing and Health Advisory Committee:**

That comments on recommendation (a) below are passed to Cabinet.

**Recommendation to Cabinet:**

- To adopt the Sevenoaks District Out of Area Placement Policy.

**Reason for Recommendation:**

The policy will enable Sevenoaks District Council to work in a structured and transparent manner when allocating properties which at times will sit outside of our district boundaries.

**1 INTRODUCTION AND BACKGROUND**

- 1.1 The demand for both temporary accommodation (TA) and settled accommodation is growing across our district with the number of applicants who are approaching the Council for resettlement support growing each year. In the preceding four years we have had an incremental increase, as set out below:

**Table 1: Homeless approaches**

	<b>Number Of Approaches</b>
Jan - Dec 2017	1080
Jan - Dec 2018	1314
Jan - Dec 2019	1193
Jan - Dec 2020	1199
Jan - Dec 2021	975

- 1.3 Approaches have slightly decreased because homeless preventions have increased over the past 12 months and new temporary accommodation placements have decreased. However, the team is struggling to secure suitable and affordable ‘move on’ accommodation in the district, which is impacting numbers of households remaining in temporary accommodation
- 1.4 The need of temporary accommodation continues to increase and has naturally led to a greater demand on longer term accommodation including both affordable housing through the Housing Register and access to the private rented sector through our Private rent Scheme (PRS). As such, the pool of decent affordable units within Sevenoaks District is shrinking, as new build affordable housing cannot keep pace with demand. We are finding it considerably more difficult to place the growing number of households within our district boundaries.
- 1.5 A large number of recent reports have demonstrated the negative effects of homelessness and temporary accommodation on people’s physical and mental health and more stable, settled accommodation available in the private rented sector may contribute to resolving this. Please see Background Paper ([22.7 HEALTH AND HOMELESSNESS\\_v08\\_WEB\\_0.PDF \(local.gov.uk\)](#)).

**Table 2: Numbers in Emergency Accommodation**

<b>Period</b>	<b>No in all Emergency accommodation (as at 1st of each month)</b>
Jan - Dec 2017	663
Jan - Dec 2018	834
Jan - Dec 2019	903
Jan - Dec 2020	1083
Jan - Dec 2021	1423

- 1.6 It is noted that an increase in temporary accommodation has meant there has been a requirement to also source accommodation outside of Sevenoaks District. Sevenoaks District Council has adapted the Help to Rent Scheme so that residents are able to source the property independently or through the assistance of Sevenoaks District Council whom have built up a number of links to access private accommodation. In each instance, the Council will conduct a number of checks to ensure the property is affordable, meets the needs of the household and is at a standard of quality in which residents would be happy to reside.
- 1.7 Alongside the increase in our own local demand, we are also competing for both Temporary Accommodation (TA) and longer-term accommodation with other districts and boroughs including unitary London Authorities, who have a far more generous budget and funding streams than Sevenoaks District. There is lack of available move on properties. These pressures have led us to consider the manner in which we allocate our resources based on household composition; community contribution including work and volunteering; and social and welfare needs. The proposed Out of Area Placement Policy sets out how the Council will seek to work with households based on their priorities, presenting needs and affordability in order to offer the most appropriate accommodation for both TA and through the Private Rented Sector as a longer-term housing solution.
- 1.8 The Policy sets out how households will be prioritised for properties, both for private rented sector offers and for temporary accommodation. Its key principle is to ensure that health and welfare needs are taken into account when households are prioritised for housing in different locations
- 1.9 Accommodation in the private rented sector within Sevenoaks District is often not affordable for many residents whom approach the council. The local housing allowance (LHA) sets the amount of housing support paid out either as part of Universal Credit (UC) or under the legacy Housing Benefit, to those living in the PRS. LHA rates are set by calculating the 30th percentile of rents in 'Broad Rental Market Areas'. In Sevenoaks's case, the area includes neighbouring districts and boroughs where rents are cheaper. The shortfall between LHA rates and private rents in Sevenoaks District is significant as shown in Table: 3.

Accommodation type Gap between LHA and rents	20/21 LHA rate Per Week	Effective monthly LHA rate	Properties to Rent (Rightmove) in Sevenoaks District Lowest appx rent £	Gap between monthly LHA and rents
Shared Accommodation Rate	£88.85	£385.02	£680.00	-£385,02
One Bedroom	£155.34	£673.14	£950.00	-£276.86
Two Bedroom	£195.62	£847.68	£1,200.00	-£352.32

## Agenda Item 11

Three Bedroom	£241.64	£1,047.17	£1,500.00	-£452.83
Four Bedroom	£299.18	£1,296.45	£1,800.00	-£503.55

- 1.10 The Placement Policy will ensure we comply with the relevant case law, including the Supreme Court judgment in the case of *Nzolameso v City of Westminster* [2015] UKSC 22 and the Court of Appeal decisions in the cases of *Alibkheit v London Borough of Brent* and *Adam v City of Westminster* [2018] EWCA Civ 2742, which set out that Local Housing Authorities should adopt a structured and fair process, which determines how applicants will be prioritised for accommodation in our district and beyond.
- 1.11 In order for private rented offers to be affordable to homeless households within benefit levels (or as close as possible), many of these offers are likely to be outside the Sevenoaks District. Support will be offered to households relocating outside the District and to other households where needed, in order to minimise adverse impacts and to enhance the prospects of relocated families integrating into the new area. The policy also aims to help to improve outcomes for homeless households in that they will receive a quicker permanent offer of housing, in an area where they are able to settle and put down long-term roots.
- 1.12 The cost of nightly paid temporary accommodation has increased by 40% from last year. The policy aims to reduce temporary accommodation use and contain costs by offering homeless households private rented housing, as an alternative to them spending many years in temporary accommodation waiting for social housing.

### **Cost of emergency accommodation (Nightly let) April to April**

- 2021/22 - £1,086,572 to December 2021
  - 2020/21 - £769,664
- 1.13 The Council's first priority will be to secure accommodation in Sevenoaks District. Where it is not possible to secure good quality affordable accommodation in the District, the Council will next look in surrounding districts and boroughs, then in other areas increasingly further afield if we deem it to be suitable and meets the requirements as set out by Part 7 of the Housing Act 1996, and the Homelessness Reduction Act 2017; statutory guidance on suitability; and the Homelessness Code of Guidance. The Council will also work to secure accommodation for those households who wish to live outside of this area."
- 1.14 The Placement Policy sets out the way in which we will offer residents homes in the private rented sector and ensure that these are both suitable for the household and sustainable in the longer term. It also covers the way in which we will prioritise households for accommodation within Sevenoaks District in situations where there is not enough housing within the district. Our policy though remains not to place families out of the district unless this is either what they want or where there is no suitable alternative

- 1.15 If the applicant refuses the offer of accommodation and cannot provide further evidence that it would be unsuitable we will discharge our duty and no longer be under a duty to secure accommodation for the applicant. An ongoing duty to provide advice and assistance continues and this may include access to the Housing Register and assistance with obtaining private rented accommodation. The decision on ending our duty to secure accommodation will not be taken lightly and the policy speaks to our aspiration of working in a supportive and transparent manner.
- 1.16 We particularly struggle to procure properties big enough for larger families that is both affordable and suitable. Four bedroomed social housing stock is very limited and larger properties in the private rented sector in Sevenoaks District are often unaffordable.
- 1.17 The human cost of homelessness and households spending years in temporary accommodation is enormous. At the same time the financial cost to the Council of an ever-increasing number of households in temporary accommodation is growing from its current level of £1.2 million per annum. The proposals outlined represent a shift in focus and investment in the prevention of homelessness and support for residents to proactively reduce the number of households reaching crisis point.
- 1.8 The impact of Covid-19 has meant that we have had a sudden rise in the number of single people approaching us for help and who we have accommodated on the basis of their risk of rough sleeping as required by Government. This has led to us accommodating over 75 people in short term emergency housing. The pandemic has also highlighted the role that overcrowding plays in the sustainability of the lockdown for many of our poorest households. Recent figures on mortality from Covid-19 have also added physical risk to the dangers of overcrowding. The Allocations Scheme gives additional priority to social housing tenants who are overcrowded. For private rented tenants, we are working to improve access to the private rented sector to make it easier for them to move to a more suitable home. The Placement Policy sets out our approach to this.

## **2. AVAILABLE OPTIONS**

- 2.1 Option 1: Do nothing - this is not recommended because if we continue to operate without an adopted Placement Policy, this could leave Sevenoaks District Council open to legal challenge and in a precarious position when seeking to end our duties by making an offer of suitable accommodation which sits outside our district boundaries. Households would be in temporary accommodation for longer than necessary which would lead to a negative financial cost implication.
- 2.2 Option 2: Endorse the new Placement Policy - to ensure those households in Temporary accommodation can be offered appropriate accommodation outside of the district in accordance with an adopted policy that reflects the relevant case law and good practice. This may mean households we have an open duty to, could be offered accommodation beyond our district

## Agenda Item 11

boundaries - but this will be undertaken in a transparent and consultative manner with the applicant.

### **3. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS**

- 3.1 Our preferred option is Option 2, to endorse the Out of Area Placement Policy. This will enable the homelessness prevention service to work within a framework with households to ensure good quality affordable housing options are offered to applicants.
- 3.2 The Placement Policy will give the housing service team a structure in which to work and also provides transparency to our customers on how allocations will take effect. Sevenoaks District Council will also be working within the spirit of good practice and relevant case law.
- 3.3 The secondary outcome of this we hope would support a reduction in our TA budget moving forward as we can offer more households (currently residing in TA) offers of private rented accommodation which means their housing journey will come to an end quicker than previously.

### **4. RISK**

- 4.1 The Placement Policy codifies the approach to the use of the private rented sector. The transformation programme is based on making best use of the private rented sector. Without a formally approved policy there is a risk of legal challenge.
- 4.2 The policy also enables us to work closely with applicants in a transparent and fair way - this ensures an equitable process for all - instead of an approach that is perceived to be subjective by an aggrieved applicant.
- 4.3 There is a risk that there will be limited affordable private rented properties to meet the needs of homeless households. While the research gave an indication of different locations where properties may be available, market changes can happen quickly and the actual availability of properties depends on the willingness of landlords to let accommodation to homeless households. To mitigate this risk, incentives will continue to be offered to landlords to secure properties in line with local market intelligence. The supply and availability of properties will be kept under review but it needs to be noted that building up supply to meet demand is likely to take time.
- 4.4 There is a risk of legal challenges where offers are outside Sevenoaks District and, or where shared accommodation is offered. To minimise this, individual suitability assessment will be carried out before an offer is made in line with legislation and statutory guidance.

**5. NEXT STEPS**

- 5.1 The draft timeline for reporting, and final approval for the implementation of the Out of Area Placement Policy is as follows:

Housing & Health Advisory Committee	6 June 2022	This report asks HHAC to recommend the Out of Area Placement Policy to Cabinet
Cabinet	7 July 2022	The adoption of the Out of Area Placement Policy

**6. COMMUNICATION AND IMPLEMENTATION OF THE DECISION**

- 6.1 The policy will be uploaded on to our website so that the general public can review and have access, ensuring transparency.
- 6.2 If the policy is endorsed, the Housing teams will be trained to implement the new processes.
- 6.3 Finally, the Policy will be monitored and reviewed formally in line with the development of a new Homelessness and Rough Sleeping Strategy in 2022. The Policy may also be reviewed at any time, in line with any relevant changes in legislation or Guidance issued by relevant Government Departments.

**7. Other Options Considered and/or Rejected**

None.

**Key Implications**

Resource (non-financial)

Existing staffing resources will be utilised.

Financial

There are no financial implications from the introduction of this Policy because the implementation will be delivered within existing resources. Any financial impact that results as an outcome of the new policy should have a positive impact on the Homelessness service because it will reduce the number of people in TA thus reducing service costs. The effects of the policy will be monitored and reported as part of the overall monthly budget monitoring.

Legal Implications and Risk Assessment Statement

The judgement made by the Supreme Court in *Nzolameso vs Westminster Council* [2015] are set out in this report.

## Agenda Item 11

Section 188 of the Housing Act 1996 Part 7 imposes a duty on the Council to secure accommodation for an applicant where it has reason to believe that they may be homeless, eligible for assistance and has a priority need.

Section 193 of the Housing Act 1996 Part 7 imposes a duty on the Council to secure accommodation for an applicant where it is satisfied that they are homeless, eligible for assistance, has a priority need and are not homeless intentionally.

Section 17 of the Children's Act 1989 also provides a general duty on the Council to safeguard and promote the welfare of children within their areas who are in need by providing a range of services to the child and/or his family, which may include the provision of temporary accommodation on a temporary basis.

Section 208 of the 1996 Act also provides that so far as reasonably practicable the Council shall in discharging their housing functions secure that accommodation is available for the occupation of the applicant in their district and that if it secures accommodation outside its district it shall give notice to the local housing authority in whose district the accommodation is situated. The Homelessness (Suitability of Accommodation) Order 2012 sets out factors to be taken into account in determining whether accommodation provided under part 7 is suitable, which includes the location of the accommodation. It also lists various factors to be regarded as unsuitable in relation to a Private Rented Sector Offer. The Homelessness Code of Guidance and Supplementary Guidance include various provisions on suitability of accommodation in relation to part 7.

### Equality Assessment

The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. Under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The impact has been analysed and does not vary between groups of people.

The key policies within the Out of Area Placement Policy have a particularly positive impact for disabled people by ensuring a new suitability assessment and ensuring prioritisation for disabled people with the highest needs for in-district accommodation and transfer moves. Overall the impact of the policy upon homeless people with disabilities is positive; ensuring all disabled groups can now access clear guidance on the whole homeless placements process.

Ethnic minority & female households, who are more likely to be homeless and on low income, will benefit from assistance from the council to help them find affordable housing solutions beyond Sevenoaks District when no solution can be found in district. See Appendix 2.

### Net Zero Implications

The decisions recommended through this paper have a remote or low relevance to the council's ambition to be Net Zero by 2030. There is no perceived impact regarding either an increase or decrease in carbon emissions in the district, or supporting the resilience of the natural environment

### **Conclusions**

The annual supply of social housing is reducing and after a long period of steady reduction numbers of households in temporary accommodation are increasing. The affordability of temporary accommodation for the Council is a major concern. Changes to temporary accommodation subsidy rules, welfare reform and a private rental market experiencing above inflation rises all combine to put significant financial pressure on the Council.

The extent of demand for temporary accommodation and its limited supply within the Sevenoaks District has historically meant that the majority of temporary housing procured and used has been provided outside the district's boundaries.

For the most part, the proposed policy is simply formalising an existing procedure that the Council has worked to in making out of district placements for many years. However, given the decreasing supply of affordable temporary accommodation and increased competition between Kent and London local authorities to secure it, the majority of households will continue to be placed a considerable distance away. The potential for an increased number of legal challenges exists and therefore, in those circumstances, a policy highlighting which households, where possible and when reasonably practicable will be offered temporary accommodation in the local area is deemed prudent.

Sevenoaks District Council intends to make use of the existing powers to fully discharge its full housing duty by way of a 'private rented sector offer' under (s193 7AA - 7AC) Part VII Housing Act 1996 as amended by s.148 (5)(7) Localism Act 2011. The policy will apply for most homeless applicants who have made a homeless application to the Council and will particularly be apt in cases where there is a significant financial burden on the local authority or applicant. There will not be a blanket application of the legislation and a decision will be taken after a full consideration of each household's individual circumstances and the facts that apply to that case.

The policy makes the Council's position clear and provide a realistic message to applicants on their chances of being placed into accommodation locally.

## Agenda Item 11

**Appendices:**

Appendix 1: Sevenoaks District Council Out of Area Placement Policy

Appendix 2: Equality Impact Assessment (EqIA)

**Background Papers:**

LGA The Impact of Homeless on Health [22.7 HEALTH AND HOMELESSNESS\\_v08\\_WEB\\_0.PDF \(local.gov.uk\)](#)

Sarah Robson  
Deputy Chief Executive  
Chief Officer - People and Places

<b>Appendix 1:</b>	
<b>Sevenoaks District Council</b>	
<b>Policy</b>	<b>Out of Area Placement Policy</b>
<b>Key legislation</b>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Housing Act 1996, as amended by the Homelessness Act 2002; Homelessness Code of Guidance</li> <li><input type="checkbox"/> Homelessness (Suitability of Accommodation)(England) orders 1996, 2003 &amp; 2012. Supplementary Guidance on the Homelessness changes in the Localism Act 2011 &amp; the homelessness (Suitability of Accommodation)(England)Order 2012</li> <li><input type="checkbox"/> Homelessness Reduction Act 2017;</li> <li><input type="checkbox"/> Domestic Abuse Act 2021 (England)</li> <li><input type="checkbox"/> Children Act 2004;</li> <li><input type="checkbox"/> The Localism Act 2011</li> <li><input type="checkbox"/> Equality Act 2010; and</li> <li><input type="checkbox"/> Civil Contingencies Act 2004</li> </ul>
<b>Key strategies and policies</b>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Community Plan (2019-22);</li> <li><input type="checkbox"/> Housing Strategy (2017);</li> <li><input type="checkbox"/> Housing Allocations Policy (2019);</li> <li><input type="checkbox"/> West Kent Homelessness Strategy (2016-21); and</li> <li><input type="checkbox"/> Kent &amp; Medway Housing Strategy (2020).</li> </ul>
<b>Version</b>	Final (14/02/22)
<p><b>Contents</b></p> <p>1. Introduction .....1</p> <p>2. Private Rented Sector Offer (PRSO) and Temporary accommodation ..... 4</p> <p>3. Suitability of accommodation.... .....6</p> <p>4. Criteria for prioritising placements inside and outside of the Sevenoaks District..... 8</p> <p>5. Monitoring and Review.....11</p> <p>APPENDIX A: Local Housing Allowance (LHA) rates..... 11</p>	

## Section 1: Introduction

- 1.1 This document sets out Sevenoaks District Council's policy for the placement of households in private rented accommodation, both inside and outside of the Sevenoaks District.
- 1.2 It covers *longer term* temporary accommodation placements for households accepted as homeless under section 193 HA96 and a private rented sector offer defined by section 193(7AC) with a view to bringing the section 189B(2) duty, or section 193(2) duty to an end.
- 1.3 This policy does not cover interim temporary accommodation for homeless households where this is required under section 188 of the Housing Act 1996 while inquiries are carried out.
- 1.4 This policy does not apply to offers of long-term accommodation under Part VI of the Housing Act 1996 as amended.

In accordance with legislation and statutory guidance, the Council seeks to accommodate homeless households in Sevenoaks District as far as reasonably practicable. However, as there is a serious shortfall of accommodation in the District to meet housing need, it will not be reasonably practicable to provide accommodation within Sevenoaks District to every household and there will be an increasing need to use accommodation that may be at some distance from the District.

### The policy complies with:

- The Housing Act 1996, as amended by the Homelessness Act 2002
- The Localism Act 2011
- Equality Act 2010
- Homelessness (Suitability of Accommodation) (England) Orders 1996, 2003 & 2012.
- Supplementary Guidance on the Homelessness changes in the Localism Act 2011 & the Homelessness (Suitability of Accommodation)(England) Order 2012
- The Homelessness Code of Guidance
- The Homelessness and Rough Sleeper Strategy 2019-2024
- The Allocation Scheme
- Children Act 2004 (in particular section 11)
- Relevant decisions by the Courts including the Supreme Court judgment in the case of *Nzolameso v City of Westminster* [2015] UKSC 22 and the Court of Appeal decisions in *Alibkheit v London Borough of Brent and Adam v City of Westminster* [2018] EWCA Civ 2742.

- 1.5 The policy takes into account the statutory requirements on local authorities in respect of suitability of accommodation as per Section 206 Housing Act 1996 (HA96), including Suitability Orders, Supplementary Guidance on Homelessness changes in the Localism Act 2011 and on the Homelessness (Suitability of Accommodation (England) Order 2012, the Homelessness Code of Guidance 2018, the Children Act 2004 s.11 which places duties on a range of organisations and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.
- 1.6 As per Section 208 Housing Act 1996, and paragraph 17.50 of the Homelessness Code of Guidance, so far as reasonably practicable, the Council seeks to accommodate homeless households as close as possible to where an applicant was previously living and always considers the suitability of the accommodation, taking into account the circumstances of the individual household. However, due to an acute shortage of affordable housing locally, and rising rental costs, an increasing number of households are likely to be placed outside the District, as it will not be reasonably practicable to provide accommodation within Sevenoaks District. The application of housing benefit caps, Local Housing Allowance rates within the District, welfare reform and universal credit, together with restrictions upon overall benefit entitlement, has further restricted the number of properties that will be affordable to homeless households in Sevenoaks District, and particularly larger families.
- 1.7 When determining whether it is reasonably practicable to secure accommodation in Sevenoaks District, as opposed to simply what is reasonable, the cost of the accommodation is a relevant and proper consideration. Matters to be taken into account here include information provided by the applicant, together with paragraph 17.45 of the Homelessness Code of Guidance. The reality however, is that the demand for housing greatly exceeds supply in respect to securing affordable Private Rented Sector Offers (PRSO) accommodation and all forms of temporary accommodation within our District boundaries.
- 1.8 The scale of demand and the limitations on resources are such that the Council and its partners cannot build enough affordable accommodation for households on lower incomes to meet all housing need. Even if resources were available, there is a limit to capacity given that the opportunities for large scale new development in Sevenoaks District are constrained by land availability and costs.
- 1.9 The Local Housing Allowance (LHA) is used to work out how much Housing Benefit a tenant will receive to pay their rent. LHA rates depend on who lives in the household, and the area they are making their claim in. These areas are called Broad Rental Market Areas (BRMA). The local authority area of Sevenoaks District is divided into two Broad Rental

## Agenda Item 11

Market Areas (BRMA), which are used to calculate LHA rates in Sevenoaks, namely High Weald BRMA and North West Kent BRMA. Appendix 1 provides a link to the Valuation Officer Agency website where the LHA rates for each District can be searched.

- 1.10 The Council is making efforts to ensure that its temporary accommodation portfolio reflects the most common locations for applicants presenting as homeless in our district. However, the Council is committed to securing suitable accommodation for homeless households under all relevant sectors of the Housing Act 1996.
- 1.11 The policy therefore details how applicants will be prioritised for housing inside the Sevenoaks District and out of District.

### **Section 2: Private Rented Sector Offer and Temporary Accommodation Lettings**

- 2.1 **Temporary Accommodation:** Due to the shortage of suitable accommodation in Sevenoaks District, homeless applicants who are housed under the Council's interim duty to accommodate pursuant to section 188 HA96 may initially be placed in emergency accommodation, including bed and breakfast and short-term self-contained accommodation, such as annexes, or nightly-paid accommodation while enquires are carried out. This accommodation is highly likely to be outside of the District. Where it is not reasonably practicable to offer an applicant in-District accommodation on a specific day, and it has been necessary to offer an applicant out-of-District accommodation, there is no legal requirement on the Council to continue to search for in-District accommodation, only that they have done all that is reasonably practicable to offer a particular applicant accommodation within its own District. If the Council decides the Section 193(2) main housing duty is owed, they will be moved to longer-term temporary accommodation or made a Private Rented Sector Offers (PRSO) as soon as a suitable property becomes available.
- 2.2 Wherever possible and in compliance with the regulations, the Council will avoid placing families with dependent children, pregnant women and young people aged 16/17, in bed and breakfast accommodation. Where no other suitable accommodation exists and such placements are necessary, the Council will move these households to more suitable self-contained accommodation within six weeks.
- 2.3 Applicants will be given one offer of suitable accommodation. This may be under longer-term temporary accommodation where the main housing duty has been accepted, or a Private Rented Sector Offers (PRSO). Offers of temporary accommodation will be made verbally over the phone by the Accommodation Services Team and followed up in writing thereafter.

- 2.4 **Private Rented Sector Offer (PRSO):** If a PRSO is being offered the Housing Advice Service will discuss the potential offer with the applicant in a supportive manner, explaining why this decision has been made and follow this up in writing. **The applicant will be advised to accept the offer made, with both the Officer and the offer letter explaining the consequences of refusal and any right of review that they have of the suitability of the offer of accommodation.** There is no obligation upon the Council to enable applicants to view the accommodation prior to acceptance but in terms of a PRSO we would endeavour to enable a viewing. In making the offer, the household's individual circumstances will be considered, taking into account the factors set out in section 3 of this policy and the Council's criteria on in/out of District placements detailed in section 4.
- 2.5 If an applicant rejects an offer of accommodation, they will be asked to provide their reasons for refusal. This applies to those being transferred from existing Temporary Accommodation (TA) or those in TA who are required to move by the Council and whom the Council has accepted a rehousing duty towards under Section 193 HA96. The Council will consider the reasons given and undertake further enquires as necessary. If the Council accepts the reasons for refusal and agrees the offer is unsuitable, the offer will be withdrawn and a further offer will be made.
- 2.6 Where applicants refuse suitable accommodation (which may include out of Area placements) and the Council does not accept their reasons for refusal and considers that the offer is suitable, applicants will not be offered further accommodation and will be required to make their own arrangements.
- 2.7 In cases where the applicant still refuses a suitable offer of accommodation, after having been informed that the Council has not accepted their reasons for refusal, the interim homelessness duty will be discharged. The homeless household will be provided reasonable period of time to leave the interim accommodation unit. In accordance to the Council's safeguarding policy and procedure relevant referrals would be made to Adult and Specialist Children's Social Services to promote the safeguarding of vulnerable adults and children.
- 2.8 If they are already in longer-term temporary accommodation, the main housing duty will be discharged, and the applicant will be served with the appropriate Notice to Quit this accommodation. For applicants where the Council has accepted a rehousing duty under section 193 HA96, (s.193 duty) there is a right to request a review of the suitability decision, pursuant to section 202 HA96.

## Agenda Item 11

- 2.9 Where applicants, for whom the Council has accepted a s.193 duty refuse a suitable offer and submit a review request, they will only continue to be accommodated during the review period in exceptional circumstances. The Council will apply the principles laid down in the judgment in *R(Mohammed) v Camden LBC* [1997] 30 HLR 315 when reaching a decision on providing discretion to accommodate an applicant pending a review. Each case will be considered on an individual basis, taking into account the overall merits of the review request, any new information or evidence that may affect the original decision, the personal circumstances of the applicant and the potential impact of the loss of accommodation. In accordance with the Council's safeguarding policy and procedure relevant referrals would be made to Adult and Specialist Children's Social Services to promote the safeguarding of vulnerable adults and children.

### Section 3: Suitability of accommodation

- 3.1 In relation to a temporary or private sector offer of accommodation, the Council will consider the suitability of the offer, taking into account the following factors:

3.2 **Accommodation available in the District**

If suitable accommodation is available in the local authority area, the Council will seek to house applicants in the Sevenoaks District, allowing them to maintain any established links with services and social/support networks. However, when there is a lack of suitable accommodation or there are higher priority households awaiting accommodation in the District, out of Area placements will be used to meet the Council's housing duty (see section 4 on priority for local accommodation below).

The Council may also keep aside local vacant units in anticipation of applicants presenting who meet the criteria for a local placement. This has been confirmed as a reasonable practice in the Court of Appeal decisions in *Alibkheit v Brent LBC* and *Adam v Westminster*.

3.3 **Affordability**

'Affordability' as defined in this policy means: "the household must have its equivalent level of income support or income-based Jobseeker's Allowance (whether claimed or not) available to spend on reasonable living costs after accommodation costs have been deducted from the household's income". Due regard will be given to s.17.45 of the Code of Guidance 2018 when assessing affordability.

3.4 **Size and location of the property and availability of support networks in the area**

Accommodation must provide adequate space and room standards for the household in light of the relevant needs, requirements and circumstances

of the household (e.g. health or mobility issues and free from any Category 1 Hazards under the Housing Health Safety Rating System).

The Council will consider whether the applicant can afford to pay for their accommodation without being deprived of basic essentials such as food, clothing, heating, transport costs and all other reasonable expenditure. We will therefore take into account the rent that the household can afford as well as any additional costs, such as travel costs, resulting from the location of the accommodation.

In deciding on the fitness of the property, consideration would be given to the length of time needed to complete any necessary repairs and whether it is reasonable to complete these while the property is occupied. The quality of the decoration/furniture, the layout/type of accommodation, provision of parking and lack of access to a garden are unlikely to be acceptable reasons for a refusal.

### **3.5 Health factors**

The Council will consider health factors, such as ability to get up the stairs, care and support provided by other statutory agencies or the need to access any specialist medical services that are only available within the District. If the applicant or a member of the resident household is citing medical grounds that were not identified during the initial assessment, the applicant must submit medical evidence within 48 hours. The key test in determining the impact of medical issues is whether the condition itself makes the housing offered unsuitable. Problems such as depression, asthma, diabetes or back pain would not normally make a property unsuitable, as the problems would persist in any accommodation.

### **3.6 Education**

Attendance at local schools will not be considered a reason to refuse accommodation, though some priority will be given to special educational needs and students who are close to taking public examinations in determining priority for in-District placements (see Section 4).

### **3.7 Employment**

The Council will consider the need of applicants who are in paid employment to reach their normal workplace from the accommodation that is secured (see Section 4).

### **3.8 Proximity to schools and services**

The Council will consider the proximity to schools, public transport, primary care services, and local services in the area in which the accommodation is located

### 3.9 Pet ownership

Pets are not allowed in temporary accommodation. If you have pets you should make arrangements for them to be looked after by a friend, relative or a charity. You will be responsible for any costs incurred. However, where

a PRSO offer of accommodation is made by the local authority, the Accommodation Services Team will advise the homeless household if the private landlord will allow pets in the private rented accommodation unit.

### 3.10 Any special circumstance

The Council will consider any other reasons for refusal put forward by the applicant and come to an overall view about whether the offer is suitable.

## Section 4: Criteria for prioritising placements inside and outside of the Sevenoaks District Council

- 4.1 It is the Council's preferred position to house applicants within the Sevenoaks District. The Council acknowledges that in the current housing market it will be necessary to make decisions about the suitability of out of area placements for individual households and balance these against the type and location of temporary accommodation and private rented accommodation that can be offered. In some cases, housing outside of the District might be more sustainable for the household in the long-term, with lower rents allowing them to better meet their subsistence and household costs and avoid rent arrears.
- 4.2 In placing households in temporary accommodation and private rented accommodation, there will be a general presumption that placements outside of Sevenoaks District may be used to discharge housing duties where the accommodation is suitable and where an affordable accommodation solution is not available locally.
- 4.3 Our preference for resettlement will follow a stepped approach, we will seek accommodation within our district, then to the wider County of Kent and finally we may consider placements outside of Kent across the whole country. All of these options will be fully considered using the prioritisation listed below. However, we may at times withhold available accommodation in the district or the wider Kent County if we feel other households would be more in need as set out in *Alibkheit v London Borough and Adam v City of Westminster*. Each application will be assessed according to the household's presenting needs.

## Placements within the Sevenoaks District

4.4 Priority for in-District accommodation will be given to certain households whose circumstances indicate that they would best be housed locally. These include but not limited to:

- Applicants with a severe and enduring health condition requiring intensive and specialist medical treatment that is only available in Sevenoaks District.
- Applicants who are in receipt of a significant package and range of health care options that cannot be easily transferred.
- Applicants with a severe and enduring mental health problem who are receiving psychiatric treatment and aftercare provided by community mental health services and have an established support network where a transfer of care would severely impact on their wellbeing.
- Households with children registered on the Child Protection register in Sevenoaks District, or families who have high social needs who are linked into local health services and where it is confirmed that a transfer to another area would impact on their welfare.
- Households containing a child with special educational needs who is receiving education or educational support in Sevenoaks District, where change would be detrimental to their well-being.
- Households containing one or more children in secondary school in their final year of Key Stage 4 (generally Year 11) with exams to be taken within the next six months
- Applicants who have a longstanding arrangement to provide care and support to another family member in Sevenoaks District who is not part of the resident household and would be likely to require statutory health and social support if the care ceased.
- Any other special circumstance will also be taken into account

### **Priority for placements in the County of Kent will be given to:**

- 4.5 Applicants who have been continuously employed in Kent for a period of 12 months, and for 24 hours or more per week.
- 4.6 Women who are on maternity leave from employment and meet the above criteria would also be prioritised for placements in Kent.
- 4.7 Applicants who have as part of their household, a child or children who are enrolled in public examination courses in Sevenoaks District, with exams to be taken within the next six months or in year 11 and year 13 of their secondary education. Wherever practicable the Council will seek to

## Agenda Item 11

place such households within 60 minutes car travelling distance of their school or college.

- 4.8 Wherever practicable, any applicant who works for more than 24 hours per week and has been employed continuously for more than 12 months will not be placed more than 90 minutes travelling distance by public transport, from their place of employment.
- 4.9 Applicants who meet none of the above criteria may be offered properties out of Kent when no suitable property is available.
- 4.10 The Council will access 'safe' accommodation for victims or survivors of domestic abuse. Victims will have individual and varying needs and support will be tailored to the individual. To meet the needs of all victims, paying special attention and consideration to those who share protected characteristic(s) under the Equality Act 2010 or who share a vulnerability requiring additional support.
- 4.11 We will make services easier to access by identifying and removing barriers and creating clear pathways to access support for those living in safe accommodation, including, for example, quick access to independent, and specialist services to help them with any financial difficulties they may be experiencing as a result of economic abuse. The Homelessness case officer will undertake a DASH (Domestic Abuse Stalking and Harassment) risk assessment to assess risk and safer locations a victim and (or) households are able to reside at.
- 4.12 Children are recognised in the Domestic Abuse Act 2021 as victims in their own right. We will ensure that children's individual needs and preferences are taken into account and that all children affected by domestic abuse in safe accommodation have access to support that will help them recover from abuse
- 4.13 Applicants who are at risk of violence being perpetrated against them will be placed outside of the District, however, this will be subject to a Domestic abuse, stalking and harassment risk assessment (DASH) risk assessment. The Homelessness case officer will assess the risk and safer locations a victim and (or) households are able to reside at. Whilst having given consideration to all other factors within this policy.
- 4.14 Applicants who indicate a desire to be housed in a particular area outside of Sevenoaks District will be housed in those area(s) so far as reasonably practicable.
- 4.13 Any other special circumstance will be taken into account.

**Notification arrangements when households are placed outside of Sevenoaks District**

- 4.14 The Council, when discharging a homeless duty, will aim to ensure that information concerning details of placements in temporary accommodation and private rented accommodation outside Sevenoaks District is shared as far as possible in a fair and timely manner with the relevant Local Housing Authority in areas where families are moving to.
- 4.15 Notification arrangements - The Council will notify the receiving Local Housing Authority of any placement (as far as this is possible). The receiving Local Housing Authority should also notify Sevenoaks District Council as to any action they may have taken against a landlord/agent.
- 4.16 Pay a Fair Rent - The Council will, as far as is practical, ensure that the rent paid is in accordance with the prevailing local housing allowance rent levels and is not at a level that is likely to encourage inflation of rent levels.
- 4.17 Vulnerable families - So far as is practicable, if placing vulnerable families outside of Sevenoaks District, the Council will ensure that such families will continue to receive appropriate support.
- 4.18 For any household offered long-term temporary or permanent privately rented accommodation outside of the District, information will be provide on how to access local services, amenities and facilities in the local area. In particular they will be given general guidance on registering for Local Council Tax Support, applying for benefits, registering with a local GP, what to do if they need emergency funds and how to apply for a school place in the local authority area in which they are to reside.

<b>Section 5: Monitoring and Review</b>
---

- 5.1 The Policy will be monitored and reviewed formally in line with the development of a new Homelessness and Rough Sleeping Strategy in 2022. The Policy may also be reviewed at any time, in line with any relevant changes in legislation or Guidance issued by relevant Government Departments, in consultation with the Cabinet Member for Housing and Health.

**Section 6: Local Housing Allowance (LHA) rates**

Visit: <http://lha-direct.voa.gov.uk/Search.aspx>

**Sevenoaks District**

As at February 2022, the North West Kent LHA levels are as follows:

Shared £88.85 per week per week or £385.07 per month.

1 bed £155.34 per week or £673.14 per month.

2 bed £195.62 per week or £847.69 per month.

3 bed £241.64 per week or £1,047.11 per month.

4 bed £299.18 per week or £1,296 per month.

As at February 2022, the High Weald LHA levels are as follows:-

Shared £100.11 per week per week or £433.81 per month.

1 bed £159.95 per week or £693.12 per month.

2 bed £207.12 per week or £897.52 per month.

3 bed £260.05 per week or £1,126.88 per month.

4 bed £345.21 per week or £1,495.91 per month.

## Equality Impact Assessment

### Appendix 2 - Out of Area Placement Policy

<b>Summary of decision to be made:</b>	Out of Area Placement Policy		
<b>Lead Officer (job title):</b>	Abigail Agba, Interim Head of Housing		
<b>Date the final decision is due to be made:</b>	19/07/2022	<b>Date this assessment commenced:</b>	16/02/2022
<b>Is the decision relevant to the aims of the Public Sector Equality Duty?</b>			<b>Yes / No</b>
Eliminate discrimination, harassment and victimisation			<b>Yes / No</b>
Advance equality of opportunity			<b>Yes / No</b>
Foster good relations			<b>Yes / No</b>
If the answer is yes to any of the above, proceed with the assessment. If the answer is no, please say why and summarise any evidence:			
For each of the following characteristics, summarise any existing data, consultation activity, interpretation of the impacts and actions that can be taken to reduce or mitigate any negative impacts:			
<b>Characteristic:</b>	<b>Data and consultation</b>	<b>Summary of impact</b>	<b>Actions</b>
Disability	Sevenoaks District Housing Needs Survey 2017, Targeted Review of Local Housing Needs 2021, 2011 Census, Sevenoaks District Housing Strategy 2022 (emerging), Older Persons' Housing Needs Study 2022.	<p>People with physical disability or mental health condition and need health treatment that cannot be transferred out of area, or those with longstanding care arrangements will be given In District Priority therefore the policy will have no impact on this client group.</p> <p>People with more severe disabilities are therefore less likely than other households to have their duties discharged into the private rented sector by offer of a PRSO and are more likely to be offered supported or adapted accommodation within the council's own stock. For this reason, the policy has a neutral effect on this group</p>	
Carers	As above	Reasonable travel distances now stipulated as a factor when	

## Equality Impact Assessment

		determining priority. This will ensure applicants experiencing unsustainable journeys to give/receive care, will have priority.	
Race	As above	None - the out of area placement policy aims to treat all applicants equally irrespective of race Ethnic minority groups are more likely to be homeless and on low income, therefore it is less likely to for them to find affordable housing solutions in the district or within 90 minutes travelling distance. This policy will have a positive impact on this client group as they will benefit from assistance from the council to help them find affordable housing solutions beyond Sevenoaks when no solution can be found in district	
Gender	As above	None - the Out of Area Placement Policy aims to treat all applicants equally irrespective of gender Female lone parents are more likely to be homeless and on low income, therefore it is less likely for them to find affordable housing solutions in District or within 90 minutes travelling distance. This policy will have a positive impact on this client group as they will benefit from assistance from the council to help them find affordable housing solutions beyond Sevenoaks when no solution can be found in district.	
Age	As above	Vulnerable children with needs that	

Equality Impact Assessment

		<p>cannot be met outside the district will be given In District Priority, and young homeless persons have access to a number of supported housing schemes in Kent, therefore the policy will have no impact on these client groups. People aged 65 accepted homeless those needing health treatment that cannot be transferred out of District or with longstanding care arrangements will be given In District Priority therefore the policy will have no impact on this client group.</p> <p>The placements policy has a positive impact for children who are at key stages of education enrolled at public examinations in the same school year (GCSE level or above). to prevent any disruption to educational attainment and will not be placed more than 60 mins traveling time to place of education. Households with dependent children under the age of 18, who are not due to take qualification exams in the same academic year, may be adversely affected by this policy as comparably they do not have as high education need to remain in-District. Households may find additional travel requirements and transport fares to current place of schooling. If this becomes unaffordable, a negative impact may arise meaning that an alternative school placement closer to home may have to be found. The Council will take distance to</p>	
--	--	---	--

## Equality Impact Assessment

		schools into consideration during individual assessments however will not use this as a reason to consider the household for in-district placement. To mitigate any negative impact arising from an out of District placement, the service will be providing developed resettlement advice that will include help with aspects of travel and setting up links to support or community based amenities.	
Religion / Belief	As above	None - the out of area placement policy aims to treat all applicants equally irrespective of religion or belief. There are no perceived implications on the basis of religion or belief	
Sexual Orientation	As above	None - the out of area placement policy aims to treat all applicants equally irrespective of sexual orientation There are no perceived implications on the basis of sexuality	
Pregnancy / Maternity	As above	The Out of Area Placement Policy prioritises pregnancy and maternity as a protected characteristic.	
Marital or Civil Partnership Status	As above	The policy aims to treat all applicants equally irrespective of this status.	
Gender reassignment	As above	The out of area placement policy aims to treat all applicants equally irrespective of gender reassignment	

## Equality Impact Assessment

<p><b>Summary of impacts :</b> (to be included in committee reports)</p>	<p>Under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The impact has been analysed and does not vary between groups of people.</p> <p>The key policies within the Out of Area Placement Policy have a particularly positive impact for disabled people by ensuring a new suitability assessment and ensuring prioritisation for disabled people with the highest needs for in-district accommodation and transfer moves. Overall the impact of the policy upon homeless people with disabilities is positive; ensuring all disabled groups can now access clear guidance on the whole homeless placements process.</p> <p>Ethnic minority &amp; female households, who are more likely to be homeless and on low income, will benefit from assistance from the council to help them find affordable housing solutions beyond Sevenoaks when no solution can be found in district.</p>		
<p>Please tick the outcome of this assessment:</p>	<p><b>Continue the policy</b></p>		
<p>Date assessment will be reviewed:</p>	<p>19/07/2023</p>		

This page is intentionally left blank

## ROUGH SLEEPER INITIATIVE UPDATE

Housing and Health Advisory Committee - 7 June 2022

**Report of:** Sarah Robson Deputy Chief Executive and Chief Officer, People and Places

**Status:** For Consideration

**Key Decision:** No

**Executive Summary** To update the Housing and Health Advisory Committee on the recent and latest rounds of funding announced by the Government for the Rough Sleeper Initiative (RSI).

**This report supports the Key Aim of:** the Housing Strategy and West Kent Homelessness Strategy.

**Portfolio Holder:** Cllr Kevin Maskell

**Contact Officer:** Rav Kensrey, Homelessness Prevention Manager

**Recommendation to Housing & Health Advisory Committee:**

- a) To note the key achievements in supporting rough sleepers in the Sevenoaks District as a result of receiving Rough Sleeper Initiative (RSI) funding in 2021-22;
- b) To note the latest round of funding announced by the Government for the RSI and to outline the Council's submission bid for 2022-2025.

### Introduction and Background

- 1 As a Local Housing Authority, the Council has a duty to provide advice and assistance to homeless households and in certain circumstances, has a duty to secure suitable accommodation. These duties are set out in part 7 of the Housing Act 1996 (as amended by the Homelessness Act 2002).
- 2 Single homelessness continues to see an increase due to welfare benefit changes, universal credit and the changes to homelessness legislation setting out which people are classed as vulnerable. This increase has also been recognised across Kent and nationally.
- 3 The Rough Sleeping Initiative (RSI) is a grant programme provided by the Department for Levelling Up, Housing and Communities (DLHUC) to local authorities to provide local support for people living on the streets.
- 4 In 2019/2020 the scheme was called the Rapid Rehousing Pathway programme and 2020/21 and 2021/22 the scheme was called the Rough Sleeper Initiative (RSI). This was a step in the Government's plan to halve

## Agenda Item 12

rough sleeping by 2022 and eliminate it altogether by 2027, To date Sevenoaks District Council has received funding in 2019/20 and 2021/22.

- 5 This report provides an update on the how the funding has benefitted the Sevenoaks District in the past 12 months and provides an update on DLUHC's announcement of a fifth phase (RSI 5), which will cover the period 2022 - 2025. The deadline for bid submission was late February 2022 and a decision on the council's allocation is expected in April/May 2022.
- 6 RSI is one of a number of funding streams, which contribute to the council's actions to tackle homelessness and rough sleeping. Others include Housing First, Homelessness Prevention Grant (HPG) and the Rough Sleeper Accommodation Programme (RSAP), each of which is ring fenced for its specific programme aims. In addition to these funding streams, the council also allocates core funding in order to discharge its legal obligations concerning homelessness and rough sleeping.
- 7 The information below details the interventions to funded by the RSI 4 grant over the past 12 months and demonstrates a continuation of the work in the previous years to support the rough sleeping population.

### RSI 4 update

- 8 **The key objectives of the current RSI 4 funding for 2021-22 have been to:**
  - Ensure that as few people as possible return to streets from emergency accommodation put in place during COVID-19;
  - Continue to ensure a response to those who remain or arrive on the streets who are at risk of COVID-19;
  - Ensure longer-term accommodation and support solutions for those already in a rough sleeping pathway - enabling them to move on to independent living; and
  - Ensure supported accommodation is available for those that need it.
- 9 A range of initiatives have been successfully delivered under RSI 4. The Council secured approximately £275,760 in funding for 2021/22. The following interventions are having the desired effect, minimising rough sleeping and preventing homelessness:
  - **Housing Pathway Co-ordinator post** - Officer for rough sleeping, overseeing service provision, supporting outreach and engagement work and working collaboratively with public, voluntary and community sector stakeholders.
  - **Personalisation Funding Personalisation Funding** - to support targeted and flexible interventions for rough sleepers - this readily accessible pot of money enables barriers to be removed when supporting individuals to exit rough sleeping and secure accommodation. Interventions have included funding travel costs and providing furnishing for new homes.

- **Housing Led Complex Needs Worker** - The Council commissioned Porchlight, a Kent-based charity supporting homeless and people, to appoint a Housing Led Complex Needs Worker, enabling enhanced working with individuals rough sleeping or exiting rough sleeping, ensuring tenancies and accommodation secured are sustainable in the long run.
- **Outreach Worker** - The Council commissioned Porchlight to deliver an outreach service to provide timely and responsive interventions. The outreach sessions enable focused work at times when individuals are more likely to be rough sleeping, enabling prompt identification and engagement. Intensive outreach work is undertaken, providing for the necessary time and repeated engagement to build relationships with entrenched rough sleepers who require additional support and may be hard to reach.
- **Emergency Accommodation 'off the street offer'** - Enabled flexible approaches to temporary accommodation aligned to the principles of Government's 'Everyone In' policy. Provision of temporary accommodation ensuring individuals who face or pose a risk in shared or supported accommodation are able to be housed in emergency situations.

10 Key achievements resulting from RSI 4 include:

- Building trust with people who have been entrenched rough sleepers is not easy. We believe the main achievement is that we are engaging in a meaningful way with a large number of people who were socially excluded and in some cases were completely unknown to us. Officers have stated that there is a sense of optimism about the future for many of them, which was just absent before we started this work.
- 20 are now engaging well with local commissioned addiction and other support services, with a further 10 continuing to be helped with complex addictions and mental health.
- 5 have been accepted into supported accommodation, with a further two being assessed for supported accommodation.
- 1 has been accepted into residential rehabilitation services.
- 15 are being supported into employment or training.
- One of the key outputs of the Outreach Worker is to dedicate a high proportion of their time to engaging with people who are either not engaging/ accessing services or use them in a sporadic manner. This enables them to identify new vulnerable rough sleepers quickly before they adopt a more established street lifestyle. The outreach work is also able to accompany clients to assist them to access other services such as mental health provision through the Community Mental Health Team.

## Agenda Item 12

- 11 The current approach has been successful at delivering interventions and delivering against the Housing Strategy priorities. Sustaining these interventions will enable continued delivery against these ambitions.

### RSI 5 funding submission

- 12 The Government's objectives for RSI 5 are:
- **Prevention** - Activities to stop people sleeping rough for the first time;
  - **Intervention** - Support for those currently sleeping rough to move off the streets;
  - **Recovery** - Support for those who have slept rough to ensure they do not return to the streets.
- 13 The Government has committed to ending rough sleeping by the end of the current Parliament. The Spending Review demonstrates the Government's commitment to deliver on this by preventing rough sleeping as well as supporting those on the streets to rebuild their lives. This means the Government is committing over £2bn to tackle homelessness and rough sleeping over the next 3 years, with multi-year funding enabling local partners to better plan services and maximise efficiencies.
- 14 A 3-year spending review is the opportunity to put in place an ambitious plan for ending rough sleeping and think longer-term and innovatively about different approaches to rough sleeping
- 15 The Council has submitted a funding bid to Government to support the following:
- 16 **Proposed staffing structure relating to RSI 5 2022 - 2025 and additional funding request**

Current posts	Proposed Year 1 - April 22/23	Year 2 - April 23/24	Year 3 - April 24/25
<p><b>1 x full time Pathway Coordinator</b></p> <p>Coordinates rough sleeping response across the Council and ensures delivery of RSI programme. Coordinates multi-agency response to long term and intermittent rough sleeping resulting from complex need</p>	<p>Pathway Coordinator x 1 full time = £67,749</p>	<p>Pathway Coordinator x 1 full time</p>	<p>Tenancy Sustainment Officer x 1 full time</p>

<p><b>1 x full time Complex Worker Housing Led</b></p> <p>Enhanced working with individuals rough sleeping or exiting rough sleeping, ensuring tenancies and accommodation secured are sustainable in the long run.</p>	<p>Assessment &amp; Resettlement Worker x 1 full time £56,371</p>	<p>Floating Support Worker x 1 full time £56,371</p>	<p>Floating Support Worker x 1 full time £56,371</p>
<p><b>1 x full time Outreach worker</b></p> <p>Outreach service to provide timely and responsive interventions</p>	<p>1 x full time Outreach worker £56,371</p>	<p>Assessment &amp; Resettlement Worker x 1 full time £56,371</p>	<p>Assessment &amp; Resettlement Worker x 1 full time £56,371</p>
<p><b>Additional funding Requests</b></p>	<p><b>Proposed Year 1 - April 22/23</b></p>	<p><b>Year 2 - April 23/24</b></p>	<p><b>Year 3 - April 24/25</b></p>
<p><b>Personalised budget</b></p> <p>Enables services to find individualised solutions to rough sleeping. Funds reconnections, clothes, furnishings, access to ID etc</p>	<p>70 cases per annum x £500.00 cost per case = £35,000.00</p>	<p>50 cases per annum x £500.00 cost per case = £25,000.00</p>	<p>40 cases per annum x £500.00 cost per case = £20,000.00</p>
<p><b>Private rented sector funding</b></p> <p>To fund interventions to increase Private Rented Sector (PRS) access for low needs rough sleepers, and for rough sleepers moving on from supported accommodation.</p>	<p>70 cases per annum x £1400.00 cost per case for 1 bed LHA £98,000.00</p>	<p>50 cases per annum x £1400.00 cost per case for 1 bed LHA £70,000.00</p>	<p>40 cases per annum x £1400.00 cost per case for 1 bed LHA £56,000.00</p>

## Agenda Item 12

<p><b>Emergency Accommodation</b></p> <p>Additional funding for 'off the street' offer Direct access to short-stay accommodation to enable assessment and engagement ensuring individuals who face or pose a risk in shared or supported accommodation are able to be housed in emergency situations</p>	<p>The costings to support 45 cases</p> <p>£54, 675.00</p>	<p>The costings to support 35 cases</p> <p>£47,250.00</p>	<p>The costings to support 25 cases</p> <p>£33,750.00</p>
<p><b>Imago Social Prescriber Service x 1 full time worker</b></p> <p>To mobilise resources from the NHS, local government, charitable trusts and the private sector to deliver care navigation and social prescribing services.</p>	<p>£37,800</p>	<p>£40,800</p>	<p>£45,800</p>
<p><b>CAB x 1 full time Single Homelessness Specialist</b></p> <p>To provide training, education, employment and financial support services to singles cohort case load with completing job applications, creating CV's, assistance with accessing applying for training &amp; education.</p>	<p>1 x full time Singles Specialist</p> <p>£52799</p>	<p>1 x full time Singles Specialist</p> <p>£57799</p>	<p>1 x full time Singles Specialist</p> <p>£62799</p>

### Other Options Considered and/or Rejected

- 11 No other options considered. Any interventions funded will be contained within the RSI funding envelope and no match funding or additional administration costs are required to accept and manage the funding. Successful outcomes will reduce future costs arising from repeat homelessness, and associated costs to the public purse from rough sleeping.

### Key Implications

#### Resource (Non-Financial)

There are no additional resource requirements arising from this report.

#### Financial

The RSI funding is external Government funding, which the Council bids for. There is no additional financial impact arising from this report.

#### Legal Implications and Risk Assessment Statement

The Council has a number of statutory obligations in relation to homelessness as set out in the Housing Act 1996 and amended by the Homelessness Reduction Act 2017 which extended existing and introduced new duties.

The Council is required to produce and publish a Homelessness Strategy in line with its obligations under the Homelessness Act 2002 and national Rough Sleeping Strategy (2018).

This funding will support the council to deliver against its legal duties and achieve the objectives of the Strategy.

Risks to individuals who sleep rough are high. Individuals who experience rough sleeping over a long period are:

- (a) More likely to die young than the general population. The average age at death for people who experience homelessness was 42 for women and 44 for men;
- (b) More likely to die from injury, poisoning or suicide. 35% of people who die whilst sleeping rough die due to alcohol or drugs, compared to 2% in the general population;
- (c) Likely to have poorer health due to a combination of factors including exposure to poor living conditions, poor diet, difficulty maintaining personal hygiene, high levels of stress, substance dependency and lack of access to primary care;
- (d) Likely to face risks related to exposure to the elements in extreme conditions, including low and high temperatures.

## Agenda Item 12

The interventions provided by RSI funding minimise or remove the risk of harm through providing timely, effective interventions to individuals who are, or at risk of, rough sleeping.

Funding under this initiative ensures there is not an additional strain on other Council resources, including but not limited to the core homelessness budget.

### Equality Assessment

The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. Under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups.

The measures outlined as part of the funding seek to ensure accessibility of the interventions to all individuals who are, or at risk of, rough sleeping. These individuals are often from disadvantaged backgrounds with multiple, complex needs which require an inclusive approach bespoke to their needs.

### Net Zero Implications

The decisions recommended through this paper have a remote or low relevance to the council's ambition to be Net Zero by 2030. There is no perceived impact regarding either an increase or decrease in carbon emissions in the district, or supporting the resilience of the natural environment.

### **Conclusions**

Rough sleepers and those at risk of sleeping rough are the most vulnerable as they lack any accommodation, but anyone who is threatened with homelessness, actually homeless or is recovering from being homeless may have a degree of vulnerability due to their housing situation, or have an existing vulnerability made worse by the situation. Any interventions funded will be contained within the RSI funding envelope and no match funding or additional administration costs are required to accept and manage the funding. Successful outcomes will reduce future costs arising from repeat homelessness, and associated costs to the public purse from rough sleeping.

#### **Appendices**

None

#### **Background Papers**

None

**Sarah Robson**

**Deputy Chief Executive and Chief Officer - People & Places**

This page is intentionally left blank

## HOMELESSNESS OUT OF HOURS SERVICE UPDATE

Committee - Housing and Health Advisory Committee - 6 June 2022

**Report of:** Sarah Robson. Deputy Chief Executive Chief Officer - People and Places

**Status:** For Decision

**Also considered by:**

- Cabinet - 7 July 2022

**Key Decision:** No

**Executive Summary:** The Council is required to deliver a dedicated service to customers facing homelessness outside standard office hours. This report provides an update on the current contract with Centra to deliver the Council's homelessness out of hours service.

**This report supports the Key Aim of:** the Council's Housing and Health Strategy.

**Portfolio Holder:** Cllr. Kevin Maskell

**Contact Officer:** Sharon Donald, Interim Head of Housing, x 7131

**Recommendation to Housing and Health Advisory Committee:**

That comments on the recommendation below are passed to Cabinet.

**Recommendation to Cabinet:**

That, subject to comments from Housing and Health Advisory Committee, Members approve an extension to the current contract with Centra for a further three years to deliver the Council's homelessness out of hours service.

**Reason for Recommendation:** The Council is required to deliver a dedicated service to customers facing homelessness outside standard office hours.

### INTRODUCTION AND BACKGROUND

- 1 As a Local Housing Authority, this Council has a duty to provide a housing and homelessness advice service to people at risk of homelessness. This service includes an out of hours (OOH) service for people who are made homeless outside office hours, to assist them to find immediate emergency accommodation.
- 2 Since the changes to housing legislation through the introduction of the Homelessness Reduction Act, the work of the Council's Housing Advice Team has increased, with the need to support more people, for longer periods of time and help people with very complex needs and vulnerabilities.
- 3 All councils nationally are finding it increasingly difficult to recruit to posts as there is such a high demand for experienced housing staff to cope with the additional workload demand and customer contact, including the out of hours period.
- 4 Cabinet approved a request to work with Centra to handle the Council's homelessness out-of-hours service, which commenced on 17 October 2019. The appointment was based on a 6 month pilot however, due to the additional pressures of the Covid-19 response, it was agreed to extend the contract up to Spring 2022, in consultation with the Cabinet Member for Housing and Health.
- 5 Centra is a not for profit organisation, providing a range of high quality face-to-face support services, telecare monitoring and call handling services to over 200,000 customers across the UK each year. Centra provide housing out-of-hours services for a large number of other local authorities and housing associations including West Kent Housing Association.

#### **Council's Homelessness OOH Service**

- 6 The Council's homelessness out-of-hours telephone service provides an essential emergency contact for anyone who is going to be imminently homeless and need to contact the Council out of core business hours, during evenings, weekends and bank holidays.
- 7 It is important for people to have access to emergency housing support, as the Council continually strives to place the district's most vulnerable residents at the heart of what it does.
- 8 Prior to the Centra pilot, Housing Advice Officers were operating the service during the day and also taking OOH calls on a rota basis, outside the Council's office hours. This presented a significant challenge to officers, particularly during periods of vacant posts, sickness and covering annual leave. On occasions, two officers were covering these hours

continuously, meaning officers were taking emergency homelessness calls 24/7 across an extended number of months each year.

- 9 For the Council’s Housing Advice Officers to provide this service, it costs the Council an additional £506.44 per month, as it is paid as an OOH payment in addition to monthly salary costs. The pilot has cost the Council £195 per month (for up to a maximum of 180 calls). On balance, for the last financial year Centra have call handle approximately like for like call since the pilot started.

**SERVICE DETAILS**

- 10 The Council contracts the OOH service with Centra, but continues to maintain the majority of our housing service in-house, most importantly during weekdays when we see the highest levels of customer contact.
- 11 The OOH service still enables customers to telephone the Council’s main office number, which is answered by the Council’s CCTV operators who take the details and contact Centra if a customer needs an emergency accommodation placement. This ensures consistency in service for customers and customers calls are answered promptly with no waiting time.
- 12 The table below illustrates the customer contacts to the Council’s Housing Advice and Homelessness Service, compared to the service provided by Centra during out of hours.

Service	1 Oct 2019 - 31 Oct 2020	1 Nov 2020 - 31 Oct 2021	1 Nov 2021- February 2022	TOTAL
<b>SDC Housing Advice Service</b>				
No. of customer calls	2846	3126	2955	8927
No. of new customer cases	1258	1066	227	2551
No. of TA placements	286	231	46	563
<b>Centra OOH Service</b>				
No. of calls	33	50	53	135
No. of TA placements	11	7	9	25

## Agenda Item 13

- 13 The majority of customer calls are received during weekdays during office hours. On an annual basis, the Housing Advice and Homelessness Service on average receives and responds to approximately 3,000 calls during weekdays, compared to an average of 9 calls supported by Centra within the same annual period.
- 14 The Housing Advice and Homelessness Service capacity is already under severe strain during the week to cope with increasing customer demand. The majority of the customer calls handled by the team are incredibly complex, supporting vulnerable people with mental health, addiction, other disability, age or illness issues, as well as those who have been released from prison or are victims of domestic abuse. Officers always strive to provide the best customer service to ensure the right support and advice is provided.
- 15 Officers meet regularly with Centra and the Council's CCTV Manager to provide updates, review calls and make adjustments to scripting and information to assist both teams dealing with OOH calls. Centra continues to utilise our CCTV scripting so that they can assess whether the person needs a placement.
- 16 Centra provide a dedicated customer telephone number to ensure that a customer can ring Centra direct with any follow-up queries or questions.
- 17 The Council's senior housing officers continue to have contact with Centra operators advising them on issues above and beyond a standard placement, mainly where there is an issue with an existing placement and they are being asked to leave. Managers have always found Centra very helpful, professional and have provided clear and accurate advice to customers, based on current housing legislation.
- 18 The Council has access to Centra's OOH online portal, which shows all call logs and actions taken for each call, accommodation placement details and customer outcomes. This is checked by the Council's Housing Advice Team every morning and all customers who present through OOH are allocated with a Housing Advice Officer who contacts them to take a full homelessness application.
- 19 The contract with Centra continues to be a success. It has released the pressure on existing housing officers to concentrate fully during the day to support customers to the best of their ability, as they have not had disturbed sleep during the night delivering the service 24/7. In addition, Centra has represented this Council to a high customer service standard and professionally at all times.
- 18 To ensure that customers have received a high standard of service, senior housing officers have continued to carry out a number of mystery shopper calls to the service. These calls were dealt with quickly with accurate information provided, whilst demonstrating empathy and consideration for the difficult housing circumstances.

- 19 The Housing Advice and Homelessness team are fully supportive of continuing the contract with Centra. Officers continue to strive to provide the best customer service to ensure the right support and advice is provided.

**CUSTOMER FEEDBACK**

- 20 Throughout the past 12 months, officers have undertaken spot checks, contacting customers who have accessed the OOH service to obtain their feedback on the service:

Customer	Q.1: Were you satisfied with the service you received?	Q.2: Is there anything you would want us to change about this service?
Customer 1	Yes, they were helpful and found me somewhere to stay.	No.
Customer 2	Yes, the service was good.	No, the service was fine.
Customer 3	They found me somewhere quick, so I was happy.	No, nothing to change.
Customer 4	Yes, I was satisfied.	No
Customer 5	Yes, I was satisfied.	No, it was good.
Customer 6	Very good service. I felt like they wanted to help me.	They don't need to change anything.
Customer 7	Yes, they helped me to find somewhere and were very helpful.	No, it's a good service.
Customer 8	The man was very kind and helped me find somewhere to stay.	No.

- 22 All feedback was positive.

### Other Options Considered and/or Rejected

- 29 Two options were considered:
- a. Option A - To extend the current contract with Centra for a further three years, with an annual break clause, to deliver the Council's homelessness out of hours service with regular monitoring of the service in place. The total cost to the Council of this service would be £3,689 per annum. This would ensure the residents of Sevenoaks District continue to receive the same high standards of service required for contacts of this nature.
  - b. Option B - To bring the service back in-house. It would be difficult to deliver this service in-house, additional work from the new legislation and more complex customers have already increased workloads and pressures on the service and team. The small team of two housing advice officers are working on high and complex caseloads during the day, with no capacity to take on this service outside of normal working hours. This may also have a negative impact on staff morale and mental wellbeing, service standards during the day and be a less attractive employment opportunity when trying to recruit new officers in the future. The two existing housing officers employed by this Council would be on a rota basis for at least two to three weeks a month (as well as covering annual leave, vacancies and sickness cover). In addition 95% of all housing staff are accessing weekly, fortnightly, monthly one to one clinical supervision due to the impact and trauma that the complexity of their caseload places upon them. The cost of providing the service in-house is in excess of £6,077.34 per annum.
- 30 The current contract with Centra is coming to a close and therefore, the preferred option is A, because it delivers a cost-effective and efficient service for customers and the Council.
- 31 It is recommended the Council enter into a longer-term contract with Centra to be reviewed every 3 years, subject to Member approval. This would ensure the residents of Sevenoaks District continue to receive the same high standards of service required for contacts of this nature.
- 32 Based on customer feedback, officers are satisfied that the Council and its customers have received a good-value and efficient service from Centra since 2019.
- 33 Providing the service externally would continue to support the morale and wellbeing of the housing team, who deal with difficult and complex customers daily. This would create a better work-life balance for staff, whilst not compromising the high standard of customer service.

**KEY IMPLICATIONS**

Financial

The budget to provide this service would come from existing housing budgets, with no additional financial burden to this Council. A contract with Centra would cost the Council £3,689 per annum, handling up to 180 calls per annum. The annual cost has been confirmed for a three year period. There would also be a need for a Council Housing Officer to be paid the emergency out-of-hours payment of approximately £112 per month, to provide a back-up contact for Centra and CCTV, only in the case of an emergency. This compares to the cost to this Council to provide the service in-house in excess of £6,077.34 per annum.

Legal Implications and Risk Assessment Statement.

This Council has a legal duty to provide a 24/7 homelessness service, which includes an emergency OOH service for people made homeless outside office hours, who are statutory homeless and in priority need between 17.00-09.00 (under part VII of the Housing Act 1996).

Risk	Risk level	Measures to balance risk
Increase in emergency accommodation placements	Low	<p>The service since October 2019 has not seen an increase in placements.</p> <p>Placements monitored as part of the Contract. Service Specification clear on requirements of the Section 188 duty to provide temporary accommodation if a customer is eligible, homeless and in priority need.</p> <p>OOH Operators have a strict script in place detailing requirements to prevent unnecessary placements being made.</p> <p>Approved list of Kent housing providers agreed in advance.</p> <p>Senior officer contact details provided for any issues above and beyond a standard placement.</p>

## Agenda Item 13

Impact on customer service	Low	<p>Contract in place with regular reviews with the provider, during which any issues raised would be discussed with the Provider and processes amended.</p> <p>If the service was not meeting the high levels required for our customers, we could consider another external provider or bring the service back to the council, at break clause intervals or at the end of the contract period.</p> <p>Customer feedback would gathered as part of the service monitoring arrangements.</p> <p>All OOH calls would be recorded and can be accessed by SDC, to ensure customer service standards are high.</p>
Failure to deliver the SLA requirements	Low	<p>If Centra failed to deliver the service outlined in the Contract, service standards would be discussed with the provider and process adjustments made. If no improvement, contract review and break clauses within the Contract would be actioned.</p> <p>Regular monitoring meetings with the provider, performance measured set out in the Contract with reviewed at regular intervals.</p>
GDPR and data sharing	Low	<p>A GDPR Compliant Data Sharing Agreement in place as part of the Contract, developed in partnership with our Legal Team.</p> <p>SDC access to the provider's online OOH portal and database to see details and recording of all calls, placements and advice given.</p>

### Equality Assessment

The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

Working in partnership with Centra and outsourcing the OOH function has not impacted the Council's lawful responsibility, statutory homelessness duties or customer delivery

### Net Zero Implications

The decisions recommended through this paper have a remote or low relevance to the council's ambition to be Net Zero by 2030. There is no perceived impact

regarding either an increase or decrease in carbon emissions in the district, or supporting the resilience of the natural environment

**CONCLUSIONS**

The Council is required to deliver a dedicated service to customers facing homelessness outside standard office hours. The contract with Centra continues to be a success. It has released the pressure on existing housing officers to concentrate fully during the day to support customers to the best of their ability. In addition, Centra has represented this Council to a high customer service standard and professionally at all times. It is recommended the Council enters into a 3-year contract with Centra.

**Appendices:** None.

**Background Papers:** None.

**Sarah Robson**  
Deputy Chief Executive  
Chief Officer - People and Places

This page is intentionally left blank

**Housing and Health Advisory Committee Work Plan 2022/23 (as at 22/03/22)**

**07 June 2022**

- Housing Strategy
- Allocations Scheme
- Rough Sleep Initiative Update
- Out of Area Placement Policy
- Homelessness Out Of Hours Update
- Quercus Housing - increasing delivery of affordable housing in the district

**27 September 2022**

- Homelessness and Rough Sleeping Strategy
- Update on Empty Homes Action Plan
- Tenant Support Officer and Downsizing Cash Incentive Scheme

This page is intentionally left blank