

**Draft West Kent Homelessness Strategy  
Consultation 16 June to 28 July 2017  
Response Report**

Question 1 - Given the challenges set out in the Strategy, do you agree these are the most important areas to focus on?	Question 2 - Please provide any other comments you may have on the document.	Question 3 - name:	Question 4 - The organisation you represent (if applicable):
<p>Preventing homelessness can include Care Leavers and be highlighted a specific vulnerable group of young people;</p> <p>Local authorities have duties under the Leaving Care Act 2000 towards eligible, relevant and former relevant children and young people. All local authorities have a statutory duty to ensure that all such young people who meet the criteria for services as care leavers are placed in suitable accommodation when leaving care, transitioning to adulthood.</p> <p>It is recognised that there is a lack of affordable housing in the private rented sector and that social housing is also a scarce resource. In response to this, we must work with the 18+ Care Leaver Service and be committed to working in partnership as responsible District Council across Kent County to find the best solutions for Care Leavers, this may require exploring more creative options including shared accommodation where suitable and appropriate. To support this approach and raise the profile and accommodation requirements of Care leavers, the 18+ Service are working in partnership with the Kent Joint Policy and Planning Board.</p> <p>The impact of not working in partnership with care leavers will place pressure on increased youth homelessness.</p>	<p>P.25 Care Leavers and be highlighted a specific vulnerable group of young people with local demand and priority need</p>	<p>Nick Crick</p>	<p>Kent County Council; Specialist Children's Services</p>

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Yes, particularly the availability of housing for all.	<p><b>The strategy does not have any specific reference to Care Leavers which we would expect to see</b></p> <p>Local authorities have duties under the Leaving Care Act 2000 towards eligible, relevant and former relevant children and young people. All local authorities have a statutory duty to ensure that all such young people who meet the criteria for services as care leavers are placed in suitable accommodation when leaving care, transitioning to adulthood.</p> <p>It is recognised that there is a lack of affordable housing in the private rented sector and that social housing is also a scarce resource. In response to this, we must work with the 18+ Care Leaver Service and be committed to working in partnership as responsible District Council across Kent County to find the best solutions for Care Leavers, this may require exploring more creative options including shared accommodation where suitable and appropriate. To support this approach and raise the profile and accommodation requirements of Care leavers, the 18+ Service are working in partnership with the Kent Joint Policy and Planning Board.</p> <p>The 18+ Service is keen to support both Care leavers and housing providers to ensure that the future placements of young people is successful, to this end Care Leavers are being equipped with life skills including tenancy training, budgeting skills and understanding benefits. In addition Care leavers will not be expected to move to independent living until</p>	Andrew McDonald	Kent County Council 18+ Care leaver Service

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	<p>they are ready to so and will have their continued support of their PA up to age 21 as a minimum.</p> <p>The 18+ Service intention is to achieve successful and sustainable tenancies for Care Leavers by working jointly with the District Housing Departments.</p>		
I think the four themes are tackling the areas that will impact on homeless people and can cover the full range of activities needed.	Interesting document with good information and the use of case studies was informative and useful. Actions from the strategy appear realistic and deliverable.	Deborah White	West Kent Housing Association
Yes	<p>The proposed actions do not appear to be going to fulfil the four ambitions. There seems to be too much reliance on "managing expectations" and not enough action to provide affordable and social housing. We recognise the constraints imposed by current Government policies but the Councils need to do much more to ensure that sufficient affordable and social housing is provided. If necessary, this should include the Council itself building new Council housing. According to the SHMA, 50% of the housing need in Tunbridge Wells borough is for affordable housing and based on previous experience there is no way that relying merely on requiring a proportion of new market housing to be affordable will meet this affordable housing need. It also seems unlikely that in present conditions housing associations will be able to fill the gap through "exceptions housing".</p> <p>Over the past decade the building of affordable housing in relation to larger housing has fallen well</p>	Elizabeth Akenhead	Campaign for the Protection of Rural England, Kent Branch

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	<p>short of target. We understand that the land footprint of affordable housing is at most 25% to 33% of equivalent market housing built for private sale. A substantial increase of affordable homes within the new Local Plan would therefore 'save' the land for at least twice as many houses. Within the new housing targets, raising the achievement of affordable housing would save hundreds of acres of greenfield land, thus helping to protect the countryside in a Borough where most of the countryside is in the High Weald Area of Outstanding Natural Beauty and the Metropolitan Green Belt.</p>		
	<p>West Kent Homelessness and Housing Strategy 2016-21 Consultation: Response by the Royal Tunbridge Wells Town Forum</p> <p>Introduction and conclusions</p> <p>Formed in 2005, the Town Forum is the voice of 50,000 residents in the unparished area of Royal Tunbridge Wells. It takes an interest in the provision of housing for all sectors of the local population.</p> <p>We welcome the consultation report as an extremely well researched and clearly expressed exposition of the serious and growing problems of homelessness and affordability across the three Boroughs. We similarly welcome its proposed vision to increase the availability of good quality affordable homes for purchase and rent while reducing homelessness and</p>	M Booker	Royal Tunbridge Wells Town Forum

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	<p>contributing to building the West Kent economy. We also support the four ambitions identified in Section 5 of the report.</p> <p>However, the situation concerning homelessness and affordability which it so carefully describes unfortunately appears to us to flow directly from the cumulative effects of nearly 40 years of central government policies under successive administrations. The deficit of affordable housing in our town gives cause for serious concern and is liable in the medium term to lead to growing social unrest unless central government allows or adopts radically different policies towards social housing.</p> <p>It is admirable to seek to build resilience and to encourage the communities most affected by present policies to support each other. We support many aspects of the Sherwood Partnership as an example of what can be successfully achieved. However, we do not share the perhaps despairing hope expressed in the report that such initiatives will have more than a marginal impact in finding overall solutions to local affordable housing problems.. To tackle the identified affordable housing need of 341 units per annum for Tunbridge Wells Borough will require quite other solutions. We are deeply concerned that the present situation will only worsen and are sympathetic to the difficulties facing TWBC and its two neighbouring authorities in seeking to avoid this happening. We would therefore strongly encourage the three authorities to militate for political changes which</p>		

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	<p>might present them with more effective tools to tackle their problems, which are also our problems because the homeless and inadequately housed are all part of one local community.</p> <p>In February 2017 we published a vision statement for the town of Royal Tunbridge Wells intended to inform the then forthcoming consultation on Issues and Options under the 2013-33 Local Plan development. In it we expressed serious concerns over the present housing mix and the issue of affordability. Inter alia we stated the following:</p> <p>“While the clear need is for Affordable Housing (not least for key public sector employees) the SHMA expects the private market to cater for most future housing need. However the cost of open-market housing makes it likely that there will be an overall deficit in meeting the affordable housing need. Sharp increases in house prices in London may make Tunbridge Wells still more attractive to buyers from outside the Borough, many of whom would continue to travel daily to jobs elsewhere. Seeking to achieve a better balance between identified need and overall supply should underpin the Borough Council’s policy, within the constraints imposed at a national level.</p> <p>Currently, land values in the Borough push house prices well beyond the purchase ability of many residents. The SHMA finds gross affordable housing need is more than 50% of housing need in the</p>		

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	<p>Borough. The present definition of `affordable` housing means that the element required at present (35% on developments of more than 10 dwellings) is out of reach for many. In practice on many developments where high land prices have been paid, a lower figure for affordable housing is negotiated on grounds of what the developer can afford. There are elements of a vicious circle here, and we see ensuring an adequate supply of housing at genuinely affordable prices as a key issue, and strict application of planning policies as a way to reduce land prices.”</p> <p>We believe that the otherwise hopeless seeming situation might be attenuated by a more vigorous exploration by the three Authorities of the possibility of establishing an arm’s length development company to build and rent out affordable housing units in the area, as is being contemplated in Medway. This might first make use of any suitable surplus land already in public ownership, but might also look at judicious use of compulsory purchase powers.</p> <p>Other specific comment</p> <p>Affordability</p> <p>The present concept of “affordability” is little short of farcical in Royal Tunbridge Wells. Household incomes of some £58,000pa and a deposit of some £67,000 will not be available to the overwhelming majority of the 341 households per annum stated to</p>		

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	<p>be in need of affordable housing in RTW. So, home purchase of any kind, even under government schemes, will not be an option for them.</p> <p>If no two bedroom properties are available for commercial rent within the Local Housing Allowance cap of £765 per month, then a significant majority of the same demographic will never be able to rent privately in the area either.</p> <p>Even the concept of an “affordable” rent in national terms has no meaning in Royal Tunbridge Wells where a rent of 80% of a typical market rent cannot seriously be considered to be “affordable” within the normal meaning of that word.</p> <p>So far as social housing is concerned it is no solution to suggest that replacement homes might be provided outside the area: The Town Forum has previously pointed out that the crisis of traffic congestion and on street parking in our town is being exacerbated by the numbers of essential but low wage employees already being forced to come in from far away because no actually affordable housing is available to them.</p> <p>Additional measures to tackle homelessness and the housing shortage</p> <p>If the ending of an Assured Shorthold Tenancy is locally the principal cause of homelessness, as is</p>		

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	<p>stated in the report, the three authorities should vigorously campaign for changes to the law to increase the length of such tenancies at least to the three years common in continental countries. With two thirds of homeless households stated to include children, for whom homelessness (and even the recurring threat of it) is a particularly frightening experience, such changes in the law could have a significant positive impact.</p> <p>We welcome the “No use empty” scheme to bring back into occupation or convert for occupation space which is lying empty within existing properties. While we are aware that the nearly 1000 vacant residential properties at any one time in Tunbridge Wells Borough do not, for a variety of reasons, constitute an available additional housing pool and still less an affordable housing pool, there may be some further measures available to local authorities to render it unprofitable for properties to be left unoccupied for long periods of time.</p> <p>The largest identified need of those on the housing register in Tunbridge Wells Borough (430 out of 994) is for one bedroom accommodation. A significant number of large properties currently in multiple occupation providing this kind of accommodation have recently been coming onto the market described in such terms as “would make a superb family home”. The authorities should explore how the planning system may be used to prevent changes of use in such circumstances. If the present planning system is</p>		

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	<p>incapable of doing so, the authorities might usefully militate for change at a national level, as conversions to single occupation will be appreciably worsening an already unacceptable situation.</p> <p>To provide new 1 or 2 bedroom accommodation, it might help if TWBC and Town and Country Housing Association were to work with companies such as Grainger and Watkin Jones on build to rent schemes. These are specialist builders of properties designed for young people, singles and couples that use space efficiently and provide facilities that young couples want and can afford. Such companies have been very successful nationwide and are able to borrow cheaply. Substantial areas for new build across the Boroughs should therefore be designated for 1/ 2 bedroom flats and not houses, which use up around 75% more space.</p> <p>Assistance with down-sizing</p> <p>There is a wide range of elderly people who need advice, and sometimes transitional financial help, to down-size into more suitable accommodation (independent or sheltered/extra care) thus releasing typically 3 bedroom homes for family occupation. This applies both to public and market housing and we believe consideration could usefully be given to creation of a publicly funded service to enable the elderly to move. This is a huge and difficult decision and needs more knowhow and energy than many have</p>		

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	at the time they move, when there may be no other family members nearby to help.		