Draft Housing Framework 2013 – 2018

Report of the public consultation
7th January to 4th March 2013

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1) Introduction

The draft Housing Framework 2013-2018 contributes to the delivery of the three overarching themes of the Ashford 2030 Framework of prosperity, community and quality and the eight long-term strategic priorities.

The draft Housing Framework considers the challenges and opportunities that lie ahead and how best use of resources can be made to deliver housing and housing related services to meet a range of resident’s needs across all tenures. The draft Housing Framework has five overarching priorities each of which is supported by a number of actions. Taking a route map analogy, the priorities are the destinations and the actions are how we will arrive there.

The draft Housing Framework has been developed in a constantly changing environment. New policy is evolving both nationally and locally that affect housing supply and housing related services. Mindful of this the draft Housing Framework seeks to respond to these changes and through review will be amended to reflect significant policy or legislative changes throughout its lifetime.

The draft Housing Framework has been written to provide a basis for consultation. The outcome of which will inform the final version of the Housing Framework that will be put forward for adoption by Ashford Borough Council.

2) Consultation process

- Consultation with housing staff has been continual through the development of the draft Housing Framework.
- The tenants forum discussed the initial draft priorities in May 2011
- A first stage of public consultation was undertaken in June 2011 where views were sought on draft priorities (Appendix 3). The draft housing framework was then revised to demonstrate its contribution and alignment with the Ashford 2030 Framework.
- A Member working group convened in September 2012 considered and amended the draft delivery plan.
- The draft Housing Framework was approved for public consultation by Cabinet on 11th October 2012 (minute number 166).
- The public consultation commenced on 7th January 2013 and ran for a period of 8 weeks to 4th March 2013.

The Ashford Borough Council ‘Have Your Say’ consultation portal was the main route for accessing the documents and questionnaire. In addition a number of potential consultees were emailed directly advising them of the commencement of the consultation and the link to the portal.
Responses to the consultation

| Number of people registering online to view consultation | 38 |
| Number of people completing the questionnaire - online or submitting a paper version | 19 |
| Number of people submitting comments other than via the questionnaire | 3 |
| Total number of respondents to the draft Housing Framework | 22 |

3) Results of the questionnaire

3.1 Question 1
What do you feel are the most important housing or housing related issues in the Borough? Please select up to 3 options:

![Bar chart showing responses to Question 1]

The following options were not selected as one of the three most important issues by any respondent: Private sector housing renewal; self build homes.

Summary of comments to question 1
- Promote institutional investment
- Objectively assess housing need and provide sufficient housing to meet those needs
- Close liaison needed between Housing Framework and Local Plan
- Mixed developments
- Housing for young people, young families and vulnerable groups including offenders
- Make use of empty properties

3.2 Question 2
Do you agree the 5 overarching priorities are the right ones?
1. Improve the supply of affordable housing to meet local housing needs in Ashford borough’s urban and rural areas
2. Improve environmental quality of homes and address fuel poverty in all tenures
3. Increase availability and choice of accommodation including for vulnerable people
4. Increase resident satisfaction with homes and neighbourhood and increase opportunities for resident involvement
5. Prevent and reduce homelessness and increase access to settled accommodation for homeless households and those at risk of homelessness

Summary of comments to question 2
- Priorities should not be considered equal
- Potential impact of welfare reform should be included
- Duty to Cooperate should be included
- Develop brownfield sites first
- Agree priorities, now need to deliver outcomes

3.3 Question 3
Do you think the five year period of the Housing Framework, with a review in three years, is an appropriate timeframe?
Summary of comments to question 3

Agree:
• Enables implementation and reviewed to respond to change
• Housing issues need addressing promptly

Disagree:
• Need to consider future households requirements
• Longer to align with development plan process
• Nine years with 3 year reviews

3.4 Question 4
Please add any other comments you may wish to make regarding housing in the borough. Are there any housing issues that you think should be included in the delivery plan?

Summary of comments to question 4

• Viability issues requires flexibility over affordable housing provision on development sites
• Local needs housing and supported housing for elderly needed in rural areas
• Allow conversions from empty retail to residential to revitalise town centre
• Encourage a ‘sense of place’ in design and investigate infill rather than large sites
• Important to measure success of the action plan
• Address need of offenders as vulnerable client group and reduce reoffending
• Standards for private landlords
• Reference to Community Infrastructure Levy (CIL) and affordable housing required as impacts on delivery
• Delivery of housing should have higher priority than achieving high standards

3.5 Question 5
Please say whether you represent an organisation

3.6 Summary of comments received in addition to the questionnaire responses

This includes comments sent directly in response to the consultation and housing related comments taken from workshops with two Parish Councils, Independence and Access
Matters and the Ashford District Partnership Group organised by Planning Policy in relation to the Local Plan consultation under the “Plan-it” programme

- Include Tenancy Fraud aspect in section on 'Making best use of the Housing Stock'.
- Consider how to reach those parishes which have not had local housing needs surveys undertaken recently or where a suitable site is yet to be found.
- Future funding for affordable housing likely to be reduced even further, putting even more financial pressure on delivering small, expensive to build rural schemes, ABC should consider funding by way of the new homes bonus.
- Concern over impact of welfare reform, the introduction of universal credit, changes to council tax and housing benefit as potential removal of housing benefit for 18-25 year olds.
- Use of telecare in assisting people to maintain a good quality of life and safe secure long term accommodation for vulnerable people

Housing related comments from Plan-it workshops

- Mix of types of supported housing for vulnerable, from independent living with low level support to 24 hr support in a residential setting, to cater for a range of needs, urban and rural areas. Including accommodation for people with substance misuse problems.
- More information about where to go for housing advice
- More housing for families and attractive smaller homes to encourage downsizing
- Use empty homes and allow conversion of empty office blocks to residential
- Design of homes to include downstairs toilet, wheelchair accessible, have gardens and adequate car parking
- Important to feel safe at home, neighbourhoods to be designed to reduce crime and fear of crime
- More affordable housing for singles and families
- Use brownfield before greenfield sites
- Good public transport links and access to community facilities and services
- Enable older people to stay at home
- Create mixed communities; do not group any specific group, such as older people, in a particular location

4) Ashford BC response

The majority of respondents agreed the 5 overarching priorities as right for the Borough and the timeframe for the Framework is correct, these will remain unchanged

The provision of affordable housing was considered the most important housing issue. The Council will continue to give this high priority both in partnership with Housing Associations and though the building of new council owned homes. In addition the Council
will continue to seek alternative and innovate ways of increasing the number of affordable homes available in the borough such as through the proposed Housing and Regeneration Company and accommodation through the Council’s social lettings agency, as well as exploring investment opportunities and utilising its own assets to fund new affordable housing.

Achieving the policy targets for the percentage of affordable housing to be built is often challenged with the overall site viability cited as being compromised if the full percentage is delivered. The Council considers affordable housing delivery a strategic priority and has introduced a number of mechanisms to enable this, such as deferred contributions and the phasing of affordable housing delivery on larger sites, without compromising its quality and design standards. The introduction of the Community Infrastructure Levy could add further pressure to the viability of sites and the Council will need to balance this requirement without compromising affordable housing delivery. The Housing Framework will make reference to this.

An updated Strategic Housing Market Assessment is to be commissioned by Planning Services in collaboration with Housing Services. This will provide evidence of housing need and inform decisions for the development of the local plan and the delivery of housing in the borough to meet existing and future needs. Future reviews of the Housing Framework will reflect findings of the Strategic Housing Market Assessment and the emerging Local Plan. The Local Plan will develop polices for future housing development such as brownfield sites and infilling.

The Council undertakes master-planning for major developments to create mixed, sustainable developments with well integrated affordable housing. Affordable housing is made up of a mix of affordable tenures, sizes and types of homes to avoid concentrations of any one type of socio-economic group. The Council will continue to work with other agencies to identify and deliver a range of supported housing choices for vulnerable client groups in both urban and rural areas.

The private rented sector is an important source of accommodation and the Council recognises the ongoing need to develop good relations with private sector landlords. This work is identified in the Housing Framework and will be further developed in forthcoming Private Sector Housing Strategy.

The introduction of the Tenancy Strategies, both by the Council and Housing Associations will create more movement in the housing stock and make better use of the affordable housing available. The work of revenues and benefits officers in conjunction with housing officers to tackle tenancy fraud, prosecute offenders and return homes to appropriate use will be included in the Housing Framework.

The impact of the changes to the welfare system will be monitored to wherever possible minimise any negative outcomes arising as a result of the changes. The Council is working with residents to help those affected plan for the changes as they are introduced. The Council has written to all those people it is aware maybe affected by the changes. In addition there is a dedicated information page on welfare reform on the Council’s website, a booklet has been produced with examples of how people maybe affected and housing and benefits officers are providing advice. Any longer term effects such as an increase in rent arrears and homelessness are currently unknown, the Housing Framework action plan will, as part of the review process, seek to address any impacts arising from welfare reform.

The Council works with the KCC No Use Empty campaign to bring empty property back into use. We are also exploring alternative ways to tackle empty homes.
5) Proposed adoption of Housing Framework and monitoring

The responses to the consultation and proposed amendments to the draft Housing Framework will be considered by the Member working group.

The Housing Framework will be reported to Cabinet in June and then put forward for adoption at the next available full Council meeting.

Further to adoption the Housing Framework 2013-2018 will be published on the Ashford Borough Council website, along with each annual review.

Progress to achieving the 5 overarching priorities will be monitored annually from the date of adoption of the Framework and a report presented to Overview and Scrutiny Committee. This will also provide an opportunity to identify any areas of work which need greater resources to deliver and where necessary to take a different course of action when external influences cause pressures that may not have been foreseen at the time the priorities of the Framework were established.

6) Appendix 1 – Comments from questionnaire

Question 1

| Ashford should exploit its unique transport infrastructure to promote institutional investment. |
| Families will put pressure on council services when there is market failure, i.e. lack of mortgages |
| Fundamentally the most important housing issue should be to provide sufficient housing for the objectively assessed housing needs of the Borough. This includes not only those needs resulting from changes in the existing population but also for planned growth and in-migration which is currently being established through the Development Plan process. There should therefore be close liaison between the Housing Framework and the emerging Local Plan in establishing the specific needs of the Borough and planning for delivery against those needs. |
| Housing provision should be mixed in character to encourage mixed communities. |
| Lack of accommodation is a significant ‘criminogenic need’ i.e. linked with risk of reoffending |
| More affordable homes for young families, 3 & 4 bed properties are needed |
| Need to have rents which are affordable for the younger age group |
| Utilise empty properties |
| Difficult to chose only 3 – they are all important |

Question 2

Five questions need five answers, not one
In addition to meeting the local housing needs in Ashford there is also a Duty to Cooperate with neighbouring authorities on planning issues that cross-administrative boundaries, particularly those which relate to the strategic priorities (paragraph 178 of the National Planning Policy Framework). These strategic priorities include the delivery of homes needed in the area. This Duty should be recognised in the priorities.

More public sector housing. Build on brownfield first.
No mention in priorities of potential impact of welfare reform.
We totally agree the 5 priorities now they need to be put into practise

Supply of affordable accommodation for offenders important to reduce reoffending
They are not all equal and should not be treated as such

Question 3

Build for the future of the present school-population to adulthood - so 5 years is too short.
By keeping a close review of the Framework it can be corrected if not working as you would wish

In view of:
   i) The Council's Duty to Cooperate with neighbouring authorities over strategic priorities (NPPF paragraph 178);
   ii) The need for local authorities to prepare plans to deliver housing for the objectively assessed needs of the area (including cross-boundary) through the Development Plan (paragraph 14 of the NPPF);
   iii) The requirement for provision of an adequate five year supply of housing land; and
   iv) The time it takes for delivery;
It is considered that a longer timeframe than five years for the Housing Framework would be more appropriate.

Smaller - not enough time for implementation, longer - not able to respond to change

These issues need to be addressed asap otherwise we will have a serious shortage of housing
Too short - nine years with three years more practical

Question 4

1) There is a need to recognise that delivery of affordable housing is largely and significantly dependent on the delivery of new open market housing through the requirement of a percentage of affordable housing units.
2) It is also important to recognise that the percentage requirement for affordable housing through delivery of open market housing schemes must be realistic and viable also taking into account other infrastructure requirements and contributions. If that is not the case the outcome will be to inhibit not only the provision of open market housing but also the corresponding affordable housing.
3) As part of the viability equation it is important to recognise that there are varying cost implications depending not only on the overall % requirement for affordable housing but also on the size mix and tenure. There should therefore be flexibility in the application of mix when seeking affordable housing on the back of open market housing.
4) This later point re flexibility and viability also applies to the potential to deliver specialist housing needs.
A recent survey in the village, for the Parish Plan, shows that local needs housing and care housing for the elderly are needed much more than council homes. It is inevitable that, in the future, Ashford will not need as many retail properties, given the development of on-line shopping. Empty retail premises should be converted to residential thereby revitalising the town centre as well as meeting housing needs.

Affordable housing positioning is difficult. Pepper pot mixing often not popular with affordable housing occupiers. Often affordable housing needed in the countryside where there are no major developments. Any chance of moving some housing from developments to sites where they are more needed.

Good work ABC in providing affordable housing - not enough, but better than most. People need cheap good rented accommodation - only the public sector will provide that. There should be more attempt to provide a sense of place - Kentish vernacular detail should be mandatory. If the developers don't want to do it, send them away. It should be clear to anyone looking at new build that Ashford is in Kent. See if you can beat some sense into the KE in its comments on housing!!! Just a bit of balanced reporting from them would be refreshing. Careful search for infill housing land would be worth-while, rather than all these large sites. Please use Section 106 - it isn't obvious that this is being done. Please do what you can to insist that the brownfield sites are occupied first.

I haven't been able to read the whole document but measuring success of the plan is important. By this I mean what has been the success of the individual Council interventions, and how have these mitigated the housing problems in the district? Some of these are easier to measure than others eg number of new homes built, so maybe a collective measure of residents' views of the supply, quality and improvement in housing services over a period of time?

I will support people with a learning disability to complete this and feedback their comments at a later date.

It's particularly helpful for the local authority to be both fully involved in relevant MAPPA cases via fulfilling its duty to cooperate with MAPPA to reduce risk of harm, and to reduce risk of reoffending in the community by doing everything possible to address the widespread accommodation needs of offenders as a vulnerable client group where appropriate.

Many cannot afford the rents. This is a particular problem in the rural areas where families ties are involved. It would help to ensure there is a workforce available to sustain growth within the borough. Many rural areas in particular feel that the younger generation will not be eligible for rented properties - or afford then, let alone a mortgage. There is a need to maintain a reasonable even age demographic across all areas if a healthy social-economic environment is to be maintained. This could attract employment to the area.

In our society of an ageing population, there is again a need to ensure that the housing reflects this trend. Possibly more 1 & 2 bed houses. A lot of the recent developments across Ashford in the recent past seems to have been large 4+ bed town houses. The need for more emphasis on 1, 2, 3 bed properties would be more suitable to provide for current needs. This may have been a planning issue which has now been revised in view of the current economic climate. It is not a situation which should be returned to if the market forces improve.

It is good to see the Council building its own properties - there are many who feel more secure and cared for than if they rented via other social providers: particularly those within the private sector. Perhaps there should be private landlords some form of standards to which they meet rent/housing conditions.

The strategy is an intelligent and well constructed document that sets a clear vision for Ashford's housing future. We welcome reference to the Kent Forum Housing Strategy. However, the strategy does not refer to the relationship between CIL and viability of affordable housing delivery via S.106, this is critical to delivery of the strategy's priority.
1and action 1a in the Delivery Plan.

Urgently address the social housing shortage, create additional affordable housing for key workers.

Concentration on delivery rather than expensive standards to increase supply would help.

7) Appendix 2 – Further comments received

There is no mention of the tenancy fraud aspect - especially as we are managing to get properties back successfully. Could this be included in section on 'Making best use of the Housing Stock'.

There is a need to consider how to reach those parishes which have not had local housing needs surveys done recently or where a suitable site is yet to be found. And whilst the recent review of the delivery process was helpful it does not perhaps deal with this particular issue? Likely that in the future HCA funding for affordable housing will be reduced even further, putting even more financial pressure on delivering small, expensive to build rural schemes and that Ashford Borough Council should perhaps look at giving a clear commitment to contributing funding by way of the new homes bonus.

Inclusion of sensory disabilities and definition of wheelchair standard housing

How the need for housing for 18-25 year olds will be addressed once housing benefit is no longer available for this age group?

Concern regarding impact welfare reform, the introduction of universal credit, changes to council tax and housing benefit.

Inclusion of specific reference to Autistic Spectrum Condition and need for safe, secure, long-term accommodation, with telecare which can be very useful in assisting people to maintain a good quality of life

8) Appendix 3 – Summary of Responses to Housing Strategy Discussion Paper Circulated June/July 2011

1. Background:

The Ashford Housing Strategy 2008 – 11 is due for review and renewal. Ahead of drafting a revised strategy a meeting with executive members was held in December 2010 to consider existing priorities and potential new priorities for the housing strategy.

In June 2011 a discussion paper was circulated to a wide range of partners, stakeholders and bodies with an interest in housing. The paper outlined the purpose of the housing strategy, highlighted achievements from the 2008-11 strategy, put forward some of the issues and challenges ahead and sought views on the suggested draft priorities and aims.

2. Response:

27 responses were received as follows:

Members of the Council  2
Parish Councils  1
ABC staff  3
Kent County Council  5  (Mental Health, Strategic Housing, Families and Social Care, Economic Development, Supporting People)
Other Agencies                   4 (Kent Probation, Environment Agency, Eastern & Coastal Kent NHS, Homes and Communities Agency)
Housing Associations         5 (Sanctuary, English Rural, Southern, Moat, Golding Homes)
Developers                         3 (Jarvis Homes, Barton Willmore for Persimmon Homes &Taylor Wimpey, Sellwood Planning for Barratt Homes, Hodson Development, Pentland Homes)
Other organisations           3  (Churches together in Ashford, Climate Energy, National Landlords Association)
Individuals                          1

2.1 Respondents’ comments on issues and challenges:

Comments received have been grouped under common headings

Welfare Reform
• Impact of single room rent for people moving from supported accommodation to independent living

Localism Bill
• Consideration on how to introduce/manage fixed term tenancies, changes to succession, mutual exchange, affordable rent, tenancy strategies

Big Society
• How to embrace the role of volunteers and neighbourhoods in delivering housing related support
• Encourage the involvement of community groups in new build projects

Specific Housing Needs
• Housing need of offenders must be recognised and shared responsibility to reduce reoffending and managing harm posed by high risk offenders. Lack of suitable housing is a major factor in re-offending. Resources need to be in place to meet local housing needs of offenders
• Supply of wheelchair accessible housing to meet identified need
• Consider the transition of telecare and telehealth to localities
• Impact of funding changes to Supporting People programme
• Homelessness is excepted to rise and minimising homelessness is important has negative impact on health and wellbeing
• Older people living at home may be less able to maintain their houses and require additional support, not just about the physical building but delivery of services in an integrated way
• Affordable housing for key workers is essential to provision of local public services and infrastructure
• Must recognise the special needs of Armed Forces veterans
• The needs of gypsy and traveller community need to be addressed
• Homes for young people are needed, may need to consider other approaches such as using private rented sector

New Development
• Concerns that any reduction or slowing down of housing development will reduce number of affordable homes and increase housing need.
• Need to find ways of maximising the delivery of all housing tenures within the context of less public funding
• Continued fragile market challenges levels of delivery - consider use of free or
discounted land on marginal sites that are less attractive to commercial developers and
more easily marketed to housing associations.
• Need to recognise that majority of affordable housing will come forward as part of
larger developments.
• 30% affordable housing quota is acceptable if site is viable - need to be flexible on mix,
tenure and quota. Homes and Communities Agency need to understand viability
issues and accept grant is required to maintain delivery of maximum quota (30%)
affordable housing.
• Community Infrastructure Levy (CIL) needs to be flexible to avoid viability issues which
could jeopardise the 30% affordable housing target. Affordable housing should be
exempt from CIL and s106 contributions waived or reduced. Strategy needs to
consider impact of introducing CIL on affordable housing targets.
• Proposed space standards will inhibit growth and increase costs, these issues need
addressing to maximise affordable housing provision on s106 sites.
• Need to seek innovative funding mechanisms to deliver affordable homes; are there
opportunities from Housing Revenue Account reform, new homes bonus income and
Tax Increment Financing?
• Should Housing Strategy wait until after review of Core Strategy when growth
proposals will be known?

Rural Housing
• Need to continue local needs housing survey programme and subsequent
development of local needs housing schemes.
• Affordable housing in rural areas is important to reduce imbalance of demographics
(young people leaving) which in turn can lead to increases social isolation of those
remaining.
• Need to reduce long lead in time for local needs housing.

Private Rented Sector
• Proactively work with private landlords and tenants – education of tenants on
responsibilities of renting.
• Concern that private landlords seen in negative way and that many may not be able to
reduce rents due to their own outgoings in respect of the property.

Environmental Sustainability
• Reduce environmental impact by maximising use of previously developed land, avoid
unsustainable sites, e.g. high flood risk, reduce carbon emissions, increase uptake of
energy efficient measures, secure efficient water usage.
• Ensure access to green infrastructure for health and social benefits.

3. Respondents’ comments on priorities & aims:
• Overall respondents agreed the priorities and aims were appropriate to meeting the
issues and challenges noted in the paper.
• Some respondents suggested that Priority 1 should be to ‘maximise the supply of
homes’ and not just related to affordable housing. This was due to the direct
relationship between affordable housing delivery on larger sites through s106
obligations and it therefore follows that level of affordable housing is dependent on
attracting developers to commit to large scale, viable projects.
• Other suggestions were to link the priorities more closely to those of the Kent and
Medway Housing Strategy. This included Planning Futures for managed growth and
infrastructure to support housing delivery.
4. Other suggested aims and objectives:

- The council enabling role extends to stimulating the wider housing market to include home ownership and private rented sector
- The sheltered housing remodelling project results in high quality, spacious accommodation
- To take a holistic approach to homelessness and need for a night shelter to assist in helping homeless people back into a more stable lifestyle
- Expand aim to deliver improved sustainability to make clear it covers both new build and existing housing
- Include a specific mention of youth homelessness
- Release council owned land, especially in parishes to shorten time for delivery of local needs housing
- As part of bringing empty homes into use, install PV (solar electricity) to make the properties more attractive to future purchasers
- Utilise the carbon offset fund for projects to improve energy efficiency and reduce fuel poverty
- Consider introducing eco-homes or similar standard for domestic refurbishments
- Engage with water companies to link to metering and water efficiency
- Give stronger focus to infrastructure including transport

5. Additional comments:

- More parking provision on new developments required along with lower density, detached housing – larger gardens and more local open spaces, improved road networks for faster more efficient car travel.
- Reference Strategy back to Kent Rural Housing Protocol
- Parishes who have not undertaken local needs surveys should be encourage to do so.
- Concerns over small family homes being extended into large family homes, reducing stock of smaller family homes in rural areas.
- Include conversion of redundant farm buildings to residential in addition to tackling empty homes
- Energy conservation and affordability – Borough Council bulk buying for its electorate
- Wheelchair accessible housing, London policy minimum of 10% of new homes to be wheelchair accessible, could Ashford follow this?
- Work with private sector to maximise new housing opportunities and to recognise the private rented sector to be seen as a source of long term housing solutions rather than short term stop gaps
- The council should be willing to be flexible in both the types of affordable housing products and the phasing of their provision by designing the affordable housing package for larger sites so that the initial phases bear a lower proportion of affordable housing and any shortfall is made up in the later phases
- Sufficient private space and open space to support community cohesion and neighbourliness
- Inclusion of more voluntary groups
- Moving more able council house tenants to make space for those in expensive bed & breakfast
- Self build – availability of land is an issue, maybe consider incorporating plots for self build within s106 agreements.
- Co-housing can engender a greater sense of community anyways of supporting this should be explored
- How will the strategy be monitored and reported?
Comments collated by:
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