

# 6 Appendix B: consultation responses

## Summary of responses to the consultation questions

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



Priorities 1, 2 and 3 were all considered important, with respondents ranking them as follows:

Priority 1 - 8 respondents ranked this most important, rank 1, 6 respondents ranked it as 2, 5 respondents as 3 and 5 as least important with a rank of 4.

Priority 2 - 6 respondents ranked this most important, rank 1, 7 respondents ranked it as 2, 8 as 3, and 3 as least important with a rank of 4.

Priority 3 - 8 respondents ranked this most important (rank 1), 8 respondents ranked it as 2, 3 as 3, and 5 as least important with a rank of 4.

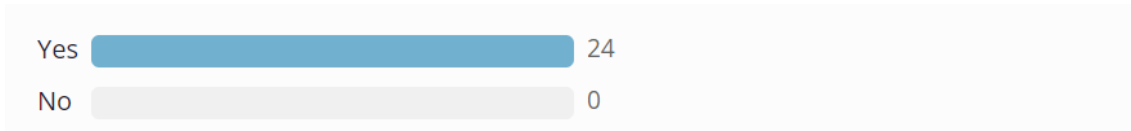
Priority 4 - 6 respondents ranked this most important (rank 1, and zero have been included), 2 respondents ranked it as 2, 3 as 3 and 13 as least important with a rank of 4.

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

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

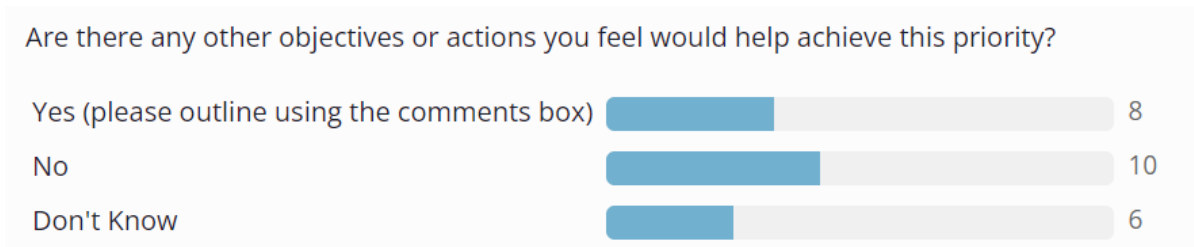
Priority 1 received the most responses stating it to be very important (18), closely followed by Priority 2, with 15 responses. Priority 4 received the most responses stating it to be important.

3. Do you agree with Priority 1?



All respondents indicated agreement with priority 1.

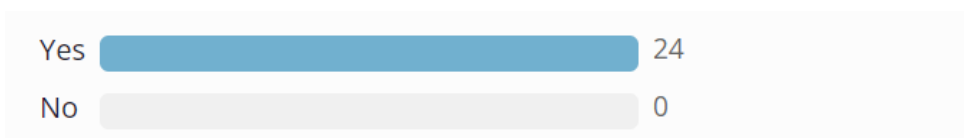
#### 4. Are there any other objectives or actions you feel would help achieve this priority?



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

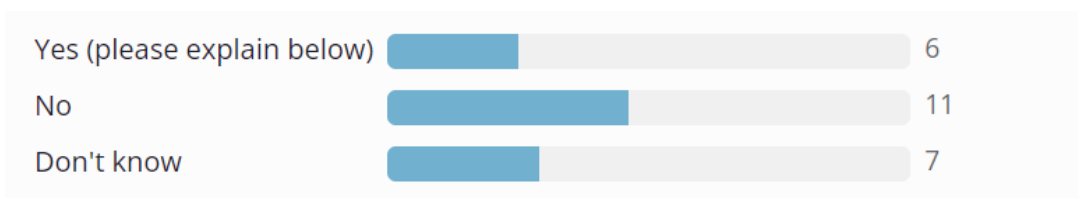
- Take more control of housing associations, like Clarion, that have houses sitting empty and cannot transition people between different houses. New builds should have eco min. requirements.
- Raise the standard required of developers at the point of build.
- Long term, cross political party planning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

#### 5. Do you agree with priority 2?



All respondents indicated agreement with priority 2.

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



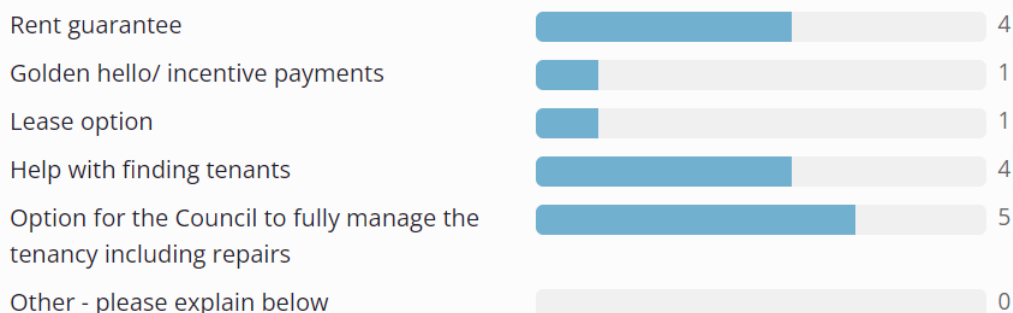
Comments submitted for question 6:

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

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

7.

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



Comments submitted for question 7a:

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

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



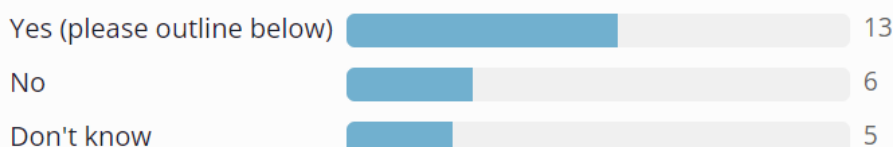
One Registered Provider of social housing answered yes to this question along with two others who are likely to be private landlords. The Housing team will contact the three respondents who agreed to being contacted.

8. Do you agree with priority 3?



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

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



Comments for question 9:

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

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

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

#### Annual Monitoring Report

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

#### Housing Delivery Test

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

#### Housing Land Supply Position

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

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

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

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

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

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

Two respondents provided comments, as follows:

Registered Provider:

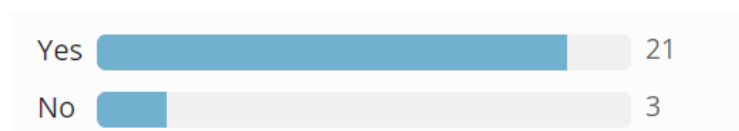
- Bringing forward more schemes with a high focus on affordable housing.
- Working closely with RPs to ensure new affordable schemes can be brought forward.
- 100% affordable schemes
- Working with our needs for local lettings plans.

Neighbouring local authority:

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

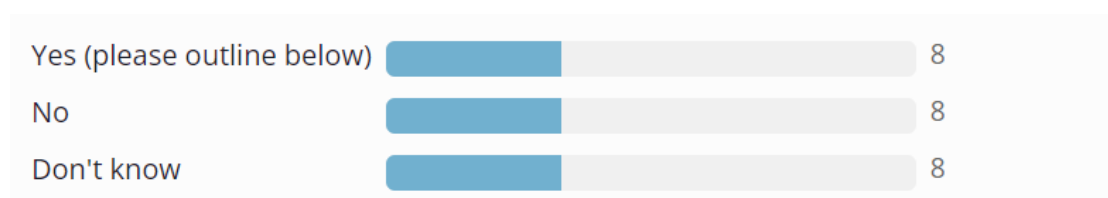
#### Priority 4: Working in partnership

11. Do you agree with priority 4?



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

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

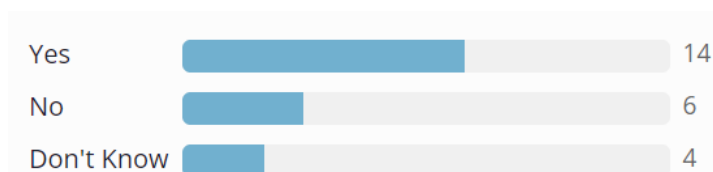


Comments given for question 12 about priority 4:

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

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

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



#### Comments submitted for question 13:

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