

Local Authority Housing Inspection Report

February 2006



Affordable Housing

Tunbridge Wells Borough Council

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Local Authority Housing Inspections

The Audit Commission is an independent body responsible for ensuring that public money is spent economically, efficiently and effectively and delivers high quality local and national services for the public.

Within the Audit Commission, the Housing Inspectorate inspects and monitors the performance of a number of bodies and services. These include local authority housing departments, local authorities administering Supporting People programmes, arms length management organisations and housing associations. Our key lines of enquiry (KLOEs) set out the main issues which we consider when forming our judgements on the quality of services. The KLOEs can be found on the Audit Commission's website at www.audit-commission.gov.uk/housing.

This inspection has been carried out by the Housing Inspectorate using powers under section 10 of the Local Government Act 1999 and is in line with the Audit Commission's strategic regulation principles. In broad terms these principles look to minimise the burden of regulation while maximising its impact. To meet these principles this inspection:

- is proportionate to risk and the performance of the Council;
- judges the quality of the service for service users and the value for money of the service;
- promotes further improvements in the service; and
- has cost no more than is necessary to safeguard the public interest.

Summary

- 1 Tunbridge Wells Borough Council is located on the western side of Kent bordering East Sussex and Surrey. The population of the area is 105,600ⁱ, of which around half live in the town of Royal Tunbridge Wells. The black and minority ethnic (BME) community is relatively small, comprising 5.9 per cent of all residentsⁱⁱ.
- 2 Although there are some isolated pockets of deprivation, the borough is affluent with low levels of unemployment. House prices in the borough are relatively high, currently averaging £262,385 compared to a regional average of £223,372ⁱⁱⁱ. As a result, many low and average income households cannot afford to get on the housing ladder. A housing needs assessment in 2000 identified a need for 1,847 additional affordable homes to 2005.
- 3 The Council comprises 48 councillors and is controlled by a Conservative administration with 36 seats. The remaining seats are held by the Liberal Democrats (11) and Labour (1). The Council adopted a leader and cabinet model of governance in 2002. Nine Conservative councillors sit on the cabinet.
- 4 The Council's net revenue budget for 2005/06 is £11.2 million, with an approved capital programme of £9.7 million. The Council employs around 470 staff.
- 5 The inspection covered a broad range of services which contribute to the delivery of affordable housing, including planning, homelessness and housing advice, private sector housing and strategy and enabling. The Council's net revenue budget for housing in 2005/06 is £1.666 million, including capital charges. There is also a housing capital budget of £455,000. The Council has estimated that planning services costs of £14,350 per annum are related to its work on affordable housing issues.

ⁱ Office of National Statistics, Mid-Year Estimates, 2004

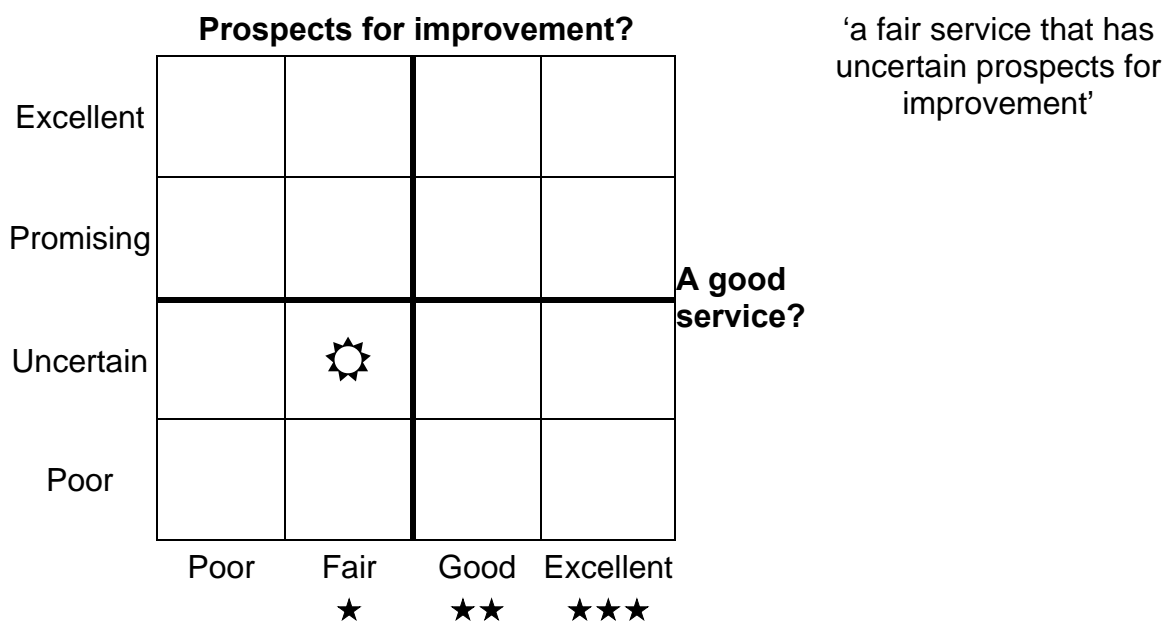
ⁱⁱ Office of National Statistics, 2001 Census

ⁱⁱⁱ Land Registry quarterly statistics, April to June 2005

Scoring the service

- 6 We have assessed Tunbridge Wells Borough Council as providing a ‘fair’, one-star service that has uncertain prospects for improvement. Our judgements are based on the evidence obtained during the inspection and are outlined below.

Table 1 Scoring chart¹



Source: Audit Commission

- 7 We have judged the service as a fair one-star service because:
- the Council helps to promote access to those seeking affordable housing services via outreach services, a wide range of public leaflets and an affordable housing website;
 - a range of activities are having a positive impact on the prevention of homelessness, including an accessible housing advice service, a rent deposit and guarantee scheme and effective multi-agency working;
 - there is a reasonable range of up-to-date housing needs information to support the development of the Council's housing strategies;
 - there is effective joint working with local parishes and housing associations on affordable housing issues;
 - the planning system is contributing to the delivery of affordable housing, with an increasing number of homes delivered through planning agreements;

¹ The scoring chart displays performance in two dimensions. The horizontal axis shows how good the service or function is now, on a scale ranging from no stars for a service that is poor (at the left-hand end) to three stars for an excellent service (right-hand end). The vertical axis shows the improvement prospects of the service, also on a four-point scale.

- the Council actively seeks to influence the tenure, size and location of affordable homes, helping to promote sustainable communities;
 - there has been some progress on meeting the housing needs of key workers, with 43 key worker homes delivered between 2001/02 and 2004/05;
 - supported by the Council, the Care and Repair Agency provides a range of support to vulnerable residents, helping them to remain independent; and
 - the Council has made good progress in improving the energy efficiency of homes occupied by vulnerable people, through effective partnership working and promotional activity.
- 8 However, there are some areas where improvements are needed.
- Despite recent improvements, the delivery of affordable homes in the past four years has fallen well below both the Council's own targets and the level of local needs.
 - There is a lack of emphasis on measuring customer satisfaction with the range of affordable housing services.
 - The approach to addressing equality and diversity issues in relation to affordable housing service is weak. For example:
 - the Council has missed the deadline for compliance with the Disability Discrimination Act;
 - policies and service delivery in relation to affordable housing have yet to be formally assessed for equality and diversity issues;
 - there has been slippage on developing housing sub-strategies for young and older people; and
 - there is lack of cultural and diversity training for staff involved in delivering affordable housing.
 - Consultation and user involvement in the development of the existing housing strategies has been very limited.
 - There is a lack of synergy between the various aspects of affordable housing strategy and some gaps in information are still evident.
 - Following the change in local authority social housing grant (LASHG) rules, the Council has not fully supported its housing priority through investing available capital receipts.
 - The strategic approach to addressing affordable housing problems in the private rented sector is under-developed, with insufficient focus on how the sector can contribute to the supply of affordable homes.
 - The Council is not policing conditions in the private rented sector effectively, with very few homes in multiple occupation inspected each year. This limits the opportunities to bring high risk homes up to standard and will result in vulnerable tenants being at risk from poor conditions.
 - Empty homes in the borough are not being tackled effectively.

8 Affordable Housing | Summary

- The budget for mandatory disabled facilities is too small to meet demand, resulting in significant annual overspends.
 - The housing service does not have robust systems for driving and delivering value for money, with an inconsistent focus on cost comparisons and benchmarking.
- 9 We have judged that the service has uncertain prospects for improvement because:
- there is a mixed track record in delivering planned improvements, with slippage on a number of targets within key housing strategies;
 - the existing range of housing strategies and related action plans do not provide a clear focus for future improvements;
 - performance monitoring is under-developed, with insufficient information to inform Member-level decision-making and scrutiny;
 - it is not yet clear how a robust approach to value for money will be driven forward, either corporately or within the housing service;
 - the competency and knowledge of Councillors involved in driving the housing agenda needs to be further developed to drive improvement;
 - the Council has yet to refine its range of priorities and align these with resources, making it difficult to be certain whether capacity and other budgetary issues within the housing service will be addressed; and
 - the lack of a strategic approach to capital planning within the Council does not support long-term development planning for affordable housing.
- 10 However, there are also some positive factors which will help to drive improvement.
- There have been some recent improvements which have benefited service users, including a greater focus on housing advice and homelessness prevention and the introduction of rent deposit and rent guarantee schemes.
 - There is a clear commitment to addressing the shortfall of affordable housing among both senior managers and Councillors.
 - Effective partnership working provides opportunities to enhance capacity and inform future housing strategies.
 - The Council has taken some difficult decisions to support its affordable housing priority, including contesting planning appeals and selling Council land for housing development at below its market value.
 - The Council is strengthening its arrangements for projecting and tracking affordable housing development, with a focus on risk management and contingency planning.

- A staff appraisal system linked to the performance management framework provides direction to staff involved in affordable housing.
- The Council actively learns from complaints, with some evidence of policy and procedure changes following feedback.

Recommendations

- 11 To rise to the challenge of continuous improvement, organisations need inspection reports that offer practical pointers for improvement. Our recommendations identify the expected benefits for both local people and the organisation. In addition, we identify the approximate costs¹ and indicate the priority we place on each recommendation and key dates for delivering these where they are considered appropriate. In this context, the inspection team recommends that the Council shares the findings of this report with service users and councillors and addresses all weaknesses identified in the report. The inspection team makes the following recommendations.

Recommendation

R1 Improving access to people with disabilities by:

- *ensuring that access to Council offices meets the requirements of the Disability Discrimination Act 1995.*

The expected benefits of this recommendation are:

- delivery of equitable services for people with disabilities; and
- increased customer satisfaction.

Interim measures to improve accessibility should be implemented by July 2006¹¹.

Recommendation

R2 Improve access to services and standards of customer care by:

- *developing service standards which are specific to housing services, such as housing advice and private sector grants activity;*
- *updating the website to include more user-focussed information about housing services and local affordable, high quality accommodation provided by private sector landlords; and*
- *developing ways to maximise feedback from, and involvement of, service users in housing services - and ensuring that those consulted know what has changed as a result of their feedback.*

¹ Low cost is defined as less than 1 per cent of the annual service cost, medium cost is between 1 and 5 per cent and high costs is over 5 per cent.

¹¹ Mandatory recommendations which are made by the Audit Commission where the inspected body is in breach of a statutory duty are not costed. Under the Disability Discrimination Act 1995, the Council was required to make its offices accessible to disabled people by October 2005.

The expected benefits of this recommendation are:

- increased customer satisfaction;
- delivery of equitable services for people with disabilities;
- improved access to information for service users; and
- increased ability to learn from service users and meet changing needs.

The implementation of this recommendation will have high impact with medium costs. This should be implemented by June 2006.

Recommendation

R3 Improve the Council's approach to private sector renewal by:

- *reviewing the housing renewal assistance policy to ensure that it supports the Council's focus on affordable housing and maximises support to vulnerable tenants and value for money;*
- *developing a Private Sector Landlords' Accreditation Scheme which is widely available and provides a list of accommodation that has been inspected by the Council and found to meet safety and amenity standards;*
- *strengthening the approach to inspection of homes in multiple occupation to ensure that all high risk homes are inspected within a five year period;*
- *reviewing the budget for disabled facilities grants to ensure a closer match with expressed demand;*
- *developing a clear understanding of the extent of empty homes in the borough and implementing a strategy to bring them back into use;*
- *improving links between private sector landlords and the housing service;*
- *addressing capacity issues in the private sector housing team to ensure that it can take forward all its key areas of work; and*
- *consider options to reduce waiting times for occupational therapy assessments.*

The expected benefits of this recommendation are:

- increased support to, and improved housing conditions for, vulnerable tenants, allowing them to maintain their independence;
- improved budget management and better scope for cost control;
- reduced waiting times for adaptations; and
- long-term improvements in the quality and use of the borough's privately-owned housing stock.

The implementation of this recommendation will have high impact with high costs. Key milestones for each of the above tasks should be identified by 31 March 2006 and all recommendations should be implemented by April 2007.

Recommendation

R4 Maximise the effectiveness in preventing homelessness by:

- *developing formal protocols with other agencies involved in the provision of housing advice in the borough to clarify responsibilities and ensure effective co-ordination;*
- *agreeing a borough-wide approach to measuring the extent and cause of homelessness across the range of local advice and support agencies; and*
- *developing and implementing plans to improve the IT system in the housing needs service.*

The expected benefits of this recommendation are:

- improved information on homelessness to support strategy development;
- better scope to minimise duplication of effort between housing advice services; and
- improved staff capacity and quality of information through introduction of automated processes.

The implementation of this recommendation will have medium impact with high costs. This should be implemented by October 2006.

Recommendation

R5 Strengthen the approach to service and improvement planning by:

- *ensuring that all strategies and plans are clearly informed by consultation with key stakeholders and service users;*
- *ensuring that all strategies and plans address equality and diversity issues and reflect the needs of vulnerable groups;*
- *ensuring that all housing strategy action plans are SMART (specific, measurable, achievable, resourced and time-bound) and that targets are regularly monitored by Councillors;*
- *routinely benchmarking the quality and costs involved in delivering affordable housing with comparable organisations; and*
- *improving the scope and quality of performance information provided to Councillors, with details of remedial action to address under-performance.*

The expected benefits of this recommendation are:

- increased ability to identify and implement options for improvement;
- improved accountability for service delivery;
- a better understanding of whether value for money is being achieved; and

- more informed political and managerial responses to under-performance.

The implementation of this recommendation will have high impact with low costs. This should be implemented by April 2006.

Recommendation

R6 Strengthen the management and leadership of the service by:

- *developing a long-term approach towards funding of the housing priority, including consideration of the use of capital reserves;*
- *developing and implementing a corporate approach to equality and diversity training for both staff and Councillors; and*
- *reviewing the training and development needs of Councillors involved in directing the Council's approach to affordable housing issues, and developing individual training plans.*

The expected benefits of this recommendation are:

- greater clarity about the scope to invest in housing services and affordable housing;
- improved understanding of customer needs and equity in service provision among both officers and Councillors; and
- councillors are better placed to drive performance and improvement.

The implementation of this recommendation will have high impact with high costs. This should be implemented by April 2006.

Recommendation

R7 Strengthen the Council's capacity to improve delivery of housing services by:

- *completing equality impact assessments for all services and policies related to the delivery of affordable housing; and*
- *taking steps to measure the effectiveness of partnerships and identify any gaps in current arrangements.*

The expected benefits of this recommendation are:

- improved understanding of customer needs and equity in service provision among both officers and Councillors; and
- increased awareness of the costs and benefits of partnership working.

The implementation of this recommendation will have medium impact with low costs. This should be implemented by December 2006.

- 12 We would like to thank the staff of Tunbridge Wells Borough Council who made us welcome and who met our requests efficiently and courteously.

Dates of inspection: 31 October - 4 November 2005

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Report

Context

The locality

- 13 Tunbridge Wells Borough Council is located on the western side of Kent bordering East Sussex and Surrey. The population of the area is 105,600^I, of which around half live in the town of Royal Tunbridge Wells. There are 44,800 homes in the borough of which 72 per cent are owner occupied, 20 per cent are owned by housing associations and 9 per cent are privately rented^{II}.
- 14 The age profile of the area is broadly similar to regional and national averages. The black and minority ethnic (BME) community is relatively small, comprising 5.9 per cent of all residents^{III}. The population of the borough grew modestly between 1991 and 2001, with an increase of 2.6 per cent compared to a regional average of 5 per cent. The population is projected to increase by a further 5.6 per cent up to 2011, with significant implications for housing needs.
- 15 The borough is affluent with very low levels of unemployment. It ranks 297 out of 354 on the Government's 2004 index of local deprivation, with 354 being the least deprived local authority area^{IV}. Average weekly wages are just above the regional and national averages but house prices in the borough are relatively high, currently averaging £262,385 compared to a regional average of £223,372^V. As a result, many low and average income households cannot afford to get on the housing ladder. A housing needs assessment in 2000 identified a need for 1,847 additional affordable homes to 2005.
- 16 Much of the borough is green belt with approximately 69 per cent designated an Area of Outstanding Natural Beauty. Green belt restrictions and the attractiveness of the area, along with the borough's proximity to job opportunities in London, add to the pressures of housing demand and supply. Other local pressures relate to road congestion in the town centre and on and around the A21, and sustaining the viability of Royal Tunbridge Wells as a regional shopping centre and tourist attraction.

^I Office of National Statistics, Mid-Year Estimates, 2004

^{II} Tunbridge Wells Borough Council Housing Conditions Survey, 2003. Results of a housing needs survey in 2005 found that 72 per cent of homes were owner occupied, 15 per cent were owned by housing associations and 12 per cent were privately rented.

^{III} Office of National Statistics, 2001 Census

^{IV} Office of the Deputy Prime Minister Index of Local Deprivation, 2004

^V Land Registry quarterly statistics, April to June 2005

The Council

- 17 The Council comprises 48 councillors and is controlled by a Conservative administration with 36 seats. The remaining seats are held by the Liberal Democrats (11) and Labour (1). The Council adopted a leader and cabinet model of governance in 2002. Nine Conservative councillors, including the Leader, sit on the cabinet.
- 18 The Council's management structure comprises the chief executive, two directors, covering operational services and finance, and 18 heads of service. The line management for housing, planning and IT recently transferred to the Chief Executive. The Council employs around 470 staff.
- 19 The Council's net revenue budget for 2005/06 is £11.2 million, with an approved capital programme of £9.7 million. The projected revenue reserves for the 2005/06 are £41 million and its Council Tax for Band D is £1,144, one of the lowest in Kent. Interest income of £2.1 million is being used to reduce net expenditure in 2005/06. The Council transferred its housing stock to High Weald Housing Association (HWAHA) in 1992.
- 20 In 2003 a comprehensive performance assessment carried out by the Audit Commission rated the Council as weak, with key weaknesses identified in leadership and the use of resources. A Balancing Housing Markets diagnostic carried out as part of the assessment also found a high need for improvement. An Audit Commission progress assessment carried out in June 2005 found that the Council had begun to tackle its improvement agenda but progress was limited.

The service

- 21 This inspection covered a broad range of services which contribute to the delivery of affordable housing, including planning, private sector housing, homelessness and strategy and enabling. It looked at how the Council works in partnership with others to deliver affordable housing and how well it understands the local housing market. Affordable housing can be defined as low cost market housing and subsidised housing, irrespective of tenure, ownership, whether exclusive or shared, that is available to people who cannot afford to rent or buy properties generally available on the open market.
- 22 There is currently no single housing inspectorate Key Lines of Enquiry (KLOE) which specifically covers all aspects of affordable housing but in undertaking this inspection we have drawn upon the relevant elements of the KLOEs covering strategy and enabling, private sector housing and homelessness and housing needs. Elements of the Council's planning service were also included within the scope of the inspection.
- 23 The Council's net revenue housing budget in 2005/06 is £1.666 million, including capital charges. There is also a housing capital budget of £455,000 which includes sums for home improvement grants and works to temporary accommodation. The Council has estimated that planning service costs of £14,350 per annum are related to its work on affordable housing issues.

How good is the service?

What has the service aimed to achieve?

- 24 The Housing Strategy Statement 2001-2006 includes four strategic aims, underpinned by a number of priorities and targets.
- Meeting the needs of all our customers:
 - providing 2,900 additional new homes by 2011;
 - 50 per cent of new homes to be of small or intermediate size;
 - 85 per cent of development to be on brownfield sites; and
 - reflect the demand for urban versus rural sites in our housing policy.
 - Helping people access homes:
 - 815 affordable homes between 2001 and 2011;
 - influence the location, size, tenure and type of housing to match needs;
 - reduce homelessness through early intervention, advice and assistance; and
 - reduce use of bed and breakfast accommodation and eliminate its use for families.
 - Helping people live in the community:
 - work in partnership to address and identify the support needs of vulnerable residents in the community;
 - fund and support services eg, Home Improvement Agency, floating support and mediation; and
 - ensure that existing services are effective and develop new initiatives to meet priorities.
 - Improving the standard of our homes:
 - work with RSL partners to monitor progress on decent homes;
 - improve private sector stock quality through grant and enforcement activity and liaison with landlords; and
 - reduce domestic energy use through promotional activities, advice and discount schemes.

- 25** There are clear links between the local aims and priorities and national and regional policies. For example, the focus on affordable homes, improving conditions in private accommodation and joint working reflects the national housing priorities set out in the Government's sustainable communities policy and the South East Regional Housing Strategy^I. Equally, the commitments to develop mixed communities and re-use of urban land accord with the principles set out in the Government's planning policy guidance on housing^{II}.
- 26** The Council's key corporate and community strategies reflect the importance of affordable housing issues. The Borough Community Plan 2003-2011 includes meeting the housing needs of local people as a key theme and recognises that affordable housing is central to the social and economic well-being of the area. Housing is also one of the Council's nine priority areas included in its annual operating plan for 2005/06, with a focus on affordability, energy efficiency and safety in the home. However, these do not match the priority areas in the housing strategy.

Is the service meeting the needs of the local community and users?

Access and customer care

- 27** The quality of access and customer care is mixed. There are some positive aspects of the service, such as a broad range of leaflets providing advice and guidance to people seeking affordable housing, reasonable access to housing advice, and a specialist website outlining affordable housing options. However, information about private sector housing options is limited and there has been insufficient focus on measuring customer satisfaction and developing customer service standards for affordable housing services. The main housing reception is not fully accessible to disabled people and does not offer visitors a high quality environment.
- 28** There is reasonable access for people seeking housing related services, though arrangements have not been agreed with service users. The housing reception at the Town Hall opens from 8.30am to 5.00pm each weekday and people seeking housing advice can attend afternoon surgeries without a prior appointment. Outreach sessions are regularly held in two rural areas (Cranbrook and Paddock Wood) and home visits are available, helping to address the dispersed nature of the population. Information advertising the housing advice service is also routinely included in the borough newsletter and local papers. However, as access has not recently been discussed with service users, it is not possible to know whether current provision meets their needs.

^I Sustainable Communities: Building for the Future, Office of the Deputy Prime Minister, 2003

^{II} Planning Policy Guidance (PPG) notes set out the Government's policies on different aspects of planning. PPG3 was released in March 2000 and introduced a new approach to planning for housing.

- 29 The offices providing access to affordable housing services do not offer visitors a high quality environment. The housing reception is poorly signed, with no clearly displayed information about opening hours and emergency contact numbers. It is not compliant with the Disability Discrimination Act (DDA). The reception desk is not suitable for wheelchair users and the private interview rooms are not wheelchair accessible. The reception offers limited seating and lacks some positive features, such as a children's play area or a freephone service. Following our inspection, the Council agreed to implement temporary measures by July 2006 to ensure better access to disabled people, pending its long-term development of a new one stop-customer contact centre.
- 30 There are some customer service standards in place, but the approach is not yet comprehensive. Corporate customer service standards are in place, covering general customer care issues. A planning services charter also sets out the standards that planning applicants and agents can expect, including pre-application advice which is given free in respect of all major applications. However, the lack of published standards (for example, in private sector regulation and grants activity or housing advice and homelessness services) makes it difficult for service users to know what they can expect in these areas.
- 31 The Council's website contains some useful information about affordable housing services, but there is scope for improvement. The website provides copies of the Council's key housing strategies and planning policies. There are also some useful links, including one to the Affordable Homes in Kent website which provides a good overview of affordable housing options and housing associations based in the borough. However, the website lacks some information which would be useful to the public, such as details of housing advice surgeries, lists of local lettings agents and national sources of information. It is not yet possible to submit housing or private sector grant applications on line.
- 32 The Council provides a wide range of information leaflets which are written in a clear, accessible style and include a range of useful local contact numbers. These include leaflets covering housing advice for home owners and older people, relationship breakdown, supported housing, and homelessness. The housing reception also displays information from other agencies, such as the Care and Repair Service, helping people to understand what is available from which agency.
- 33 The range of information about private sector housing options is limited. The Council has produced some basic information about finding housing in the private sector and has produced a list of local lettings agencies which will accept people on housing benefit. However, the Council has not publicised a list of privately rented accommodation which it has inspected and is known to meet current standards and has not developed its own landlord accreditation scheme, reducing opportunities to signpost people to good quality, affordable accommodation. Additionally, leaflets on the rent in advance and rent guarantee schemes were not on display in the housing reception at the time of our inspection. Without full information, people may not explore the full range of options available to them.

- 34 There has been mixed success in promoting the support available via home improvement grants and energy efficiency schemes. The Council has successfully worked with its partners to promote and target energy efficiency initiatives, drawing upon Census information and information on energy databases, leading to good levels of take-up. In contrast, promotion of grant assistance available under the private sector renewal policy has not been effective. Although there has been some innovative leaflet targeting, this has been negated by the Council not being able to meet the additional demand.
- 35 The housing service has not yet established mechanisms to seek feedback from its service users. Although the Care and Repair Service routinely surveys its customers, there is a lack of service user satisfaction surveys in housing services. A borough-wide satisfaction survey did take place in November 2004 but did not include any questions about satisfaction or awareness of housing services, such as housing advice or home improvement grants. Although a customer comments card has recently been introduced, feedback has yet to shape changes in policy and practice. This means that there is no comprehensive information about user satisfaction to guide service improvement.
- 36 A Council-wide complaints system allows people to raise concerns about the services they receive. The three stage procedure is well-publicised via a clearly written leaflet and details are also on the website. Complaints can be made by e-mail, by freephone, in writing or in person, ensuring good access. An analysis of the complaints received about housing in the last 12 months (19) show that all were dealt with reasonably. No reports of maladministration have been issued in relation to complaints made to the Local Ombudsman about housing services (2) in the last five years.

Diversity

- 37 The Council's approach to addressing equality and diversity issues in relation to affordable housing is weak. The corporate framework for equalities is still developing and no equality impact assessments have been completed in housing. Existing housing strategies do not fully address diversity issues and the BME housing strategy has not provided a focus for driving improvement. Although the housing service is strengthening its understanding of the needs of diverse groups, the development of housing sub-strategies for older and young people has slipped. However, a range of supported housing services has been developed to meet the needs of some vulnerable groups.
- 38 The Council has been slow to develop its approach to equality and diversity and ensure that its services meet the needs of all groups. It has only achieved Level 1 of the Equality Standard and a Council-wide diversity strategy is still being developed. Slippage is also evident on existing diversity plans: for example, a target to complete equality impact assessments in housing services by April 2003 was included in the Race Equality Scheme (RES) Action Plan, but has not yet been met. There has not been a comprehensive cultural and diversity training programme at a service level. This means that staff delivering front-line services or developing the strategic approach to housing may not be fully equipped to take account of diversity and equality issues when carrying out their work.

- 39 Existing housing strategies do not fully address diversity issues. For example, the homelessness strategy considers the needs of young people and some vulnerable groups, but does not look at BME housing needs. Equally, the housing strategy includes little intelligence about the housing needs of vulnerable and BME groups and does not spell out a comprehensive approach to strengthen the information base. Although a separate BME housing strategy was developed with High Weald Housing Association, the housing strategy action plan does not include any targets to ensure its implementation and its action plan is out-of-date. This makes it difficult to assess how work on diversity will be taken forward.
- 40 There have been delays in developing specific strategies to meet the needs of diverse groups. Although housing strategies for older and young people were initially scheduled for completion in March 2004, they will not be completed until the end of 2005. Additionally, while gaps in provision for vulnerable groups - such as offenders, drug misusers and people with mental health problems - were identified in the homelessness review, it is unclear what the Council intends to do to bridge these gaps. Lack of a clear approach to different sub-groups will make it more difficult to determine priorities when it is not possible to meet all needs.
- 41 The reporting of service provision by ethnicity is under-developed. The housing service monitors some aspects of its service by ethnicity, including homeless acceptances, registrations and grant applications made via the Care and Repair Service. However, there is no information about the profile of those taking up housing advice or requesting the services of the private sector housing team. Additionally, the housing service plan does not include a focus on diversity: none of the proposed performance indicators show a breakdown of outcomes by ethnic group. This will make it hard to identify patterns of under-representation and assess if services are being provided fairly.
- 42 The Council is undertaking some work to increase its understanding of the diverse needs across the borough. Research on the housing needs of gypsies and travellers has been commissioned (in partnership with Tonbridge and Malling Borough Council, Maidstone Borough Council and Ashford Borough Council) and a comprehensive study of young people's housing needs has just been completed. The 2005 housing needs survey also provides good information about the needs of BME and disabled households, including the need for supported accommodation and adaptations. This information will help the Council to develop its services and housing provision to meet the needs of diverse groups.
- 43 In contrast, the housing needs surveys carried out for parishes provide insufficient information about diversity. None of the seven surveys that have been completed collected information about the ethnicity of the respondents and not all of the surveys asked about disabilities and special needs, such as the need for wheelchair access and special care, making the demand for specialist housing unclear.

- 44 The Council has taken steps to make its services accessible to different groups, though there are some gaps. Language Line has been introduced and advertised at public offices, supported by staff training, and a minicom service is available. However, there is an inconsistent approach to advertising whether information is available in other languages and formats. For example, the complaints leaflet indicates that other formats are available, but those promoting the rent deposit schemes do not. Language strap-lines do not feature on any of the Council's publications.
- 45 The Council has worked with neighbouring boroughs and Kent County Council's Supporting People team to develop local supported housing schemes, helping to meet the needs of some vulnerable groups. Examples include the development of a thirteen bed hostel for single homeless people and eight new units for people with learning or physical disabilities. A generic floating support service has also been developed covering teenage parents, people with mental and physical disabilities and young tenants, helping them to sustain their tenancies.

User and stakeholder involvement

- 46 There is a mixed picture in terms of user and stakeholder consultation. Historically, the Council has not consistently involved services users and stakeholders in the development of its housing strategies. However, formal consultation structures have recently been developed, laying a foundation for greater stakeholder involvement, and there is now more collaborative working with local parishes. The Council is also doing more to involve and engage residents and hard-to-reach groups, though user involvement in housing services and links with private sector landlords remains under-developed.
- 47 Some of the existing housing strategies were not based on widespread consultation. The housing strategy was endorsed through a special stakeholder event, but its development was not overseen by a standing multi-agency forum or steering group and there was no work to promote service user involvement. Equally, a draft of the private sector renewal strategy was circulated to a range of consultees, such as the landlords' forum, social services and housing associations, but the strategy does not make clear how feedback shaped its priorities. As a result, the Council has missed opportunities to learn from its stakeholders and build wider ownership of its proposals.
- 48 There was a reasonable level of consultation around the development of the Council's homelessness strategy. This included feedback from six stakeholder focus groups who considered key challenges and ways to improve services. The overall approach was overseen by a homelessness strategy group including representatives from statutory agencies, community groups, and local service providers. Stakeholders have commented favourably on their involvement in the homelessness strategy and the homelessness strategy group continues to play a role in monitoring its implementation.

- 49 Mechanisms for ongoing consultation on housing issues are now in place, allowing more meaningful engagement. A Borough Housing Partnership (BHP) was established in August 2005, with clear terms of reference. Membership includes representatives from residents' and community associations, housing associations, supported housing providers, statutory agencies, estate agencies, landlords and developers. The BHP has started to play a role in shaping the new housing strategy. As a formal sub-group of the Borough Community Plan Partnership, it should also ensure that the new housing strategy and community plan are well-aligned, though it is too early to judge its effectiveness.
- 50 Steps have also been taken to promote wider involvement in housing issues, although user involvement remains under-developed. A Borough Housing Forum was held in July 2005, providing an opportunity for stakeholders to contribute to service planning via workshops. However, users of affordable housing services are still not playing a significant role in strategy development. This is a missed opportunity to learn from those with first hand knowledge of the housing service. As future plans for user involvement are not clearly set out in the housing service plan for 2005/06, it is not yet clear how this area will be strengthened.
- 51 The emerging Local Plan^I has been subject to extensive consultation over the past few years, though feedback from the Local Plan inquiry identified scope for improvement. The revised local deposit plan published in October 2002 was informed by wide consultation and 2,651 objections were considered during the Local Plan Inquiry in 2003/04. However, while statutory requirements were met, the Inspector noted that there was 'a widespread perception amongst objectors, both lay and professional, that it was difficult to negotiate with the Council during the process of plan preparation and as the Inquiry approached'^{II}. Difficulties partly reflect the sheer volume of responses to the Plan, as well as high staff turnover in planning services which at times limited the Council's ability to respond.
- 52 The draft Statement of Community Involvement (SCI) that has since been developed by the Council as part of its preparation for the Local Development Framework^{III} places greater emphasis on consultation during the plan making process, publicity and feedback. The draft SCI was itself subject to extensive consultation with key interest groups, with over 80 responses received. Implementation of the approach set out in the SCI should help to strengthen the approach to planning consultation in the future.
- 53 Consultation with the parishes has been strengthened. Regular Parish Chairs' meetings with the Leader and Chief Executive, along with closer links with officers in housing services, have helped to promote better understanding and more collaborative working on rural housing issues.

^I The Development Plan for the borough against which all new development proposals are assessed.

^{II} Letter to the Chief Executive from the Local Plan Inspector, 27th April 2005

^{III} The Local Development Framework will gradually replace the Tunbridge Wells Borough Local Plan and Supplementary Planning Guidance.

A recently agreed policy on assessing rural housing needs also ensures that parishes get a say in selecting the site and housing association partner, helping to minimise areas of potential conflict and provide more assurance that long-term housing management issues on new developments will be addressed. Parish Chairs who attended our focus group rated their working relationship with the Council highly.

- 54 The Council's involvement with private sector landlords has not been effective. Although it has recently introduced an annual Landlords Forum, the first meeting operated as an information exchange and it has not yet produced outcomes in terms of service and policy developments. The annual nature of the meeting also reduces scope for joint working and makes it unlikely that the Council will maximise the potential that can be offered from the private sector in delivering affordable housing.
- 55 The Council is beginning to build links with the wider community and hard to reach groups. It has recently established a new Town Forum, bringing together representatives from residents' associations in Tunbridge Wells who are not covered by parishes. A list of organisations covering hard to reach groups has also been developed, helping staff know who they can consult. Guidance and tools are being developed to support staff carrying out consultation with diverse groups. These initiatives will provide new opportunities for consultation on affordable housing issues in the long-term.

Partnerships

- 56 The Council's approach to partnership working in relation to affordable housing issues is strong. The Council is actively involved in a wide range of partnerships that help to tackle housing problems and increase its capacity to deliver affordable housing. However, there is scope to strengthen joint working with private sector landlords and improve evaluation of partnership activity.
- 57 There is effective partnership working with the Council's development partners. A Registered Social Landlord (RSL) Preferred Partner Development Group meets quarterly and includes representatives from housing, planning, legal, finance and the Housing Corporation. The meetings focus on bidding and planning issues, helping to maximise opportunities to develop affordable housing. Thirteen bids for the Housing Corporation funding in 2006/08, which total £6.25 million and would deliver 148 new affordable homes, have been developed by the Council's partners and are currently being prioritised by the Council. A protocol agreed by the group also sets out a clear process for site registration and progress monitoring, with a commitment to give each partner a reasonable share of the development programme. This will help to eliminate unnecessary competition between RSLs which can be both time-consuming and expensive.

- 58 There are some good examples of partnership working between High Weald HA and the Council. For example, High Weald gave the Council nominations to 65 per cent of their vacancies in 2004/05, well above the 50 per cent requirement in the stock transfer agreement. They also undertake home visits to all households who register for housing with the Council and provide some stock for temporary accommodation, helping the Council to meet its target to reduce the use of bed and breakfast accommodation for homeless families.
- 59 Capacity is being increased through close working with other councils in the West Kent sub-region, Tonbridge and Malling and Sevenoaks. For example, the three authorities are working on the development of a new joint homelessness strategy and a key worker initiative, offering the potential to ensure consistency of approach and reduce costs. The boroughs have also developed a range of joint supported housing provision to meet the needs of vulnerable groups, including a women's refuge and a 13-bed scheme for single homeless people.
- 60 Effective partnership working is helping the Council to address housing problems and in a broad range of ways.
- Developing a county-wide approach to HMO licensing and the Housing Health and Safety Rating System (HHSRS) to meet the requirements of the Housing Act 2004 through the Chartered Institute of Environmental Health Kent Branch Technical Group.
 - As a member of the Kent Energy Efficiency Partnership, the Council part funds the Kent Energy Centre which drives forward a range of initiatives to tackle fuel poverty and improve health. The Council has recently adopted a county-wide health and affordable warmth strategy for 2005-2008.
 - Working with the Moat Care and Repair home improvement agency which plays a key role in delivering adaptations and supporting vulnerable tenants through initiatives such as its handyperson service for minor repairs.
 - The Council's energy and initiatives officer is leading a project group investigating the possibility of establishing a Kent-wide loans scheme in partnership with Houseproud.
 - As a member of the Kent Housing Officers group, there has recently been an in principle agreement to work towards the future joint commissioning of county-wide housing conditions and needs surveys. Membership of this group, which includes representatives from the Government Office for the South East (GOSE) and the Housing Corporation, enables the Council to receive new guidance and initiatives at an early stage.
 - The Council participates effectively in the county-wide Supporting People partnerships and is an active member of both its Commissioning Body and Core Strategy Development Group, helping it to meet and identify supported housing needs through joint research and provision.
 - A new joint officer post focussing on equalities in both Tunbridge Wells and Sevenoaks has recently been approved, giving potential to strengthen work in this area.

- 61 The Council has not developed effective partnerships with private sector landlords in relation to the existing stock. The Housing Renewal Assistance Policy does not provide for grants to landlords in return for nomination rights and guaranteed affordable rent levels. There has also been a lack of emphasis on working with private landlords and neighbouring councils to develop innovative ways of reducing the number of empty homes. This is a missed opportunity to secure affordable housing in the existing stock.
- 62 The Council does not consistently ensure that it maximises benefits from partnership working. For example, while a significant level of funding has been invested in the Citizen's Advice Bureaux, the Council has not routinely monitored the contribution it is making to homelessness prevention or assessed whether it is duplicating services provided by the Council. However, a review of its work is now underway and a more detailed service level agreement is being developed. Equally, while the housing service reviewed membership of its attendance at partnership fora in early 2005, there are no clear mechanisms for routinely evaluating their success or identifying gaps or duplication in current arrangements. As a result, the Council may not be targeting its efforts effectively.

Strategic approach to housing

- 63 The Council's strategic approach to addressing affordable housing is an area of mixed performance. The overall approach has some positive features: there is reasonable information on housing needs; different parts of the Council now work well together to address the housing priority; and there is an effective approach to asset management. However, the range of housing strategies do not set a clear direction for future work on affordable housing and there are gaps in information about private sector housing conditions and rural housing needs.
- 64 There is a reasonable research base on housing needs to inform the Council's strategic approach. A housing needs survey was undertaken by a specialist consultant in 2000, using a recognised methodology. The survey was based on 1,611 responses, made up of 502 face to face interviews and 1,109 postal returns. The assessment identified a need for 1,847 affordable homes by 2005. A further survey in 2005 has ensured that information is kept up-to-date and improved the quality of information, with a greater focus on BME, key worker and older people's housing needs. The revised estimate in the 2005 survey indicates a need for 2,436 homes in total over the six years to 2011.
- 65 Housing needs data has been used to shape the Council's approach to affordable housing policy. For example, the 2000 survey found that 93 per cent of households in need of affordable housing were unable to afford any form of home ownership or market rent housing. As a result, the Council seeks to maximise the amount of affordable housing for rent, with a target of 97 per cent of all new affordable homes. The survey has also supported the Council's broader approach to affordable housing. The recent Local Plan Inquiry judged the information to be sufficiently robust to support the Council's policy of seeking affordable accommodation on sites of 15 or more dwellings.

- 66 Only seven of the thirteen parishes have had housing needs surveys in the past five years, making it impossible to designate rural exception sites in some areas of the borough. However, a policy has now been agreed, in consultation with parishes, to introduce a rolling programme of surveys. This will be based on the results of the 2005 survey, ensuring that areas with the highest needs are prioritised. Following a series of housing roadshows to parishes in spring 2005, three new parish surveys will also be completed in 2005/06. This will provide more robust information to support rural developments in the longer-term.
- 67 There is limited information available about the condition of the private sector stock and its potential for supplying affordable housing. The Council commissioned a stock condition survey in 2003 which consisted of a 2.2 per cent sample. However, the small sample size does not usefully support policy development in a number of areas. For example, it will not identify potential accommodation such as 'over the shop', it is too small to give confidence in the number of empty houses and does not provide a starting point for exploring area-based improvement schemes, such as block schemes and group repair. It does, however, provide a broad indication of levels of unfitness, decent homes failure, energy efficiency and repair costs.
- 68 The housing strategy does not provide a clear framework for addressing affordable housing issues. Although the strategy has been rated 'fit for purpose' by the Government Office for the South East (GOSE), there is a lack of detail about how different options were evaluated and how priorities will be taken forward. For example, there are broad targets to facilitate the provision of affordable housing and to develop a policy to clarify funding issues around affordable housing, but there is limited explanation about how any barriers to progress will be tackled. Plans to develop some critical areas of work, such as partnership development, service user engagement, resource management and diversity, are limited. This makes it hard to understand how the Council plans to effectively action its priorities.
- 69 The homelessness strategy provides a more focussed approach to addressing weaknesses and challenges identified in the homelessness review, but also has limitations. For example, lack of information about some key issues, such as trends in repeat homelessness, the extent and nature of single homelessness and the health needs of homeless people, reduced the opportunity to identify areas for improvement and set clear baseline targets when the strategy was developed. Moreover, as most of the related actions within the plan were scheduled for completion by April 2004, it does not provide a focus for future development and a new homelessness strategy is currently being developed.
- 70 The strategic approach to addressing housing problems in the private sector is under-developed. The private sector renewal strategy mainly focuses on assisted improvements and adaptations for existing owner occupiers, but does not provide any assistance towards the provision of new accommodation, such as the conversion of existing houses into flats, 'over the shop' schemes, or support for landlords letting new accommodation in return for nomination rights and guaranteed affordable rent levels.

The Council is therefore missing an opportunity to develop partnerships with the private sector to increase the supply of affordable housing in this sector.

- 71 There is a lack of synergy between plans and targets for the housing service. For example, the four strategic aims set out in the housing strategy do not mirror the housing priorities in the Council's annual operating plan. Additionally, while there is a clear link between targets set out in the Council's operating plan and the housing service plan for 2005/06, a number that feature in the housing strategy do not appear in either plan. This is potentially confusing for both stakeholders and staff and will make overall progress difficult to assess.
- 72 The Council's approach to asset management planning supports the Council's affordable housing policy. Since 1999/2000, land and property has been subject to scrutiny to ensure optimum use, with a commitment to disposal of surplus property. Annual reviews of property holdings have identified new opportunities for social housing development, including the redevelopment of the Medway depot to provide high density housing in the town centre. Derelict land has also been sold to an RSL to provide 12 affordable homes and a further 13 homes have recently been approved through redevelopment of a local community centre, with completion expected in March 2007.
- 73 Separate services within the Council are now working more closely together on the delivery of affordable housing. The Affordable Housing Officers Group was established in December 2004 and meets bi-monthly, bringing together officers from planning, housing, legal services and, more recently, finance. This, along with the appointment of an affordable housing officer, has helped to improve the understanding of respective responsibilities and provide a framework for improved joint working. Feedback from staff during our inspection demonstrated a clear sense of common purpose in tackling affordable housing issues and all considered cross-Council working to be effective.

Enabling new housing

- 74 In recent years, the Council has struggled to meet its target to deliver affordable housing. Delays in agreeing the Local Plan, a lack of Council investment and an ineffective approach to meeting rural housing needs have contributed to the shortfall. However, the Local Plan now provides a stronger platform for future development and the Council is helping to ensure that new developments promote sustainable communities. A more robust approach to rural exception sites will also help to meet rural housing needs. The Council is making some use of its own assets to support its housing priority, but there is no firm commitment to invest any of the Council's reserves to support the housing priority.
- 75 The Council has failed to meet its previous targets for the delivery of affordable housing. Between 2001/02 and 2003/04, only 137 affordable homes were delivered, compared to an overall target of 255. In comparison, performance improved in 2004/05, with 103 homes delivered compared to a target of 85. Performance on rural housing has also been weak, with only 12 homes delivered on rural exception sites between 2001/02 and 2004/05, compared to a target of 15 per year in the Local Plan.

- 76 The Council's target of 85 affordable dwellings per year was over-turned during the Local Plan Inquiry. Although the Council sought to base its target on needs, housing land supply and funding availability, the Local Plan Inquiry considered that there was insufficient assessment of the viability of the allocated sites to support the target. Although potential funding constraints were acknowledged, it was also judged inappropriate to set a target so far below the level of identified need. As a result, no specific target is now included in the Local Plan, though the Council's proposed threshold of seeking affordable housing on all sites of 15 or more dwellings was upheld.
- 77 Lack of capacity in the planning service and the high number of objections to the draft Plan led to significant delays in its adoption and reduced the Council's ability to maximise affordable housing through the planning process. Although the Council sought to apply its proposed 15 dwelling threshold from the time of the First Deposit of the Plan in September 2001, a planning appeal in early 2002 concluded that Local Plan Inquiry was the appropriate forum for the review of the policy. The Council therefore had little option but to suspend operation of the policy until the Inquiry reported. As a result, the Council lost the ability to negotiate on a number of sites of 15-24 dwellings, leading to the estimated loss of around 50 affordable homes.
- 78 Additionally, the Council has not fully supported its housing priority through investing available capital receipts. Receipts from the initial sale of the Council's housing stock in 1992 raised £55.1 million, though the Council used part of this to repay its housing debt of £23 million in 1992/93. Following the transfer, the Council used local authority social housing grant (LASHG) to help meet its commitment to provide 500 homes up to 1996/97, with £31 million paid to housing associations up to 2002/03 supporting the completion of over 800 new homes. However, since the change in LASHG rules in 2003 which prevented recycling, there has been no further investment of capital receipts and capital estimates to 2008/09 show no planned commitments. This does not demonstrate the Council's commitment to its housing priority.
- 79 Following the conclusion of the Local Plan Inquiry, the Council is now better placed to use the planning system to secure affordable housing. The Local Plan Inquiry published in June 2005 recommended the provision of up to 30 per cent of affordable housing within all developments of 15 or more dwellings and this is now being applied by the Council in considering all new planning applications. Following the proposed adoption of the Plan in March 2006, the Council aims to issue supplementary planning guidance on affordable housing by July 2006. In the interim, the Council has published a leaflet for developer's helping to clarify the Council's affordable housing policy.

- 80 The Council does not yet have a clearly set out delivery plan which demonstrates how affordable homes will be achieved to the end of the Local Plan period. The Council estimates that it will deliver approximately 400 affordable homes to 2011 via allocated development sites, rural exception sites and windfall sites. However, while the Council is making good progress against the strategic land requirement in the Local Plan¹, there is no composite site list showing all potential affordable housing development sites, anticipated numbers of homes, sources of funding and associated risks. Although a broad framework for minimising risks and monitoring progress on affordable housing has been developed, the absence of a clear delivery plan increases the risk that progress will not remain on track.
- 81 The Council provides developers with good support at the pre-application stage. A development team meets with applicants who express interest in development at an early stage to spell out what the Council is looking for. Housing officers also participate more fully in pre-application discussions with developers to confirm the Council's affordable housing requirements. All planned development sites now have an allocated RSL, helping to ensure early consideration of local needs and funding issues. However, there is no active approach to parcelling smaller sites to ensure that the number of affordable homes are maximised.
- 82 The number of homes secured through planning agreements has increased significantly in the past year. While only 28 homes were delivered through planning agreements between 2001/02 and 2003/04, this rose to 53 in 2004/05. This partly reflects an improved approach to negotiating agreements.
- 83 The Council is taking a more pro-active response to securing rural exception sites. As noted earlier, the Council recently agreed to introduce a five-year rolling programme of parish surveys to support designation of sites and has given the parishes a clearer role in the selection of sites and development partners to encourage collaborative working. Site identification will take place at the same time as surveys to ensure that proposals to meet any identified needs can be developed quickly. Under the new policy, surveys are completed irrespective of parish objections, helping to ensure a consistent approach across the borough. This means that the Council will be better placed to meet rural housing needs.
- 84 The Council seeks to influence the mix of housing types and tenure on new developments, but adopts a pragmatic approach. The Council seeks to maximise affordable homes for rent, with a target of 97 per cent of all affordable homes delivered for this tenure. However, where the inclusion of some shared ownership units ensures the financial viability of a proposal, the Council will sometimes accept a shortfall to ensure that an application can progress. In the last four years, 67 per cent of new affordable homes have been for rent. In influencing developments, the affordable housing officer also requests a mix of housing in direct relation to the Housing Register, ensuring that the proposed developments match expressed needs.

¹ The Council's strategic housing land requirement for the period is 2,900 dwellings or an average of 290 per annum. From 2001/02 to 2004/05, 1,340 new dwellings were completed at an average of 335 dwellings per annum. Completions are projected to be ahead of the requirement to 2010/11.

- 85 The Council has a clear policy to ensure on-site provision of affordable housing. The Council does not accept commuted sums, partly because land values within the borough are often beyond the reach of housing associations. It also costs more to develop a separate site, leading to fewer affordable homes, and does little to promote sustainable communities. Affordable housing included in new developments is integrated as part of the overall mix of dwellings through 'pepper-potting' or clustering. A requirement to ensure consistency of materials, styling and details also make it very difficult to distinguish between tenures on the development, ensuring social inclusion.
- 86 The Council is beginning to respond to the needs of key workers. The 2005 housing needs survey includes an assessment of the key workers' housing needs and the Council has worked with other West Kent authorities to agree a wider definition of the group, based on consultation with local employers. It has also made progress in enabling accommodation to be provided for key workers, with 38 completions funded through the Government's Homebuy and Starter Homes Initiative in the last four years. The redevelopment of the Tunbridge Wells High School site has also provided a further ten homes for teachers.
- 87 The Council has provided support to promote some affordable housing projects through use of its own assets. It has sold some of its own land to an RSL at less than the market value, with a view to securing 12 units of affordable housing. Redevelopment of the Council-owned Sherwood Community Centre will also provide land for housing development. In the long-term there are plans to re-locate Medway depot site to provide housing land. Although the existing depot could be renovated at a lower cost, there is a political commitment to unlocking the site's housing potential.

Prevention of homelessness

- 88 The Council is having some success in reducing the need for affordable housing by preventing homelessness. It places an emphasis on preventative work and this is supported by a strong multi-agency approach. However, there are some gaps in information about homelessness and co-ordination of local agencies providing housing advice could be improved.
- 89 The Council is placing increasing emphasis on preventing homelessness in delivering its housing services. Since the re-organisation of the service in October 2004, there has been a stronger focus on the provision of housing advice, with two additional staff allowing the development of a more comprehensive service. All customers now have a discussion with a housing advisor to discuss available options: while 879 cases were handled in 2004/05, 674 have already been recorded in the first half of 2005/06. Decreases in the overall number of homelessness acceptances, which fell by 16 per cent between 2003/04 and 2004/05 have been attributed to the new approach, though this will also reflect a wider downturn in acceptances across the South East region.

- 90 There is strong multi-agency working in the prevention of homelessness. The Council co-ordinates a joint assessment referral scheme (JARs) to determine options and support packages for people moving in and out of supported housing. This brings together a wide range of stakeholders, including staff from RSLs, supported housing providers and care managers. Panel meetings for the scheme are well-attended and the approach is highly valued by partners. A range of protocols have also been developed to ensure effective working with key referral points. For example, a protocol with Maidstone and Tunbridge Wells Hospital Trust allows homelessness officers to complete assessments of people with mental health problems before they are discharged.
- 91 Residents on low income with no savings who are facing homelessness are helped by the Council to secure private rented accommodation. The rent deposit guarantee scheme and the rent in advance scheme can help people to obtain an assured short-hold tenancy by providing access to funding. Since the introduction of the schemes in April 2004, 41 clients have been assisted in this way.
- 92 The Council also supports people faced with the risk of homelessness through family disputes to seek mediation although its success has been limited. In the past year only three cases have been referred to mediation, and none reported a successful long-term outcome. A new mediation provider recommended by another Council is now being used to secure improvements.
- 93 The Council is using its nomination rights to housing associations to prevent homelessness. For example, in 2004/05, approximately 65 per cent of net lettings made by High Weald HA were to applicants nominated by the Council, considerably above the Stock Transfer agreement requirement of 50 per cent of net lettings. Nomination agreements are also in place with some supported housing providers, helping to meet the needs of more vulnerable people.
- 94 Although some local RSLs operate under-occupation schemes, there has not been any promotion or financial support offered for these by the Council. A recent joint bid to the Homelessness Innovation Fund, developed in partnership with the other West Kent authorities, included a sum of £45,000 to supplement existing RSL incentive schemes operating in the borough, but this was unsuccessful. However, this type of approach would help to ensure that best use is made of the existing social housing stock.
- 95 Private sector leasing (PSL) has been developed to improve the quality of accommodation for people in temporary accommodation, but it is not effectively monitored. The Council currently has 23 PSL self-contained properties and 13 leased from High Weald HA. The development of the PSL scheme has helped the Council to meet the Government's bed and breakfast targets and decommission some of its own hostel provision with shared facilities. However, neither the PSL schemes nor bed and breakfast premises are formally checked or routinely inspected by environmental health officers before they are made available to clients, so acceptable standards are not assured.

- 96 There is a lack of effective co-ordination of housing advice and homelessness services. For example, while the Council provides a significant level of funding to the Citizens Advice Bureau (CAB), there are no formal protocols with the Council's housing advice service to clarify responsibilities and understanding. Equally, there is no standard approach to collecting information about homelessness presentations across local agencies. The recent review of young people's housing needs found it difficult to compare local statistics due to the range of methods used. This is a missed opportunity to collect robust information about homelessness to inform future planning.
- 97 The housing advice service does not routinely engage with landlords who could provide a considerable resource. There are no proper referral systems between the housing advice service and private sector landlords and forum meetings are limited. There has also been no discussion with landlords about the scope to address high rent levels and related shortfalls in HB payments. However, the Council is trying to build stronger links with local lettings agencies and has sought to publicise the rent deposit scheme through the Landlords' Forum.
- 98 The Council has a fair understanding of the reasons for homelessness, but some gaps are apparent. The review of homelessness in 2003 looked at trends in acceptances, the reasons for homelessness and pattern of evictions in social housing. However, trends in repeat homelessness, the extent and nature of single homelessness and the health and support needs of homeless people were not considered, reducing opportunities to identify areas for improvement. More outcome based performance information is now being collected to respond to new national homelessness performance indicators, but this information has not yet been demonstrably used to drive improvements.

Private sector housing

- 99 The Council's approach to private sector housing is weak. Although support is provided to enable vulnerable and low income home owners to improve their homes, there are limited options for those who do not satisfy the entry threshold for grant aided assistance. Lack of capacity has also limited progress on tackling empty homes and improving private sector housing conditions. However, the Council has made good progress on energy efficiency and fuel poverty issues and offers good quality services through its care and repair service.
- 100 Vulnerable and low income home owners are provided with reasonable assistance to help them improve their homes. The Housing Renewal Assistance Policy allows for grant aided assistance up to £7,000 for vulnerable and elderly people; a priority points system is in place to determine what applications will be approved. This assistance will help many home owners remain in their properties, support sustainable communities and limit the demand for affordable housing.
- 101 There is a mixed level of assistance provided to home owners who do not satisfy the entry threshold for grant aided assistance. Under the policy, those residents whose homes require more expensive works and may be on low incomes are encouraged to move to more suitable accommodation or to take up loans.

However, while the Council will make a grant of up to £10,000 available to people who wish to move, there is currently no support provided in relation to loans, though a Kent-wide private sector renewal loans scheme in partnership with House-proud is being explored. A target to develop this initiative by December 2004 has been missed.

- 102** The Council manages its disabled facilities grants programme effectively, though some people have to wait a long time for assistance. There is currently a delay of four to five months between residents approaching an Occupational Therapist and the Occupational Therapist providing an assessment to the grants officer. This increases the overall waiting time for residents, though the Council has advised that urgent cases are expedited following regular case meetings between key stakeholders.
- 103** The budget available for processing Disabled Facilities Grants (DFGs) is too small to meet the level of demand. Although the budget was increased from £180,000 in 2003/04 to £230,000 in 2005/06, the allocated sum has already been committed and 'spend' is currently at £198,000. In 2004/05, the service spent £432,000 against an initial budget of £180,000. Referral rates are also rising due to increased capacity in the Occupational Therapy team allowing a backlog of cases to be cleared. This under-resourcing creates uncertainty for staff and service users alike, particularly as the shortfall has historically been partially met by taking resources away from other key service areas including the home improvement grant budget.
- 104** The housing service is not effectively policing conditions in the private rented sector. While some significant groundwork was carried out several years ago to identify HMOs and develop a risk-based inspection and re-inspection programme, the service has not been able to drive this forward due to a lack of capacity. Inspection and property improvement targets for 2005/06 are unchallenging: although there are estimated to be over 1,000 HMOs in the borough, the Council has set an annual target for the inspection of only 20 HMOs and for 10 HMOs to be brought up to standard. This level of intervention will potentially place many tenants at risk, particularly as around half of HMOs have inadequate fire precautions.
- 105** There have been no recent effective actions to address empty homes in the borough. The stock condition survey identified a small number of empty properties (50) but recent information from the Council Tax register indicates that the actual number may be as high as 450. However, while the Private Sector Renewal Strategy includes a commitment to develop a strategic approach to empty homes, lack of capacity has prevented work being taken forward. This is a missed opportunity to development these homes for affordable housing.
- 106** The Council has ensured good support for elderly, disabled and other vulnerable people obtaining home improvement assistance via the Moat Care and Repair Scheme (C&R). For example, C&R makes sure clients are maximising the benefits they are entitled to receive. They also check that there are smoke alarms present and will refer clients to the fire service or handyman scheme for free installation where appropriate.

A handyman scheme also provides minor repair works for vulnerable people at reasonable rates. The handyman has been trained to carry out minor adaptations. This ensures that vulnerable clients get rapid assistance to address small but potentially dangerous repairs from a trusted source.

- 107** There is an effective service to help residents address energy efficiency and fuel poverty issues in their homes. The Council has entered into a number of successful partnerships which resulted in over 200 homes being improved through various funding streams in 2003/04; in 2004/05, this number increased to 250 homes. During the same period, the Council drew in over £210,000 from external funding sources to support this work. Promotional activity by the Council and its partners has also helped to drive up take-up rates. This will help people to retain their existing home and reduce demands for affordable housing.
- 108** The private sector housing team is not adequately monitoring the impact of current policies or the efficiency and effectiveness of current work practices. The team has not been recording the reason why enquiries do not proceed to application or what happens to those who fall out of the application process because they do not meet grant criteria. There is also no practice or indicators which measure key issues which are of importance to customers, such as waiting times between stages in enforcement and satisfaction with works.

Is the service delivering value for money?

- 109** This is an area of weakness. The Council is not systematically assessing the value for money (VFM) provided by its affordable housing services and a corporate procurement strategy has only just been developed. Although partnership working and the approach to homelessness is helping the Council to make better use of its resources, the Housing Renewal Assistance Policy does not ensure that grant aid targets households with the highest needs. Some savings have been achieved by reducing expenditure on bed and breakfast, but the Council has not yet fully maximised savings through outsourcing ownership and maintenance of its temporary accommodation property portfolio.
- 110** There is a limited focus on benchmarking and comparing costs in affordable housing services. Although some comparative work was undertaken for a best value review of housing, this information is very dated, with most only covering the period to 2000/2001. There have been no local arrangements in place since 2003/04 when a regional benchmarking group for stock transfer authorities disbanded. Officers could not provide concrete examples of how recent benchmarking has been used to strengthen policy and procedures or reduce costs. These weaknesses mean that the Council lacks robust systems for driving and delivering VFM in this area.
- 111** The Council is yet to deliver a robust approach to promoting VFM through its procurement strategy. A procurement strategy has recently been agreed by the Council, but it recognises that the organisation has some way to go to ensure effective co-ordination of procurement activity and a related action plan has only just been developed.

Equally, while the Council's annual efficiency statement (AES) focuses on achieving savings through procurement and driving down management costs, this approach is yet to deliver savings. However, work has been commissioned in partnership with other Kent councils to look at the range of suppliers used and assess the scope for joint contracting and purchasing.

- 112** The Housing Renewal Assistance Policy does not ensure that the Council's limited resources are targeted effectively. For example, the policy offers a high level of assistance (up to £10,000) to help households in poor quality private housing to move, but this does not guarantee improvements in the quality of the existing stock. Equally, applicants for home improvement grants totalling less than £1,000 are not subject to a waiting list if they have savings of less than £3,000. However, this could mean that some households with a higher level of need may have to wait longer for support.
- 113** The approach to securing energy efficiency improvements does not consistently demonstrate a best value approach. The Care and Repair Scheme will sometimes use home improvement grants to pay for energy efficiency works. This is because clients can get help more quickly than they would if they applied for a Warm Front grant. However, this depletes the resources available for home improvement grants and does not maximise use of external funding.
- 114** The Council has been slow to work towards outsourcing the ownership and management of its temporary accommodation. The Council owns and manages two hostels providing 18 units of accommodation, 3 of which are self-contained, the remaining 15 having shared facilities. A best value review in April 2002 found that the standard of accommodation provided was variable and that the retention of stock was generally contributing to high service costs. However, a disposal policy has been slow to progress, though one hostel has recently been decanted and is now the subject of an options appraisal. Delays in implementing this policy means that cost savings in this area have not yet been maximised.
- 115** Some aspects of the Council's approach to homelessness should help to reduce costs. The increased focus on prevention is probably contributing to the reduction in homelessness applications and demand for temporary accommodation, though savings have not been quantified. The overall reduction in bed and breakfast use and growth of the private sector leasing initiative will also provide estimated revenue savings of around £200,000 between 2006/07 and 2007/08¹.
- 116** The focus on partnership working helps the Council to promote VFM. Joint approaches to HMO licensing and the Housing Health and Safety Rating System will help the Council to share costs, while joint work on energy efficiency has already increased the Council's access to external funding. Agreements to appoint joint post-holders and work towards joint commissioning of county-wide surveys will also offer opportunities for savings in the medium to long term.

¹ Housing Services Service Plan 2005/06

Summary

- 117 Overall, we judge that the Council's approach to the provision of affordable housing is fair.
- 118 There are some positive aspects of the service. The Council is involved in a wide range of partnerships which maximise opportunities to deliver affordable housing and help to prevent homelessness. Formal consultation structures have recently been developed, laying a foundation for greater stakeholder involvement. The Council is also beginning to use the planning system effectively to deliver affordable housing and to promote sustainable communities. The more robust policy on rural exception sites and collaborative working with local parishes means that the Council is better placed to meet rural housing needs. There has been good progress on energy efficiency and fuel poverty issues and the Council offers good quality services through its care and repair service.
- 119 In contrast, some aspects of the service are weak. Delivery of affordable housing has been relatively low compared with the Council's own targets and level of needs. The Council has not supported its housing priority through investment of its own reserves and lack of capacity has limited progress on tackling empty homes and improving private sector housing conditions. The Council is not systematically assessing the value for money (VFM) provided by its affordable housing services and has been slow to progress equality and diversity issues. While staff from across the Council now work well together, the range of housing strategies do not set a clear direction for future work on affordable housing and some gaps in information are still evident.

What are the prospects for delivering improvements to the service?

What is the service track record in delivering improvement?

- 120** The Council has shown a balance of strengths and weaknesses in delivering improvements. It has not consistently implemented its own improvement plans or addressed weaknesses identified in the Comprehensive Performance Assessment (CPA). Some key targets within action plans have been missed and not all of the issues identified in the previous best value review of housing services have been effectively followed up. Proposals to adopt a pro-active and risk-based approach to the regulation of conditions in the private rented sector have not been taken forward. Similarly, there have been delays in work to identify and address empty homes. Some of the Council's actions have led to tangible improvements for people in need of affordable housing, but benefits are not being maximised. The housing service has yet to demonstrate significant improvements in value for money over a sustained period.
- 121** The Council has addressed some of the weaknesses identified in the CPA Balancing Housing Markets diagnostic, but overall progress is mixed. The following summary shows progress made in response to the assessment, as well as areas of slippage.
- Affordable housing only recently a priority:
 - housing is now widely recognised as a priority by Councillors, staff and stakeholders. The priority is reflected in key Council plans, including the community plan and annual operating plan. However, budgets have not yet been re-aligned to reflect this prioritisation, leading to limited increase in resources.
 - Local Plan out-of-date and no supplementary planning guidance:
 - progress has been made, and although policies have yet to be adopted they are now fully operational. Modifications to the Local Plan were approved by the Council in October 2005 following the conclusion of the Public Inquiry in June 2005. Following the statutory consultation period, the Council aims to adopt the Plan in March 2006. Supplementary Planning Guidance on affordable housing is being drafted and is scheduled to be in place by July 2006.
 - Gaps in information on special needs groups and sub-strategies incomplete:
 - there has been limited progress in this area. Although some research work has been progressed, sub-strategies for older and young people are yet to be developed. There is not a clear strategy for addressing BME housing needs and some gaps in information about homeless households are still evident.

38 Affordable Housing | What are the prospects for improvement to the service?

- Stakeholder engagement incomplete:
 - the establishment of the Borough Housing Partnership now provides a formal mechanism for the engagement of stakeholders, supplementing effective partnership working around the homelessness strategy and liaison with RSLs. However, user engagement and links with private sector landlords remain under-developed.
- Affordable housing targets not met:
 - the Council exceeded its target for affordable homes in 2004/05, with 103 homes delivered against a target of 85. However, completions between 2001/02 and 2004/05 did not meet overall targets, with 240 homes completed compared to a target of 340.
- Lack of additional resources to deliver affordable housing, with resources directed away:
 - the re-structuring of the housing service in October 2004 led to some increased investment in staffing, helping to strengthen the management of the housing service and to promote a more comprehensive approach to housing advice and prevention. Additional sums totalling £32,250 were also agreed in July 2005 to further strengthen staffing, training and the promotion of the housing service. However, while the Council has agreed to make use of some of its own assets to support its housing priority, there are no firm plans to increase capital investment in affordable housing. It is not yet clear how lack of capacity in the private sector housing team or budget shortfalls related to disabled facilities grants will be addressed. This issue is discussed more fully later in this report.
- Inconsistent internal liaison on affordable housing issues:
 - the affordable housing officers' group provides a clear focus for liaison and there is a more joined-up approach to consultation through other fora. There is now a clear sense of common purpose across housing and planning services about tackling affordable housing issues.
- Slow progress with rural exception sites:
 - overall performance remains well below target, with only 12 homes delivered on such sites over the past three years compared to a target of 45. However, the new policy on rural exception sites, along with better collaborative working with parishes, provides a firm basis for improvements.
- HMO inspection targets not met:
 - this remains an area of weakness. The original housing strategy target to inspect 40 homes per year and bring 20 up to a fit standard was reduced due to lack of staff capacity and the reduced target of inspecting 20 homes per year and improving 10 has not been met¹. The revised target is unchallenging and will not result in a significant level of improvements.

¹ The Housing Service Plan for 2005/06 shows that 11 HMOs were inspected in 2003/04, with 13 brought up to fitness. In 2004/05, 12 HMOs were inspected and 11 brought up to fitness.

Moreover, lack of capacity means that the current service is essentially reactive and is not therefore effectively targeting the worst conditions in the private rented sector.

- Low staff capacity to tackle strategic housing issues and enabling:
 - the appointment of a head of housing is providing more effective leadership to the service. However, lack of resources in the private sector housing team is still limiting progress in key areas, demonstrated by inadequate follow-up of work completed some years ago to identify and prioritise HMOs and empty properties. Overall slippage on implementing key housing targets shows that capacity within the housing service remains stretched.
- Limited performance reporting to councillors and limited focus on performance outcomes:
 - progress in this area is limited. While a raft of useful performance indicators is included in the housing service annual plan for 2005/06, some of the key strategic tasks within the plan, such as the development of the housing strategy and implementation of the affordable housing policy, lack clear milestones and outcomes. Although headline performance is reported to councillors, information is too vague. For example, a recent quarterly report to the Cabinet indicates satisfactory progress on targets to 'develop a new housing strategy for 2005-06', 'to deliver rural affordable housing' and 'to develop an empty homes strategy'. However, it does not spell out what progress has been made on each task or what outcomes are expected.

122 Performance against a number of performance indicators related to affordable housing show that the Council is making progress in some areas. The number of empty homes returned to occupation increased from 3 in 2003/04 to 37 in 2004/05, exceeding the West Kent average performance of 23 homes¹ and reflecting enforcement action by the Council. There were also significant reductions in both the length of stay in bed and breakfast accommodation and hostels between 2003/04 and 2004/05, reflecting the wider range of housing options now available for homeless families and the development of the Council's homelessness prevention initiatives.

123 Service improvements have not always been made at the rate planned by the Council. Some targets in the housing strategy action plan have been missed, including those to ensure compliance with the DDA, to develop sub-strategies for key groups, and to develop an equity loan scheme. Equally, outcomes from the best value review of the housing service do not demonstrate a sustained focus on key issues. For example, under-capacity in the private sector housing team was identified as a weakness, but the Council has not secured improvements, resulting in the shortfalls in HMO enforcement activity. Plans to outsource the management and ownership of temporary accommodation have also been slow to progress, limiting opportunities to maximise cost savings.

¹ The comparative group for West Kent included the following councils: Tonbridge and Malling, Sevenoaks; Dartford; and Gravesham.

- 124 The Council's actions have led to some tangible improvements for people in need of affordable housing, but these have not been maximised. The increasing focus on prevention provides benefits to potentially homeless households, via better access to housing advice and rent deposit schemes. Initiatives to improve energy efficiency and the services offered via C&R will also help some vulnerable people to remain in their own homes. However, shortfalls in the delivery of affordable homes compared to target in the past four years and ineffective policing of conditions in the private rented sector mean that positive outcomes are not yet being maximised. Weaknesses in the overall approach to equality and diversity make it difficult to ensure that existing services meet the needs of all groups.
- 125 The Council is yet to demonstrate significant improvements in its approach to value for money. Some aspects of the Council's approach, such as the move towards homelessness prevention and focus on partnership working, provide opportunities to deliver cost savings. Reductions in the use of bed and breakfast accommodation have also led to savings which have been re-invested in the service. However, more work is needed to demonstrate the cost effectiveness of existing services, via closer scrutiny of costs and routine bench-marking. There have not yet been significant savings within housing through joint procurement activities.

How well does the service manage performance?

- 126 Weaknesses outweigh strengths in this area. The Council has demonstrated a clear commitment to affordable housing. However, the strategic framework for affordable housing is still weak: existing strategies are not adequately resourced, sufficiently comprehensive, lack a long-term focus and make inconsistent use of SMART¹ targets. There remains scope within housing to strengthen performance monitoring and develop a more structured approach to learning and evaluating feedback. While more robust arrangements are being put in place to develop future housing strategies, weaknesses in the current performance management framework create doubts about councillors' ability to drive continuous improvement.
- 127 The Council has identified affordable housing as a key priority and taken some tough decisions to support it. Meeting the need for housing is one of eight priorities within the Community Plan, supported by a range of targets which focus on delivering affordable homes. The Council has demonstrated support for its housing priority by selling Council land for housing development at below its market value and increasing investment in some areas of the housing service. It has also shown a willingness to routinely contest planning applications (at some cost) which do not deliver affordable housing, including a recent application by a major developer seeking to provide retirement homes. Feedback from staff and partners showed a clear understanding of the Council's commitment to affordable housing.

¹ SMART targets are specific, measurable, achievable, resourced and time-bound

128 The Council has a number of plans in place which address affordable housing issues and guide the day-to-day management of housing services, including:

- the housing strategy statement 2001-2006;
- the homelessness strategy 2003 and related action plan;
- a private sector renewal strategy 2004-2009; and
- the housing services plan for 2005/06.

129 However, weaknesses in the approach to strategy development and target-setting mean that these existing strategies and plans do not provide a robust basis for promoting improvements.

- There are inadequate linkages between housing strategies and corporate plans. For example, the housing strategy does not fully reflect the targets within the community plan and the four strategic aims in the housing strategy do not mirror those set out in the Council's annual operating plan, Additionally, not all targets within the housing strategy are clearly reflected in the housing services plan, making progress difficult to track.
- Some of the issues raised during the best value review of housing services are not reflected in current plans. Although the review focussed on the 4Cs (challenge, compare, compete and consult), some of the identified weaknesses, such as lack of capacity in the private sector housing team and the high cost of temporary accommodation, are not picked up in the current plans. This does not demonstrate a clear link between service review and service improvement.
- Best value principles have not consistently shaped existing strategies. For example, there was very limited consultation with users and stakeholders to inform the housing strategy and private sector renewal strategy. While comparative data was collected for the best value review, it is unclear how learning fed through to inform strategy development. As a result, the Council has not maximised opportunities to learn from elsewhere and build ownership for its proposals among stakeholders.
- Some strategies and plans are not comprehensive. The private sector renewal strategy does not fully consider the links between private sector and affordable housing, with no exploration of initiatives that could increase housing supply, such as targeting grants to create self-contained accommodation or developing over the shop schemes. Equally, the housing strategy did not explore how partnership working, service user engagement and work on diversity could be strengthened to promote improvements. Nor does it spell out clear proposals to improve delivery of affordable housing.
- The targets within existing plans are often out-of-date. Most of those in the housing strategy statement and homelessness strategy action plan were scheduled for completion by 2004. Consequently, neither strategy sets out a long-term direction for the service, making it difficult to determine how a step-change in future performance will be achieved.

- Not all targets within existing plans are SMART. For example, the housing service plan for 2005/06 includes broad targets to develop an affordable housing policy, deliver rural housing and further develop private sector leasing, but there is no information about anticipated outcomes or milestones, making it difficult to see how these initiatives will be monitored and measured. Some proposals in the homelessness action plan, including those to reduce the number of young single men placed outside the borough and increase the numbers of people housed in the private sector, also lack clear targets, making progress difficult to assess.
- Some of the proposed targets for affordable housing from 2005/06 onwards are not ambitious. Targets set out for a number of indicators, including those covering improvements to private sector homes, are below the performance achieved in 2004/05. Targets to only inspect 20 HMOs a year (and improve 10) to 2007/08 will also have little impact on conditions in this sector. A lack of challenging targets will make it more difficult to drive improvements.

130 The Council recognises that there is room for improvement in the strategic framework and is beginning to make improvements. Work is already underway to produce a new five-year housing strategy for 2006-2011, with a target date of October 2006, and a new homelessness strategy for West Kent is due to be adopted by July 2006. Work on the housing strategy is being overseen by the Borough Housing Partnership. As this group is also a sub-group of the Community Plan Partnership and is involved in the development of a new community plan, this should help to promote greater synergy in the strategic framework.

131 Following publication of the Local Plan Inquiry Inspector's Report, the Council is better placed to ensure delivery of affordable homes through the planning system, but more work is needed. The Council has recently developed a risk management framework for affordable housing. This focuses on the actions the Council will take to maximise delivery of affordable homes, including the development of strong bids with its RSL preferred development partners, pro-active working with parishes, lobbying for increased investment at regional level and continued monitoring of windfall and allocated sites. However, while these are positive steps, there is not yet a clear composite list of the number of affordable homes that will be delivered on named development sites, showing sources of funding and an assessment of risk. This increases the likelihood of slippage. Arrangements to monitor the risk management framework are not yet in place.

132 The Council has taken steps to improve its performance management arrangements. For the past three years, it has implemented a robust approach to monitor its performance on customer contact via telephone, letters, email and visits and has taken remedial action to strengthen performance. A new performance management system has also been implemented. Although this is yet to be fully embedded, the framework is structured around corporate priorities and future performance reports will show the action proposed to correct problems.

A CPA progress assessment in April 2005 concluded that performance management was becoming more effective, though our inspection identified limited capacity within the corporate centre to support best value reviews and ensure a robust approach.

- 133** Despite an improved corporate focus, housing performance monitoring arrangements are weak. Quarterly reports to the Cabinet do not spell out progress on key activities, such as the delivery of affordable housing, and the vague nature of many targets makes it hard to know whether performance is on track. Although the housing service plan contains a good range of targets, the housing portfolio holder does not receive regular progress reports or any updates on strategy action plans. Plans to introduce monthly performance meetings between the housing portfolio holder and the head of housing have yet to be implemented and it is unclear what information will be considered. Current arrangements do not help councillors to determine if their objectives are being met or whether additional resources are needed to address under-performance.
- 134** The Council's approach to value for money is not robust. The annual efficiency statement (AES) contains some broad proposals to achieve efficiencies by reducing the number of transactions and overhead costs. Work has also been commissioned with other Kent councils to look at the range of suppliers used and assess the scope for joint contracting and purchasing, though this is at an early stage. Specific proposals for the housing service are not yet clear. While scope to achieve savings through out-sourcing temporary accommodation and reducing building maintenance costs are being explored, there has been no recent focus on systematically evaluating processes, costs and outcomes to identify scope for improvement. It is not yet clear how a stronger approach to value for money will be implemented, either corporately or within the housing service.
- 135** The housing service is not maximising its scope to learn from other organisations or from service users. A target to develop surveys of users of its homelessness services by April 2004 was missed and, while plans to develop wider feedback mechanisms are now included in the service plan, detailed proposals are not yet in place. Although partnership working offers opportunities to share good practice, it is not always clear how learning from these fora has shaped policy and practice and cost and process benchmarking is under-developed. As a result, examples of learning tend to be isolated and are not indicative of a structured approach.
- 136** In contrast, there is a more structured approach to learning from complaints. Quarterly performance reports to the Cabinet provide an overview of complaints, focusing on trends by service area, type of complaint and remedial action. There is some evidence of policy changing following housing complaints. For example, a review of bed and breakfast charges was carried out following a complaint by a homeless applicant, leading to changes to the charging framework.

Does the service have the capacity to improve?

- 137** There is a balance of strengths and weaknesses in this area. The Council has strengthened its capacity to deliver its affordable housing objectives in some areas, both through the appointment of new staff and improved political accountability. More effective partnership working and initiatives to promote closer links with the local community will also support delivery. However, capacity in some parts of the housing service is stretched and IT systems are not fully effective. The Council has yet to make any long-term financial commitments to support its housing priority. Councillors involved in a new housing advisory panel have received insufficient support, limiting their ability to drive forward the housing agenda.
- 138** Corporate arrangements to support delivery of improvements are still developing. The CPA progress assessment in April 2005 identified some improvements, with strengthened performance management and better internal and external communications helping the Council to focus on priorities. However, some key 'building blocks', such as procurement, risk management and scrutiny arrangements remain under-developed. Although senior managers have a good understanding of the barriers to progress, plans to secure improvements are at an early stage.
- 139** The re-structuring of the housing service has improved management capacity and collaborative working on affordable housing issues. The appointment of a new head of the housing service in February 2005 has provided a greater focus on strategic housing issues, demonstrated by the development of the Affordable Housing Officers Group and better working relationships with external stakeholders. The creation of the affordable housing officer post has also allowed housing services to play a more influential role in the development process and maximise opportunities to secure affordable housing. Effective leadership of the service is now recognised as a strength by councillors, partners and staff.
- 140** The creation of a dedicated portfolio holder for housing has created clearer political accountability for the housing priority and its position as a corporate priority. Since her appointment in May 2005, the portfolio holder has held one-to-one meetings with RSL development partners and parish chairs, helping to champion affordable housing issues. Although her grasp of housing issues is still developing, she meets regularly with the head of the housing service and housing staff, helping to develop her understanding of key issues. The recent introduction of regular meetings between the heads of housing and planning and their respective portfolio holders will provide further opportunities to assess policy challenges and site specific issues.
- 141** Arrangements for promoting wider councillor involvement in shaping the housing agenda are not effective. A cross-party housing advisory panel (HAP) has been established to support the housing portfolio holder and provide input into the decision-making process. However, the role of the group is not well-defined and its members have received inadequate support and training, reducing their ability to play an effective role. As the panel does not hold formal meetings, opportunities to develop a shared understanding of housing issues are limited.

Consequently, without changes, the group is unlikely to make an effective contribution to decision-making.

- 142** While the housing service has sought to promote wider understanding of housing issues among councillors through open days and training events, attendance has often been limited. As a result, some councillors still have low awareness of key housing issues, such as the role of private sector housing or partnership working. Although a member training programme is being developed based on an assessment of councillor competencies, it is not yet clear how this will promote service level expertise. Some potential opportunities for development, such as building better links between portfolio holders in other boroughs, are yet to be fully explored.
- 143** Effective partnership working helps to strengthen the capacity of the Council at an operational and strategic level. For example, joint work on energy efficiency and via the C&R service helps the Council to lever in external funding and ensures a more comprehensive approach to meeting the needs of vulnerable people. Equally, the recent agreement to jointly appoint an equalities officer with Sevenoaks Council offers new opportunities to strengthen policy and practice. At a strategic level, the new Borough Housing Partnership will provide a focus for the development of new housing strategies, and should ensure wider ownership of the Council's plans. Future plans to develop a sub-regional housing strategy for West Kent will provide new opportunities to explore joint working.
- 144** Improving corporate arrangements to engage the wider community offer new opportunities to develop better understanding of housing issues and build support for proposed developments. For example, the recent establishment of a Town Forum, to bring together representatives of local residents' associations who are not covered by parishes, and work to develop better links with local community groups, offers the potential to improve consultation on housing and planning issues. Regular meetings between the Council leadership and parish chairs should also help to develop understanding of rural housing issues and could ease the process of bringing forward rural exception sites.
- 145** Despite some increased investment in the housing service, capacity remains stretched in some areas. Lack of resources in the private sector housing team has reduced the Council's ability to take forward work on improving private sector housing conditions and delayed progress on implementing an empty homes strategy. Delays in taking forward key areas of work, such as the development of housing sub-strategies, raise questions about the strategic capacity to progress key housing policy initiatives. Some wider budget pressures are evident. For example, the budget for disabled facilities grants does not match levels of demand: expenditure in 2004/05 exceeded the budget by £252,000 and this year's allocation, which was set at a similar level to the previous year's budget, was fully committed by November 2005.

- 146 There is some uncertainty about how these budget pressures within the housing service will be addressed. The Council has begun to develop a medium-term financial strategy and has made a decision to eliminate the use of reserves to support revenue funding. Essentially, this means that future revenue growth will be heavily reliant on both cost savings and the re-alignment of resources. However, given the high number of Council priorities, it is not clear what scope there will be to move resources from one area of Council business to another. Without a sharper focus on priorities, there is a likelihood that a process currently in place to identify savings and growth will simply lead to a list of new financial demands that cannot be easily ranked in importance. At present, it is unclear how housing will fare in this process, given other pressures faced by the Council.
- 147 The Council does not have a capital strategy which sets out options for long-term growth and the criteria for prioritising competing bids. This makes it difficult to determine how future affordable housing bids will be supported by the Council or the overall scale of resources at its disposal. Existing capital plans to 2008/09 do not include any capital commitments to support the development of affordable housing, though the Council has made some commitments to make use of its own assets to provide land.
- 148 Weaknesses in existing IT systems are a potential barrier to improvement. Manual systems are being used to complete some performance information in the housing needs service and the existing systems do not reflect recent changes made to the allocations policy, leading to more administrative work. While a sum of £30,000 was initially allocated to upgrade the system, the Council recently took a decision to replace it, though no additional money was earmarked. Lack of certainty about funding, combined with a wider need to take the outcome of a recent joint choice based letting bid into consideration, now means that timelines for the introduction of a new system are unclear. Although some enhancements are being made to the existing system in the interim, the lack of fully effective systems means that staffing resources cannot be used to best effect.
- 149 The Council places a strong emphasis on the training and development of its workforce, helping to maximise internal capacity. The performance appraisal process picks up performance against individual targets and is linked to a personal development plan, ensuring a structured approach to learning and developing new skills. The new head of housing has also taken steps to improve communication and support for staff, through team meetings and monthly supervision sessions. Discussions with staff in affordable housing services confirmed that there was now better communication across departments and all felt well-briefed by managers. Additional funding of £5,000 over two years for professional training for housing staff was also approved by the Council's Cabinet in July 2005.

¹ Opportunities to raise funds through Council Tax increases are limited partly due to the existing low base and capping restrictions.

Summary

- 150** In summary, we have judged that the Council has uncertain prospects for improvement.
- 151** We found some evidence to support the view that the Council would deliver further improvements. The Council has made housing one of its priorities and has demonstrated its commitment to affordable housing through contesting planning applications and making use of its own assets to support housing development. Some important building blocks have also been put in place. The appointment of the head of housing and improved political accountability for the service is providing stronger leadership and giving housing a higher profile, both inside and outside the Council. More effective working with key stakeholders and better joint working between key services also lays the foundations for an improved approach to strategy development.
- 152** However, there are also barriers to improvement which potentially outweigh the drivers and create uncertainty about future prospects. The Council's track record does not yet demonstrate a sustained focus on key issues, reflected in slippage on key targets and inadequate follow-up of outcomes from service reviews. The existing range of strategies and plans does not provide a robust framework to drive future improvements and the absence of effective performance monitoring in housing raises doubts about the Council's ability to keep progress on track. At a corporate level, the Council has yet to make clear links between priorities and resource allocation, making it difficult to know whether capacity issues within the housing service will be successfully addressed.
- 153** Although the adoption of the Local Plan, scheduled for March 2006, will provide a firmer basis for securing affordable housing, arrangements to ensure effective monitoring of the new risk management framework are not yet in place. The lack of a clear composite list of development sites, showing sources of funding and an assessment of risk, also increases the likelihood of slippage. The lack of a clear long-term capital commitment is a potential barrier to the delivery of affordable homes.

Appendix 1 – Performance indicators

There are a number of statutory performance indicators which are relevant to the issue of affordable housing. Details of performance are shown below.

Indicator	2002/03	2003/04	2004/05	Best 25 per cent of districts (2004/05)
BVPI 62 - % of unfit private sector dwellings made fit or demolished as a direct result of action by the local authority	1.65%	2.2% ^I	6.96%	
BVPI 64 - Number of private sector dwellings that are returned into occupation or demolished as a direct result of Council intervention	7	3	37	
BVPI 106 - New homes on previously developed land	93%	Qualified	97.13%	
BVPI 183a - Average length of stay in bed and breakfast accommodation	7 weeks	5.75 weeks	0 weeks	
BVPI 183b - Average length of stay in hostel accommodation	12 weeks	18 weeks ^{II}	7 weeks	
BVPI 203 - % change in the average number of families placed in temporary accommodation under homelessness legislation compared to previous years			-9.09%	
BVPI 109a - Planning applications: major applications determined within 13 weeks	50%	48%	76%	

^I National PI data gives figure of 6.1%, but doubts were expressed about the method of calculating this indicator.

^{II} National PI data gives figure of 19.3 per cent, but doubts were expressed about the method of calculation of this data

Appendix 2 – Documents reviewed

- 1 Before going on-site and during our visit, we reviewed various documents that were provided for us. These included:
 - the Council's self-assessment;
 - Community Plan, 2003-2011;
 - Annual Operating Plan, 2005-06;
 - Housing Strategy Statement, 2001-2006
 - Housing Needs Surveys 2000 and 2005 (draft);
 - Private Sector Renewal Strategy 2004-2009;
 - draft Affordable Housing Policy;
 - Homelessness Strategy and Action Plan;
 - Local Plan Review, Inspectors Report, June 2005;
 - customer service standards and information;
 - Procurement Strategy and related action plan;
 - asset management strategy; and
 - performance reports.

Appendix 3 – Interviews

- 2 We interviewed a wide range of people involved in the delivery of affordable housing in Tunbridge Wells. This included senior councillors and officers, as well as staff involved in housing needs, housing strategy, planning and private sector housing. We also met with some external partners including registered social landlords and the home improvement agency.

Appendix 4 – Positive practice

- 3 *'The Commission will identify and promote good practice. Every inspection will look for examples of good practice and innovation, and for creative ways to overcome barriers and resistance to change or make better use of resources'. (Seeing is Believing)*

Joint assessment referral scheme (JARs) for supported housing

Tunbridge Wells Borough Council co-ordinates a joint assessment referral scheme (JARs) to determine options and support packages for people moving in and out of supported housing in the borough. This brings together a wide range of stakeholders, including staff from RSLs, supported housing providers, the YOT and social services care managers. Panel meetings for the scheme are well-attended and the approach is highly valued by partners.

Affordable Housing website

Tunbridge Wells Borough Council and other housing authorities in Kent co-fund an affordable homes website covering the county of Kent. This provides a good overview of affordable housing options and housing associations based in the borough. It can be accessed at www.affordablehomeskent.org