

Social Housing Green Paper – A New Deal for Social Housing

Proposed Kettering Borough Council Response

Kettering Borough Council is a stock owning local authority situated in Northamptonshire. The Council owns and manages just under 3,700 properties. The Council has been attempting to increase housing supply both through our enabling function and directly. The Council has delivered 5 new build properties and a number of HRA acquisitions over the last couple of years. We are about to submit planning applications to deliver 27 new homes across two sites in Kettering Town and are carrying out feasibility work on further sites. In addition and as part of our balanced housing strategy we have been investing in existing pre-war stock under our Homes for the Future capital programme. The Council has also been undertaking an acquisition programme within the General Fund to purchase properties to use as temporary accommodation in an attempt to provide more suitable temporary homes to accommodate those who are homeless and alleviate the pressures of nightly paid accommodation.

Kettering Borough Council largely welcomes the themes within the Social Housing Green Paper and is keen to contribute as part of the consultation process to help form the more detailed policy to follow.

1. Ensuring homes are safe and decent

Following Grenfell the Council took necessary steps to reassure our tenants that their safety was of paramount importance. We regularly review our properties' compliance with fire safety regulations, as well as other compliance areas and will continue to do so. We support the proposal to be more proactive in the information that is given to tenants regarding their building safety and support for them to be engaged on safety issues.

The review of the Decent Homes standard is welcome and long overdue however a concern remains over the financial resources and flexibility available to the Council to carry out any required works to our properties. Any further regulation of social housing standards needs to be considered alongside that of our private rented sector stock, where many vulnerable and homeless families are housed due to a lack of available social housing.

2. Effective resolution of complaints

The Council has a corporate complaints policy which recognises the importance of customer complaints and welcomes complaints as a valuable form of feedback about our services. The Council is committed to using the information we receive to help drive forward improvements. The Council has a three stage complaints procedure which is published and communicated to our tenants and residents. We have improved our process of logging, monitoring and reporting of first stage complaints. We would support a system of mediation between us as a landlord and our tenants in order to attempt to provide a better solution and negate the need to escalate. The current process to escalate to the Housing Ombudsman through a designated person, is long-winded and is not appropriate where complaints need a prompt resolution.

3. Empowering tenants and strengthening the regulator

We welcome provisions to improve resident engagement and scrutiny and to strengthen the role of the Social Housing Regulator. We would support additional measures which include monitoring how housing associations assist homeless households through their lettings, pre- eviction management and supporting local authorities in our statutory homelessness responsibilities, as well as greater regulation over how housing associations work with us on issues of anti-social behaviour.

We already share performance information with our tenant reps and communicate this more widely. We subscribe to HouseMark in order to see where our services are benchmarked against other housing providers and see this as a valuable way of seeing where we need to improve, are excelling etc. The proposal of financial incentives to support better performance of landlords is good however should be treated with caution and seen alongside results of any tenant satisfaction/experience and also local knowledge as Councils are best placed to understand our tenants, residents and local circumstances. There is a risk that KPIs lead to a tick box approach that does not accurately reflect how we manage our homes and estates and engage with our residents. Often the data that sits beneath the headline figures is more complex and headline figures/league tables don't always tell the full story, thus making comparisons against other landlords more difficult.

4. Tackling stigma and celebrating thriving communities

We welcome proposed further guidance through the NPPF to encourage new affordable homes to be designed to the same standard as other tenures and ensure that they are well integrated within developments and respond to changing demographic needs. This is something Kettering has been quite strong on both through the production of design codes for larger strategic developments, as well as the negotiation with developers and housing associations.

Social housing is vital for those vulnerable and low income households who have no other option but to rent from the Council or our partner housing associations. We welcome proposals to tackle the stigmatisation that exists and recognise the positive contribution that social housing residents make to their communities and to society more widely. The green paper does not however go far enough in enabling and supporting us as a Council to invest in our existing stock, build new housing and improve our communities and places. Social housing continues to be seen as an option of last resort, a safety net or springboard to other tenures.

5. Expanding supply and supporting home ownership

We welcome the announcement in the green paper of additional funding for housing associations and the proposed long term strategic partnerships the government wishes to form with them however there is a huge need for genuinely affordable homes in our Borough. Kettering Borough Council has ambitions to build more council housing and although not currently close to our debt cap, lifting this is a step in the right direction, enabling us to borrow to build more housing as well as to invest in our

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existing stock, a third of which is pre-war. The Prime Minister's speech on the 3rd October announcing plans to lift the debt cap is positive.

We welcome the Government's plans to scrap the policy which would have forced us to sell our higher value assets to help fund the voluntary right to buy. Whether it would have been physically selling our assets or paying a cash levy by other means, it would have meant reduced ability to provide and manage the affordable homes needed in our Borough.

Expanding the supply of genuinely affordable social housing at scale is the single most important step the Government could take in solving the housing crisis. It would add new supply quickly, support home ownership, reduce homelessness, and generate huge public service savings (through reduced expenditure on expensive temporary accommodation).

The green paper does not go far enough to enable this to happen. The real issue preventing us as a Council from building homes at scale is the availability of suitable land at a price low enough to enable us to develop viable schemes. The Council has limited land holdings, the majority of which are small scale i.e. existing garage sites. The small numbers of larger sites that are in the Council's ownership are being progressed with plans for housing. Lifting the borrowing cap for all local authorities, not just those deemed to be in 'areas of high affordability pressures' [NB from our own analysis of the gap between social and private rents in our Borough we feel we would currently meet this criteria], plus additional subsidy in the form of grant funding for Councils, RTB flexibilities and the ability to mix RTB receipts with other forms of grant to assist with viability would be a step in the right direction to enable us to deliver homes that are more secure and affordable.

Whilst support for home ownership is welcomed this should not be at the expense of providing genuinely affordable homes to rent for those in the population who simply cannot afford, or even want to own a home.

Kettering Borough Council introduced flexible tenancies for new tenants following the Localism Act 2011 introducing the power to offer "flexible tenancies" to new social tenants after 1 April 2012. We welcome the proposal to still allow some local discretion to consider 2 year fixed term tenancies where there are tenants who are not managing so well to allow for more intensive management where this is the best option. It has been recognised that the intensive management of our new tenants has brought benefits to both tenant and landlord as part the fixed term tenancy process however we now extend that support to all existing tenants of Kettering Borough Council anyway through a regular, periodic home visit by our Neighbourhood Managers. Our experience of administering fixed term tenancies has been found to be overly disproportionate and resource-intensive compared to the benefits it reaps and we have only had one tenancy that was not renewed upon review since their introduction. We would welcome advice and support in how to move towards granting secure tenancies once again. We welcome the right of victims of domestic abuse to retain their lifetime tenancy if they are forced to move.

Looking at more ways to support the development of community-led housing should be explored however it is not clear how potential stock transfer of council housing will lead to an increase in supply.

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Resident and community choice over day-to-day services should still be a possibility without the requirement of a programme of stock transfers. Any decisions on stock transfer should be made at a local level.