

DOVER DISTRICT COUNCIL
TENANCY STRATEGY 2012-2016

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1. INTRODUCTION

The Localism Act 2011 (“the Act”) received Royal Assent on 15 November 2011. Section 150 of the Act provides that each local authority in England must prepare and publish a strategy (“a tenancy strategy”) setting out the matters to which the registered providers¹ of social housing for its district are to have regard in formulating policies relating to:

- the kinds of tenancies they grant;
- the circumstances in which they will grant a tenancy of a particular kind;
- where they grant tenancies for a term certain, the lengths of the terms; and
- the circumstances in which they will grant a further tenancy on the coming to an end of an existing tenancy.

The Act does not affect the rights of existing social housing tenants but does allow for more flexible arrangements for new tenants. Social landlords (stock holding Councils and registered providers) are now able to grant tenancies for a fixed length of time. The minimum length of a new tenancy will be two years in exceptional circumstances with five years or more being the norm. There is no upper limit on the length of tenancy and Councils and other affordable housing providers can still offer lifetime tenancies if they wish. The government believes that by providing this flexibility in relation to the length of a tenancy, social landlords will be able to manage their social homes more effectively and fairly, and deliver better results for local communities.

The term ‘fixed term tenancies’ used in this strategy applies to all tenancies that are offered for a specified period of time, as opposed to traditional ‘lifetime tenancies’. However, the exact form of tenancy used will vary depending on whether the landlord offering it is a local authority or a housing association. The precise term for a local authority tenancy for a fixed term is a ‘flexible tenancy’.

In addition to responding to the very important tenancy reforms introduced in the Act this Strategy also takes account of Government changes in respect of the new rent model for affordable housing and the strengthened powers for Councils to discharge their duty to homeless households by securing housing in the private sector.

A summary of the Council’s strategic position in respect of these changes can be found in Appendix A.

2. BACKGROUND & CONTEXT

The reasons for introducing these reforms are set out in the Government’s Housing Strategy for England which can be summarised as

¹ The term housing association was replaced by “registered social landlord” (RSL) but this has been more recently replaced by the concept of registered providers of social housing. All providers of social housing are listed on a register with the TSA and known as “Registered Providers” (RPs). All three terms are sometimes used interchangeably.

- Social housing is a scarce resource and should be used in the most effective way possible.
- Households who are capable of meeting their own housing needs should not be allocated social housing.
- Social housing should not be a 'lifetime' housing choice and should act as a springboard to social mobility and not a barrier.
- The new affordable rent model will help to ensure new affordable homes continue to be provided at a time when government is seeking to reduce the budget deficit.
- Changes to the way in which the homelessness duty can be discharged will provide local housing authorities greater flexibility and enable them to meet the needs of other types of household.

Scope

This strategy provides an overview of the general approach the Council would like registered providers of social housing to take when preparing their Tenancy Policies, implementing the new tenure flexibilities in Dover district, the application of the new affordable rent model and the Council's approach to using new powers to meet its homelessness duty.

The Council is aware of the requirement set out in section 151(3) of the Localism Act 2012 that in preparing this Strategy it must have regard to its current allocation scheme under section 166A of the Housing Act 1996 and its current homelessness strategy under section 1 of the Homelessness Act 2002. The Strategy does not include guidance as to how social housing should be allocated and therefore does not impact on the existing allocations policy. Nor does it change the Council's strategic aim of ensuring that the needs of homeless households are met through the provision of good quality, appropriate housing.

The Strategy does not set out the Council's policy for granting tenancies in respect of its own housing stock or detail changes that will need to be made to its allocations policy in response to legislation and other government guidance. These will be dealt with in a separate Tenancy Policy and a revised Allocations Policy to be developed in due course.

The Strategy does not apply to almshouse charities which are not registered social landlords.

Strategic View of the Use New Tenure Options

Local Authorities (Flexible Tenancies)

The Localism Act allows local authorities to grant for the first time 'flexible tenancies' for a fixed period. It is a form of secure tenancy and generally tenants with a flexible tenancy will have the same rights as other secure tenants including the Right to Buy. The same grounds for seeking possession of a property are also available and can be used during the fixed term.

All new secure tenancies (including flexible tenancies) only have a statutory right of one succession to a spouse/partner and not also to other family members. Existing tenant's right to succession is not affected.

Registered Providers (fixed term tenancies)

Previously regulation meant that registered providers generally couldn't offer fixed term tenancies at a social rent and effectively required them to grant 'lifetime tenancies' to the vast majority of new tenants in general needs, social rent housing.

However, a revision to the Tenancy Standard made in April 2011 allows registered providers to offer fixed term tenancies at an affordable rent as part of a contract with the HCA to deliver new homes under the Affordable Homes Programme.

Registered providers do not need a new type of tenancy to grant fixed term tenancies. They may simply grant 'fixed term assured shorthold tenancies'

Strategic Housing Objectives

The Government has made it clear that it wants local authorities to exercise strategic influence over how registered providers of affordable housing will implement these reforms and that they will give 'due regard' to the objectives and principles set out in this strategy.

The strategy has been developed with reference to the Council's Housing Strategy 2010-2015 which is itself informed by other key corporate plans such as the Corporate Strategy and LDF Core Strategy. The Housing Strategy is underpinned by a number of other housing related strategies and empirical research. The Strategy highlights a number of key housing issues within the district and sets out high level priorities supported by more specific objectives.

We believe that this strategy can have an impact in addressing some of the issues and help the Council meet its Housing Strategy objectives particularly in relation to:

- Increasing the supply of affordable housing across the district,
- Making best use of the existing stock of affordable homes, and
- Supporting the development of sustainable, inclusive communities where people want to live.

The evidence base in relation to the need for affordable housing is contained in the East Kent Strategic Housing Market Assessment and key findings are reflected in the Council's LDF Core Strategy, Housing Strategy and the various underpinning strategies. Providers of social housing are expected to have due regard to these documents when framing their own policies and be able to demonstrate that their tenancy policy objectives are mutually compatible and supportive of the Council's strategic objectives. Strategic compatibility will be a factor that the Council will take into consideration if it is asked by a registered provider to provide strategic support for a proposed development.

The Council believes that tenancy flexibility can enable social housing landlords to help more people move on from such housing once they are in a position to secure and maintain an alternative housing option such as full home ownership, shared ownership or the private rented housing. This should help increase the turnover of existing social housing and assist those families in genuine housing need at a time when there is an identified shortage of affordable housing.

The flexibility to offer fixed term tenancies also provides social landlords with the opportunity to use their stock most effectively by reducing under occupation and making best use of adapted homes. Larger 3 and 4 bedroom family homes are in short supply in the district and enabling registered providers to move households living in homes that are larger than they need to smaller homes will help release these homes for those that need them including families that are overcrowded.

3. TENURE REFORM

Tenancy Policies

Affordable housing no longer has to be let on a tenancy for life. Social landlords can choose to let a property on a fixed term tenancy. There are now a range of options available when issuing such tenancies in addition to the periodic (lifetime) tenancies traditionally issued. The minimum tenancy term that can be offered is 2 years but government has indicated that this should only be used in exceptional circumstances and that it would expect the normal minimum duration to be 5 years.

The Council expects that every landlord managing social housing within the district will publish a clear and transparent Tenancy Policy which should cover:

- The kinds of tenancies they will grant
- Where they grant tenancies for a fixed term, the length of those terms
- The circumstances under which they will grant tenancies of a particular type
- The circumstances under which a tenancy may or may not be reissued at the end of the fixed term, in the same property or in a different property
- The way in which a tenant or prospective tenant may appeal or complain about the length of fixed term tenancy offered and the type of tenancy offered, and against a decision not to grant another tenancy on expiry of the fixed term
- Their policy on taking into account the needs of those who are vulnerable, by reason of age, disability or illness, and households with children, including through tenancies which provide a reasonable degree of stability
- The advice and assistance they will give to tenants on finding alternative accommodation in the event they decide not to grant a further tenancy.

In respect of the above requirements the Council's strategic position is as follows:

Types of tenancy and tenancy length

Introductory/Starter Tenancies

The Council supports the use of introductory or probationary ('starter') tenancies which were introduced under earlier legislation: Part 5 of the Housing Act 1996. An introductory tenancy is a one-year 'trial' Council tenancy and as long as the terms of the tenancy agreement are met it will be automatically followed up with a secure tenancy. A probationary tenancy is similar to an introductory tenancy but used by registered providers and will generally last up to 12 months before converting to an assured tenancy.

Introductory and starter tenancies enable social landlords to obtain possession of a property more easily where there have been problems with the way in which the tenancy has been conducted. Examples include a persistent failure by the tenant to pay their rent on time and/or the tenant or a member of their household causing nuisance and annoyance.

The landlord will be expected to follow the correct legal process if it decides to seek possession and the Council would also encourage landlords to make use of powers granted under Section 179 of the Housing Act 2004 to extend introductory tenancies granted after 2 June 2005, where there are continuing doubts about the conduct of a tenant, or where there have been problems of anti-social behaviour so as to provide sufficient time to try and resolve problems. The Council also expects landlords to meet the appeal requirements of the legislation

Fixed Term Tenancies

Two year tenancies should only be issued in exceptional circumstances for example where there is a strong likelihood that the tenant will only require the tenancy for a short duration or where the property is only available for a short, fixed term.

The Council believes that the normal minimum tenancy term that should be provided by social landlords in Dover district is 5 years. The use of short fixed term tenancies may result in increased costs for housing providers due to additional administration related to tenancy reviews and increased voids and it therefore recognises that providers may want to minimize this by offering longer tenancies. However, this needs to be balanced against the need to make best use of the housing stock and the Council would expect the rationale for adopting a particular approach to be clearly set out in tenancy policies.

Social landlords are expected to monitor the impact of fixed term tenancies on local communities and to identify to the Council any potential situations where their use appears to be having a detrimental impact on the sustainability and cohesiveness of a particular community. The Council will be prepared to consider the implementation of an agreed localised lettings plan to address any such issues

Lifetime Tenancies

The provision of lifetime tenancies will be particularly appropriate for some tenants. This includes tenants where the circumstances which led to them being granted a tenancy are unlikely to change over time. Examples include tenants with long term health conditions

such as a learning difficulty, permanent physical disability and older people living in specially designated housing such as sheltered housing and extra care housing.

However, where a tenancy is to be offered on the basis that a member of the household has a long term health condition or disability, it may be more appropriate to offer a fixed term tenancy as this will enable the landlord to make the best use of specially adapted properties in the event that the disabled household member is no longer living in the property.

The Council also believes that it would be appropriate to offer some members of the armed forces who successfully apply for housing, a lifetime tenancy. The Council believes that the following criteria should be used for determining which tenants this should be applied to:

(a) a person who is serving in the regular forces or who has served in the regular forces within five years of the date of their application for an allocation of housing under Part 6 of the 1996 Act;

(b) a person who is serving or has served in the reserve forces and who is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to that service.

Circumstances under which different types of tenancy are to be granted

Tenancy Policies developed by registered providers should clearly set out the circumstances under which different types of tenancy are to be granted and must clearly support the strategic objectives of this Strategy. Tenancy Policies should be reviewed on a regular basis and must meet the requirements of national tenancy standards produced by the relevant regulator.

Circumstances under which a tenancy may or may not be reissued at the end of the fixed term

Whether a tenant will be able to remain in social housing at the end of the fixed tenancy will depend on the landlord's tenancy policy. Registered providers are expected to review a fixed term tenancy six months before it is due to end to decide whether it should be renewed and must publish clear guidance on the process and assessment criteria to be used in deciding if the tenancy should be renewed.

The procedure for local authorities who decide not to grant another tenancy at the end of the fixed term is set out in the Localism Act. A court can only refuse possession if the correct procedure has not been followed by the landlord or if the court is satisfied that the decision not to grant another tenancy was otherwise 'wrong in law'. The Council's own Tenancy Policy will address this matter in more detail.

Any of the following could be acceptable reasons to end a fixed term tenancy:

- Under-occupation (the property is larger than reasonably required)
- A financial assessment identifies that the tenant is able to meet their own housing needs without subsidy
- Adapted property where the tenant no longer needs the adaptation

- The tenant has acquired another property

Where there have been no material changes in the tenants circumstances the Council would expect landlords to grant a further tenancy.

The Council recognises concerns relating to the possible 'residualisation' of social housing in the district and potential disincentives to aspiration that might arise from the use of income related criteria and will therefore keep this matter under review.

The way in which a tenant or prospective tenant may appeal or complain about the length of fixed term tenancy offered and the type of tenancy offered, and against a decision not to grant another tenancy on expiry of the fixed term

The procedure by which a tenant may seek a review of a decision not to grant another tenancy is set out in secondary legislation (The Flexible Tenancies (Review Procedures) Regulations 2012).

The Council expects registered housing providers to clearly set out in their Tenancy Policy how these statutory requirements will be implemented

Taking into account the needs of those who are vulnerable, by reason of age, disability or illness, and households with children, including through tenancies which provide a reasonable degree of stability

As referred to above, the Council's expectation is that people with enduring, long term health conditions such as a learning difficulty and older people living in specially designated housing such as sheltered housing and extra care housing will be offered lifetime tenancies. When developing their policies, landlords should also consider the potential impact of fixed term tenancies on children within a household and be able to demonstrate how any impact would be mitigated.

Policies must be supported by a robust equality impact assessment a copy of which should be provided to the Council.

Advice and assistance given to tenants in the event that their tenancy is not renewed

The Council expects landlords to be proactive and take a person centred approach in helping households take the steps that will help them to secure alternative accommodation at the end of their fixed term tenancy and avoid homelessness. This may include the promotion of skills related designed to help people secure employment during their tenancy period as well as a range of advice services in the lead up to a tenancy review. These may include:

- Advice on low-cost home ownership options and other alternative affordable housing tenures
- Specialist housing and or welfare-related advice and/or signposting to appropriate advice

services

- Advice on renting in the private rented sector and assistance in identifying and securing a suitable property (this may involve assistance with a deposit where necessary)

Landlords are expected to conduct reviews in partnership with other relevant agencies (eg health and social care agencies) and to notify the Council and other appropriate agencies, at the earliest opportunity, where a decision is taken not to renew a tenancy.

The Council does not expect that a decision not to renew a tenancy will result in a homelessness application being made to the Council.

Armed Forces Personnel

The Council shares the Government's view that the sacrifices made by members of the Armed Forces should be recognised by making sure that they are able to access the type of housing that they and their families need.

As stated above, the Council believes that former members of the armed forces who qualify for social housing should be offered lifetime tenancies.

Alongside recent consultation on proposed guidance for the allocation of accommodation, the government has also consulted on new regulations which are intended to improve access to social housing for former and serving armed forces personnel.

The Council awaits the outcome of this consultation with interest and in drafting its new Tenancy Policy and Allocations Policy later this year it will seek to take advantage of any new flexibilities and powers to give armed forces personnel the priority for housing it feels they deserve.

Tenancy Succession

The Localism Act 2011 changes the legal entitlement to succeed to a new secure, introductory or demoted tenancy (i.e., to take over the tenancy of a person who has died). The legal right to succession will be limited to a spouse or civil partner only. While this excludes other close relatives living with the tenant at the time of their death, social landlords will be free to allow discretionary successions to additional groups. The Council wishes to avoid the possibility that this change will result in more households becoming homeless and seeking assistance with re housing. Registered providers are therefore expected to use their discretion and put in place measures that will avoid this. This may include the granting of a normal fixed term tenancy where the property is of an appropriate size, a short term tenancy where the household would be under occupying or assistance with a move to suitable alternative accommodation.

Local Lettings Plans

The Council believes that local lettings plans can play a role in helping to achieve balanced, sustainable communities. However, they should only be used where it can be clearly

demonstrated they will have a positive community benefit and should be subject to regular review.

Kent Homechoice

This is the choice based lettings service for Kent and the Council encourages social landlords to use this service when letting homes. When advertising properties, landlords should clearly indicate the duration of the tenancy being offered and the rent that will be charged. Details of how to access the landlord's tenancy policy should also be provided.

4. AFFORDABLE RENTED HOUSING

Background

As well as tenure reform, the Government has reformed the way in which the development of new affordable homes is funded and has introduced the 'affordable rent' product as its preferred model for new social housing provision. Social housing providers now have the flexibility to charge rents of **up to** 80% of local market rents for new homes and a proportion of re-lets, but **only** where this is part of their agreement with government to build new homes. The ceiling of 80% is inclusive of service charges.

Whenever an affordable rented home is let either by granting a new tenancy or renewing an existing one, providers are required to rebase the rent, to ensure that the rent remains no more than 80% of the relevant market rent.

The government's intended policy objectives in this respect are:

- to maximise the delivery of new social housing, making the best possible use of constrained public subsidy and the existing social housing stock over the next Spending Review period, and matching delivery of new build to areas of housing need; and
- to provide an offer which is more diverse for the range of people accessing social housing, providing alternatives to traditional social rent and making the provision of social housing more flexible.

PPS 3 was revised on 9 June 2011 to include the following definition of Affordable Rent:

“Affordable rented housing is:

Rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80 per cent of the local market rent.”

The affordable rent model is intended to enable social housing providers to secure additional financial capacity for the provision of new homes.

While initiatives aimed at increasing the supply of affordable homes are to be welcomed it is important that we ensure the flexibilities are used in a way that benefits our local communities and we therefore believe it is appropriate for us to set out guidelines as to how we would expect them to be used.

It should also be noted that Registered Providers are free to undertake the delivery of other types of social housing or market housing, funded entirely from their own resources (without conversion of re-lets), without entering into an agreement with the HCA.

The Council expects registered providers to comply with the Tenancy Standard and use a valuation of market rent in accordance with a RICS recognised method so as to ensure a consistent and transparent approach to the valuation of market rents.

Affordable Rent Implications

Affordable Housing Supply

The Council recognises that registered providers who build new social homes with grant assistance provided by the Homes & Communities Agency will be expected to let these homes at an affordable rent. However, they do have discretion over the number of existing homes that will be converted to affordable rent when they become available for re letting.

Affordable rented housing can have a role to play in meeting housing need within the district but there is a need to ensure that there is an adequate supply of housing that is affordable for people on the lowest incomes, who are unable to access market housing and may not be able to afford affordable rented housing. Consequently, while we accept that social housing providers will want to develop Affordable Rent properties, the continued provision of new Social Rent homes on sites where viability allows it, will also be strongly encouraged.

The additional borrowing capacity registered providers will benefit from via conversions to affordable rent and shared ownership should help to maintain the general supply of affordable homes but the Council is aware that this funding is not ring fenced for use in those areas where homes are converted. There has been a relatively low level of affordable housing delivery in the district in recent years a problem that has been exacerbated by housing market difficulties. Consequently, in order to give strategic housing support to a conversion policy the Council would wish to see a commitment from registered providers that a reasonable level of local reinvestment would occur.

Affordability

Evidence suggests that affordable rent levels in parts of Dover district would fall within the LHA rate and that the difference between an average social rent charged by registered providers and an average affordable rent is likely to be lower than in many other local authority districts in Kent.

However, the Council recognises that market rent levels can vary significantly across the district and that in higher value areas, there is the possibility that the affordable rent for

some property types could exceed the LHA rate. Recent valuations provided to a registered provider development partner for a proposed affordable rented housing scheme in a rural location indicate that the affordable rent for a 2 bed house would be £520 pm and £600 pm for a 3 bed. Given these local market variations we would expect registered providers to discuss development proposals with the Council at an early stage so that proper consideration can be given to the potential impact of charging affordable rents on a scheme by scheme basis.

The Council's view is that wherever possible affordable rent levels should not exceed LHA rates.

The need to provide access to affordable housing across the whole of the district is also an important consideration as far as the conversion of properties from social rent to affordable rent or shared ownership is concerned. Government guidance proposes that affordable rents should rise at a rate of RPI+0.5 per cent for the duration of tenancy, but are rebased upon re-let, implying that average affordable rents for a cohort of properties should ultimately, in the long-run, increase at the rate of market rent inflation. The Council wants to avoid the possibility of high levels of conversions occurring in particular parts of the district thereby potentially restricting access to affordable housing by people on lower incomes and limiting opportunities available for existing social rented tenants to transfer to areas of their choice.

Registered providers should notify the Council of their intentions with regard to rent conversions within the district.

House Types

The Council wants to avoid the possibility that the relative shortage of certain social rent house types such as larger family homes is made worse by their conversion to affordable rent or shared ownership. Evidence shows that the difference between social rent and affordable rent levels increases in accordance with the number of bedrooms and that in higher value areas, the conversion of 4 bed houses to affordable rent will cause affordability problems for households receiving full housing benefit when the £500pw benefit cap is introduced in April 2013. Consequently, the Council does not expect 4 bed houses to be converted to affordable rent unless it can be clearly demonstrated that it will not have a detrimental impact on the availability and affordability of such homes for people in housing need.

Welfare Reform

The Government plans to introduce a universal credit system and housing benefit reforms which will cap benefit and reduce benefit paid to some under occupying households. The Council therefore expects registered providers to be mindful of the potential impact of the proposed changes and the need to help under occupying tenants affected, move to smaller housing where they wish to do so.

Lettings

The Council expects that affordable rent properties will be allocated in the same way that social rent properties are now. The existing regulatory obligation on providers to co-operate with local authorities' strategic housing function on the allocation of social rent properties will also apply to Affordable Rent. Similarly existing lettings arrangements operated by local authorities and housing associations should continue to apply and we expect that Affordable Rent properties will – where appropriate – be made available through choice-based lettings.

Mobility

The Council recognises that the tenancy rights protection given to tenants looking to transfer to another social rent property does not apply to affordable rent properties and that this has the potential to discourage tenant mobility. We therefore believe that landlords should offer transferring tenants the same type of tenancy they already have although at the higher affordable rent level.

There is also a potential work disincentive for those households in receipt of housing benefit living in an affordable rent property. The Council therefore expects providers to play a proactive role in supporting skills and training initiatives which help tenants access employment and increase their housing options.

5. HOMELESSNESS

Councils continue to have a duty to house homeless people who are eligible for such assistance under related legislation, in priority need and unintentionally homeless.

However, under the previous rules, people who became homeless were able to refuse offers of accommodation in the private rented sector, and wait for a suitable social home to be offered to them. This can result in households being temporarily housed in expensive temporary accommodation until such a home becomes available.

The Localism Act allows local authorities meet their homelessness duty by providing good quality private rented homes. Government believes that this option could provide an appropriate solution for people experiencing a homelessness crisis, at the same time as freeing up social homes for people in real need on the waiting list.

While there is no certainty that this change will result in more homeless households being re housed in the private rented sector, the Council welcomes it as an additional tool we can use to tackle and prevent homelessness. The Council will seek to ensure that any offer of private rented housing is appropriate to the needs of the household and the minimum length of any tenancy will be 12 months.

6. MONITORING & REVIEW

The Council will wish to monitor the effectiveness and extent to which the new provisions are implemented. This will include monitoring:

- The number of fixed term tenancies issued.
- The number of reviews carried out and tenancies renewed/not renewed
- Reasons for non renewal of tenancies
- The number of under occupying households re housed
- The number and location of social rented homes converted to affordable rent
- The number of homeless households re housed in the private sector

It will also consider changes in market conditions and the impact this may have on affordable rent levels and housing affordability as well as the impact of welfare benefit changes, particularly housing benefit.

This monitoring and review will inform future changes to the strategy and we will expect registered housing providers to assist with this process by providing statistical information when requested.

7. WHERE TENANCY POLICIES CAN BE FOUND

The Localism Act requires the Tenancy Strategy to summarise the policies of registered providers 'or explain where they may be found'.

A schedule detailing where the policies of all the registered providers active in Dover district can be accessed will be published on the Council's web site.

8. EQUALITIES

A full Equality Impact Assessment of this strategy has been undertaken following the consultation period. Its purpose has been to assess the impact of the strategy on the different equality groups with the intention of implementing remedial action where the impact is negative and maximising access to services for everyone.

TENANCY STRATEGY 2012-2016

SUMMARY

Strategy Issue	Strategic Considerations	Strategic Position
Flexible/Fixed Term Tenancies	<ul style="list-style-type: none"> • Demand for social housing exceeds supply – need to make best use of available stock and target it at those most in need • Increased frequency of re-lets with associated costs including void rent loss • Increased administration relating to tenancy reviews and associated resource implications • Increased turnover may have negative impact on community stability and contribute to a residualisation of estates 	<ul style="list-style-type: none"> • Introductory/starter tenancies encouraged • Flexible/fixed term tenancies to be used for majority of general needs tenants with minimum term of 5 years being the norm. • 2 year tenancies used in very exceptional circumstances • Lifetime tenancies offered to older people moving into sheltered housing, people with enduring long term medical conditions (unless accommodation has been significantly adapted) and former members of the armed forces • Expectation that tenancies will be renewed unless: <ul style="list-style-type: none"> - the property is under occupied - there has been a significant change in income and tenant can afford an alternative housing option - the property has been significantly adapted and no members of the household require the adaptations • Registered providers to provide information to enable review of strategy to consider community impact
Affordable Rent	<ul style="list-style-type: none"> • Need for additional, new affordable housing and development funding • Impact on affordability and potential differential impact re location and property type • Potential benefit trap and disincentive to work • Impact of welfare reforms • Registered providers already tied into HCA development agreements 	<ul style="list-style-type: none"> • Acceptance that affordable homes developed under current programme will be let at affordable rent • Affordable rents not to exceed LHA rate • 4 bed homes not to be converted • No more than ??% of homes to be converted • Registered providers to take pro active approach to assisting under occupiers to downsize • Registered providers to take a proactive approach to assisting tenants access employment
Homelessness	<ul style="list-style-type: none"> • Shortage of accommodation for those in most urgent need • Limited temporary accommodation • Unsuitability of B&B • Need to contain cost of temporary accommodation 	<ul style="list-style-type: none"> • Pro active use to be made of the private sector where housing is of an acceptable standard.

