



# COUNCIL HOUSING ASSET MANAGEMENT STRATEGY

2025-2028

Together - Proud to Be Gravesham

**Gravesham**  
Borough Council



## Document Control

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## Revision History

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## Foreword

Gravesham Borough Council is committed to providing quality and sustainable housing that are homes to be proud of for our tenants and leaseholders, and I take great pride in leading this strategic plan for improving our homes for them.

One of the few councils to retain its social housing stock in-house, we are in a time of rapid change with a review of national standards, new duties to ensure tenants are safe with particular focus on our high-rise residential buildings, and ambitious plans to improve the energy efficiency of our homes and achieve net zero carbon emissions.

We pride ourselves on being ahead of the legislation, of thinking innovatively and creatively to make the changes that matter to our tenants and our environment.

Our energy efficiency programme is attracting national interest, coverage and awards. Others are studying and following our example as we help our tenants reduce their energy consumption and bills as we work towards our ambitious net zero targets.

This strategy reinforces that pioneering approach and ensures we are working to common and achievable objectives.

**Councillor Karina O'Malley**  
**Cabinet Member for Housing**

## 1. Introduction

The housing stock represents one of the Council's most valuable assets and its largest liability in investment terms. The condition, comfort and security of the council's properties is also of upmost importance to tenants, and they consistently select the improvement of their homes and a good repairs service as one of their top priorities.

Gravesham Borough Council have adopted a strategic approach to asset management. This approach is forward-looking and is focussed on making the best use of resources to meet the future needs of our tenants.

Our Asset Management Strategy is also based on a good understanding of stock condition and relative asset performance that will be used to drive investment plans and support evidence-based decision-making.

The Strategy will be underpinned by robust governance and performance reporting arrangements and our tenants will play a key role in shaping our future standards and services and holding us to account for performance and decisions.

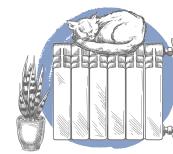
The council's key asset management priorities are influenced by the following drivers for change:



### **Influence 1**

#### **- Ageing assets**

Modernising and maintaining the performance and safety of an ageing asset base.



### **Influence 2**

#### **- Tenant expectations**

Keeping our assets aligned with the expectations of our tenants and we recognise that expectations will increase in line with the Tenant Satisfaction Measures.



### **Influence 3**

#### **- Technology**

Exploiting technological advances in repairs and property management.



### **Influence 4**

#### **- Improved energy efficiency**

Responding to climate change by decarbonising our homes and providing homes and services in a sustainable way, improving the thermal comfort of a home with reduce fuel bills.

### **Influence 5**

#### **- Financial investment**

Becoming more efficient in the way we manage the capital investment for modernisation of the housing stock in line with the Council's Capital Strategy.

### **Influence 6**

#### **- Legislative and regulatory change**

Meeting the standards set out in the Social Housing (Regulation) Act 2023 (including new Decent Homes Plus proposals) and as well as further significant changes to building and fire safety standards following the Grenfell Tower Fire in 2017.



## 2. Policy Environment

Over recent years, the social housing sector has been in a phase of rapid change that will fundamentally reshape what we do and how we will deliver strategic asset management services in the future.

- **National focus on ensuring tenants are safe in their homes and neighbourhoods.**
- **Increased focus on housing quality and desirability with a zero-tolerance approach to damp and mould and disrepair.**
- **Greater emphasis on placing the tenant voice at the centre of service delivery through a culture of openness, respect and accountability.**
- **Targets to ensure all homes to meet energy performance Band C by 2030.**
- **The need to increase affordable housing supply to meet local demand.**
- **Greater focus on the importance of communities and neighbourhoods - including usable green space, external areas and communal areas.**
- **Focus on ensuring reliable and accurate data is used to support evidence-based decision-making.**



Over the last 18 months local authorities have seen increased pressures in relation to assets which include:

## Consumer Standards

On the 01 April 2024 new Consumer Standards for social housing providers came into force. The new standards are intended to protect tenants and to drive improvement in the services that social landlords provide.

Through changes in legislation the Regulator of Social Housing (RSH) will undertake inspections and have stronger enforcement powers to make social housing providers address issues.

The standards are split into four categories:

**The Safety and Quality Standard** – requires landlords to provide safe and good quality homes and landlord services to tenants.

**The Transparency, Influence and Accountability Standard** – requires landlords to be open with tenants and treat them with fairness and respect so that tenants can access services, raise complaints when necessary, influence decision making and hold their landlord to account. This includes the Tenant Satisfaction Measures that applied from 01 April 2023.

**The Neighbourhood and Community Standard** – requires landlords to engage with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes.

**The Tenancy Standard** – sets requirements for the fair allocation and letting of homes and for how those tenancies are managed and ended by landlords. Within each of the four categories there are multiple 'specific expectations' which total over 60 in number.

## Tenant Satisfaction Measures

The Tenant Satisfaction Measures Standard requires all registered providers of social housing to collect and report annually on their performance on a core set of defined measures to provide tenants with greater transparency about their landlord's performance.

The Measures comprise 12 tenant perception measures, to be obtained through tenant surveys carried out by providers, and 10 landlord management information measures. The measures include keeping properties in good repair, maintaining building safety, effective complaints handling, respectful and helpful tenant engagement, and responsible neighbourhood management.

This increases pressures on landlords as these measures will be used by the Regulator of Social Housing to track how well social landlords are doing at providing quality homes and services.

## Grenfell Tower

Since the Grenfell Tower fire in June 2017, several significant changes and new regulations have been introduced in the UK to address fire safety, building regulations, and accountability. Key legislative measures include the Building Safety Act, Fire Safety Act 2021 and The Fire Safety (England Regulations) 2022 these legislative measures represent a concerted effort by the UK government to improve fire safety, ensure better building practices, and enhance the accountability of building owners and managers to prevent another tragedy.

## Disrepair Claims

The introduction of The Homes (Fitness for Human Habitation Act 2018) initiated the spike in housing disrepair claims received by local authorities and housing associations with Inside Housing reporting the number of cases increased by 132% since the introduction of the Act. There have been an increased number of solicitors pursuing housing disrepair claims casework and approaching tenants to claim for any unresolved repairs. The Council understands that sometimes tenants may not be happy with the service they have received from us, or with our offers of how we can make things right, but would urge tenants to be cautious about accepting an offer of help in making a housing disrepair claim.

While we understand the prospect of receiving a financial award if the claim is upheld in the courts can be tempting, especially with times as tough as they are at the moment, some of the companies offering to make claims on tenant's behalf may not have their best interests at heart, and some have even been found to be acting in fraudulent way. Tenants are actively encourage to let us know if there is something that needs to be repaired or have outstanding issues.

## Spotlight on Damp and Mould

The Housing Ombudsman released a special report in October 2021 addressing the issue of damp and mould called "Spotlight on: Damp and mould. It's not lifestyle". The report is a result of both the media spotlight on social housing conditions and what is described as "the high uphold rate and reoccurring reasons leading to maladministration" in the Ombudsman's case work.

The report calls for landlords to take a 'zero-tolerance' approach to damp and mould as well as considering proactive actions to identify homes that have or may be at risk of developing problems rather than waiting for tenants to report issues.

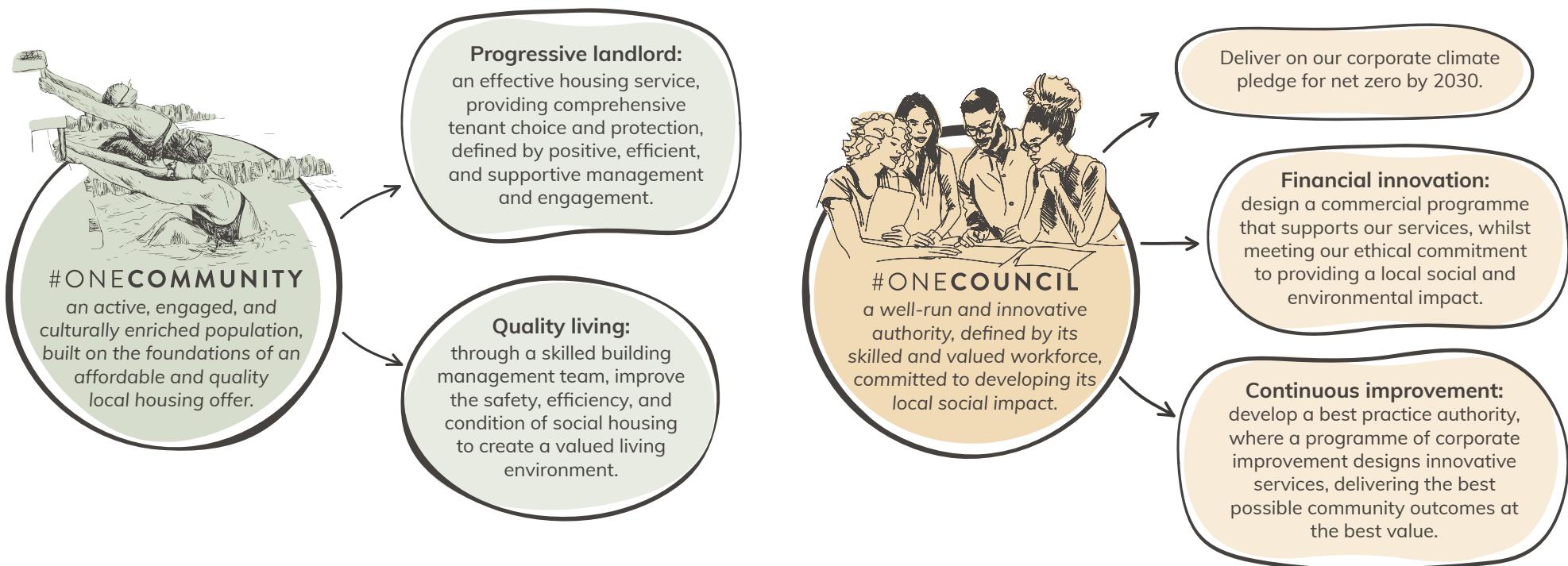
The Housing Ombudsman's report recognises the challenges for landlords in tackling these issues including overcrowding, poverty, the age and design of homes, but says landlords should avoid inferring blame on tenants due to 'lifestyle'. The council has a standalone policy to setting out our approach to damp and mould.

## Awaab's Law

As part of the government's mission to transform the safety and quality of social housing, Awaab's Law will come into force from October 2025, ensuring social landlords have to investigate and fix dangerous damp and mould within a set amount of time as well as repair all emergency hazards with 24 hours. Landlords who fail to comply face being taken to court, with social tenants able to use the full powers of the law to hold them to account.

### 3. Corporate Drivers

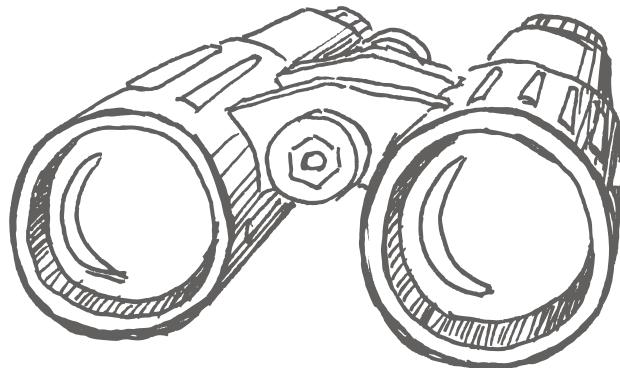
Managing our valuable housing stock and related assets efficiently and effectively is a priority for the council and wholly consistent with the vision and priorities set out in the Corporate Plan 2023/27, **Together- Proud to be Gravesham** (summarised below). Aligning our assets and services with this vision is fundamental to the success of this journey:



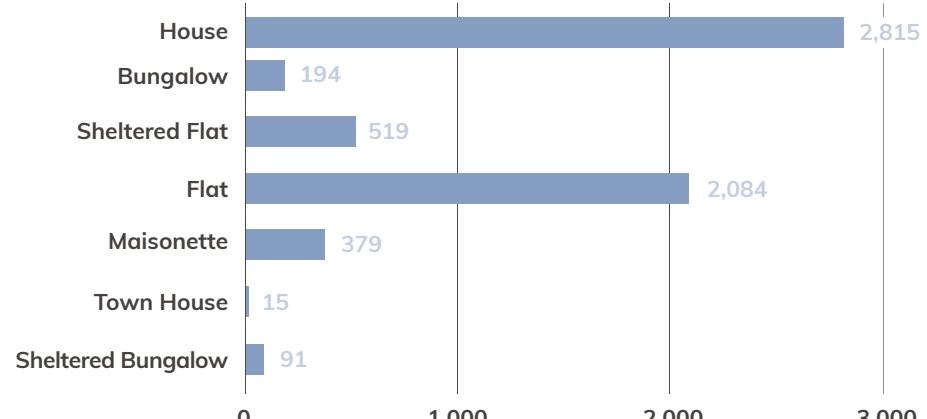
The Asset Management Strategy will support the delivery of these core objectives. The Council will be using its valuable resources (people and property) to ensure effective and efficient management their assets.

## 4. Housing Stock Overview

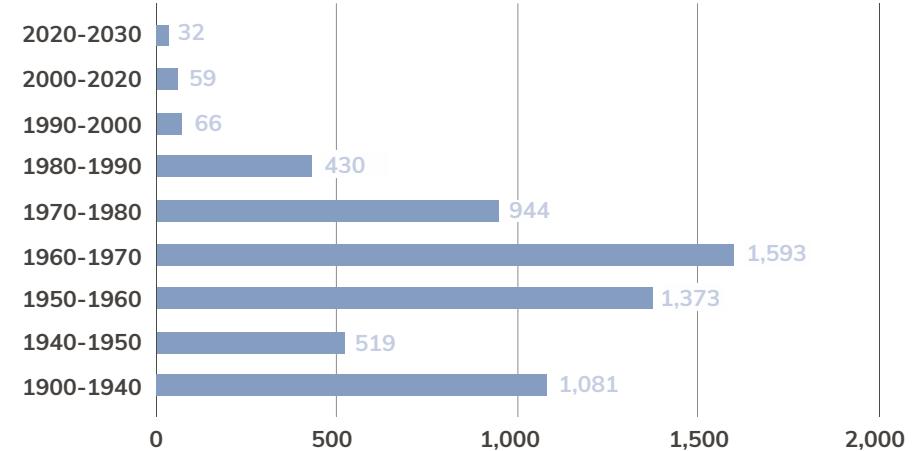
We currently manage **5,641** rented homes, **456** leasehold properties, **630** garages and **1** HMO.



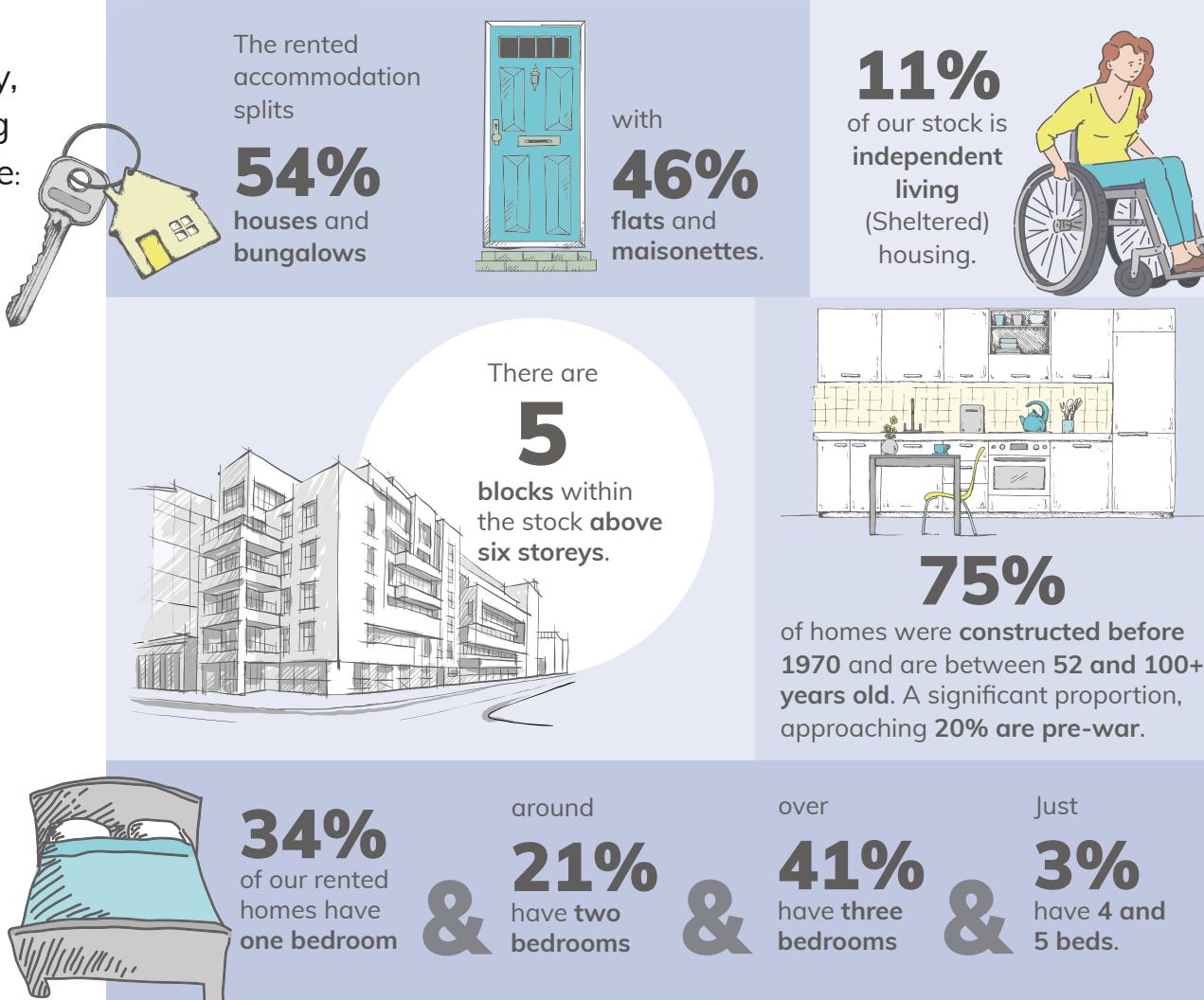
Total stock by archetype



Total stock by age



In summary,  
our housing  
stock profile:

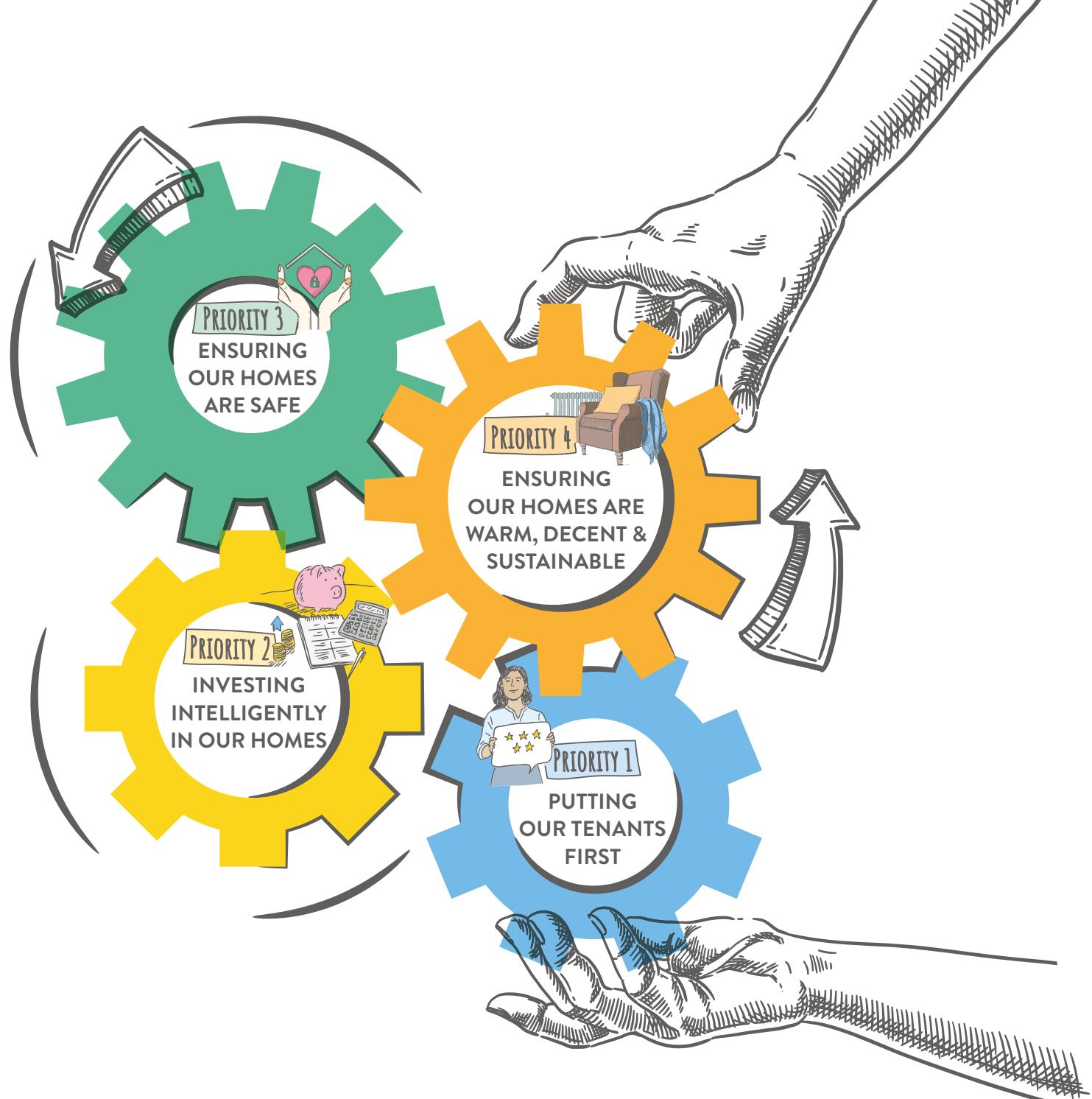


The Council's housing stock is managed and maintained by the Housing Assets service. Repairs, Voids, Kitchen & Bathroom Programme and Electrical Upgrade Programme are delivered through the Council's direct services organisation (DSO) supplemented by external contractors as appropriate.

The aspiration is to maximise the volume of work undertaken by the in-house team to underpin quality, exercise direct control and secure the social premium of local employment and the service is constantly looking for opportunities to expand.

## 5. Asset Strategy Priorities

Our asset management objectives ensure that we focus on making informed decisions in regard to our stock. Our objectives are:





## Putting our tenants first

The strategic objective is to ensure tenants are at the heart of decisions taken in planning, delivering and monitoring works programmes, with discussions on standards and timescales being the priorities within this strategy. Investment in assets should reflect the views expressed by tenants in tenant surveys and via other feedback mechanisms. Tenants will be consulted about schemes affecting their homes and about local proposals and strategies, for example in relation to new homes and any regeneration.

To deliver our work in this area we will:

- **Embed tenant engagement at the heart of the service delivery through our policies and practice - ensuring all staff and contractor partners provide a customer-focussed service.**
- **Provide tenants with a range of ways to engage with us and have their say in the delivery of this strategy.**
- **Ensure effective communication with tenants and set targets to improve the number of tenants that feel informed, listened to and safe.**
- **Create opportunities for resident scrutiny to influence decisions and hold us to account for performance.**
- **Involve tenants in 'piloting' and promoting the success of new technologies and approaches for example, heating and ventilation systems and renewables.**

We are committed to deliver social value through all of our investment programmes, and this is a scored element of all our major procurement exercises in order to leave a lasting legacy for our tenants.





## Investing intelligently in our homes and ensuring they are of a high quality

The Council is seeing increasing financial pressures on the funds we have available and the priorities we have in relation to the housing stock notably the drive for a renewed focus on decent homes and building safety legislation as well as improving the energy efficiency of a property. A key priority for the Council is therefore to ensure all investment is targeted to achieve good value for money.

The work described in this section will be any capital stock investment work required to maintain the building or improve it in line with legislative requirements and the ambitions as set out in within this strategy. In the past few years, approaches to capital maintenance have tended to move towards a more whole-building approach, and Gravesham is now operating this approach in current programmes of work, in line with many other social housing providers.

Any proposal to move to a whole building approach to capital maintenance needs to be supported by suitable financial planning and spending controls, and suitable decision-making processes and governance. This will ensure that the advantages of this approach can be delivered while ensuring that expenditure is managed and that decisions are robust, transparent and can command the confidence of tenants. We will also ensure we are mindful of any leaseholders within the building and the financial impact this may have.

We recognise the need across Gravesham to further strengthen our systems and to make better use of 'business intelligence'. We also want to embed a robust approach to data management. For poor quality or poorly performing assets we will conduct a detailed option appraisal. This approach will involve a series of practical steps that can be applied to individual properties, schemes or whole estates.

The option appraisal process will explore all options to improve 'performance' for example, through a range of locality-based interventions such as energy efficiency improvements or targeted approaches to address anti-social behaviour. Where an asset is identified as unsustainable or no longer fit-for-purpose, we will identify an alternative course of action such as remodeling, redevelopment or disposal.



## Ensuring our homes are safe

Ensuring homes are safe and high-quality is paramount for Gravesham and our tenants.

The Grenfell Tower Fire tragedy in June 2017 illustrated the consequences of routine maintenance and fire safety failures, for which authorities had not accepted accountability. An independent review of the building regulations and fire safety was ordered in the wake of the tragedy. The Building a Safer Future - Independent Review of Building Regulations and Fire Safety final report, also known as the Hackitt Report, was released in May 2018 and contained a number of comprehensive recommendations for fire safety and the regulatory system. The majority of these recommendations have now been incorporated into existing and new legislation:

- **The Fire Safety Act 2021**
- **The Building Safety Act 2022**
- **The Fire Safety (England) Regulations 2022**
- **The Regulatory Reform (Fire Safety) Order 2005**

The Hackitt report also emphasised the need for a “golden thread” of information running throughout the areas of risk, the Regulator of Social housing has also stated “Good quality data forms the cornerstone on which all other assurance of compliance is based”. There is now a clear expectation that social landlords will seek assurance on the quality and integrity of the data they hold and report.

In 2024 Gravesham Borough Council became the first local authority to apply and achieve the full award for The Building a Safer Future Champion Assessment proving our commitment to an ongoing safety journey and raising standards.

The Building Safety team are responsible for all areas of compliance and safety and a series of planned programmes which ensure we meet our obligations as outlined below:

### Gas Servicing

We have a legal obligation under the Gas Regulations 1998 to annually check the safety of all gas appliances, pipework and associated fittings within our stock.

### Fire Safety

We have an obligation under the Regulatory Reform (Fire Safety) Order 2005 to carry out Fire Risk Assessments (FRA) in all our residential blocks and Houses of Multiple Occupation (HMO).

The fire risk assessment process is managed internally but carried out externally by a consultancy. The fire risk assessment process drives both any remedial works and a planned programme of works to ensure fire safety integrity within our properties. We work closely with Kent Fire & Rescue Service to ensure both compliance and test fire safety procedures. Alongside the FRA process there is an inspection and servicing programme for all our fire safety related equipment. This includes emergency lighting, fire alarms, fire extinguishers, fire doors, sprinklers, smoke/fire detection.

## Asbestos Management

We have a duty to comply with the Asbestos Management Regulations 2012 and follow best practice relating to domestic properties. Our asbestos register is contained within our asset management system MRI and managed by the Building Safety Team.

All communal areas have been surveyed, and details of these surveys are held within our asbestos register. All asbestos is managed in situ until it is appropriate to remove. We have an annual programme of re-inspection for all communal areas where asbestos has been identified.

Asbestos surveying and management are monitored through the Building Safety team and appropriate surveys are carried out prior to any works.

## Legionella

Our policy for the control of legionella is designed in accordance with the Approved Code of Practice L8. The code recommends that we carry out routine testing of communal water systems.

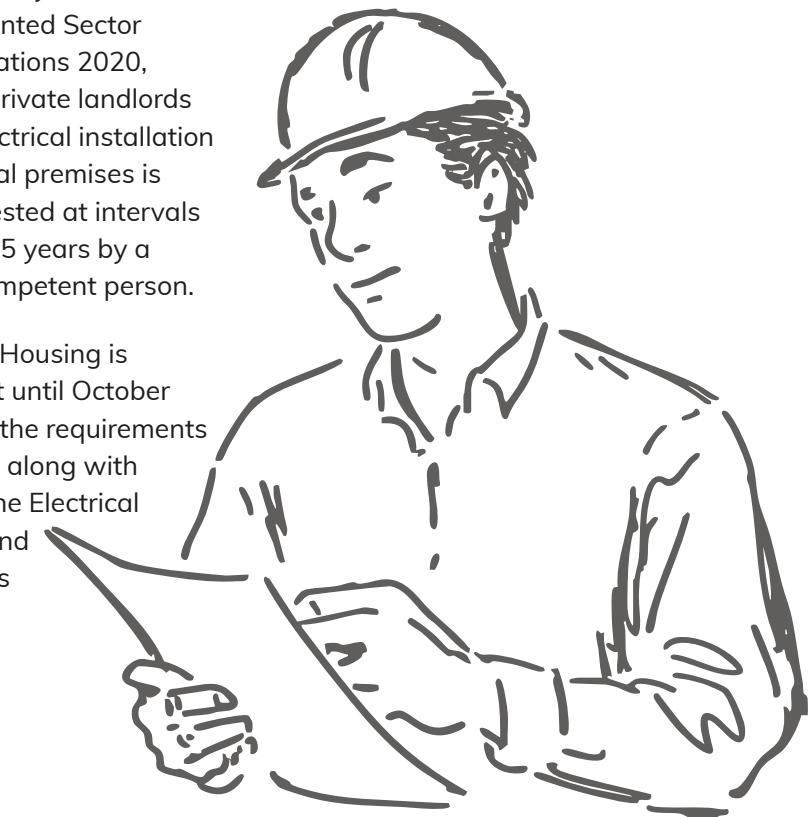
Risk assessments of individual sites are used to identify the testing and inspection regime including the frequency. The Building Safety team are responsible for management of Legionella risk across the stock. Where practicable, shared water stored in communal tanks are removed and supplies converted direct to mains.

## Electrical Safety

We have a duty under the Landlord and Tenant Act 1985, to ensure electrical installations in rented properties safe when a tenancy begins and maintained in a safe condition throughout the tenancy.

The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020, which requires private landlords ensure every electrical installation in their residential premises is inspected and tested at intervals of no more than 5 years by a qualified and competent person.

Although Social Housing is currently exempt until October 2025, we adopt the requirements of the regulation along with guidance from the Electrical Safety Council and BS7671: 2008 as best practice.





## Ensuring our homes are Decent, Warm and Sustainable

### Decent Homes

In 2006, the Department for Communities and Local Government set out a minimum Decent Homes Standard for social housing assets, which is part of the Regulator of Social Housing's Home Standard. The pending updated Decent Homes Standard is expected to be extended and increase. Gravesham Brough Council will strive to fully adhere to the new Decent Homes Standard and this Standard remains a key benchmark and used as a baseline to plan investment in homes, including communal spaces.

A decent home is defined by meeting the following four criteria:

- **It meets the current statutory minimum standard for housing.**
- **It is in a reasonable state of repair.**
- **It has reasonably modern facilities and service.**
- **It provides a reasonable degree of thermal comfort.**

### Stock Condition

All stock data is held on the MRI asset management database, which is administrated by the Housing Asset team. This provides a comprehensive single data source for condition information, works programmes, renewal and cyclical maintenance history. The database is used to carry out investment modelling scenarios and provides information for business plan forecasts as well as detailed work programmes, proposed contract works and assessments of progress in meeting the Decent Homes standard.

A stock condition programme was completed in 2021 by a third-party company. The information uploaded onto our stock data base to ensure our records are current and allows us to make informed decisions around investment. The stock condition process has recently been brought back in house, and we have set a target to survey a minimum 20% of the stock each year to maintain the accuracy of our stock condition data and ensure each property is surveyed once every five years and to ensure that investment is spent in the most appropriate way, we will carry out a condition survey of all planned maintenance works that are due to be carried out in the following financial year and if necessary adjust the replacement dates accordingly.

### Housing Health and Safety Rating System (HHSRS)

The HHSRS assesses the health and safety risks within a property. If a property fails, the HHSRS it automatically fails the Decent Homes Standard. All HHSRS failures are treated as urgent and addressed at the earliest opportunity. The identification of HHSRS failures are being carried out as part of the ongoing stock condition survey. Refresher training for front line staff has been delivered as part of this strategy to ensure failures are identified and remedial work actioned.

### Damp and Mould

As a landlord, we aim to provide and maintain dry, warm, healthy homes for our tenants whilst ensuring that properties and tenants are protected from damage resulting from damp and mould.

We are committed to working in partnership with tenants to support tenants who experience issues with damp and mould. We are committed to improving housing conditions and adopting a zero-tolerance approach to damp and mould.

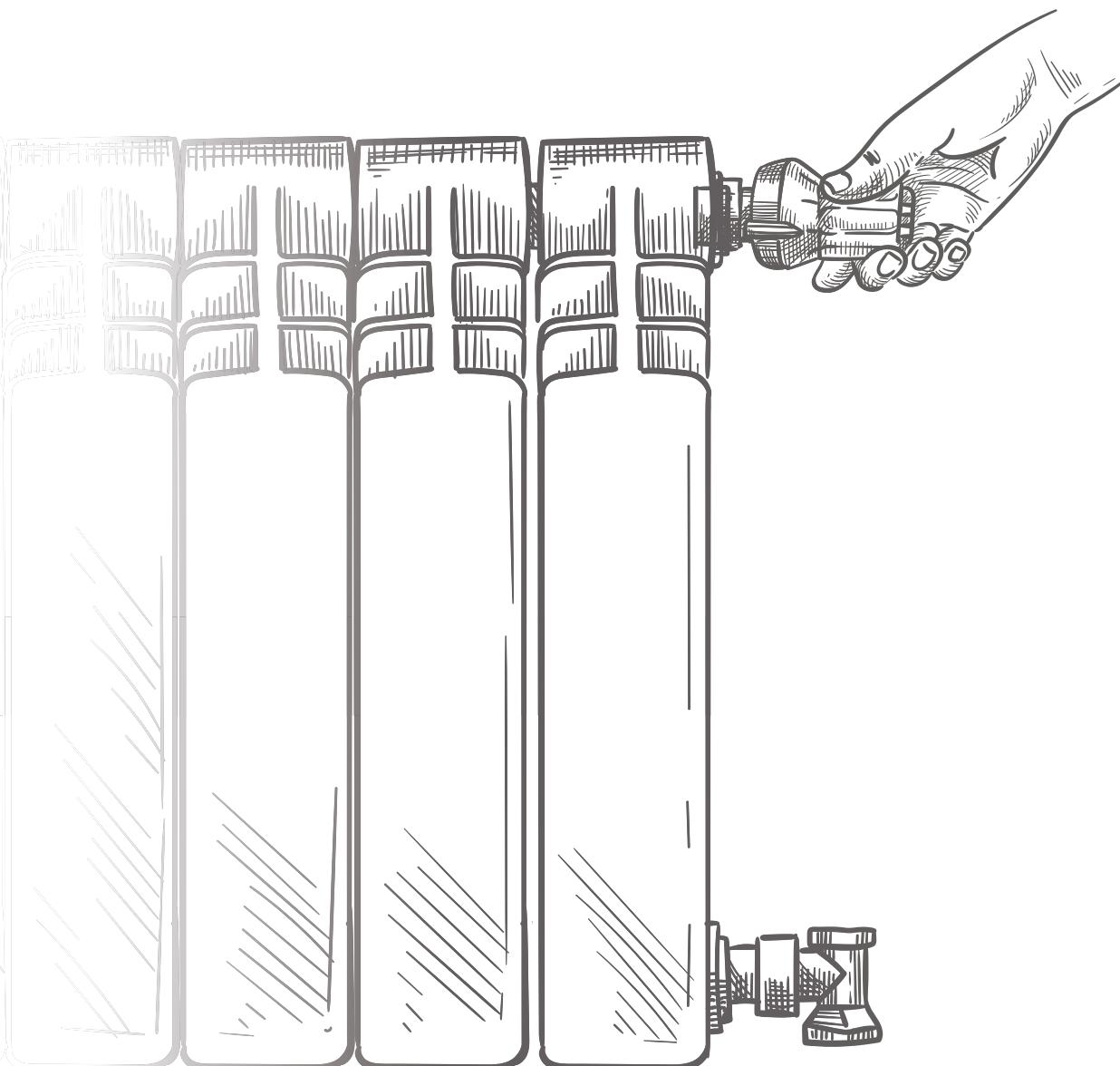
### **Warm & Sustainable**

Since 2021, the Housing Assets team has accelerated the delivery of energy efficiency works to our homes. The team has completed a large programme of fabric improvements consisting of loft and cavity wall insulation and the installation of renewables including solar panels, air source heat pumps and ground source heat pumps and currently, 82% of the housing stock is at a rating of EPC C or above.

The Parity Portfolio system is used by the team to hold energy performance data for every home within the stock. This data is made up from completed energy performance certificates and stock condition data and allows the team to identify which homes require investment to improve the thermal comfort and energy efficiency.

The council will do what is possible within the resources available to work towards the UK Government's target for social housing providers, as set out in the Clean Growth Strategy, to attain the minimum rating of Energy Performance Certificate (EPC) C for rented properties by 2030 where practical, cost-effective and affordable.

To ensure that we are working in line with the Government's 'no-regrets' approach to energy efficiency retrofit, we will look to combine or align traditional planned maintenance programmes with energy efficiency projects where possible.



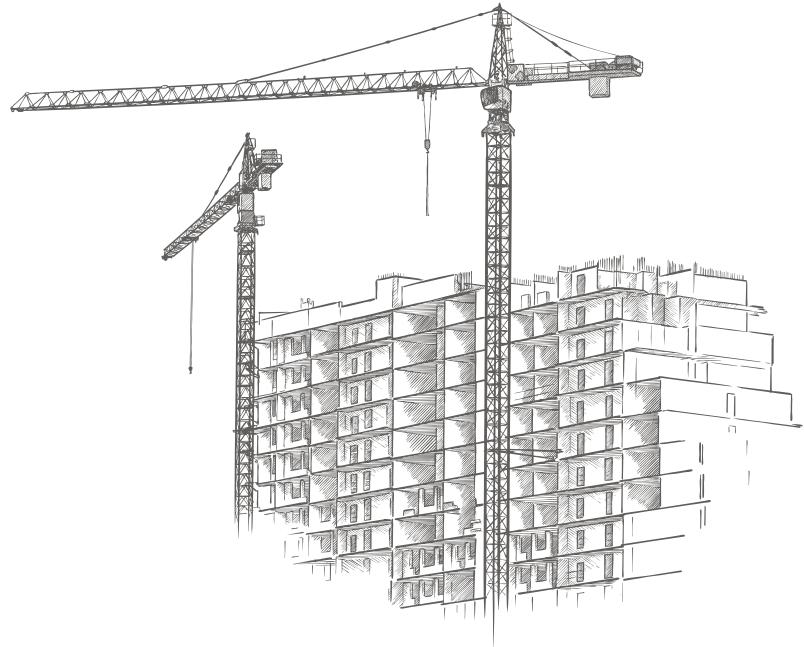
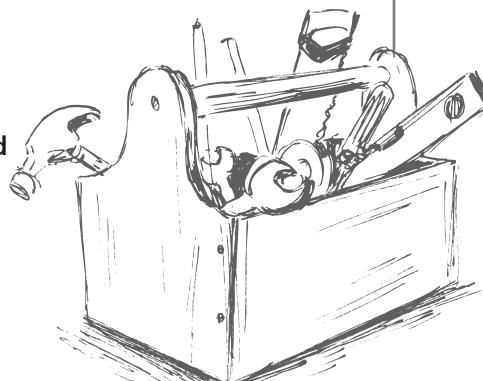
## 6. Investment Planned Work/ Repairs and Maintenance

The Asset Management Strategy will seek to reduce maintenance costs by appropriate capital investment and planned programmes of work that will bring the stock to a proper standard that can be effectively and efficiently maintained. Benchmarking will be used to verify that all investment programmes are delivering value for money and the investment modelled alongside repairs to see the effect of planned works on the day to day repairs.

With that being said, we recognise the importance of the repairs and maintenance service to tenants and we will always carry out our contractual repair obligations as a responsible social landlord.

The aims of our repairs approach can be summarised as follows:

- **To ensure we and our tenants meet all their statutory and contractual obligations**
- **To provide a prompt, efficient and economical 24 hour, 365 day per year responsive repairs service**
- **To determine the key interventions required to improve resident satisfaction with the repairs service**
- **To ensure vulnerable tenants receive a service which is appropriately tailored to their needs**



## 7. Housing Development

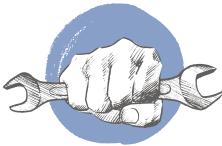
In May 2024, the Council's Housing Development Strategy 2024-2029 was taken to and approved by Cabinet and sets out how the Council would successfully deliver on its target of 1,000 affordable homes by 2028/29. The strategy makes mention on how it will work in tandem with the Housing Asset Strategy to enable vital consideration of key issues around investment required but also to connect those decisions with wider opportunities around regeneration and redevelopment, based on up-to-date data.

Ongoing collaborative working between the Asset team and the Development team over key development objectives is essential to ensure that all priorities are met in the most effective manner possible to ensure effective handover coordination, standard and specification requirement and long term strategic asset planning.

## 8. Funding

The reform of council housing finance and the introduction of self-financing has given councils the resources, incentives and flexibility to strategically manage their own housing stock for the long-term. This change also provides the opportunity to improve the quality and desirability of homes and ensure all investment delivers good value for money.

As outlined in the Council's Capital Strategy, the council's capital investment priorities for the Housing Revenue Account will be:



### **Investment to improve and maintain council dwellings**

– the council has dwellings portfolio valued at some £409m at 31 March 2023. As a landlord, the council has increasing responsibility to ensure that the dwellings it provides are fit for purpose and maintained to a decent standard.



### **Investment to increase the supply of affordable housing**

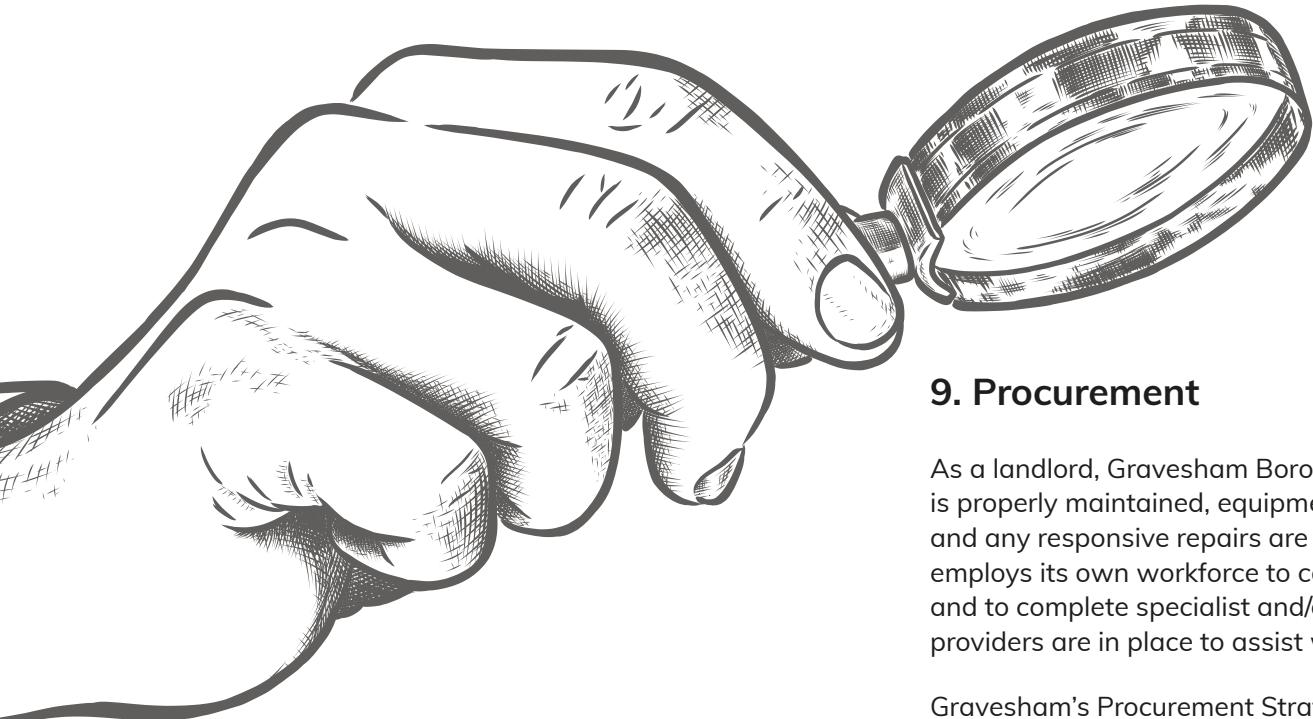
– The council will be looking to continue its long-term programme to deliver more affordable housing for the borough.



**Investment to save** - the council will seek to invest in capital projects that support the sustainability of Housing Revenue Account services over the longer term, including those that are expected to reduce running costs, avoid costs that might otherwise arise or are expected to generate a financial return.

Funding for the strategy will be found from within the ring fenced HRA account and, where appropriate, from other capital financing sources. As previously mentioned in this strategy, resources for asset management are allocated through the HRA 30 Year Business Plan and the business planning process, which feeds into the setting of the Council's annual budget. The Plan is reviewed on an annual basis in the light of economic assumptions and priorities for the service.

The Strategy is in line with the Medium-Term Financial Strategy (MTFS). However, there are a number of potential issues highlighted in the strategy that could have a financial impact in future years, such as Decent Homes 2. If realised, these potential costs would need to be accommodated within the HRA Business Plan, as part of the normal annual planning process and would be prioritised against other emerging demands on the account. In turn, the implementation of the new stock condition programme and improved data, may mean that this has a positive impact on the HRA 30 Year Business Plan.



## 9. Procurement

As a landlord, Gravesham Borough Council has a statutory duty to ensure its housing stock is properly maintained, equipment is serviced, is compliant with any regulatory requirements, and any responsive repairs are completed within a timely manner. To enable this, the Council employs its own workforce to carry out certain elements of this work, however for resilience and to complete specialist and/or large scale works it is essential that external service providers are in place to assist with the delivery of required works.

Gravesham's Procurement Strategy actively encourages the use of frameworks and dynamic purchasing-systems, which consist of a list of pre-approved suppliers for effective procurement arrangements via min-tender or direct award to deliver high quality services to our tenants.

For a number of years, Gravesham Borough Council has been an active member of the South East Consortium (SEC) delivering a wide range of pre-tendered frameworks through collaborative procurement arrangements involving a number of public sector organisations. These have been procured in accordance with current procurement legislation, from which the Council may legitimately appoint contractors to meet their operational needs.

As part of the Procurement Strategy, all procurements over £100,000 will be required to include social value metrics as a part of the scoring and evaluation process and any resource/funds achieved will be reinvested in to HRA projects.

As part of Gravesham's Procurement Strategy and Gravesham's Climate Declaration, all tender submissions will be required to provide a Decarbonisation Declaration. This will demonstrate how each supplier is reducing carbon emissions in their daily operations and how they are playing their part in tackling the global climate emergency.

## 10. Delivering the Strategy, monitoring and risk

The Assistant Director (Social Housing) and Head of Housing Assets has responsibility for this strategy and the programmes, activities and actions which are needed to deliver it over the next 3 years financial years.

The strategy will largely be monitored through the Consumer Standards Action Plan, which will be cascaded into the Housing Asset Business Plan, individual targets and personal objectives.

We will carry out a review annually of progress against the strategy each year to ensure we are on track and that there have been no significant changes which would impact on the importance or delivery of the priorities and actions that have been agreed and will report this to Housing Cabinet Committee.

The governance framework outlined above also underpins the approach to managing risk. The Asset Management service is exposed to a wide range of risks around safety and compliance, financial risk, regulatory and legal compliance, supply chain management and risk of reputational damage through poor service delivery.

A resilient approach to risk management is one of the key outcomes of an Asset Management Strategy. Effective policies, procedures and processes, high quality data, intelligent planning and analysis, smart investment in assets and having the resources with the right skill sets all contribute to effective risk management.

The risk management approach is co-ordinated through the Housing Asset Business Plan Risk Register which is regularly reviewed and updated. This identified key themes, likelihood and impact of specific risks and mitigations to reduce risks as required.

We will also review our progress to tenants and leaseholders through regular communications, newsletters and consultation meetings and scrutiny panels. Throughout the strategy we will invite feedback from tenants as to our progress.



