Brent

HOUSING STRATEGY

2017- 22

CONSULTATION DRAFT

Note on the Consultation Draft

The Housing Strategy was published in 2014 but developments since then make a review necessary and this document sets out initial proposals for the next five years, structured around five main themes. This exercise aims to adjust our approach rather than produce a completely new strategy and the objectives and priorities are broadly taken from the earlier document, with some updating to reflect the changed environment. The main task is to identify whether and how the ways in which we meet these objectives need to change; in short, we are interested in how we do things rather than what we do. However, we are also keen to hear views on whether the objectives, priorities and actions are the right ones at this point.

Given the pace of change and continuing uncertainty about aspects of national policy where further detail is awaited and longer-term impacts cannot be assessed with confidence, the revised strategy will be an interim document to some extent. It is intended that a further review will be undertaken, probably after two years, leading to the publication of a final strategy and a revised statutory Homelessness Strategy.

Consultation provides an opportunity for our partners and others to scrutinise and inform our approach and we are keen to hear views on:

- Whether the approaches and initiatives set out in the document will deliver the identified objectives and, if not, what needs to change?
- How the strategy connects with work being done across the council and by partners in the public, private and voluntary sectors and how we ensure this will deliver positive outcomes for Brent residents.
- The specific actions we should take – for example, suggestions for innovative approaches, projects and programmes that will assist in meeting objectives.
- How we can maximise the resources available to the council and partners.

Consultation questions are set out at various points in the document and there is space at the end for more general comments.

You are asked to respond using the council's Consultation Portal. The Consultation Portal is a single website platform accessible to all residents and stakeholders where consultations are logged and explains why we're consulting and how we're going to take people's views into account.
Click on the consultation link to give us your views to be inserted

The strategy will be supported by an evidence base and an action plan, which are being developed in parallel with this consultation.

Consultation runs for eight weeks from…….. to ……..**2017**

Contents

1. INTRODUCTION

1.1 Since the Housing Strategy was published in 2014 the political and economic climate has changed rapidly and significantly and new approaches and partnerships are needed. Some clear priorities emerge from the evidence and the policy context:

- Addressing the supply and demand imbalance is a central ambition. The strategy aims to secure resources and partnerships to deliver new homes in all tenures and use existing housing effectively. An increased focus on demand management to direct people to the right housing solutions is also essential.

- Limited supply is coupled with a severe problem of affordability that affects an increasingly wide range of households, suggesting a need for a mix of housing products that reflects changing demand.

- The private rented sector plays a significant role. The council aims to raise standards, work with landlords and developers and play a direct role in provision.

- Stark contrasts still exist between different parts of the borough in terms of housing tenure, income and other factors.

- The strategy must, above all, deliver positive outcomes for Brent residents.

1.2 Some aspects of government policy are yet to be clarified through consultation, regulation and guidance, although the Housing White Paper has set the agenda on supply in broad terms. The Mayor will review his London Housing Strategy during 2017, having set out some general principles in *A City for All Londoners* and published guidance on affordable housing in *Homes for Londoners: Affordable Homes Programme 2016-21,* as well as Supplementary Planning Guidance and a draft guide on estate regeneration. The strategy will be updated as necessary as further detail emerges.

2. VISION

2.1. The ambition is to realise:

A housing market that provides a range of housing options to meet the diverse needs and aspirations of Brent's residents, enables social and economic mobility and supports access to decent, affordable accommodation for all

3. CONTEXT

3.1 An evidence base supporting the strategy will be published and updated along with the strategy over its life and will contain the bulk of the background data. This section provides a summary of the main areas to inform consultation.

3.2 Demographics and Tenure

3.2.1 The 2011 Census highlighted population growth and an increase in average family size to the second highest in London and this trend continues to drive demand. The private rented sector is estimated at 34% of the housing stock, while owner occupation has declined and the proportion of social housing is broadly unchanged. GLA population projections predict a longer-term increase in demand from smaller households, including older people in the private rented sector.

3.2.2 There are significant differences in the tenure pattern across the borough. Highest levels of owner occupation are seen in Kenton (73%) and Northwick Park (62%), with much lower levels in Harlesden (22%) and Stonebridge (18%). Similar contrasts exist for social and private renting. Stonebridge has the highest proportion of social renting (62%), followed by Kilburn (45%), while Tokyngton (12%) and Kenton (5%) have the lowest levels. Private renting is highest in Mapesbury (45%) and Willesden Green (43%) and lowest in Northwick Park (19%) and Stonebridge (15%). This contrast is also seen in the type of housing stock in different wards. For example, the dominant type in Kenton and Northwick Park is semi-detached houses (57% and 46%), compared to the high percentage of flats in wards such as Kilburn and Mapesbury (86% and 75%). This reflects what can be characterised as a north/south divide, partly defined by wards north or south of the North Circular Road but with significant variations within those large areas.

3.2.3 The private rented sector includes a growing high-quality segment for those able to pay, especially in the south of Brent. At the other extreme is a segment operating outside regulation, characterised by overcrowding, disrepair and poor management. Between these poles is a diverse supply, owned and managed almost exclusively by small landlords catering for a range of incomes and household types.

3.2.4 Brent's changing pattern of diversity is also an important factor. For example, the White Other group has grown, mainly as a result of inward migration from Eastern Europe, with the private rented sector the main source of housing. Demographic change and squeezed affordability are also driving an increase in overcrowding.

3.3 Housing Market

3.3.1 Rising demand and restricted supply are accompanied by rising rents and prices. *A City for all Londoners* notes a 20% rise in rents in the last five years, with average incomes only 2% higher, while successful first time buyers need a median income of £50,000 and a deposit of £70,000. The Office for National Statistics *Housing Summary Measures* report (October 2016) underlines the problem. In 2015, the median house price was £415,125, compared to £300,000 in 2011. Over the same period, the median gross annual salary rose at a much lower rate to £24,927 from £21,271. In 2011, the local price to income ratio was 14:1, meaning that a household on median earnings would need to raise over 14 times its income to buy a median priced home. By 2015, the ratio had risen to over 16:1.

3.3.2 Contrasts between neighbourhoods are also evident. In 2014, the median house price in Queensbury was £677,500, compared to £249,950 in Sudbury. The *Strategic Housing Market Assessment* (SHMA) carried out in 2016 gives an overview of the problem:

Table 1: **Percentage unable to afford market housing**

	Under 25	**25-34**	**35-44**	**45 - 54**	**55-64**	**65+**
Single person household	49%	26%	59%	61%	56%	46%
Couple family with no dependent children	17%	11%	17%	22%	19%	17%
Couple family with 1 or more dependent children	58%	76%	55%	43%	35%	54%
Lone parent family with 1 or more dependent children	99%	96%	85%	75%	69%	78%
Other household type	29%	32%	52%	44%	36%	26%

3.3.3 Private rents follow a similar pattern. The median monthly private rent in 2015 was £1400, or 67.4% of the median gross salary. Most assessments of affordability suggest that rents at 35-40%% of salary are reasonable. Even in the affordable housing sector, affordability is strained. The average weekly Registered Provider (RP) rent in 2015 was £123.16, while the gross weekly salary for a household in the lowest 10% of earners (a category into which many social housing tenants fall) was £141.40, meaning that rent represented 87.10% of earnings, compared to 85.8% in 2011. Although the change is not as marked as in other sectors, there is still upward pressure on rents and increasing reliance on Housing Benefit (HB).

3.3.4 The table below illustrates the impact, showing the salary levels needed to afford rents at 100% to 50% of market rates and the percentage of average gross pay in Brent this equates to, assuming rent would not exceed 40% of income.

Table 2: Gross Pay Required to Meet Market and Sub-Market Rents and Required % of Gross Pay

% Market Rent	**1 bed**	**2 bed**	**3 bed**
100%	£55,714	£68,714	£87,286
	177%	219%	278%
90%	£50,143	£61,843	£78,557
	160%	197%	250%
80%	£44,571	£54,971	£69,829
	142%	175%	222%
70%	£39,000	£48,100	£61,100
	124%	153%	194%
60%	£33,429	£41,229	£52,371

	106%	131%	167%
50%	£27,857	£34,357	£43,643
	89%	109%	139%

3.3.5 The affordability gap affects London's economy, businesses and public services. For example, the salary range for teachers in outer London is £25,880 to £36,540, well below almost all the required levels in the table. Business organisations and public services have raised concerns about recruitment and retention and the inability of staff to find housing within a reasonable travelling distance from work.

3.3.6 Unemployed and lower income households struggle to access the sector and the council struggles to accommodate homeless households. While this conforms to established patterns of need, the most striking change has been the impact on working households unable to afford purchase or renting and with no access to affordable housing. Many fall outside traditional definitions of housing need but are vital to Brent's social and economic mix. This prompts a question about how this aspect of demand can be balanced with other urgent needs and what kinds of housing product fit the demand profile.

3.4 Welfare, Employment and Deprivation

3.4.1 HB has been restricted through the Local Housing Allowance (LHA) cap and the social sector size criteria (the so-called bedroom tax). The Overall Benefit Cap (OBC) has been in place since 2013 and is now £23,000 (£442.31 a week) for couples and single parents and £15,410 (£296.35 a week) for single people in London. A four-year freeze in working age benefit rates is in place from 2016 and phased introduction of Universal Credit (UC) poses new challenges.

3.4.2 Government proposes to cap social rents at LHA rates from April 2019 for tenancies signed after 1 April 2016 and for households on UC. This will also apply to supported housing, with a fund to support top-up payments where rents exceed LHA levels. A consultation is underway but concerns remain, particularly for those subject to the Single Room Rate for HB (this will not apply in supported housing), and the adequacy of top-up funding. In addition, automatic entitlement to HB for non-working 18-21 year-olds claiming Universal Credit will begin to be removed from 2017 (with some exemptions).

3.4.3 There are pockets of entrenched deprivation, poverty and worklessness in certain neighbourhoods. The 2015 Index of Multiple Deprivation ranks Brent 39th most deprived overall but 3rd in the barriers to housing and services domain and highlights concentrations of deprivation, centred in particular on social housing estates; a picture that has remained largely unchanged for many years. Despite improvement in the physical quality of homes and neighbourhoods, there has been less impact on unemployment, low incomes, child poverty, educational attainment and health inequality and improvements have not always been accompanied by an increase in supply or tenure diversity.

3.4.4 Again, there are contrasts across the borough. In 2015, the claimant rate for Housing Benefit was 30% in Stonebridge and Harlesden, 6% in Northwick Park and under 5% in Kenton. The rate for out of work benefits was nearly 29% in Harlesden and Stonebridge, under 9% in Northwick Park and under 8% in Kenton.

3.5 Housing Need and Housing Supply

3.5.1 Demand remains high and there is a backlog of households in temporary accommodation. Over 3,800 households are in Bands A-C on the Housing Register (those considered to be in housing need). 73% are in need following homelessness and 8% due to overcrowding, while 52% need three bed or larger accommodation. Temporary accommodation use has fallen along with applications and acceptances against London's upward trend but homelessness remains the clearest symptom of acute need. The need for new supply to meet existing and emerging needs is clear but existing targets will not, even if met if full, match demand.

3.5.*2* Brent's Core Strategy projects at least 22,000 new homes between 2007 and 2026 of which 11,000 (50%) should be affordable. *Affordable housing* in this strategy includes all provision below market prices or rents, while *social* housing refers to homes for rent at target or Affordable Rents, including Capped and Discounted rents in the 2015-18 programme and London Affordable Rents in the programme from 2017. The government has indicated that Build to Rent homes in the private sector let below market rates will be classified as affordable.

3.5.3 The Strategic Housing Market Assessment (SHMA) found a need for 47,500 dwellings in the period 2011-37 - an average of 1,826 a year. This includes Objectively Assessed Need for Affordable Housing of 21,707 homes over the same period - an average of 835 a year. This is above Brent's current London Plan target of 1,525 a year to 2026. In 2014/15, 1,400 new homes were provided, of which 707 were affordable. This was the highest affordable housing total and the second highest affordable housing percentage in London but subsequent delivery has been lower across the capital.

3.5.4 In 2016/17, 712 lettings into social housing are expected, which will meet around 18% of demand from Bands A to C. This includes lettings into existing housing, illustrating the importance of effective use of the stock and encouraging movement within it to supplement new supply.

3.5.5 It is recognised that supply has not kept pace with demand and that new approaches are needed. If the council is to meet the level set out in the SHMA, delivery from all sources will need to increase. In broad terms, resources and land supply mean that it will not be possible to build too much; the challenge will be building enough of the right size and tenure alongside efforts to manage demand.

3.5.6 In summary, the sources of new supply are:

- Development for market sale and shared ownership by private developers.

- Development by RPs with subsidy.
- Affordable housing provided through planning under S106.
- Development by the council, directly or through special purpose vehicles supported by borrowing.
- Build to rent by developers and RPs at market or sub-market rents.
- Bringing empty properties back into use for sale or rent.
- Community-led development, including self-build.
- Intensification of existing housing through regeneration and redesign resulting in increased densities.

3.5.7 All of these depend on factors including market conditions, availability and targeting of subsidy, appetite and capacity for borrowing and availability of sites. The Housing White Paper sets out the government's approach and is considered further below.

3.5.8 The Mayor prospectus for London's £3.15 billion share of the national programme aims to deliver 58,500 London Shared Ownership and London Living Rent homes, and 29,000 at London Affordable Rents. The latter will be set according to target rent benchmarks as below:

Table 3: 2017/18 Benchmark Rents

Number of Bedrooms	**2017/18 Benchmark Rent (weekly, excluding service charges**
Bedsit or One Bed	£144.26
Two	£152.73
Three	£161.22
Four	£169.70
Five	£178.18
Six or more	£186.66

3.5.9 Grant will be available at £60,000 per unit and bidders will need to commit to 50% affordable housing across their portfolio during the period to March 2021. The Mayor also proposes to agree 'strategic relationships' with providers committing to 60% affordable housing. .

3.5.10 The balance between London Living Rent and London Shared Ownership homes will be flexible and based on demand, with grant rates for both at £28,000 per unit. London Living Rent is a Rent to Buy product with a fixed term tenancy, rents set at a third of average household income in the borough and an income limit of £60,000.

3.5.11 In terms of the proportion of affordable housing to be sought on sites brought forward by private developers, the 50% target is retained but supplementary planning guidance will allow developers delivering 35% affordable housing to avoid further viability assessment. Brent has two Housing Zones among its five Growth Areas and therefore has significant capacity but limited land in council ownership.

3.5.12 The council's ability to build is limited by factors including the HRA borrowing cap, the 1% rent reduction for four years from 2016/17 and lack of council-owned land. However, the council will deliver new affordable homes funded by the HRA and intermediate rented homes supported by the General Fund as well as a programme of acquisitions of private sector property. The Housing and Planning Act also promotes self- and custom-building, requiring the council to grant permissions to meet demand for self/custom-build housing. The Self-build and Custom Housebuilding Act 2015 requires local authorities to keep a register of interested people and, in principle, the council is keen to support self-build or similar projects.

3.6 Brent's Social Housing

3.6.1 The social housing stock has not grown significantly, mainly due to loss through Right to Buy (RTB) and past regeneration programmes. Brent has made use of tenure reform, flexibilities around allocations and lettings, changes to homelessness duties and planning reforms introduced by the Localism Act and Housing Revenue Account reform has given the council more control over resources and increased ability to borrow to fund improvements to the stock and new building.

3.6.2 Following a review, Cabinet has taken the view that housing management should be brought back in-house, ending the arrangement with Brent Housing Partnership. Consultation is underway and, following further consideration by Cabinet, change could be implemented by October 2017. This would not in itself alter strategic priorities but is expected to lead to efficiencies, cost savings and improved service for tenants and leaseholders.

3.6.3 The government has announced that a levy on councils to finance the Right to Buy for housing association tenants and fund replacement homes will not apply in 2017/18 and that a regionally-based pilot programme will run for five years. Full implementation before the pilot ends is not ruled out and the scheme will proceed in some form but there is doubt about its future shape. The government has also abandoned proposals for compulsory higher rents for "high income" council tenants, although local authorities will have the power to introduce a voluntary scheme, as will housing associations. The Council has no plans to do so.

3.6.5 Brent already offers five-year fixed term tenancies, preceded by an Introductory Tenancy, in most cases. The Housing and Planning Act introduces a requirement for new tenancies to be granted on a minimum two-year and maximum ten-year basis, with five years as the norm. Longer terms will be available for households with children and secure tenancies will still be available in some cases. Detail will be set out in regulations and it is not yet clear when they will come into effect. It is likely that guidance on renewal of fixed terms will cover how a tenant's income should be taken into account. This may require changes to the Tenancy Strategy and Allocation Scheme in future.

Consultation Question:

Does this section give an accurate picture of the context for the strategy?

Are there other factors, nationally or locally, that should be highlighted?

4. STRATEGIC PRIORITIES AND OBJECTIVES

4.1 The following sections set out the response to the factors outlined above, noting progress, clarifying challenges, setting objectives and identifying outcomes. Further detail on delivery will be set out in a comprehensive Action Plan accompanying the final version.

5. HOUSING SUPPLY

Priority: To significantly increase the supply of affordable housing.

5.1 There is high demand and shortage of supply for all tenures as well as a significant affordability problem. Existing and new supply must be matched to demand, including in the way it is let and managed. This strategy therefore promotes a range of products. At the same time, it remains important to manage demand effectively, ensuring that scarce social and affordable housing is available to those who need it while those who can do so are supported to pursue other options. This is particularly so in the case of homelessness, where the focus is on early intervention and prevention and use of the private rented sector to meet need where appropriate.

5.2 While current programmes will make a significant contribution, both the target for 5,000 new affordable homes and for 700 new council homes by 2019 are challenging. The council and partners will need to intensify their efforts, existing programmes will need to be accelerated and new initiatives will need to be launched.

5.3 Objective - Affordable Housing Supply

To significantly increase the capacity to meet housing needs and support social mobility through the provision of 5,000 Affordable Rent and Low-cost Home Ownership properties by 2019

5.3.1 The five Growth Areas identified in the Core Strategy and the Regeneration Strategy (Wembley, Alperton, Burnt Oak/Colindale, Church End and South Kilburn) offer the main opportunity for new development on a larger scale, with Wembley and Alperton now designated as Housing Zones, but the contribution of smaller developments across the borough will also be significant.

5.3.2 It is proposed that the target agreed in 2014 should be retained as a minimum, with an aspiration to exceed it. This will require a suite of innovative approaches and the combined efforts of partners.

5.4 Mayor's Affordable Housing Programme

5.4.1 2014/15 represented a high point in delivery. In 2015/16 national new supply was up 11% on the previous year, although still below the level in 2007/08, but the proportion of affordable housing in the total fell; 210 of 1,050 new homes in Brent were affordable, although this was the first year of a three year programme and lower figures might be expected due to the lead-in time for development.

5.4.2 The current Local Framework Agreement agreed with the GLA is designed to ensure that homes are genuinely affordable to those in housing need and provides for:

- Social housing for rent affordable within the Overall Benefit Cap, with larger properties at Capped Rents up to 50% of market rents.
- Discounted Rent homes, typically one and two bedrooms with rents pegged to LHA levels.
- A range of low-cost home ownership products accessible to those on middle incomes

5.4.3 While the Framework Agreement is relevant for the remainder of the 2015-18 programme, the next phase will be based on the Mayor's Housing Prospectus, which emphasises rent and shared ownership, including London Living Rent. The Housing Zones have potential for at least an additional 1,000 affordable homes (by 2025). In the longer term, the Mayoral Development Corporation for Old Oak Common (the OPDC) will benefit Brent.

5.4.4 This alone will not address the supply and demand gap. Developer contributions, cross-subsidy from private sales in mixed-tenure schemes and selective disposals of high-value affordable housing remain important. The 35% threshold for developer contributions may assist in accelerating development, provide greater certainty and avoid protracted viability discussions. In the longer term, it has been argued that the threshold could help to stabilise or reduce land costs.

5.4.5 RPs, like local authorities, await further detail on many aspects of government policy but are developing responses to the new landscape. Increasingly, they are seeking options that are less reliant on subsidy. It is likely that such approaches will continue despite some increased subsidy through the Mayor's programme and all providers face limited land supply, high costs and market pressures in London.

5.4.6 The White Paper sets out proposals intended to boost and accelerate supply. While it is too early to assess the full impact, measures to simplify the planning process, give councils more power to encourage delivery and action to diversify the market and encourage new and smaller developers are welcome. The council also welcomes the intention to direct activity towards areas with severe housing need.

The council will work with providers to identify barriers, whether these relate to planning issues, land supply and assembly or other matters. The council aims to identify common approaches with providers who can deliver its priorities and will support them in bidding for funding to maximise Brent's share of the available resources.

Consultation Questions

Do you agree that the approaches outlined will deliver the desired level of supply and that the targets are appropriate?

If not, tell us why you think targets should be more or less ambitious.

What else could be done to maximise outputs through the programme?

What should the balance be between different types of rented and low-cost homeownership products?

5.5 Development by the Council

5.5.1 The current target is for the council to provide a minimum of 700 affordable homes by 2019 (and 1,000 by 2021/2) using HRA borrowing under the debt cap while seeking additional borrowing capacity. In addition, capital receipts from Right-to-Buy sales and from disposal of high-value and poorly-performing units, and from selective disposals to rebalance the stock towards larger units would be ring-fenced and re-invested in new homes, with grant funding sought where appropriate

5.5.2 An in-house development programme is underway with 70 units completed or on site and 216 due to complete by March 2018 and new-build intermediate rent development schemes for over 300 units have been identified on corporate sites. In addition, an acquisition programme of 300 units for intermediate affordable rent in 2016-18 is in place. A programme of infill development will deliver around 140 new homes let on Affordable Rents. The council is also developing homes through its General Fund, including schemes that will provide around 120 supported housing through the New Accommodation for Independent Living (NAIL) programme and over 300 intermediate rent units, as well as over 120 temporary accommodation units by 2020/2.

5.5.3 Postponement of the proposed levy provides an opportunity to direct resources to local priorities, albeit with uncertainty over the longer term. Corporate land assets will be appraised for affordable and mixed-tenure development by the council alongside alternative uses such as education provision. Acquisition of privately-owned sites will be required to provide additional capacity and a site-finding programme will be instituted, through the council's new investment company, for sites within and outside Brent. Development outside the borough, alone or in partnership, could offer opportunities for lower land or build costs, making schemes more viable.

5.5.4 The council will enter into Joint Venture partnerships, especially in growth areas, to maximise affordable provision and accelerate development. There is also potential to expand the Private Rented Sector acquisitions programme (see below). While this does not increase housing supply as such it increases the number of affordable homes. The council will also explore the potential of modern methods of construction to deliver faster and more cost effectively and welcomes the government's commitment to support this in the White Paper.

5.5.5 To support development by the council and more widely, the council will review its own land supply and supply across the borough. A revised employment land study suggests 11.5 hectares could be re-designated, subject to approval with a policy target of 50% affordable homes on such sites. A revised Core Strategy will identify opportunities to meet increased housing targets in the London Plan.

5.5.6 The Old Oak Common development is a long-term project based primarily in Hammersmith and Fulham, with the bulk of delivery after 2026. As a strategic site overseen by a Mayoral Development Corporation, a share of nominations into affordable homes will be available London-wide but discussions are underway to agree the proportion available to the boroughs in which sites are located. The scheme will have a particular impact for the areas it borders, notably Harlesden, where a Neighbourhood Plan is being developed.

5.5.7 The Housing and Planning Act 2016 requires local authorities to identify land and development opportunities for self- and custom-builders and to maintain a list of those interested. Although it is not expected that self-build will produce a significant number of new homes, the council will work with interested parties to identify options for this and other innovative approaches such as Community Land Trusts and Co-Housing schemes, using the small amount of funding supplied through the Community Housing Fund to develop proposals.

Consultation Questions

Do you agree that the approaches outlined will deliver the desired level of supply?

Should the target change and, if so, to what?

What else could be done to increase the scale of the programme?

What is your view of potential development outside the borough?

5.6 Regeneration and Development

5.6.1 Alongside the Growth Areas, estate-based regeneration schemes such as South Kilburn will deliver new supply and improvement or replacement of existing stock. In South Kilburn the council is the master-developer for the estate and the aim is to advance development and widen the mix of tenures, including intermediate and low cost home ownership options.

5.6.2 The council will explore options for further estate-based regeneration programmes, having regard to the Mayor's guidance. The primary aim will be to engage with tenants and residents to agree priorities that encompass new and more mixed supply with physical improvements and better service delivery, supporting and the wider wellbeing agenda. Proposals will be developed with the participation of the council's Property and Regeneration Teams and external partners as appropriate. Intensification of existing housing estates will also be considered where appropriate through infill and partial redevelopment.

Consultation Questions

Do you agree that there is scope for regeneration programmes that could increase supply while improving the wellbeing of existing residents?

What factors do you think the council should take into account in developing its approach in this area?

What mix of housing tenures is desirable and what is the scope for increasing density in regeneration schemes and more widely?

5.7 Objective: Larger Homes and Reducing Overcrowding

To ensure that at least 35% of new general needs Affordable Rented housing is 3 bedroom or larger, to align with the demand profile

To halve severe overcrowding in the social housing sector by 2019

5.7.1 The Census showed that, despite a small reduction since 2001, by 2011 Brent had the second highest level of overcrowding in England. 17.7 per cent of households lacked one or more bedrooms. The Census is the only regular and reliable measure of overcrowding and other data is limited and often anecdotal. However, it is clear that overcrowding is prevalent in the private rented sector and in social housing and that some BAME groups, for example Black Africans and White Other (especially eastern Europeans) are disproportionately affected. Overcrowding can have serious health impacts and is detrimental to educational opportunities, for example owing to lack of independent space for children to do homework.

5.7.2 There are many causes but the most significant is affordability, with benefit restrictions a contributory factor. The worst affected face a stark choice between leaving the borough or staying on in inadequate accommodation. In the council stock, overcrowding is prominent in leasehold homes. This probably reflects the number of homes sold through the RTB that are now rented privately. Sixty per cent (2,223) of leasehold homes have more than one person per bedroom.

5.7.3 Without a reliable and regular measure it is difficult to assess progress accurately but one proxy measure is the number of larger homes delivered. In 2014/15, 20.3% of all new homes were three bedroom or larger and the proportion of larger affordable homes was higher at 31.3%, although still below the 35% target. In addition, the proportion of lettings available to households requesting a transfer has been increased for 2016/17.

5.7.4 With no short-term prospect of building enough to meet all needs the focus on development weighted towards larger homes will continue, reflecting the significant shortage, the demand arising from Brent's large average family size and the need to mitigate the impact of the OBC. This alone will not address the problem and action to tackle overcrowding also includes:

- The revised Allocations Policy allows use of fixed-term tenancies to minimise under-occupation and, in light of the Housing and Planning Act 2016, consideration will be given to further changes.
- In 2016/17 transfers for council tenants have been increased to alleviate overcrowding and increase opportunities for movement through chain lettings.
- Further incentives to under-occupiers, including those affected by the social sector size criteria. This will include examining the potential for bespoke new-build housing for older under-occupiers to release larger homes and support long-term independence.
- Acquisitions in the private rented sector will include a higher proportion of larger homes of four bedrooms and above.
- Consideration of opportunities to extend or de-convert – for example by returning street properties to single family use – properties when they become void and encouragement of RPs to take a similar approach.
- Private sector enforcement will focus on making properties fit for the number of occupants rather than reducing the number of tenants.
- Identification of opportunities for increased provision for single people currently forming part of overcrowded households, including short-life uses within regeneration areas, use of fixed-term tenancies and access to advice and assistance in securing accommodation in the private sector.

Consultation Questions

What additional actions could the council take to reduce overcrowding in all tenures?

Is there scope to give more priority to overcrowding through the Allocation Scheme?

5.8 Objective - Private Renting and Low Cost Home Ownership

The development of 1,000 build-to-rent homes by 2019, of which at least 30% are affordable to those on lower incomes

5.8.1 The White Paper explicitly supports the increasing emphasis on build-to-rent through proposed changes to the National Planning Policy Framework (NPPF) to encourage authorities to plan for it and make it easier for developers to offer affordable private rented homes instead of other options. The government is working with the British Property Federation on approaches aimed at ensuring that “family-friendly” tenancies of three or more years are available in such schemes.

5.8.2 The Mayor intends to review planning policies to recognise the economics of build-to-rent and to support it through investment and development of innovative construction methods. The council will encourage development of well-managed private rented housing, including provision by RPs. This has the potential to meet a wider range of needs for accessible and decent accommodation and the expectation is that such developments will include a significant proportion of units aligned with LHA levels.

5.8.3 The council has established a vehicle for the purchase of private sector housing and is building intermediate rented homes on a number of corporate sites. It will consider whether it should play a direct role in mixed-rental development. The scope to introduce such provision in the Growth Areas will also be considered.

5.8.4 As noted earlier, there is a growing need for mid-market options for households unable to afford outright purchase or access affordable renting. The council wishes to promote low-cost home ownership options as well as intermediate and sub-market renting for this group and to enable and encourage movement across tenures by providing a bridge between renting and ownership. The Housing White Paper has clarified the role of Starter Homes, confirming that income limits and a mechanism for repayment of discount on early sale will apply. This will make the product more relevant in London, alongside the Mayor’s proposals for London Living Rent and wider government programmes such as the Help to Buy and Lifetime ISAs to support saving for purchase.

5.8.5 Within the wider demand for low cost home ownership, there are particular issues for key workers. The final question concerns the range of products available, their affordability and how they are accessed. In summary, the main products are:

- Shared ownership
- Rent to save

- Help to Buy
- Discount full ownership
- Sub-market renting
- Starter Homes (in future)
- London Living Rent – some details still to be announced

5.8.6 Access to most of these is centralised either nationally or through the Mayor's office. More widely, there is also scope to consider whether it is possible or desirable to extend access to affordable/social renting to workers who are likely to struggle to afford even sub-market products. The use of fixed term tenancies, especially the shorter terms available, offers some potential to at least consider this on a trial basis.

5.8.7 In addition, there is the question of how ley workers are defined. Homebuy eligibility includes NHS, Education (qualified teachers and some nursery staff), Police, Prison Service, Probation Service, Local Authority (principally planning and social care staff), Fire Fighters, Ministry of Defence, Environmental Health Officers, Highways Agency Traffic Officers. It is arguable that local policy should consider other roles, including those outside the public sector, if a case can be made, for example the importance of particular sectors or workers to the local economy.

5.8.8 Further work is needed to identify the scale of demand and affordability issues and the types of product that could address the problems. Employment related pressures arising from London's housing market and supply shortfall are fairly well documented in some ways, although less so at the local level. It is generally understood that any household on a low or medium income will struggle to afford home ownership and studies have shown that this is also the case for most intermediate options. For example, a recent study for Westminster commissioned by Dolphin Square Living comments on shared ownership: *The scheme typically involves buying between 25% and 75% of a property and paying rent on the rest. Researchers looked at 525 shared-ownership properties within a 20-mile radius of central London in November 2016. The average minimum share of even a studio or one-bed home would cost £145,000. The average total price was £368,000.*

Consultation Questions

What contribution do you think private rented housing can make to meeting needs in Brent and what should be the balance between this and other provision?

How should access to private rented developments be prioritised?

How should access to low-cost homeownership be prioritised?

What priority should be given to Key Workers and which categories of employment should be included?

5.9 Objective - Supported Housing Supply

To deliver a programme of extra-care and specialist supported housing units by 2019 to widen housing options and reduce reliance on residential care.

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5.9.1 Housing with support is needed to widen options for vulnerable residents, enable independent living and provide alternatives to residential care. Significant additional Extra Care housing is required for older residents and there is a similar need for other specialist provision such as cluster developments for people with physical or learning disabilities or mental health issues. A pipeline of schemes for around 130 units is in place, with the first projects on site through the NAIL programme. Subject to Cabinet approval, the ambition is for a total of 529 units to be delivered by 2018/19.

5.9.2 Funding for supported housing presents challenges. Recent consultation on supported housing indicates that the 1% rent cut for social housing will apply up to 2019/20, followed by a new funding system. There are concerns that this could affect the viability of existing and planned schemes, depending on the final shape of the system. Similar challenges apply to sheltered housing stock, which is increasingly considered unsuitable and unpopular, while an ageing demographic will increase demand for suitable accommodation. The council does not own any sheltered housing but will explore it can support partners to improve and remodel schemes. The council will explore the potential for shared ownership or co-housing models and intends to acquire properties suitable for conversion to meet needs.

5.9.3 The council will also explore ways in which grants and adaptations can maximise savings to health and other budgets through assisting older, sick or disabled people to stay in their homes, particularly in the private sector, and to facilitate hospital discharge.

Consultation Questions What additional actions could increase supply? Is there scope for shared ownership or other models?

5.10 Target Summary

5.10.1 The underlying assumption is that the council should aim for a mix across tenures and sizes to support mobility and meet the short and medium term supply gap. Supply could be increased and accelerated through:

- The new investment vehicle and PRS acquisitions: there is potential to expand the scale of investment and engagement with the multi-borough vehicle proposed by London Councils will be explored.
- RTB replacement and use of receipts: investment should be maximised and targeted at schemes likely to deliver the maximum level of affordable housing.
- Review of planning policies and land use: to ensure that all potential housing sites, including short-term uses, are identified.
- Development partnerships: identifying partners committed to Brent's priorities and objectives to maximise delivery.
- Land acquisition and development in and out of borough: investment to secure sites either individually or collectively with partners.
- Maximising delivery on council and other public land: local approaches will need to be allied to the Mayor's emerging approach.
- Intensification on existing estates as part of regeneration schemes: ensuring that programmes deliver an increase in supply across tenures through higher densities in line with community sustainability and improved opportunities for existing residents.
- New approaches such as self-build and Community Land Trusts: scale is likely to be small but there is potential to deliver new options, particularly on smaller sites.
- Modern methods of construction: modular construction and other options can offer faster and more cost-effective delivery and support for this should be reflected in local housing and planning policy

Consultation Question

Are the targets appropriate and achievable?

Are the approaches outlines the right ones and, if not, what should change?

What additional action could the council or its partners take?

6. HOUSING AND WELLBEING

Priority: To promote wellbeing and reduce economic and social exclusion through an integrated approach to housing and wider service provision.

6.1 The 2014 document emphasises the importance of employment in maximising housing opportunities and the links with the Employment, Skills and Enterprise Strategy. This remains a priority but the aim is for a broader perspective, stressing the links between housing and wider wellbeing, including physical and mental health, poverty, financial inclusion and education. The strategy seeks to align the work of the council and partners to ensure that these links are identified and strengthened with a focus on positive outcomes for Brent people.

6.2 Progress has been made in linking housing and employment. For example, the Allocation Scheme now offers some additional priority based on employment status and homelessness and welfare advice services feed into employment advice and services through Brent Works and other provision.

6.3 Development of a broader approach will require the engagement of other service areas, for example Public Health and Adult Social Care, and partners in the health and the voluntary sectors to identify opportunities for joint working and mutual benefit. This work will draw on the findings of Outcome Based Reviews to identify priorities and initiatives that support a collective approach to enhancing wellbeing.

6.4 **Objective: Integrated Housing and Employment Support**

To integrate housing advice and management services with employment guidance and support

6.4.1 Housing is an essential support to the local economy through provision to meet both acute needs and demand from the local and London workforce. In the context of high housing costs and welfare reform employment is, for many, a prerequisite to obtaining accommodation. Equally, decent and secure accommodation is critical in securing, sustaining and progressing within employment.

6.4.2 While employment levels in the borough have improved over the last decade, levels among social housing tenants are disproportionately high and the Index of Deprivation shows a correlation between deprivation and concentrations of social housing. The same areas have high health inequality and low educational achievement

6.4.3 Brent is among the boroughs most affected by welfare reform and the OBC in particular. The best solution for affected households is to find employment and the council is working closely with DWP, JCP, Work Programme providers and others to maximise options. It is also essential that housing provision is coupled with effective employment guidance and support, both for applicants and existing tenants. In this context, the council and RPs have a role to play in supporting tenants through initiatives to promote employment, training and financial inclusion and partners are involved in a range of relevant programmes.

Consultation Question

What more could be done to improve the links between housing and employment?

Is sufficient priority given to employment in allocating housing?

6.5 Objective – Economic and Social Deprivation

To reduce economic and social polarisation by achieving significant

convergence between priority neighbourhoods and the borough as a whole by 2019

6.5.1 The Index of Multiple Deprivation provides comparative data covering income, employment, education, training and skills, health and disability, crime, barriers to housing and services and living environment. While the 2015 index shows an improvement for Brent, there are significant contrasts between wards.

6.5.2 Worklessness is markedly above the borough average among social housing tenants and in neighbourhoods where social housing is concentrated, while many of those in employment are on low wages. Priority neighbourhoods in the Employment, Skills and Enterprise Strategy are Stonebridge, Harlesden, South Kilburn, St Raphael's, Chalkhill and Church End. All, except Harlesden, have high levels of social housing, while Harlesden has high levels of private renting.

6.5.3 A partnership approach is being taken, tailored to the needs of each area. Partners include RPs, voluntary and community organisations as well as council housing and employment services and other council and statutory services. The council is also taking a direct role, as on St Raphael's estate through the Living Room: Working People, Working Places pilot. A DCLG-funded project is promoting transfers for households who need to move for employment reasons or to give or receive care to a relative

6.5.4 The council will examine opportunities to diversify tenure in areas where social housing stock is currently concentrated. This is already underway in South Kilburn through the redevelopment of the estate and the provision of private housing. Development in other priority areas will take account of the need to promote an improved mix and balance of tenure and incomes in these areas.

6.5.5 The council will also work with partners to develop strategies for financial inclusion, improving access to and understanding of financial services and products and to support engagement with Universal Credit. The council published its Financial Inclusion Strategy in September 2015 and the Housing Strategy aims to support this work through engagement with partners, tenants and residents. Similarly, the council will work with partners to share expertise and develop programmes aimed at improving health and educational opportunities.

6.5.6 Research has established clear links between employment and improved mental health and programmes to support employment and training are intended to have an impact in this area. The council will seek to establish mechanisms through which improvements in health can be measured and monitored.

Consultation Questions

Is a neighbourhood approach to employment the best way to bridge the gap between more deprived areas and the rest of the borough?

How far can housing provision and related service impact on deprivation?

Are there services, projects and initiatives already in place or planned that could contribute?

6.6 Objective - Energy Efficiency and Fuel Poverty

To improve the energy efficiency of the housing stock through programmes of retrofit works

6.6.1 Brent has the 3rd highest level of fuel poverty in London, with between 13% and 18% of households considered fuel poor depending on the measure used. This is partly a result of low average incomes but is also due to the high percentage of “hard to treat” homes (c 45%)

6.6.2 The quality of housing is one of the most significant determinants of health and wellbeing with cold and damp homes linked to negative health impacts. People with cardiovascular, respiratory or mental health problems as well as the elderly, the very young or people with disabilities who spend disproportionate amounts of time indoors, are most at risk. Good quality housing has a key role in preventing ill health, reducing child poverty and promoting vibrant communities.

6.6.3 The council has entered into a partnership arrangement with Lakehouse Ltd to deliver energy efficiency and fuel poverty related programmes, covering both the council and private rented stock. The ending of the Green Deal programme and significant changes to the Energy Company Obligation (ECO) have limited the expected impact of these programmes to date but the partnership has been successful in delivering insulation improvements in the council stock. In partnership with Energy Solutions North West London and Lakehouse the council has been awarded funding for a range of programmes in recent years, including central heating installations from BEIS (formerly DECC) during 2016/17, benefitting residents across tenures. Energy Solutions have received funding for a project to explore the links between fuel poverty and health and outcomes will assist in identifying future priorities.

6.6.4 The council will continue to support improvements to the council stock and from April 2017 a revised ECO programme will be implemented, providing around £648 million a year nationally and targeted at fuel poor households. The council is developing its approach to the new ECO scheme in parallel with this strategy and would welcome views on how best to take advantage of the opportunities it will present.

Consultation Question How should the council position itself to take maximum advantage of the new ECO programme?

6.7 Objective - Tenancy Strategy and Allocations

To foster and support wellbeing through access to suitable and affordable housing.

6.7.1 The council's Allocation Policy provides some additional priority linked to employment while the Tenancy Strategy sets out the approach to Affordable Rent and tenure. While changes made in 2015 focussed on support for employment, there has also been an increased emphasis on housing the backlog of households in temporary accommodation, with an increase in the proportion of lettings to this group in 2015/16.

6.7.2 As noted earlier, there is a need to increase supply of intermediate and mid-market housing generally. More specifically, such provision is essential if households are to have realistic opportunities to move on from social rented homes subject to fixed-term tenancies where their circumstances allow it. Given Brent's low average incomes, it is likely that current intermediate products may still be unaffordable to this group and the council will therefore explore options to support delivery of affordable sub-market products that could facilitate mobility, including intermediate rent pegged to LHA (housing benefit) levels.

6.7.3 The impact of overcrowding on health and wellbeing has been noted earlier, along with proposed actions. The Allocation Scheme will be kept under review to identify further opportunities to alleviate overcrowding and encourage mobility within the social housing stock. Further detail on allocations with implications for wellbeing are considered below.

6.7.4 The need for specialist provision for vulnerable households has been noted earlier but there are groups who may not meet thresholds for social care or other services but who nevertheless might be considered more vulnerable for other reasons. This includes, for example, young people leaving care, where further housing responsibilities will be placed on local authorities in the future, older or disabled people who do not need specialist accommodation but may need support or adaptations as well as other groups. Allocations and the way in which they are prioritised are considered further below but views are sought as to groups whose needs are not currently met adequately.

Consultation Questions
Is there scope to offer more priority to working households and how could this be achieved? What options exist to extend opportunities to address overcrowding? Are there other groups who should be given higher priority?

6.8 Target Summary

6.8.1 It is proposed that:

- Proposals for shared management standards will be brought forward for discussion with partners, to include wellbeing and employment priorities.
- Proposals for improved partnership working in line with the wellbeing agenda will be brought forward.
- The Tenancy Strategy and Allocation scheme will be reviewed to consider how further support can be given to wellbeing in the context of the tenure changes set out in the Housing and Planning Act.

Consultation Question
What additional actions could the council and its partners take to meet these objectives?

7. PRIVATE RENTED SECTOR IMPROVEMENT

7.1 The private rented sector is a valuable resource but its growth is also a symptom of the demand profile noted earlier. The sector can play an important role in new supply and meeting need but there are concerns over access, standards and affordability. The council will use its powers to tackle poor management and conditions but aims to work with and support existing landlords and promote new development to ensure the sector meets required standards and is accessible to people on a range of incomes in a well regulated market with appropriate protection to tenants. The council itself will play an increasingly important part as a provider of privately rented homes through its acquisition vehicle, in addition to maintaining its role as a link between landlords and tenants seeking accommodation. Acquisition of private rented housing presents an opportunity to exemplify and encourage good practice in the sector.

7.2 Significant progress has been made since 2014. Additional and Selective Licensing has been introduced and the council continues to pursue enforcement action through the Housing Health and Safety Rating System and action to bring empty homes back into use, while a grants programme has supported improvements and repairs and provided facilities for disabled households.

Objective: To maximise the contribution of the private rented sector to meeting housing need and demand through the provision of decent and well-managed accommodation

7.3 Outcome – Standards

For all private rented properties in the borough to achieve minimum standards of management and condition by 2019

7.3.1 The council supported the London Landlord Accreditation Scheme and the London Rental Standard introduced by the previous Mayor and will work with the current Mayor as he develops his policy in this area. In general, the council will support the use of voluntary accreditation schemes for both landlords and agents and encourage dissemination of best practice across the sector. A discount on licensing fees is offered to accredited landlords.

7.3.2 Although much of the sector is well-run, there is a significant number of poor quality, badly managed properties and evidence suggests this is a growing problem as the sector expands. There is concern that HB restrictions are forcing some households into the poorest quality housing, exacerbating other inequalities around health and leading to increased overcrowding among other problems. Lack of long-term security can deter tenants from reporting problems, as can lack of awareness of rights and responsibilities among tenants and landlords.

7.3.3 The council introduced an Additional Licensing Scheme from January 2015, requiring landlords of all Houses in Multiple Occupation in Brent to obtain a licence. From the same date, a Selective Licensing Scheme was introduced in Harlesden, Wembley Central and Willesden Green, subjecting any privately rented home to licensing. Both schemes are in addition to Mandatory Licensing, which covers larger HMOs and is a requirement for all authorities.

7.3.4 Take up of Selective licences has exceeded expectations but take up of Additional licences has been much lower, possibly reflecting a lack of understanding of liabilities as well as deliberate avoidance. The government intends to change the definition of an HMO for the purposes of Mandatory Licensing from 2017 to include smaller properties, as the council's Additional licensing scheme does, and this may assist in raising take-up.

7.3.5 The government has made changes allowing new factors to be taken into account beyond the evidence of links to anti-social behaviour required for current schemes. These include standards and the impact of inward migration, although it is also necessary to obtain consent from the Secretary of State for a Selective Licensing scheme covering more than 20% of a borough's area or 20% of the private rented stock. Consultation on the possible extension of Selective Licensing has recently concluded and the outcome will be incorporated into this strategy in due course.

7.3.6 Poor conditions, such as damp and disrepair, contribute to health problems such as respiratory conditions and falls. Actions to tackle this depend largely on the use of enforcement powers, grants and, in the longer term, encouraging investment by existing and new landlords in the private sector that will alleviate risks under the Housing Health and Safety Rating System. Enforcement will operate in tandem with the conditions imposed under licensing.

7.3.7 The government has proposed new powers and duties, including banning orders and a register of rogue landlords. The approach to enforcement will be reviewed in light of these as further detail emerges.

7.3.8 The council aims to work with landlords to improve the quality of management and maintenance and is keen to explore the ways in which the grants programme, especially Disabled Facilities Grants, can support landlords prepared to let to older, disabled and vulnerable households in line with public health and social care priorities.

Consultation Questions

Will a further extension of licensing deliver improvement in the management of the sector?

How can the council make the most effective use of new powers?

What measures would encourage landlords to work with the council to deliver improvements and adaptations to assist vulnerable and disabled tenants?

7.4 Outcome - Access

To establish a lettings agency and other arrangements to increase access to meet housing need

7.4.1 The council has worked with private sector landlords for many years to secure temporary accommodation for homeless households and, increasingly, to secure permanent solutions. The sector is also an important source of housing for people moving on from short-term or supported housing. In all these areas, HB restrictions have made landlords wary of accepting households who may struggle to afford rents. The council will work closely with landlords and agents to understand what is needed to improve access

7.5 Lettings Agency

7.5.1 The 2014 document set out proposals for BHP to establish a Lettings Agency in 2014/15. It has not been possible to proceed with this project as originally envisaged, although significant preparatory work has been carried out and this will be used to develop alternative proposals. This could include building on the existing Find Your Home project, which is currently aimed at priority homeless households and is discussed further below, but the council also awaits further announcements from the Mayor on his proposal for a London-wide agency and is keen to explore the potential for proposals brought forward from the voluntary sector.

7.5.2 More generally, the council welcomes the Government's intention to legislate to ban letting agents' fees to tenants, to improve competition in the private rental market. A consultation paper is expected and, if published during the consultation period, this document will be updated as appropriate. Similarly, proposals to encourage longer term tenancies set out in the White Paper are welcome but will be limited to new build-to-rent developments. The council wishes to work with all landlords, many of whom recognise the advantages of longer tenancies in maximising rental income and avoiding the costs associated with frequent changes of tenant.

Consultation Question

What would be the most effective mechanism to provide increased access to the private rented sector and ensure good lettings services are provided more generally?

7.6 Empty Homes and Acquisition

7.6.1 The council has a well-established Empty Homes Programme but recent experience suggests that owners are increasingly reluctant to enter into agreements with the council through which grants are made available in return for nomination rights. Alongside the development of the wider strategy, work is underway to develop a revised Empty Property Strategy.

7.6.2 At this stage, areas for consideration include how empty homes work will align with the acquisitions programme, how far the council should focus on long-term empties, the incentives available to owners, the use of grants and the scope for more extensive use of management orders and CPO powers.

Consultation Question

What are the most effective measures to encourage owners to bring properties back into use?

7.7 Target Summary

7.7.1 It is proposed that:

- Following consultation, Cabinet will be asked to consider options for the future extension of Selective Licensing.
- The council will consider how new powers can support priorities around standards and supply.

- Building on the Find Your Home Scheme and homelessness prevention, options to bring forward a lettings agency proposal will be explored.
- The council will work with landlords to improve supply and deliver tailored solutions, for example in providing adaptations and obtaining housing for vulnerable tenants.

Consultation Question
What additional actions could the council and its partners take to meet these objectives?

8. HOMELESSNESS & ALLOCATIONS

8.1 Applications and acceptances have increased across London but the local position has improved and the implementation of the Temporary Accommodation Reform Plan has had a significant impact. In April 2014 the total of 3,300 households in temporary accommodation was the highest in England and included 300 households in Bed & Breakfast. At the time of writing, the total is 2,800, with bed and breakfast occupancy fluctuating but averaging no more than 30 households at any one time. However, applications and acceptances are still high, with 745 households accepted in 2015/16 against a London average of 549. This represents a rate of 6 per 1,000 households against a London figure of 5.5 per 1,000. This does not imply poor performance but reflects the supply and demand and deprivation issues noted earlier. In line with national and London trends, the primary cause of homelessness is eviction from a private sector tenancy. .

8.2 Since November 2012 the council has discharged its homelessness duties by securing private rented housing for homeless households, doing the same on a voluntary basis for households accepted before the change in the law. This means that the housing waiting list is the primary route into affordable housing and priority is assessed in line with the Allocation Scheme.

8.3 Given the affordability issues already discussed, there has been an increase in the number of households placed outside the borough, either on a temporary or permanent basis. The council continues to have regard to regulations on the suitability of accommodation and intends to minimise such placements, using them only where other options are not available or where the household chooses to move out of the borough.

8.4 Evidence from various sources suggests a significant growth in rough sleeping in Brent, as elsewhere in London, although the latest street count in November 2016 showed a total of 24 compared to 52 in 2015 and further research is required. Barriers to access including affordability welfare reforms affecting younger single people require a more comprehensive approach to the needs of households not falling into or on the margins of priority need within the homelessness legislation and not eligible for social care support.

8.5 In 2013 the council revised its Housing Register rules to concentrate on those in the greatest housing need and with a realistic prospect of being rehoused. Within the scheme, the proportion of lettings made to different priority groups is kept under review allowing, for example, for a higher or lower proportion to homeless households in any year.

8.6 There are indications that some RPs are seeking to impose conditions, for example requesting deposits or restricting nominations to working households, to reduce perceived financial risk from rent arrears. In a context of reduced subsidy and higher rents, as well as a changing mix of products that includes a higher proportion of intermediate and sub-market rents, RPs may be increasingly cautious in this area.

8.7 This strategy aims to build on progress in reducing reliance on temporary accommodation and preventing homelessness, addressing the causes and effects of homelessness and offering appropriate support and solutions. Although not yet enacted, the council aims to adopt the principles set out in the Homelessness Reduction Bill and to take advantage of the opportunities arising from devolution of the Temporary Accommodation Management Fee to local authorities.

Objective: To significantly reduce levels of homelessness and the use of temporary accommodation

8.8 Outcome - Prevention

To reduce the number of homeless acceptances to below the London average by 2019

8.8.1 Building on past success in preventing homelessness is central to the future approach. The Homelessness Reduction Bill will, if enacted, impose new duties on local authorities to intervene at an earlier stage in all cases where homelessness is threatened and to provide effective support and advice. The Housing Options Service has been restructured to focus on prevention, working with those at risk of homelessness at the earliest point to enable them to stay in their current accommodation wherever possible or to secure alternative accommodation before becoming homeless, assisted by the council's Find Your Home service. Although this is primarily aimed at priority homeless households, the council will offer a similar service for others, who will have access to the scheme's advice and search tool to find accommodation, although they will not be offered financial assistance. The council is also introducing a 'singles pathway' to provide greater assistance to those at risk of homelessness tailored to their needs and vulnerability, anticipating the provisions of the Bill.

8.8.2 The council has been awarded a grant through the DCLG's Trailblazer Fund which, with match funding, will provide around £900,000 a year in partnership with the voluntary sector to prevent and relieve homelessness for single people below the priority need threshold. This will support payment for prevention and relief outcomes and subsequent sustainment of accommodation for one year, while opening up new referral pathways for mental health services and ex-offenders.

8.8.3 The council will continue to work with private sector landlords individually and collectively to sustain tenancies, including use of discretionary housing payments where appropriate to secure the accommodation of those affected by the overall benefit cap. Where a tenancy cannot be sustained, the Find Your Home scheme aims to prevent homelessness through early intervention and guidance to help households find accommodation in areas they can afford.

8.8.4 Access to private rented housing for those under 35 is limited by benefit caps and phased changes mean that some unemployed young people under 21 will be unable to claim HB at all from 2017. This raises concerns about those with a degree of vulnerability but not sufficient to meet thresholds that trigger housing or social care duties. The Outcome Based Review of housing for vulnerable people highlighted this issue and work is underway to develop a pathway for single people to assist this group. This will build on work already undertaken for the Find our Home scheme and projects currently operating in the voluntary sector such as the Crisis Brent private sector access scheme. The reconfiguring of the council's Care and Support Team also offers an opportunity to feed into this work.

8.8.5 One avenue that the council is keen to explore is the Housing First approach, which prioritises moves into secure accommodation over short-term provision and lengthy assessment processes. This approach has been adopted successfully in other countries and is being tested elsewhere in London.

8.8.6 The Mayor has responded to the doubling of rough sleeping in London since 2008 by establishing a No Nights Sleeping Rough Taskforce to work with boroughs, charities and others with a commitment to maintaining City Hall investment in services and making the case to government for more resources. The Government is committing a further £10m over two years to the Rough Sleeping Fund. Brent is also a partner in a successful West London bid for targeted funding to prevent rough sleeping. At the local level, there is some evidence that migrant workers from Eastern Europe are over-represented among rough sleepers. Although there is little direct evidence, the council will investigate the potential impact of enforcement connected with private sector licensing in displacing tenants from this group. The pathway for single people outlined above will also be open to rough sleepers.

Consultation Questions

Will the actions outlined above be effective in preventing homelessness?

What is your view of the likely impact of the Homelessness Reduction Bill?

What other services or initiatives could contribute to homelessness prevention?

8.9 Outcome – Temporary Accommodation

(a) To minimise the use of Bed & Breakfast accommodation and eliminate the use of non-self-contained B&B for more than six weeks
(b) To reduce the number of households in temporary accommodation to the London average by 2019

8.9.1 Continued reduction in temporary accommodation use remains a priority. The first part of the target above has been met but achieving a reduction to the London average will be challenging. Devolution of the Temporary Accommodation Management Fee potentially offers greater local flexibility and it should also be stressed that decisions over the type and location of temporary accommodation will need to take account of current and future costs, particularly the impact of welfare reform. The Temporary Accommodation Reform Plan will be the main mechanism and sets out proposals to:

- Establish a council-owned company which will invest millions of pounds in buying and developing a long-term portfolio of properties which can be let to homeless households at affordable (LHA) rates.
- Bring forward redevelopment of Knowles House and a site on London Road to deliver self-contained temporary accommodation.
- Deliver an improved approach to helping households gain or keep employment and help them settle into their new homes.
- Improve procurement of private rented housing through external commissioning and a pilot project with West London boroughs.
- Eliminate use of B&B and hostel accommodation with shared facilities, house people closer to Brent where possible and deliver revenue savings to the council.

8.9.2 To support this and related work, a Homelessness Forum has been established, bringing partners from the statutory and voluntary sectors together.

Consultation Question

Will the actions outlined above be effective in reducing temporary accommodation use and ensuring that accommodation is suitable?

8.10 Tenure and Allocations

8.10.1 The council has used the Localism Act to let council homes on fixed terms. The standard tenancy in Brent is now a five year fixed term, preceded by a one year Introductory Tenancy, although there is some flexibility in this approach. The Housing and Planning Act will make five year fixed terms the normal maximum, with ten year terms for people with a disability and up to nineteen years for households with a child under nine. Shorter, two year terms are still possible under Localism Act provisions.

8.10.2 At this stage, the council has not made any decisions on possible changes to the Tenancy Strategy or Allocation Scheme in response to these changes but will review both documents. This will include consideration of the circumstances in which shorter terms might be appropriate, as well as the basis on which tenancies would or would not be renewed on expiry. Our partners in the RP sector are also considering their positions, although informal indications are that there is little appetite for shorter terms and that renewal criteria are not yet fixed for most organisations.

8.10.3 There is a balance to be struck between making best use of the stock and encouraging mobility and ensuring that tenants are offered appropriate levels of security. Stimulating more movement through the housing stock has the potential to assist more people with immediate and urgent needs, but would also require that alternative options are available where households need or want to move on. Research will be carried out to analyse the current composition of the Housing Register, who does or does not benefit from rehousing opportunities and how this might change under a different system.

8.10.4 In 2013 the council change the balance of priorities in its Allocation Scheme to provide a higher proportion of lettings for homeless households. In the current year, a higher proportion of lettings has been made available to transfer cases, to address overcrowding and to assist in creating chain lettings, enabling several households to move as the first home in the chain is released. Further consideration will be given to the incentive scheme for under-occupiers, which was revised in 2013 to mitigate the impact of the social sector size criteria, taking account of detailed proposals expected to emerge from the White Paper to provide for enhanced incentives.

8.10.5 The Allocation Scheme governs the letting of council homes and sets the criteria through which households are able to bid through the Locata system. While the council has nomination rights to RP homes, usually secured through planning agreements when new homes are built, and applicants can bid for them through Locata, each RP has its own lettings priorities. Increasingly, RPs are adopting a cautious approach, prompted by factors including concern about the perceived financial risk presented by low income households and those affected by welfare reform, especially as homes are increasingly let at higher rents. In some cases, this has led to calls for direct nominations based on affordability rather than choice-based lettings through Locata, or for lettings plans designed to restrict the type of household eligible for a particular scheme. Some local authorities have moved away from choice-based lettings, including former partners in Locata, and there are suggestions that some RPs would favour such an approach.

8.10.6 The council is willing to agree local lettings plans in some circumstances – for example where a development would be unsuitable for children or older people due to its location. However, the council does not expect this approach to be the norm. High levels of demand and unmet need, coupled with the relatively low proportion of affordable housing achieved in new developments, require the council to seek 100% nominations for first and subsequent lets. The supply and demand position has worsened significantly since current arrangements, through which the council receives 100% of first and 75% of subsequent lets on most schemes, were agreed. It is recognised that this may not be achievable on schemes identified as strategic sites for London, where the Mayor will seek a proportion of nominations, and that there may be a case to be made for lower levels where a much larger proportion of affordable homes could be delivered. Beyond such cases, 100% will be the norm. The council has not considered any move away from choice-based lettings, but recognises that others are doing so and would be interested in views on this subject.

8.10.7 Finally, the implications of the application of the Shared Accommodation Rate in social housing from 2019 raises issues about the affordability of social housing for single people under 35. One possible response would be the development of shared accommodation or other options specifically targeted at this group. As noted earlier, demographic changes suggests significant growth in demand from single people and smaller households and approaches in this area are not well developed at this stage.

Consultation Questions

Is there a case for the use of shorter tenancy terms? In what circumstances?

What factors should be taken into account in deciding whether or not to renew a fixed term tenancy?

Is there a case for a change in the way applications are prioritised? If so, where should additional priority apply?

Do you agree that the council should not change its approach to nominations?

Should the council reconsider its approach to choice-based lettings?

8.11 Target Summary

It is proposed that:

- The strategy will align with the agreed priorities and approach in the Temporary Accommodation Reform Plan.
- The strategy will adopt the findings of the OBR on Housing and Vulnerable People.
- The approach to homelessness prevention will be further developed to ensure that it is in line with any new prevention duty.

- The council will continue to explore options to deliver improved services to single homeless people and rough sleepers.
- Work in this area will align with supply and private sector priorities to maximise options for tackling homelessness and reducing reliance on temporary accommodation.

> **Consultation Question**
>
> What additional actions could the council and its partners take to meet these objectives?

9. SOCIAL HOUSING IMPROVEMENT

9.1 The social housing stock is a key resource and constitutes nearly a quarter of housing in Brent. The council is by far the largest individual provider but the majority of affordable homes are owned and managed by RPs. A shared commitment to raising standards is central to our strategic aims.

9.2 Increased investment and efficiencies are needed to maintain and improve the quality and performance of the stock. The four-year rent reduction will reduce rental income and impact on revenue and borrowing capacity and in the longer term the extended Right to Buy may still add to budget pressures. The promise in the White Paper to agree an approach to rent setting with councils and RPs after the four-year reduction is welcome but will not ease immediate pressures. Measures to support income collection in the context of welfare reform will continue to present a challenge.

9.3 There are opportunities for further estate-based regeneration programmes to deliver better quality housing and services and a more sustainable level and mix of affordable housing. Over the last decade estate regeneration has renewed a significant proportion of the stock. The Decent Homes standard has been achieved and maintaining it is a priority but a wider range of improvements is needed, in particular in relation to fire safety, energy efficiency and, on some estates, environmental improvement. For its own stock the council has adopted an Asset Management Strategy which provides for a high level of investment over the seven years from 2014 to 2021.

9.4 In response to the changing policy and funding landscape, as well as to concerns about performance, it has been recommended that, subject to consultation with tenants and leaseholders, housing management services should be brought back in-house.

9.5 The size-mix of social housing is poorly aligned with the profile of housing need with an acute under-supply of larger homes and programmes to achieve a better balance of units are required, in addition to new provision weighted to larger units.

9.6 Social housing tenants and leaseholders have no individual and limited collective choice over who manages their homes. In this context the council and other providers need to make resident involvement and customer insight and choice central to their operations. More widely, the council is keen to promote the adoption of common management standards across all affordable housing providers to promote consistency of service delivery and engagement with wider programmes, for example around wellbeing issues such as fuel poverty and financial inclusion.

Objective: To improve the quality of the existing social housing stock and ensure its efficient use

Consultation Question

What would be the best mechanism to deliver high standards of management across all providers of affordable housing?

9.7 Outcome - Council Housing Investment

To maintain the Decent Homes standard and complete a programme of maintenance and improvement across the council's housing stock by 2021.

9.7.1 The council's HRA Asset Management Strategy provides the basis for investment. While the Decent Homes Standard has been maintained, there have been some delays in delivering the programme. However, following implementation of a Recovery Plan by BHP, the council is confident that it is on track to deliver the identified spend, with works to 1,700 homes planned in 2016/17. Depending on consultation and final decisions, in-house housing management services are expected to assist in delivering improvements.

Consultation Question

Are there any particular areas or kinds of improvement work that the council should prioritise?

9.8 Outcome - Maximising Use of Social Rented Homes

To maximise the efficient use of the social housing stock, achieving top quartile performance

9.8.1 The council's Tenancy Strategy supports best use through provision of fixed term tenancies and other means. The council and other providers will continue to prioritise action to tackle empty homes in the public as well as the private sector, action to tackle tenancy fraud, action to tackle overcrowding and under-occupation and initiatives to find temporary uses for stock that would otherwise be left empty due to regeneration programmes. As noted earlier, the potential for further changes to the Tenancy Strategy is being considered. In particular, it will be necessary to consider the rent levels set out in the strategy as a guide to partner providers as these are now out of date and not in line with the potential introduction of new affordable housing products. In addition, the first fixed-term tenancies granted by the council and RPs will begin to expire during the life of this strategy and the council will review approaches to renewal with partners in light of this and the changes introduced by the Housing and Planning Act and proposals in the White Paper.

9.8.2 Top quartile performance has not yet been achieved and a key objective for the proposed return of housing management services to the council will be to meet this target.

Consultation Questions What would be the most attractive incentives for under-occupiers? What steps should the council take to ensure that homes are not left empty in regeneration schemes?

9.9 Objective Five Outcomes – Target Summary

9.9.1 It is proposed that:

- Housing management services should return to the council, subject to consultation.
- The council should develop a set of common standards to be agreed with partners
- The Asset Management Strategy should be reviewed to assess the impact of policy and legislative changes

Consultation Question What additional actions could the council and its partners take to meet these objectives?

10. IMPLEMENTING THE STRATEGY

10.1 The Council is committed to facilitating community-driven approaches, where barriers are identified and solutions developed and delivered by community partners and, most crucially, our residents.

10.2 As noted earlier, partnership working across all sectors will be essential to mitigate the impact of reduced resources. The council will take a leadership role, working with partners to set the direction of travel for the borough. The council will coordinate activities to avoid duplication and achieve synergies and support capacity building for VCS partners, as appropriate.

10.3 A detailed action plan will be drawn up following consultation and will be reviewed and monitored regularly. Mirroring the strategy, the action plan will be a borough plan and responsibility for delivery falls across departments and relies on a range of partnerships.

Consultation Question
Please use this section to add any other comments or suggestions not covered by the preceding questions.