



Shaping the Future of Housing in Brent

Housing Strategy 2009-2014

Version: June 2009

CONTENTS	Page
<u>Introduction</u>	3
<u>Place Shaping</u>	3
<u>Vision</u>	4
<u>Evidence Base</u>	5
<u>Key Messages from Available Evidence</u>	6
<u>Key Messages from Consultation</u>	7
<u>National and Regional Context</u>	8
Local Context	10
<u>Housing supply and regeneration</u>	10
<u>Tackling homelessness and reducing temporary accommodation</u>	14
<u>Housing Options, housing advice and homelessness prevention</u>	16
<u>Allocations and lettings</u>	18
<u>Private sector housing – standards and conditions</u>	18
<u>Managing Public sector housing</u>	20
<u>Housing and support for vulnerable households</u>	21
Priorities, Objective and Actions	24
<u>Housing supply and regeneration</u>	24
<u>Tackling homelessness and reducing temporary accommodation</u>	26
<u>Housing Options, housing advice and homelessness prevention</u>	28
<u>Allocations and lettings</u>	29

<u>Private sector housing – standards and conditions</u>	31
<u>Managing Public sector housing</u>	32
<u>Housing and support for vulnerable households</u>	34
<u>Delivering the strategy</u>	35
Appendix	
Action Plan	
Evidence base	
Policy drivers and related strategies	
Consultation process report	
Strategy launch conference report	

1. INTRODUCTION

- 1.1 This strategy sets out the strategic objectives and priorities that the council will work to deliver over the five years from 2009 to 2014. Although its primary focus is on housing, it will operate in the context of the wider strategic priorities agreed by the council and its partners, which in turn aim to contribute to national, regional and sub-regional goals.
- 1.2 The document identifies high level objectives and priorities, while the action plan sets out what the council and its partners will do to achieve these and sets targets for the next five years. The evidence that we have used to develop the strategy and that will continue to support decision making as it is implemented is published as a separate document. A report on the consultation process that has supported the production of the strategy is also published separately, and a report on the conference held on 22nd June to launch the strategy is also published separately.
- 1.3 We intend to monitor delivery and update the strategy, action plan and evidence base on a regular basis and all these documents will be available on the council's website over the life of the strategy. We will also continue to welcome comments and suggestions to improve the strategy and enhance delivery over the next five years.

2. PLACE SHAPING

- 2.1 The core theme of the strategy is housing's part in the council's role as a "place shaper". Place shaping has been defined in the report of the Lyons Inquiry as "*the creative use of powers and influence to promote the general well-being of a community and its citizens*". The government has followed up with statutory guidance that emphasises the need to encourage the development of local priorities and local innovation and to involve local communities, as well as stressing the council's role as a strategic leader and the importance of partners working together, through the Local Strategic Partnership in particular. With regard to housing and homelessness strategies, the guidance quotes the Local Government White Paper 2006, which stated that housing "*is at the heart of achieving the social, economic and environmental objectives that shape a community and create a sense of place*". Local authorities are free to choose when, how and in what format they produce their housing strategies, but there is an expectation that they will:

- Fully reflect the wider vision of the authority and its partners
- Reflect a clear and evidenced approach
- Provide a strong focus on how partners will deliver their commitments, including on the infrastructure needed to support housing growth

- 2.2 For London boroughs, it is also expected that housing strategies will be in “general conformity” with the Mayor of London’s Housing Strategy. The Mayor published the first public consultation draft of his strategy in May 2009 and it is anticipated that the strategy will be adopted by the autumn. As far as possible, this draft reflects the proposals the Mayor has made, although it should be noted that these may change as consultation on his strategy progresses and the council will submit its own response by the end of August. The development and implementation of the Mayor’s strategy will continue to influence this local strategy over the course of its implementation. It is not intended that this document should remain static over its five year life, particularly given current economic conditions, and it will need to adapt and respond to developments at the national, regional and local levels.
- 2.3 In summary, this strategy and the associated action plan set out the what, where, who and how in terms of the delivery of housing and housing related services, while maintaining a focus on the role of housing services in delivering the wider vision of the corporate and community strategies.

3. VISION

- 3.1 The Corporate Strategy and the Community Strategy set out the vision and priorities of the council and its partners. This strategy aims to support the delivery of these priorities and to work in harmony with a range of other corporate, departmental and partnership strategies. It is important to stress that this strategy will not operate in isolation, but in the context of the contribution housing can make to place shaping, which will be its dominant theme.
- 3.2 The Corporate Strategy vision is for Brent to be:
- A great place: with a focus on reducing crime, disorder and drug misuse, improving cleanliness and environmental sustainability and giving local people a greater say in shaping the services that affect their lives.
 - A borough of opportunity: with a focus on increasing choice, improving health and prosperity.
 - One community: a focus on physical regeneration, improvement to housing and improving chances for young people, providing care and support to the vulnerable and supporting independent living.
- 3.3 The Corporate Strategy sets out a range of priorities through which housing can contribute to the delivery of the overall vision. In summary, we want to arrive at a position in which:

- There is an appropriate supply of new housing (market and affordable) in the borough that will meet the needs and aspirations of residents
- Programmes to regenerate priority neighbourhoods, including the delivery of new and refurbished homes in areas such as South Kilburn, Barham Park and Wembley, are taken forward.
- With our partners, we have implemented programmes to promote employment in the borough and reduce the barriers to employment experienced by the most deprived communities.
- We have achieved our targets for reducing the use of temporary accommodation for homeless families.
- We provide an appropriate level of support and regulation to private landlords to create a sustainable private rented sector.
- Housing services are responsive to Brent's diversity.
- Residents are provided with the advice and support necessary to help them access appropriate housing across all sectors.
- New housing is developed, let, managed and maintained with a view to delivering sustainable communities.
- There are clear and agreed priorities for the type, size and location of new housing to be developed and for the way in which access to new and existing homes is prioritised.
- An appropriate range of housing with support is available to those households that need either specialised accommodation or support to live in their own homes.
- Our investment in new and existing housing is contributing to measurable improvements in energy efficiency and is meeting climate change and fuel poverty targets.
- Tenants and residents in all tenures get the highest possible quality of service in line with agreed standards.

4. EVIDENCE BASE

- 4.1 The evidence supporting this strategy has been published as a separate document. In part, this is to ensure that the strategy itself is not overloaded with data but it will also provide an accessible, single source for key information about housing and related issues in Brent that can be updated as required and act as a resource for council staff and partners. In the longer term, we aim to integrate this work with the development of the Brent Profile, which will provide a single source of key information available to council services and partners through the Brent website.
- 4.2 Evidence has been and will continue to be drawn from a wide range of sources; these include:
- Brent's Joint Strategic Needs Assessment (JSNA), produced to support the Health and Wellbeing Strategy.

- Brent's housing need and stock condition survey.
- Strategic Housing Market Assessments at the regional, sub-regional and local levels.
- Relevant regional and sub-regional studies such as the regional Gypsy and Traveller Needs Assessment and the sub-regional West London Housing Requirement report.
- Work undertaken in relation to the Local Development Framework.
- Socio-economic data at the national, regional and local levels.
- Local data including supply and demand analysis, housing register and homelessness applications.
- Performance data for housing and other relevant services.
- Reports produced by partner agencies and national or regional bodies including the Greater London Authority.

4.3 Key Messages from the Available Evidence

4.3.1 This list sets out some significant points that have influenced decisions about the direction of policy and practice in this document. Detailed information is set out in the evidence base.

- Brent's diversity is a key factor impacting on housing need and demand and decisions about housing provision and housing services.
- There is a need for new supply of housing in all sectors – affordable, intermediate and market - and access to affordable housing is severely restricted.
- The current crisis in the housing market and the wider economy will impact not only on our delivery of new homes, but on homelessness, employment, debt and other areas with which this strategy is concerned.
- Brent has high levels of temporary accommodation compared to other London boroughs.
- Brent has high levels of deprivation in some neighbourhoods, often those with high concentrations of social housing.
- Market housing and, in many cases, intermediate housing, is not affordable to many households.
- Household sizes in Brent are higher than the national and London averages and there are high levels of overcrowding, particularly in social housing, but there is a severe shortage of larger homes.
- Brent has one of the largest private rented sectors in London, representing an important resource but also containing some of the worst conditions in terms of standards of repair and management, with a predominance of small landlords.
- Unemployment, poor health, low educational achievement, crime and anti-social behaviour are significant issues in areas with high concentrations of social housing.

- There are large numbers of older owner-occupiers, many of them on low incomes, at risk of fuel poverty and facing difficulty improving their homes

5. KEY MESSAGES FROM CONSULTATION

5.1 Discussions during the consultation process have been wide ranging and, while there have inevitably been differences of opinion and approach, there is an emerging consensus around the need to address some key areas of policy and practice if the strategy is to deliver what is required over the next five years. There is a shared recognition that current approaches may no longer be appropriate, especially in the face of serious economic problems in general and the state of the housing market in particular. It is also clear that, in some areas, there is tension between local and regional or national priorities and that progress on some issues may have implications for delivery of targets in other areas: for example, our ability to meet the requirement to reduce temporary accommodation use by 50% may be affected by the current market and by any shift in current priorities for access to affordable housing, either at the regional or local levels.

5.2 These issues are discussed in more detail below and a full report on the process and findings from consultation is available separately, but the key messages from consultation can be summarised as follows:

- Access to affordable housing has been based on housing need and, given the continuing shortage, this has restricted or blocked access for many for whom affordable housing may be the most suitable option. The other main impact has been to concentrate the poorest and most vulnerable households in social housing, militating against the creation of a good mix of household and income types within the sector. There is therefore a need to consider how housing need is defined and how access to affordable housing, both social rented and intermediate, is regulated.
- There is too little mobility between the different housing sectors and too little flexibility for people wishing to move between or within different sectors – for example into social housing from private renting or out of social housing into owner-occupation. Better advice on available options, a better mix of housing in neighbourhoods, provision of incentives and support for people wishing to move and greater flexibility over allocations would all assist in bringing about more movement.
- Linked to the above, people need to be given more choice and control over their housing options.
- Definitions of affordability and security of tenure need to be sufficiently flexible to cover a range of housing types that would suit people at

different stages in their lives. For example, to include more options for sub-market renting and new kinds of shared ownership.

- Housing organisations need to do more to tackle worklessness among tenants of social housing and those in temporary accommodation. Among other options, action needs to be taken to address the poverty trap for those in temporary accommodation and to provide better advice and better incentives for those in social housing to obtain work and enter into training, although it is acknowledged that the current economic climate will make this a challenging area.
- The council and housing associations need to move beyond the decent homes standard and towards the creation of a decent homes plus concept, which should include the surrounding neighbourhood as well as the housing stock itself. This should include attention to improved open space and the development of community infrastructure as well as the hard infrastructure of transport and other facilities.
- There needs to be a continued focus on the needs of vulnerable households in all sectors of housing and in particular the needs of older and disabled people and those who need or are able to move on from supported housing, hostels and residential care.
- Tenants, residents and communities need to have meaningful involvement in decisions that affect their homes and neighbourhoods. The council and its partners should not only consult, but seek active engagement in policy and service delivery.
- The council and its partners need to respond to the economic crisis through innovation and be willing to make the changes that will sustain progress in delivering new and improved homes and neighbourhoods and high quality services. This will require new approaches to funding and delivery and the development of new and more flexible products.

6. NATIONAL AND REGIONAL CONTEXT

6.1 Previous housing strategies and other documents have identified a range of priorities. Many of these remain relevant and our overall objectives do not differ substantially from those we have agreed in the past, but it is apparent that there is room for innovation and new approaches. There are a number of factors that have influenced the development of this strategy and will continue to have an impact on its implementation.

6.2 Most immediately, this strategy has been produced against a background of global economic problems. The strategy seeks to take a longer term perspective but is obliged to take account of the immediate and medium term prospects for the wider economy and their impact on the housing market and housing need, while acknowledging that these effects may be difficult to assess with absolute confidence.

- 6.3 Legislation requires that local housing strategies in London should be in general conformity with the regional housing strategy, for which the Mayor of London is responsible. This document takes account of the indications the Mayor has given so far about the direction of housing and planning policy, in particular the first draft of his Housing Strategy. As the Mayor's strategy goes through its public consultation phase up to its adoption, this strategy and its supporting documents will be updated as appropriate.
- 6.4 The government has announced proposals for changes to the Housing Revenue Account subsidy system which may allow opportunities for local authorities and ALMOs to build new homes and reforms to the welfare system that were published in early December 2008, which focus strongly on getting people on benefits back into work or preparations for work. The government's response to the economic situation places housing at the centre of efforts to bring about recovery, while linking changes in policy and legislation to wider aims on employment and social cohesion.
- 6.5 The government has indicated that it is keen to explore options through which local authorities can once again become significant providers of new affordable housing. While there had been movement in this direction prior to the current economic crisis – for example in the ability of ALMOs to bid for social housing grant funding – new opportunities are now beginning to emerge that the council will respond to over the course of this strategy. These developments will also form part of discussions with Brent Housing Partnership on the future role and direction of the ALMO.
- 6.5 The establishment of the Homes and Communities Agency and the Tenant Services Authority provide a new basis for the funding and regulation of housing providers, with the TSA also due to take on responsibility for local authority housing from 2010. The council is already engaged in dialogue with both organizations and will continue to develop positive working relationships that will take forward the aims of this strategy.
- 6.6 Finally, the indications from the evidence base and the direction of national and regional policy suggest a number of themes that the strategy will need to address if it is to fulfill its role in providing a rounded and robust approach that recognises the links between housing and other areas such as health, social care and community safety. The centrality of the role of the local authority and its partners as place shapers has already been noted and we have identified the following broad themes in addition:
- Sustainable communities: how we can create a mix of housing and household types that will contribute to making the community work and ensure that residents have access to employment and services.

- Neighbourhoods: the contribution of housing to the look and feel of the area through design, maintenance and management.
- Climate change and the environment: how housing can contribute to reducing CO2 emissions and other environmental concerns and tackling fuel poverty
- Crime and community safety: how housing can contribute to reducing crime and improving community safety, for example through design and good housing management.
- Diversity: how Brent's diversity should shape the direction of housing policy and practice.
- Partnership: the role of partnership working in delivering strategic priorities.

6.7 These themes cut across the various activities that the strategy covers and link and overlap with each other. For example, good housing design and management can help reduce crime as well as improving the look and feel of a neighbourhood and improving energy efficiency while reducing fuel costs for residents. The interdependencies between these themes are already clear in some respects, but will continue to evolve and shape the direction of the strategy over the next five years.

7. LOCAL CONTEXT

7.1 The following paragraphs summarise the current position for the main areas of activity with which this strategy is concerned. Further information is set out in the evidence base.

7.2 Housing Supply and regeneration

7.2.1 In common with boroughs across the London region, evidence of the need for new supply is overwhelming. At the local level, clear evidence is provided by council's housing needs study and from regular analysis of supply and demand, among other sources. While there is a particular need for new affordable housing, new supply across all housing types and tenures is required. It is also clear that this need will not be met in the short term. However, it is not a simple matter of numbers: an increase in supply alone is not enough unless it meets other requirements, such as tackling climate change, and provides the right balance of housing types and tenures.

7.2.2 The bulk of new supply is provided by the private sector and is targeted at owner-occupation. Housing associations receive funding from the Homes and Communities Agency (HCA) to deliver new affordable rented and intermediate housing and a large proportion of this is secured through agreements with developers in relation to planning applications aimed at ensuring a proportion of affordable housing in all developments above a

specified size. Brent Housing Partnership (BHP), the council's ALMO, has recently secured funding to develop new homes and, although the initial programme is small, further opportunities will be available, especially if proposed reforms to the Housing Revenue Account subsidy system proceed. In addition, the council has finalised a Private Finance Initiative scheme that will deliver both new affordable homes and social care facilities.

- 7.2.3 At present, in line with the current London Plan and local planning policy, the council seeks 50% affordable housing on suitable sites, 70% of which should be rented and 30% intermediate (mainly shared-ownership). For housing associations, the HCA specifies standards concerning design and quality, such as the Code for Sustainable Homes and the Lifetime Homes standard, although less stringent rules apply to private developers. There is a particular emphasis on delivering larger homes to meet the needs of families in temporary accommodation or living in overcrowded conditions.
- 7.2.4 The Mayor's draft housing strategy indicates a shift in priorities, moving away from an automatic requirement for 50% affordable housing on designated sites and changing the mix of affordable housing to a 60:40 split between rented and intermediate homes. The reasoning behind this is, in part, that the 50% target has never been met in practice and that a 60:40 split will provide more opportunities for working households and others with no realistic prospect of securing affordable housing under current arrangements. This thinking is consistent with the view that a better mix of household types – by family size, income etc - should be encouraged on new developments and existing estates, an option considered below. However, it is likely to impact on meeting other aspects of demand, particularly from homeless households. Alongside this change, the Mayor has retained the overall target of 50,000 new homes over three years and has recently announced new borough-level targets for new homes. For Brent, the Mayor expects 1836 new homes to be delivered between 2008 and 2011. However, the council is not convinced that the new target is deliverable and has doubts about some of the elements to be included in the calculation of the 50,000 total. Discussions on these issues are continuing and outcomes will be incorporated into this strategy when available. In return for agreement on the targets, the Mayor's draft strategy proposes a new settlement with London authorities that would provide greater local autonomy on the type, location and mix of housing to be provided. In general, the Mayor's strategy supports decision making on the housing mix to be provided based on appraisal of individual schemes, taking into account a range of factors including deliverability. Such an approach may provide a more flexible mechanism to support the creation of sustainable communities.

- 7.2.5 The Mayor's increase in the proportion of intermediate housing reflects the recognition that a large group of households on low or middle incomes are effectively excluded from the main housing market and will also be extremely unlikely to qualify for affordable rented housing. So far, efforts to meet the needs of this group have tended to focus on so-called key workers – for example, workers in the health service, education and the police – with specific schemes available to those meeting employment qualifications. In practice, these schemes have often been extended to other groups where they have been undersubscribed by the main target groups and a qualification based solely on income is effectively in place for many schemes already. This has increasingly been the case in the current credit crisis and a number of schemes have also moved to intermediate renting as sales have not proceeded. The Mayor has indicated his intention to move to a purely income-based qualification, where households with an income below £70,000 a year would become the main target group. The other emphasis for such schemes has been existing council or housing association tenants, who would free up rented homes by moving on into shared ownership. The strategy needs to consider how it can expand the options available to these groups and make more opportunities available to existing tenants, including those who are overcrowded or under-occupying as well as those who could move into owner-occupation. More widely, there also needs to be consideration of ways in which new housing products could be developed that offer a range of options to people on different income levels and with different short or long term needs.
- 7.2.6 One option might be a “build to let” arrangement, such as the model proposed by the British property Foundation. This would require consideration of planning issues as well as policy on tenure mix and density, but could provide an opportunity to attract institutional investment. The council will explore the options with partners.
- 7.2.7 Brent has one of the largest private rented sectors in London and the council works with private landlords to ensure that this stock is well maintained and managed and, in particular, to secure homes for use as temporary accommodation under a range of leasing and similar schemes. Evidence indicates that the sector has expanded in most London boroughs in recent years, partly through the growth of buy-to-let arrangements and partly in response to increasing demand.
- 7.2.8 Making best use of the existing housing stock is also a key factor in improving supply. This includes ensuring that council and RSL homes are let and relet efficiently, that under-occupation is tackled and that empty homes, especially in the private sector, are brought back into use. Incentive schemes are already in place to encourage under-occupiers to move, but there is a need to consider ways in which such schemes can be

made more effective and whether there are options to pursue similar initiatives in the private market.

7.2.9 Major regeneration schemes are in progress in Wembley and South Kilburn and plans for other areas are being developed. All of these schemes have an important housing aspect and will be key contributors to both new supply and the improvement of existing homes.

7.2.10 However, prevailing economic conditions present a number of threats to new supply and regeneration. In the private sector, new housing starts have fallen significantly. This impacts directly on the supply of affordable housing as ability to secure new affordable homes on private developments is restricted. While housing associations continue to receive funding through the HCA, they also rely on cross-subsidy from private sales to fund their work.

7.2.11 Market prices are falling and most analysts predict further falls, although this is still not enough to make the average home affordable to most first time buyers in Brent or London as a whole, especially while access to mortgage finance is restricted, even for those able to meet the cost. This impact is also being felt in shared-ownership schemes developed by housing associations. This is likely to lead to increased demand in the private rented sector, where rents have not fallen in line with house prices and, on latest evidence, appear to be rising. Some effects are difficult to judge at this stage; for example, the impact on the buy-to-let market, although there is evidence that buy-to-let is experiencing severe problems, with current owners struggling to meet mortgage costs and potential new entrants reluctant to enter the market. In some cases, this has already led to homelessness for tenants after mortgage default by landlords. In addition, funding arrangements for regeneration schemes are threatened by the banking crisis, with increasing costs of borrowing and a risk-averse finance sector. The government has introduced a range of measures aimed at supporting the housing market and protecting existing home owners at risk of arrears and repossession, but it is not possible at this stage to assess the impact of these interventions and, as the Mayor's draft strategy points out, price, income and other criteria make these schemes difficult to apply in London. Action to support the banks may mean increasing pressure on public expenditure in the short to medium term, which calls into question government support in both capital and revenue terms for councils and housing associations, potentially impacting on the delivery of housing and related services as well as delivery of new supply.

7.2.12 Conversely, the market situation may provide opportunities; for example for housing associations to purchase homes from developers or in the private market, although standards on space and design may be an issue,

and for local authorities and housing associations to secure more rented homes in the private sector.

7.2.13 New housing supply also needs to contribute to tackling climate change and improving energy efficiency. Housing is responsible for over 30% of carbon emissions and rising costs of gas and electricity put many people in danger of fuel poverty if their homes are not energy efficient. Housing associations are required to build to high standards of energy efficiency. While private developers are covered by less stringent building regulations, standards in new private sector homes are still usually much higher than in existing housing. However, most of the housing stock we will have by 2050 has already been built and while the council will continue to work with developers and housing associations to raise standards, the real challenge is presented by the existing stock, mainly in the private sector, and this is considered further below.

7.3 Tackling Homelessness and Reducing Temporary Accommodation

7.3.1 There are currently 3,300 households in temporary accommodation in Brent. Although the council has been successful in achieving significant reductions in temporary accommodation use, as well as reductions in applications and acceptances, the historically high temporary accommodation occupancy presents a challenge in meeting national targets and in delivering on other priorities. There are several reasons for the high level of temporary accommodation use and it is important that this issue is understood in its correct context. A key factor has been the council's decision to focus on the regeneration of existing estates. This has resulted in notable successes such as Chalkhill and Stonebridge and in a diversification of social housing ownership and management across the borough that has had positive outcomes for tenants and residents, as well as the achievement of the decent homes target well ahead of schedule. However, it has also had an impact on supply which, taken with stock loss through Right to Buy and the low levels of government investment in the past, has restricted access to permanent homes for homeless households.

7.3.2 The Homelessness Act 2002 requires local authorities to publish a five-year strategy, covering prevention of homelessness and availability of accommodation and support for people who are homeless or may become homeless. Brent's latest Homelessness Strategy was published in July 2008 and is a companion document for this strategy. The full versions of this and other strategies referred to in this document are available on the Brent website.

7.3.3 The strategy identifies a range of issues that will influence its development and implementation, including:

- Changes to Housing Benefit subsidy arrangements for temporary accommodation which may impact on the council's overall budget
- Legislation which will limit the use of hotel accommodation for 16 and 17 year olds and the introduction of Local Housing Allowance replacing Housing Benefit from April 2010
- Effect on demand and supply of HB being replaced by Local Housing Allowance for new tenancies from April 2008
- Case law requiring better coordination of services between housing authorities and adult social services departments to meet the needs of 16 and 17 year olds
- The government target to reduce the use of temporary accommodation by 50 per cent for homeless households by 2010
- Government investment to tackle overcrowding
- Government investment to tackle worklessness and the link between worklessness and housing need.
- Requirement of Housing Act 2004 to consider the housing needs of Gypsies and Travellers.
- Effect of transient and increasing population on housing need

7.3.4 There had been a year on year reduction in the level of homelessness approaches and acceptances from 2003/4 to 2006/7 but during 2007/08 there was an upturn in both homelessness decisions and acceptances, largely due to a reduction in available private sector accommodation. It is anticipated that economic conditions will increase pressure on homelessness as unemployment rises, repossessions and evictions increase and alternative avenues are closed off as a result of the credit crunch, although there may also be a positive impact on the supply of private rented housing. So far, there is little hard evidence of such an increase but this may be due to the time lag involved in possession proceedings and the fact that the full impact of redundancies and other pressures has not yet been felt. Similarly, employment tends to lag behind the overall economy even when a recovery is in progress, so there is an expectation that high unemployment levels will continue well into the life of this strategy.

7.3.5 The causes of homelessness in Brent have remained consistent over the last five years:

- exclusion by parents, other family and friends
- eviction from assured short hold tenancies
- violence, including domestic violence from within the home, domestic
- violence outside of the home or fear of violence from others
- non-violent family breakdown
- harassment and hate crime
- rent arrears

- mortgage arrears
- discharge from hospital, prison or the armed forces.

7.3.6 The national target for reducing temporary accommodation use, with the aim of a 50% reduction by 2010, will be a particular challenge since the council is starting from a high baseline. A range of actions is in place or planned, including:

- Increasing the supply of permanent, affordable homes
- Working with homeless households to achieve alternative solutions, for example in the private rented sector.
- Seeking new supply of high quality temporary accommodation that provides value for money, including the settled homes initiative that will enable temporary accommodation to be converted into permanent affordable housing stock
- Preventing homelessness through provision of housing advice and support
- Creating a single team to focus on procurement of private sector housing
- 50 per cent of all available lets are targeted at homeless households in temporary accommodation to support the Temporary Accommodation Reduction Plan.

7.4 Housing Options, Housing Advice and Homelessness Prevention

7.4.1 The council provides or funds a range of services aimed at preventing homelessness and assisting people to access housing in all tenures. These range from advice about available housing options to interventions to resolve problems between tenants and landlords in the private sector and mediation to prevent evictions by families or friends with whom households are living.

7.4.2 For many there is genuine pressure brought about by family disagreements. In these cases we have worked with families through mediation and floating support to assist excluded people to plan to meet their housing need at the earliest opportunity to avoid crisis.

7.4.3 Our strategy has centred on tenancy protection and advice work, along with lay advocacy, and these elements of our work make up the single highest contribution towards our overall homelessness prevention. However, further analysis is needed around the current root causes for evictions resulting in homelessness applications, and some additional work with landlords renting in the borough indicates there may be a willingness to work with us to better sustain tenancies in the private sector, particularly for those in housing need.

- 7.4.4 The council has developed very strong strategic links with partners in the borough on the issue of domestic violence which represents some 35 per cent of crime in the borough. There is an active Domestic Violence Forum with a housing sub-group which works closely with the housing division and domestic violence advocates, and the Needs and Private Sector Division part-funded a domestic violence training coordinator post within the Community Safety Team up to March 2008. The Sanctuary Scheme provides security to a property and advocacy support for households in fear of violence. The scheme is aimed at reducing the impact of domestic violence on individuals and families.
- 7.4.5 We have undertaken regular educational road shows in partnership with Connexions and Brent Homeless User Group, to make young people aware of the realities of homelessness and how they can access services before reaching a crisis around their housing needs and other support needs. Positive, improving trends with Black African and Black Caribbean under 18s indicates some reasonable measure of success for this key vulnerable group, which we recognise is in part due to the road shows.
- 7.4.6 The council has a Housing Advice Service which provides housing advice to assist customers to prevent homelessness and outline available housing options. This includes access to private sector lettings and rent deposit guarantees. In partnership with other west London councils we have developed a DVD outlining housing options available for use by customers and advisors. A pilot single homelessness surgery has been in operation since March 2008, specifically to improve services for applicants who are in housing need or at the risk of homelessness and who do not have a priority need under the homelessness legislation. Customers are signposted to a single homeless surgery at which various statutory and voluntary agencies are present, providing coordinated existing services for this client group, from a single point of access.
- 7.4.7 The Brent Citizens Advice Bureau and Brent Community Law Centre provide advice, assistance and signposting at a generalist level across all categories of law to residents living or working in the borough. The services are run on an appointment based service to customers referred directly by the council's Housing Advice Service (HAS) as part of an agreed referral protocol. The HAS will book appointments for customers who require debt or money advice and those who may require housing options advice. The BCLC also provide second tier specialist support to the council's Housing Advice Service, the Tenancy Protection Team and other voluntary and community sector agencies.
- 7.4.8 The Homelessness Visiting Service has worked successfully to verify homelessness applications. A home is visited by a Homelessness Person's Officer to discuss why an exclusion by a parent or other excluder

has, or is about to take place. This service mediates and if possible will resolve issues which may have caused the exclusion or threat of exclusion. At the time of writing this service is about to be moved to the HAS service. We have been working very closely with the Housing Benefit Division to ensure that housing benefit is fast-tracked to prevent possession proceedings. Having a prompt and responsive service has enabled us to build good relationships with landlords and has contributed towards encouraging more landlords to participate in the council's letting schemes. The partnership between the council and Connexions has provided for a Connexions Personal Adviser to be based within the Housing and Community Care Department to support young people with housing or emotional issues which may be preventing them from accessing or retaining employment, education or training.

7.5 Allocations and Lettings

7.5.1 Legislation requires the council to publish an allocations scheme, setting out how housing applications are prioritised and the system through which they will be dealt with, as well as requiring that priority is given to defined groups, such as homeless households. The objectives of the current scheme are:

- Justifiable and consistent decisions aimed at assisting households most urgently in need of accommodation or alternative accommodation;
- Fair access to our services regardless of race, gender, disability, age, religion, nationality, social background or sexuality,
- The lowest possible number of households in temporary accommodation, particularly bed and breakfast;
- Maximum use of the Council's housing stock in terms of both empty and under-occupied dwellings;
- Compliance with statutory responsibilities under the Housing Act 1996 & Homelessness Act 2002;
- A degree of choice of area for applicants; and
- Clear and published information about Council policy and practice, and explanations of decisions.

7.5.2 A Central Lettings Agency, Locata, has been set up to work with all partners to advertise and match people to homes. Movement between boroughs is possible because 1 in 10 vacancies will be available to tenants and homeseekers (including homeless households) living in any of the six local authority areas. Under the scheme tenants and homeseekers become members of Locata and actively search for a home. Vacant properties are advertised in a regular free sheet (called Locata Home) and on the Internet and members of Locata are able to bid for properties. All

members are placed, in date order, into a broad needs band according to their circumstances.

7.5.3 The council and partners have undertaken pilots in the use of lettings plans for particular schemes, with a view to securing a mix of household types that will support sustainability.

7.6 Private Sector Housing – Standards and Conditions.

7.6.1 The council's 5-year strategy for the private sector was published in 2005, setting out the following broad objectives:

- Prevent homelessness through advice and intervention as appropriate;
- Increase access into the private rented sector and preserve and encourage an affordable rental market;
- Improve housing conditions and management of the private rented sector by a combination of training, carefully targeted grants and where necessary enforcement;
- Improve housing conditions for owner occupiers through subsidised equity release (where appropriate), and grants;
- Increase the number of dwellings, in line with government targets, which meet the Decent Homes Standard occupied by vulnerable households;
- Provide adaptations to tenants and owner occupiers to enable people to live independently in their own homes;
- Build on our successful empty property strategy, regenerate properties and increase the supply of affordable housing;
- Implement HMO licensing and continue to ensure a co-ordinated approach with our Planners aimed at preserving existing HMOs;
- Extend advice to maximise energy efficiency initiatives to reduce fuel poverty;
- Ensure that the private sector is fully involved in local regeneration initiatives;
- Reduce crime and fear of crime.

7.6.2 As noted earlier, Brent has a large private sector compared to the rest of West London, with only a few London boroughs having more privately rented homes. Standards of management and maintenance are variable and while there are many good landlords, there are too many examples of poor practice. The council uses its powers to intervene where appropriate, for example through licensing of houses in multiple occupation and the use of enforcement action, while working together with landlords to improve standards in the sector cooperatively.

7.6.3 Brent also has large numbers of older owner occupiers, many of whom can be described as "asset rich but cash poor". These households may

face difficulty maintaining and improving their homes and, in particular, may be at risk from fuel poverty due to high fuel costs and poor energy efficiency. As noted earlier, housing in general is responsible for over 30% of carbon emissions in Brent and, while the council and housing associations can invest to resolve these issues in their own stock, resources to do this are limited and even more so when it comes to supporting private landlords and owner occupiers to make the necessary changes. A number of schemes are in place to assist owners, landlords and tenants to improve the energy efficiency of homes and the council works closely with its main partner, Energy Solutions North West London, to maximise access to advice and funding.

7.7 Managing Public Sector Housing

7.7.1 Public sector housing makes up a relatively small proportion of the total housing stock in Brent but its significance in this strategy is high. First, it provides the means to accommodate households unable to access market housing, due to affordability or other reasons. Second, the council and its housing association partners are directly responsible for its management and maintenance and therefore accountable to tenants for the quality of these services and able to influence the way in which housing estates and other stock holdings impact on wider neighbourhoods.

7.7.2 The council's housing stock is managed by Brent Housing Partnership (BHP), an arm's length management organisation (ALMO). BHP's Business Plan 2008-13 identifies two key strands:

- To maintain and improve on our core service of managing council housing in Brent – with four key themes:
 - People focused: the internal governance and management of BHP
 - Service excellence, including resident participation
 - Services for community sustainability
 - Asset management
- To expand our business, both in terms of more services provided for the people of Brent and beyond, directly or via the council, and in terms of taking a more active role in regeneration and redevelopment – with three key dimensions:
 - To provide more of what we currently do to both the council and to other landlords and housing organisations
 - To engage proactively in the regeneration of communities in Brent
 - To begin a journey towards developing and owning our own stock to assist housing supply in Brent and to build financial strength for our company

- 7.7.3 BHP has met its key objective of bringing the stock it manages up to the decent homes standard set by government (with the exception of some stock in designated regeneration areas such as South Kilburn, for which other options are being pursued) and has seen a steady improvement in performance against key indicators, allied to an increase in tenant satisfaction. Its focus is therefore shifting to the enhancement of current services and the expansion of its role. One crucial factor for BHP is that its stock of homes and therefore its income decreases each year owing to right to buy sales. Decisions will need to be taken within the next three years on the long term future of the council stock and the future of BHP as it moves into new areas of work, particularly in its emerging role as a developer of new homes.
- 7.7.4 As a result of the transfer of local authority stock and their role as the only organisations developing new affordable housing in recent years, housing associations are collectively the largest social landlords in the borough. There are over 50 housing associations with stock in the borough. The bulk of new affordable housing development is undertaken by ten of these, plus BHP, who work with the council through a joint commissioning agreement.
- 7.7.5 While this diversity of provision is welcome in many ways, it also presents challenges. Most obviously, there is a need to ensure consistency in service delivery and quality for tenants of different social landlords. Diversity of provision also means that in any neighbourhood or estate there may be several landlords operating, making consistency doubly important. The council has worked with the larger housing associations to agree common management standards and performance monitoring arrangements and has started a process of engagement between members and housing associations, including a role for the Overview and Scrutiny Committee, which will receive regular reports on housing association performance.
- 7.7.6 All social landlords in Brent also face challenges in making best use of their existing stock. In particular, levels of overcrowding have been growing. This might be addressed through looking at the opportunities to tackle under-occupation through offering incentives to people continuing to occupy larger homes after children or other family members have moved on or to opportunities to extend more opportunities to children of existing tenants or families sharing accommodation with other households.

7.8 Housing and Support for Vulnerable Households

- 7.8.1 The Supporting People programme offers vulnerable people support with housing issues, enabling them to achieve greater independence and sustain their accommodation successfully. It promotes housing-related

services which are cost-effective and reliable, and which complement care services. The Supporting People programme is central to the Council's work in providing housing and support to vulnerable people across a wide range of priority groups. During 2007/8 an average of 3,510 people in Brent received a Supporting People funded service at any time. Of these, 56% of people received an accommodation-based service and 44% received a floating support service.

- 7.8.2 The merger of Housing and Adult Social Care services into a single department in 2007 has paved the way for a number of changes in our approach. The Supporting People team is now located in the Commissioning Unit of the Adult Social Care wing of the department, allowing for closer coordination of activity, and the Transformation Programme in Adult Social Care will mean changes of emphasis in our approach to ensure that we meet the programme targets.
- 7.8.3 For example, we have agreed new targets to deliver additional extra care housing with an emphasis on replacing use of residential care for older people and others who need support. We have reviewed our approach to managing access to supported housing and move-on from accommodation for households in supported housing, hostels and other types of temporary accommodation. A single team, START Plus, focused on preventing the silting up of such accommodation and ensuring that vulnerable people can move into independent living was established in October 2008. The project is one of the elements supporting the key principles of how housing need for vulnerable people is addressed in the borough, and will help to deliver Adult Social Care transformation through assisting people to move out from residential care.
- 7.8.4 During 2007/08 the council worked in partnership with 44 Supporting People providers (including internal sections of Brent Learning Disability Partnership and Housing Care and Support). Seventy nine contracts using Supporting People grant were funded to provide housing related support services to vulnerable adults living in Brent.
- 7.8.5 In 2005 the Council wrote a Five Year Strategy for Supporting People in consultation with providers and stakeholders. The main purpose of the strategy was to provide direction for Supporting People providers and commissioners, to ensure a planned and coordinated approach to services funded through the programme, and to make sure that future spending is based on needs. This strategy is now being updated to reflect the changing needs of the programme, with the new strategy due for publication in 2009.
- 7.8.6 Since 2005 a number of new services have been set up which address the needs identified then. These have included:

- Expanding the number of people receiving floating support to help them stay in their own homes from 1107 in 2005 to 1541 in April 2008
- In 2006 setting up a new floating support service provided by Thames Reach Broadway for 50 people with mental health needs
- Increased support for homeless families, so that 10 families attending Brent Homeless Families Centre can receive specialist housing support
- Establishing a new floating support scheme in partnership with the Drug and Alcohol Action Team to support up to 60 offenders, and providing extra funding to increase the levels of staff provided at offender hostels
- Elders Voice has been funded to provide an accident prevention service and a handyperson service for older people and Willow Housing provides hospital discharge workers to support older people and those with disabilities to return home after a period in hospital
- Funding Innisfree Housing Association to pilot a housing support service for up to 15 older Irish people living in the private rented sector
- Setting up a new service jointly with NHS Brent (Drug and Alcohol Action Team) and Paddington Churches Housing Association to provide a floating support scheme for 40 people at risk of homelessness because of drug misuse
- Implementing the strategy for people with a learning disability in 2007 by selecting preferred providers and expanding the range and quality of services offered, increasing funding from less than £1million per year to a projected £1.3million in 2009-10
- Establishing a single access point, START Plus, through which all referrals for supported housing, floating support and move on are channelled

7.8.7 The current Supporting People Strategy sets out our overall goals:

- Complement the work of partners and stakeholders to implement relevant local, regional and national strategies by offering housing related support services that support their main objectives
- Develop better quality, more flexible services that respond more effectively to the needs of a highly diverse and ever changing community and deliver fair access.
- Work in transparent partnership with providers, stakeholders and service users to prioritise our services for the people who need and can benefit from them most.
- Provide preventative services delivering outcomes with real cost and quality of life benefits to the community across all tenures
- Provide services contributing towards making Brent a safer place to live

- Offer support services that aim to invest in our young people to secure their inclusion and achievement in our community
- Deliver innovation, new partnerships and more joint funding arrangements to improve the effectiveness and value for money of housing related support services
- Respect the rights of and listen to the views of the users of services when planning, delivering, reviewing or procuring services; helping them to help us deliver real change
- Provide good quality information about how to access services and what they offer; that is accessible, clear and available to all
- Be at the centre of the work of the West London sub-region and London Region to deliver the vision for Supporting People in London and cross authority services
- Work with providers to maximise opportunities for us all to develop our skills and knowledge so that we can deliver a better quality and more responsive service

8. PRIORITIES, OBJECTIVES AND ACTIONS

8.1 HOUSING SUPPLY AND REGENERATION

8.1.1 Consultation has confirmed that delivering new supply across all sectors should be a key priority for the strategy and that, in the long-term, this is the only means by which need and demand can be met and a balanced and accessible housing market achieved. However, current conditions present an immediate threat to new supply and it may be difficult to meet agreed supply targets. Much will depend on the government's willingness to continue to support new supply through funding and on the HCA's ability to support housing associations to deliver in difficult conditions. However, the strategy also needs to identify action that the council and its partners can take mitigate the effects of the economy and the housing market.

8.1.2 It is important to consider what mix of new supply is appropriate both at the borough and neighbourhood levels. For example, while there is an acknowledged need for larger homes, there is also a continuing need for smaller homes for single person and childless households. At the London level, the Mayor has rejected an overall 50% affordable housing target for new developments. Similarly, it may not be appropriate to build more social housing in areas where there is already a high proportion, and it may be appropriate to seek higher levels of affordable housing in areas where market housing dominates. In regeneration areas, it may be

necessary to boost the supply of market and intermediate homes to provide a more sustainable mix.

- 8.1.3 Discussions during consultation indicate that achieving the right balance of new supply will be critical, not only in meeting immediate needs but also in ensuring that new developments are sustainable, both in themselves and in the context of the neighbourhoods in which they are located. There was particular emphasis on the need for larger homes to meet need arising from homelessness and overcrowding and for new supply to meet the needs of smaller, mainly single person, households currently occupying various kinds of supported housing, such as hostels or residential care homes, who would be able to move on to independent accommodation with appropriate support. The need for more intermediate options, in particular housing at rents below market levels but above social rents, was also stressed, along with the need to make this housing more widely accessible through an income-based qualification system.
- 8.1.4 A similar approach may be required in regeneration schemes, whether these consist largely of new homes - Wembley for example - or the remodeling of existing estates such as South Kilburn. Provision of market housing is essential to the funding of these schemes, but there has also been an assumption, made explicit in current planning policy, that there should be no loss of affordable homes. It is at least questionable whether this remains a sustainable policy and the creation of functioning communities may require a greater emphasis on tenures other than social renting. Consultation has indicated broad support for an approach that will lead to a more balanced mix of tenure and sizes in regeneration areas
- 8.1.5 Brent's diversity in terms of ethnicity, nationality, faith, culture age and disability requires that housing supply should be sensitive to the particular needs of specific groups. These needs may be reasonably easy to identify, such as providing accessible housing for older or disabled people, or may be more complex. For example, some ethnic groups have larger average household sizes and therefore present a higher proportionate demand for larger homes, while some cultures will require particular facilities either in the home or neighbourhood. Some of these requirements are well understood, but others are not and planning for new supply and regeneration needs to take account of these needs in homes and in terms of the infrastructure supporting developments.
- 8.1.6 Consultation indicates strong support for better provision for older people and those with disabilities through existing targets for Lifetime Homes and wheelchair accessible housing. In addition, the need to provide appropriate community facilities, safe, accessible open space and other "soft" infrastructure elements was highlighted.

- 8.1.7 Disproportionately high levels of worklessness among tenants of social housing are a particular emphasis for government and feature strongly in the Mayor's draft strategy. Brent already has a range of successful employment schemes and new projects are set out in the Local Area Agreement. With unemployment expected to rise, especially in the construction industry which has been an important element in training and employment schemes, effective action to tackle worklessness will present real challenges. Consultation showed strong support for schemes to encourage people into employment, training and volunteering opportunities.
- 8.1.8 The Mayor has expressed a desire to strengthen action to bring empty homes back into use, with tougher targets at the regional level. Brent has a good record in this area but there may be more that could be done. Current market conditions may encourage more owners to leave homes empty rather than sell and in this situation it may be appropriate for the council to take a stronger line, for example through the use of compulsory purchase. Consideration also needs to be given to how empty homes in the private sector could be brought into use as affordable rented housing. Consultation indicates support for action to bring empty homes back into use, particularly through use of existing local authority powers, including compulsory purchase, and through housing associations purchasing homes with HCA support.
- 8.1.9 In the current climate, it will be necessary to explore new mechanisms to secure the funding and create the delivery vehicles that will sustain an increase in supply. The council will work with partners to support innovative approaches to development and regeneration and ensure that community involvement is at the centre of plans and that wider social regeneration goals are supported by housing schemes.

PRIORITIES

Work with the HCA, developers, housing associations and BHP to deliver agreed new supply targets with a particular emphasis on larger homes and housing with support for vulnerable people

Ensure an appropriate mix of tenures, sizes, locations and household types that will support sustainable communities

Work with HCA, developers, housing associations, BHP and residents to encourage innovation and put new delivery mechanisms in place

Ensure that social regeneration objectives, including employment and the creation of sustainable neighbourhoods are at the centre of new housing and regeneration schemes

Continue work to bring empty homes back into use

Explore new delivery vehicles and tenure types that will support new supply and regeneration in the current economic climate

8.2. Tackling Homelessness and Reducing Temporary Accommodation

- 8.2.1 The schemes outlined in section 7 above aim to meet the 50% reduction target, with both the settled homes project and provision of new permanent supply featuring in Brent's new Local Area Agreement. However, homelessness and efforts to tackle it have an impact on other priorities and objectives in this strategy.
- 8.2.2 A 50% reduction in temporary accommodation use would present a challenge in any circumstances and, in the context of the economy, will be even more difficult. A possible reduction in new permanent supply, together with a likely increase in homeless applications, will require an even stronger focus on this issue. Current policy ensures that a high proportion of new affordable homes and relets within the existing stock goes to homeless households. This restricts access for other households in housing need and on low or moderate incomes. It also skews the balance of households in affordable housing owned by the council and housing associations. There is a difficult balance to be struck between meeting homelessness demand and reducing temporary accommodation use and adopting an approach that will support sustainable communities in the long term.
- 8.2.3 Consultation has recognised the importance of meeting urgent need. However, there is also strong support for an approach that balances these needs against others that may not receive high priority at present. There is concern that, for example, issues of overcrowding are unlikely to be tackled effectively and mobility within the social sector through transfers is likely to remain very restricted. While a combination of action to increase mobility and available vacancies through such methods as incentives for under-occupying households and action to increase take-up of private sector lettings by homeless households may contribute to meeting homelessness targets and freeing up additional opportunities for other groups, there is support for reviewing existing priorities. Consultation accepted that homelessness is likely to increase, but there was a strong emphasis on the need for additional attention to prevention and advice.
- 8.2.4 It has been noted earlier that in the past year it has become more difficult to procure private rented housing for use as temporary accommodation.

Whether current market conditions will alter that is difficult to judge at this stage, but there are some indications that more property may become available for letting. It is also necessary to consider the role of the private sector in providing permanent solutions for homeless households, either directly or through schemes such as Settled Homes. While recognising that problems of affordability and security in the private sector are national issues on which a local strategy can have limited impact, consultation indicated support for continued and, if possible, increased use of the private sector and, in particular, for schemes such as settled homes, which could provide permanent solutions.

PRIORITIES

Achieve 50% reduction target by 2010

Ensure best use of existing stock to support delivery of 50% reduction

Extend partnership with private sector to deliver temporary and permanent options

8.3 Housing Options, Housing Advice and Homelessness Prevention

- 8.3.1 As illustrated above, a range of services is available and these are constantly reviewed and revised to address the causes of homelessness. It is intended that the overall approach outlined will continue, but there are options for changes of emphasis.
- 8.3.2 The Chartered Institute of Housing, in a recent paper anticipating the publication of the government's housing reform green paper, has suggested that there should be an equal emphasis on crisis intervention and on longer term approaches that seek to educate and inform and provide appropriate advice through a households housing "career", with a view to avoiding problems and steering people towards the most appropriate options. A similar approach is encouraged in the Mayor's draft strategy. As with other issues, striking a balance between services that offer immediate and measurable results and those that have a longer-term outlook is not straightforward in the context of high housing pressures and limited resources.
- 8.3.3 Consultation recognised the value of existing services but there were arguments for a move away from crisis intervention towards a more general approach that mirrors the CIH proposal. It was recognised that this would need to be coupled with other proposals to inject more flexibility, choice and control into the housing system and be linked to initiatives to promote employment.

PRIORITIES

Maintain emphasis on preventative services

Explore opportunities to deliver broad-based options advice to improve access to appropriate housing solutions

8.4 Allocations and Lettings

- 8.4.1 The fact of and the background to the shortage of affordable housing are well documented. Among other factors, the loss of housing stock through right to buy has not been balanced by provision of new homes over a long period and, despite recent increases in investment and recognition of the need to boost supply overall, this shortage will not be remedied quickly. This has been coupled with a general move towards owner-occupation which, despite current problems, is seen as the tenure of choice by most households. In the long term, this trend will continue and the council is committed to improving opportunities for Brent residents to own their own homes, including through shared ownership. However, there will be a continuing need for affordable rented housing and other intermediate options, not just for those in serious need but also for those for whom affordable or intermediate housing is appropriate at a particular stage in their lives.
- 8.4.2 The factors mentioned above, among others, have led to a fundamental change in the way social housing is allocated and used; crudely, social housing provides, or at least is perceived to provide, for the poorest and most vulnerable. Although households are able to exercise choice over the location and type of housing, including the option to move outside the borough, this choice is restricted to those who have sufficient priority. Access to affordable housing for other groups is severely limited and those already in affordable housing may find it very difficult to obtain a move to different accommodation or to another area within or outside Brent as and when their circumstances change. There is a clear policy aim at the national and regional levels to move back to a position in which social housing provides quality and choice for a broad range of household and income groups, but there is a tension between this aim and the reality of shortage and restricted access.
- 8.4.3 New housing developments, other than those that are very small or specialised, will normally contain a mix of tenures and therefore be accessible to a wide range of households, although within this range the social rented element will be available only to those with sufficient priority. On existing estates, allocations policies and/or the restricted tenure type will generally result in concentrations of particular groups. On social

- housing estates, this will mean high numbers of households with children, with disproportionate rates of unemployment or other needs. In areas where the stock is privately owned, access will be restricted to those who can afford it. This raises questions not only about the way in which social housing is allocated, but about the location and type of new developments in areas where owner-occupied homes dominate.
- 8.4.4 A key proposal arising from consultation was a suggestion that the council should review its allocations scheme to identify ways of broadening the categories of people who may get priority and creating a more flexible system that would encourage aspiration and choice. The general principle of ensuring a balance of household and housing types in neighbourhoods should be the starting point for allocations
- 8.4.5 Arguably, the current approach to allocations perpetuates deprivation and ensures that communities are not mixed, as well as excluding or severely limiting opportunities for many groups for whom affordable housing would be desirable, such as key workers or younger households on low incomes. On the other hand, any change to current priorities would need to be within the law and has the potential to impact on the council's ability to meet temporary accommodation targets, not to mention the impact on households who are already facing lengthy waits for permanent homes.
- 8.4.6 As noted in response to earlier questions, the consensus from consultation is that, while the challenges are acknowledged, the aim should be to adopt an approach that provides a community mix that is most likely to contribute to sustainability.
- 8.4.7 Funding for new affordable housing is provided on a sub-regional basis and, in part because of this, letting and allocations schemes across London now operate sub-regionally, with moves to develop a London-wide scheme in place. One positive aspect of this is that it offers those households who qualify the opportunity to move across borough boundaries, a form of mobility that is routine in the private market. However, there is an alternative view that the sub-regional approach to funding and allocations is complicated and leads to a loss of control for boroughs. Consultation suggests that there is continued support for a sub-regional approach from partners and that this remains the best option in the context of sub-regional funding allocations and the imbalance of new supply across the sub-region and London as a whole.
- 8.4.8 Finally, our approach to allocations needs to encompass the possibility of new products and new criteria. In the private sector, options such as build to let or other forms of market or intermediate renting may be attractive to developers in the current climate. At the same time, changes to the HRA subsidy scheme will allow for new local authority development outside that

regime, with the possibility that rents would not need to follow the established system. Similarly, the Mayor's draft strategy calls for more flexibility for social housing providers in setting rents and letting homes. These changes would provide opportunities for households not currently receiving any priority to access affordable housing, but would also require consideration of how access to such homes would be achieved.

PRIORITIES

Review allocations scheme

Explore means to encourage mobility within and outside the borough

Explore access arrangements for new housing products

Review progress and future options for the use of lettings plans

8.5 Private Sector Housing – Standards and Conditions

- 8.5.1 The government has set a target for application of the decent homes standard in the private sector, but resources to deliver it in the form of grants or equity release are limited and, in the case of the latter, take-up has been disappointing. Similarly, housing improvement has the potential to make a significant contribution to reducing carbon emissions and although a range of help is available, progress will still rely largely on the willingness of individual owners to invest.
- 8.5.2 Consultation indicated a desire for the council to set a firm and ambitious target for energy efficiency in the private sector, since poor energy performance and inadequate heating are one of the main reasons homes may fail on the Housing Health and Safety Rating Standard and have particularly severe effects on the lives of older people. This would also contribute to meeting carbon emission targets.
- 8.5.3 Some issues concerning the impact of economic problems on the sector have been noted earlier, but two points are worth highlighting. First, what impact there might be on the willingness of landlords to invest in maintaining and improving their stock and second whether there is likely to be an increase in letting by those unable to sell. Also, in common with other boroughs, Brent has experienced growth in buy-to-let, especially on new private developments. Many of these investors may now face difficulty meeting costs and, although hard evidence is scarce, the future of the buy-to-let market is at least uncertain.

- 8.5.4 Consultation emphasised the potential impact of market conditions on the sector and the need to monitor changes closely. The Mayor's proposals to encourage more institutional investment in the sector were welcomed, although it was felt that this might be challenging in the current climate. There was an expectation that housing associations should be able to move to buy from those seeking to exit the buy-to-let sector and that the HCA should support such initiatives.
- 8.5.5 As noted earlier, resources are limited but, in addition to local authority funding, there are other streams available for works in the private sector. The energy companies are obliged to fund energy efficiency works and schemes in Brent are administered by Warmzone, while the proposed CESP programme offers opportunities to carry out more extensive works in selected areas. The regional housing pot has a range of funding streams under the control of the Mayor, who has indicated interest in both energy and climate change issues and empty homes. Although the current equity release programme to fund improvements has not proved effective, new proposals are being worked up for a sub-regional programme. It is important that any alternative sources of funding are identified and used.

PRIORITIES

Continue to support programmes of funding, advice and support to private landlords

Set a firm and ambitious target for energy efficiency in the private sector

Encourage more institutional investment in the sector

Encourage housing association intervention in the sector where appropriate

Maximise investment from all available funding streams

8.6 Managing Public Sector Housing

- 8.6.1 The role of the new regulator will be crucial and the council has begun a dialogue aimed at establishing a close relationship with the Tenant Services Agency. Outcomes from the TSA's national conversation will give clearer indications of tenant expectations and the direction the Agency proposes to take and we expect that findings will be similar to those emerging from our own consultation in terms of management standards and the role of tenant engagement.

- 8.6.2 Consultation indicated recognition of the need for greater consistency of service for tenants of all social landlords. The council's work to develop common management standards and a reporting framework were welcomed but more widely there was support for the view that associations need to address issues of stock condition, especially where they have limited local presence, and issues arising from multiple ownership of homes in particular neighbourhoods. It was felt that it is too early to assess the impact of new structures for funding and regulation through the HCA and TSA but the need for the council and housing associations to work closely with both bodies was stressed.
- 8.6.3 Housing associations have a central role in the development of new housing and ensuring that design, quality and allocations policy contribute to sustainability. It is equally important that housing management works to the same end, for example in the approach taken to crime and anti-social behavior and helping tenants into work.
- 8.6.4 The Mayor's draft strategy the role of housing associations in ensuring quality in design and building and proposes a stronger role for them in the development process. As noted with regard to the question above, consultation stressed the need for housing associations to work with each other and the council to develop common and consistently high standards of management. In particular, consultation sent a clear message about the potential role of tenants in all of these processes
- 8.6.5 As noted earlier, the future role of BHP will need to be agreed and, as part of this discussion, decisions will need to be made on how the council stock will be managed in the future. There are a number of options, including the potential for BHP to become a housing association, and discussions between BHP and the council and consultation with tenants will need to take place during the lifetime of this strategy. Consultation stressed the need for the strategy to set out the options that will inform discussion on the future of BHP and to reflect the approach BHP has taken in developing its role.
- 8.6.6 It can be very difficult for existing tenants of social housing to obtain transfers if they need to move to a larger home. In part, this can be tackled through improved incentives and support for people who are currently under-occupying to move to smaller homes, but this alone will not meet demand. It is therefore necessary to consider how existing tenants can be given greater access to new larger homes that will be built as part of development programmes and how other initiatives to improve mobility, such as access to shared-ownership schemes, can be enhanced.
- 8.6.7 Consultation indicated concern about inflexibility in the current system in general and about overcrowding in particular, especially where this can

lead to homelessness through ejection of children or other family members. There was widespread support for the development of any initiatives that could provide more movement within the system, both within and outside the borough, and for the development of improved incentives and targeted advice and support to households who need to move.

- 8.6.8 Although BHP and our housing association partners have achieved the decent homes standard, there is a need to take this work to the next stage. The council supports the Mayor’s proposal for a “decent homes plus” model, which we have already begun to explore. One aspect of this would be consideration of repair, maintenance and improvement issues outside individual homes in the neighbourhood in general and the surrounding environment. The council will explore ways in which this concept can be taken forward and, in particular, how it can be funded.

PRIORITIES

Establish a close relationship with the Tenant Services Agency.

Ensure greater consistency of service for tenants of all social landlords.

Ensure housing management practice contributes to community sustainability with full tenant and resident involvement

Agree the future role of BHP

Explore options for existing tenants to be given greater access to new larger homes

Improve incentives and targeted advice and support to households who need to move

Explore options for the adoption of Decent Homes Plus

8.7 Housing and Support for Vulnerable Households

- 8.7.1 New provision for vulnerable households – such as extra care housing – is largely funded from the same pot as all other new housing. Therefore, the same tension exists between competing priorities as with, for example, the balance between rented and intermediate homes. Although consultation recognised the tensions between different sources of demand, there was support for the development of new schemes to enhance move-on opportunities for those in various types of supported accommodation,

8.7.2 As noted earlier, many vulnerable households live in the private sector, especially older people. National and local policy is focused on enabling people to remain in their own homes and the council carries out a range of activities in line with this policy; most obviously, this includes funding and delivering adaptations to assist people with physical disabilities. However, this work is not always aligned with the additional requirement to ensure that private sector housing meets the decent homes standard. Consultation indicated support for firm targets to improve warmth and energy efficiency as this would tackle one of the most prominent problems for owner-occupiers and private tenants. More generally, it was recognised that providing financial and other support for adaptations is more cost effective than having to place people in residential care and would be consistent with the council's target to reduce use of residential care through the adult social care transformation programme.

PRIORITIES

Develop new schemes to support move-on

Develop schemes to improve warmth and energy efficiency, particularly for older households

Reduce use of residential care through provision of more appropriate housing solutions

9. Delivering the Strategy

- 9.1 While the council must provide strategic leadership, our objectives are only achievable through a continuation and extension of the successful partnership working we are already undertaking. As with other aspects of the strategy, our partnerships will need to evolve and change in response to the economy, policy developments and other factors that will drive change and innovation over the next five years.
- 9.2 We will monitor delivery of the action plan, providing regular reports to elected members as well as partners and updates of the strategy and its supporting documents will be made available through the Brent website. Where appropriate, we will undertake further consultation as proposals set out in this document or emerging in the future are worked up.
- 9.3 This strategy has been prepared with input from a steering group comprised of council staff and partners. As it moves into its delivery phase, we will review these arrangements with a view to establishing a

new group that will oversee progress and provide a sounding board for new initiatives.

Appendix

The documents in the appendices are available separately through the council's website

www.brent.gov.uk/hstrategy

Hard copies of this strategy and any of the supporting documents will be available upon request.