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**REPORT FOR: CABINET**

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**Date of Meeting:** 14 November 2019

**Subject:** Review of Housing and Homelessness Strategies (Part 1)

**Key Decision:** Yes

This decision is Key because it is likely to:

- (i) be significant in terms of its effects on communities living or working in an area of two or more wards of the Borough.

**Responsible Officer:** Nick Powell  
Divisional Director – Housing  
Housing Services  
Community Directorate

**Portfolio Holder:** Councillor Phillip O'Dell  
Portfolio Holder for Housing

**Exempt:** No

**Decision subject to Call-in:** Yes

**Wards affected:** All wards

**Enclosures:** Appendix A: Housing Strategy  
Appendix B: Homelessness & Rough Sleeping Strategy  
Appendix C: Housing Evidence Base  
Appendix D: Summary of consultation  
Appendix E: EqIA

## **Section 1 – Summary and Recommendations**

<p>This report sets out the first part of the review of the housing and homelessness strategies. The first part of the review comprises the Housing</p>
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Strategy and the Homelessness & Rough Sleeping Strategy. The second part will follow in early 2020, comprising the Housing Allocations Scheme and the Tenancy Strategy & Policy.

**Recommendations:**

1. Cabinet is requested to approve the Housing Strategy 2019.
2. Cabinet is requested to approve the Homelessness & Rough Sleeping Strategy 2019.

**Reason:**

The Housing Strategy is a key strategic document. Approval of this document enables us to set out our housing priorities and communicate these to stakeholders.

The Homelessness & Rough Sleeping Strategy is both a key strategic document and a statutory requirement. Approval of these documents enables us to set out our homelessness priorities, meet our statutory responsibilities and reduces the risk of legal challenge.

## **Section 2 – Report**

### **1. Introductory paragraph**

This report sets out the first part of the review of the housing and homelessness strategies.

Cabinet is requested to approve the Housing Strategy 2019, which is a key strategic document, and the Homelessness & Rough Sleeping Strategy 2019, which is both a key strategic document and a statutory requirement.

The suite of housing and homelessness strategies sets out the Council's priorities for housing in Harrow and responds to changes in the housing sector, including the Homelessness Reduction Act 2017 (HRA 2017).

They help the Council meet its vision and corporate priorities, particularly Building a Better Harrow, Supporting Those Most in Need and Delivering a Strong local Economy for All.

They also assist Housing Services in meeting its priorities as detailed in the Smarter Housing Plan, particularly those relating to Housing Regeneration and Housing Needs.

The proposed strategies and appendices will help us to focus the Council's limited resources on those local families with the greatest housing need and to meet the statutory duties placed on the Council as a local housing authority.

The objectives reflect the priorities identified through consultation with stakeholders. Wide engagement has been carried out with residents, officers, Members, Registered Providers (housing associations), voluntary & community sector organisations and private sector rented landlords.

An Executive Summary or Housing Prospectus will be produced once the Housing Strategy has been approved for use by both officers and Members.

## **2. Options considered**

### **2.1 Housing Strategy**

The Housing Strategy is a key strategic document but is not a statutory requirement.

The options considered are:

- To not have a Housing Strategy

This option is not recommended. The Housing Strategy allows us to set out our housing priorities and communicate these to stakeholders.

- To not review the Housing Strategy and to keep the existing strategy and housing priorities

This option is not recommended. The context in which the Council operates has changed since the last review of the Housing Strategy so it is important to update the strategy to reflect policy and legislative changes and set out our new housing priorities.

- To review the Housing Strategy and to agree new strategic priorities in relation to affordable housing supply, private sector housing, vulnerable people, homelessness and rough sleeping.

This option is recommended. This option enables us to set out our housing priorities and communicate these to stakeholders. This option allows us to update the strategy to reflect policy and legislative changes that have occurred since the last review.

### **2.2 Homelessness & Rough Sleeping Strategy**

There is a statutory requirement to publish a Homelessness & Rough Sleeping Strategy, with a specific obligation to submit the strategy to MHCLG by 31 December 2019. The Council is required by statute to review its Homelessness Strategy within every 5 years and there have also been significant changes brought in by recent legislation and policy that need to be taken in to account. Reviewing the Homelessness Strategy is necessary for the Council to comply with its statutory duty and to reduce the risk of legal challenge.

## **3. Background**

The current housing and homelessness strategies are as follows:

- Housing Strategy 2013-2018
- Homelessness Strategy 2013-2018 (extended to December 2019)

- Housing Allocations Scheme 2015
- Tenancy Strategy (2012) & Tenancy Policy (2012)
- Private Sector Housing Strategy 2013-2018

#### **4. Current situation**

The first part of the review of housing and homelessness strategies focuses on the Housing Strategy and the Homelessness & Rough Sleeping Strategy. The Private Sector Housing Strategy has been incorporated into the new Housing Strategy.

The second part of the review of housing and homelessness strategies focuses on the Housing Allocations Scheme and the Tenancy Strategy & Policy.

#### **5. Why a change is needed**

The Housing Strategy is not a statutory requirement but is a key strategic document.

It is a statutory requirement under the Homelessness Act 2002 to review the Homelessness & Rough Sleeping Strategy within every five years from the date of publication of the previous homelessness strategy and then to produce a strategy based upon this evidence base. Additional duties on local housing authorities to assist those who are homeless or threatened with homelessness were also introduced by the HRA 2017. The appendices are considered necessary for the Council to meet specific duties under the HRA 2017. The National Rough Sleeping Strategy 2018 requires that all local authorities submit their Homelessness & Rough Sleeping Strategy to MHCLG by 31st December 2019.

A range of changes have occurred since 2012 related to key policies, legislation and drivers contained in the housing and homelessness strategies.

These include:

- Changes to welfare benefits (e.g. Benefit Cap, Bedroom Tax, Universal Credit, benefit freeze)
- Housing & Planning Act 2016
- Grenfell Tower fire June 2017
- Homelessness Reduction Act 2017
- Social Housing Green Paper 2018
- National Rough Sleeping Strategy 2018
- Lifting of HRA borrowing cap
- Risks associated with Brexit
- National Planning Policy Framework (2019)
- draft New London Plan (2019)
- London Housing Strategy.

At a regional level the drivers have changed and include the London Housing Strategy and the London Plan. Sub-regionally a new West London (including Harrow) Strategic Housing Market Assessment (SHMA) has been completed.

The strategies should also reflect local changes to the Harrow Ambition Plan, Housing Services' Smarter Housing Plan, regeneration plans, Adult Social Care pressures and challenges of income levels and affordability.

The Housing Evidence Base has been updated to reflect current data and trends in respect of affordability, population, homelessness and housing need, social housing, supported housing and new supply. The Housing Evidence Base is attached as Appendix C.

The proposed changes to the strategies are intended to make the strategies more relevant, compliant and clearer to all stakeholders.

## **6. Consultation**

Consultation has been carried out with a range of stakeholders including:

- Cross-party Members Working Group
- Residents Board, a strategic group made up of selected council tenants and leaseholders
- Housing Matters, our residents meeting for council tenants and leaseholders
- Survey in Homing In, our residents magazine for council tenants and leaseholders
- Online survey, open to any interested respondent
- Voluntary & Community Sector organisations
- Registered Providers (housing associations)
- Private rented sector landlords
- Homelessness Task Force members
- Officers across Housing Services
- Officers across other council services.

A summary of the outcomes of the consultation is attached as Appendix D.

## **7. Main changes to the Housing Strategy**

The strategy has been updated to reflect current priorities and context. It continues to have an overall focus on increasing the supply of new affordable housing, which can only be achieved through increasing the supply of new housing overall whilst maintaining and improving the quality of existing housing in all tenures. Another theme that emerged through the consultation is the importance for any policy changes to be clear, fair, transparent and applied consistently. Stakeholders also recognise the value of projects to increase the availability of affordable housing, such as the under-occupation incentive scheme, but emphasised the importance of resourcing such schemes for them to be effective.

The Private Sector Housing Strategy has been incorporated into the Housing Strategy.

Housing Services and Adult Social Care have been working together on the Supported Housing section, which takes account of the Extra Care Housing Strategy approved by Cabinet in 2018.

Our new proposed Housing Strategy objectives, based on the priorities identified during consultation with stakeholders, are to:

- 1) Prevent and tackle homelessness and rough sleeping
- 2) Promote realistic housing options for people who need to move
- 3) Prioritise new homes for people living or working in Harrow
- 4) Increase the supply of affordable homes to rent and buy
- 5) Meet the needs of older and vulnerable residents
- 6) Improve quality and standards, especially in the private rented sector.

The strategic priorities for private sector housing, based on the consultation with stakeholders, are to:

- 1) Increase the supply of privately rented accommodation, including bringing empty properties back into use
- 2) Enable and enforce better housing conditions in the private sector.
- 3) Meet the needs of vulnerable households living in the private sector.

The new Housing Strategy 2019 is attached as Appendix A.

## **8. Main changes to the Homelessness and Rough Sleeping Strategy**

The Homelessness and Rough Sleeping Strategy must be submitted to the Ministry of Housing and Local Government (MHCLG) by 31 December 2019.

The Homelessness and Rough Sleeping Strategy objectives, based on the priorities identified during consultation with stakeholders, are to:

- 1) Prevent homelessness through advice, support and the use of personal housing plans
- 2) Reduce the number of households in temporary accommodation
- 3) Help people access economically realistic housing options
- 4) Provide extra help with housing advice and options to vulnerable groups
- 5) Support rough sleepers to find housing solutions and access other key services
- 6) Communicate key homelessness messages to residents and professionals.

Changes to Rough Sleeping section:

- Addition of rough sleeping to the homelessness strategy to meet new statutory requirements
- External funding secured for rough sleeping services so we can now put in place services in Harrow to reduce rough sleeping and work with West London partners. Having successfully bid for funding to develop services for rough sleeping and single homelessness, we intend to continue

delivering these services should our general homelessness resources allow, if future specialist funding ends.

- New services include:
  - Rough Sleeping Coordinator
  - Increased number of supported accommodation units provided by FirmFoundation
  - Outreach worker and floating support (with mental health speciality) based at FirmFoundation

Changes to Single Homelessness section:

- Improved service offered to single homeless (non-priority) households
- One housing solution offered, often outside London, to anyone at imminent risk of rough sleeping
- New service- Single Homelessness Officer
- New Transitional Insurance scheme
- More financial assistance on a case by case basis

Harassment & Illegal Eviction:

- Changes to Assured Shorthold Tenancies have made it harder for landlords to use 'no fault' evictions and this may be abolished entirely.
- This *may* lead to a rise in illegal evictions (under Protection from Eviction Act 1977).
- We will monitor and if necessary we will develop a Tenancy Relations service to address this.

Changes to the Allocation and Procurement of Homelessness Accommodation:

- Aim to use private rented sector housing to relieve homelessness rather than Temporary Accommodation, as permitted by the new Act
- There is insufficient local accommodation for homeless households at rents that can be afforded by lower income households, particularly those affected by welfare reform (including the freezing of LHA rates), so the Council will continue to prioritise those with the most pressing need to stay locally (such as those with education and caring needs). There are no proposals to change any of the current categories.
- Proposals to adopt an approach where the Council indicates how close to Harrow a family can expect to be housed at an early stage in a homeless application in order to better manage their expectations.
- The proposed distance categories are:
  - In Harrow or nearby in a neighbouring borough
  - Elsewhere in greater London or up to an hour and a half or about 35 miles away from Harrow
  - Further away than that, including the Midlands.
- Assessment may change as circumstances change and there is a right to a review of placement band.

Legislative and policy updates:

- Changes in the Council's duties brought about by the HRA 2017

- Rough Sleeping Strategy (MHCLG 2018)
- London Housing Strategy and draft New London Plan (2019).

It is intended and anticipated that all applicants who are currently assisted by Housing Needs will continue to be assisted with suitable accommodation.

The new Homelessness and Rough Sleeping Strategy 2019 is attached as Appendix B.

## **9. Ward Councillors' comments**

Ward councillors have contributed to the review of the housing and homelessness strategies through the Cross-party Members Working Group and through additional presentations to the Labour Group.

## **10. Performance Issues**

New performance monitoring indicators were introduced by the government for the new duties introduced in the HRA 2017. The new H-CLIC framework collects homelessness statistics for the Ministry of Housing, Communities and Local Government and has replaced the P1E framework. The data is collected at case level, rather than aggregated local authority level.

## **11. Environmental Implications**

A key strategic priority is to increase the supply of new homes. All new homes have to meet high standards of energy efficiency to reduce CO2 emissions as well as reduce fuel poverty. Larger schemes such as the Grange Farm regeneration project will also provide a Combined Heat and Power plants (CHP) in accordance with London Plan requirements.

Other environmental improvements often included in new housing developments include: provision of green roofs, solar thermal hot water systems to meet the target for use of renewable resources and resulting reduction in CO2 emissions, improved biodiversity as a result of increased tree planting and landscaped communal open spaces, provision of Sustainable Urban Drainage Systems, and green travel plans to encourage use of public transport and walking. Where possible, we will endeavour to recycle demolition material recognising this may be limited due to the construction type of some properties.

## **12. Risk Management Implications**

Risk included on Directorate risk register? No  
Separate risk register in place? No



The following risks are included in the Divisional Risk Register and the housing and homelessness strategies form part of the identified control measures to reduce these risks.

<b>Risk</b>	<b>Mitigation</b>
Failure to meet our statutory duty to publish a Homelessness and Rough Sleeping Strategy	The Homelessness and Rough Sleeping Strategy to be reviewed and published by the MHCLG deadline of 31 December.
Failure to meet our statutory duty to homeless households within budget	The Homelessness and Rough Sleeping Strategy prioritises preventing and addressing homelessness, sets out objectives and sets out approach to procuring and allocating homelessness accommodation.
Failure to meet the agreed targets for new affordable homes	The Housing Strategy prioritises increasing the supply of affordable housing.
Failure to improve standards in the Private Rented Sector	The Housing Strategy prioritises improving standards in the Private Rented Sector
Failure to provide a range of housing support & care options to meet the needs of vulnerable people	The Housing Strategy and Homelessness and the Rough Sleeping Strategy prioritise meeting the housing and support needs of vulnerable people.

### **13. Procurement Implications**

There are no procurement implications to this report.

### **14. Legal Implications**

The Housing Strategy is no longer a statutory requirement but it is a key strategic document.

The Private Sector Housing Strategy will enable the Council to set out its approach to this sector, taking in to account the Government's approach and priorities as set out in 'Laying the Foundations: A Housing Strategy for England 2011'.

The Homelessness Strategy is a statutory requirement under s.1 of the Homelessness Act 2002. Under the Homelessness Act 2002, local housing authorities also have a duty to review the levels and likely levels of homelessness in their district and formulate and publish a strategy based on the results of the review.

The Homelessness Act 2002 requires all local authorities to carry out a review of homelessness in the borough every five years (from the date of publication of the previous homelessness strategy) and then to produce a strategy based

upon this evidence base.

The Housing Act 1996 as amended by the Homelessness Reduction Act 2017 requires that local housing authorities must take “reasonable steps” to either maintain or secure accommodation for eligible applicant threatened with homelessness, known as the prevention and relief duties. In addition, pursuant to section 182 of the Housing Act 1996, local authorities are also bound to have regard to the Secretary of State’s Homelessness Code of Guidance. A revised code was published on 22 February 2018, which has since been updated with further amendments.

Therefore, the Strategies should be reviewed and updated to ensure compliance with the requirements of the Homelessness Act 2002 and to ensure they take in to account the legislative changes and updates to the Statutory Guidance.

The National Rough Sleeping Strategy requires that all local authorities submit their Homelessness & Rough Sleeping Strategy to MHCLG by 31st December 2019.

Article 13 of the Council’s Constitution defines a ‘key decision’, which includes a decision likely to be significant in terms of its effects on communities living or working in an area of two or more wards of the Borough.

Part 3A to the Constitution states the Cabinet is responsible for all key decisions.

## 15. Financial Implications

**Housing strategy:** The overall focus of the Housing strategy is increasing the supply of new affordable housing. The HRA budget approved by Council 28<sup>th</sup> Feb 2019 assumes additional supply of 659 units which will be primarily let at social or London Affordable Rent although some shared ownership units will also be included.

**Homelessness and Rough Sleeping Strategy:** the overall objective is to prevent homelessness and reduce the number of households in temporary accommodation. The service will operate within its current approved budget as approved in the General Fund budget and MTFs, submitted to Cabinet and approved by Council on 28<sup>th</sup> February 2019.

The Homelessness Reduction Act 2017 created additional requirements and responsibilities for the Council which have resource implications but are contained and managed within the agreed budgets.

The introduction of the Flexible Homelessness Support Grant (FHSG) in 2017/18 is designed to give greater flexibility to councils to prioritise the prevention of homelessness.

Harrow has received the following allocation from the FHSG :

2017/18 :£1,674,862

2018/19 :£1,985,422

2019/2020:£1,478,165

The Council received New Burdens Funding to meet the new burdens costs associated with the additional duties contained within the Homelessness Reduction Act 2017.

Harrow's New Burdens Funding allocation was:

2017/18 : £182,810

2018/19 ; £167,454

2019/20 :£158,396

Although New Burdens funding has now ceased, the Council will continue to receive FHSG at an amount similar to 2019/20.

Additional funding has recently been secured from MHCLG for 2019/2020 to develop services for rough sleepers and single homeless people from the Rough Sleeping Initiative, Rapid Rehousing Project and PRS Access Fund. Having successfully bid for funding to develop services for rough sleeping and single homelessness, we intend to continue delivering these services should our general homelessness resources allow, if future specialist funding ends.

## **16. Equalities implications / Public Sector Equality Duty**

When making policy decisions, the Council must take account of the public sector equality duty (Section 149 of the Equality Act 2010) and in particular any potential impact on protected groups.

An EqIA has been completed in respect of the proposed changes to the strategies, which are intended to make the strategies more relevant, compliant and clearer to all stakeholders.

Stakeholders have been involved in consultation on the proposed changes to the strategies.

Consultation has been carried out with a range of stakeholders including:

- Cross-party Working Group
- Residents Board
- Housing Matters (residents meeting)
- Homing In Survey (residents magazine)
- Online survey
- Voluntary & Community Sector
- Registered Providers (housing associations)
- Private rented landlords
- Homelessness Task Force
- Colleagues in other services

The EqIA is attached as Appendix E.

## 17. Council Priorities

The strategies help the Council meet its vision and corporate priorities, particularly Building a Better Harrow, Supporting Those Most in Need and Delivering a Strong local Economy for All and Modernising Harrow Council.

The strategies help the Council meet its priority of Building a Better Harrow by focusing on increasing the supply of genuinely affordable and quality housing for Harrow residents.

The strategies help the Council meet its priority of Supporting Those Most in Need by focusing on reducing levels of homelessness in the borough and empowering residents to maintain their well-being and independence.

The strategies support the Council's priority of Delivering a Strong local Economy for All by considering how the housing market can help attract and retain workers.

The strategies support the Council's priority of Modernising Harrow Council by considering value for money, contributing to the reduction of Harrow's carbon footprint in the delivery of affordable housing and exploring innovative housing solutions including new technologies and modern methods of construction.

### Section 3 - Statutory Officer Clearance

Name: Tasleem Kazmi	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 31/10/2019		
Name: Baljeet Virdee	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 04/11/2019		

Name: Nimesh Mehta	<input checked="" type="checkbox"/>	Head of Procurement
Date: 31/10/2019		

Name: Nick Powell

On behalf of the  
Corporate Director

Date: 05/11/2019

**MANDATORY**

**Ward Councillors notified:**

**NO, as it impacts on all  
Wards**

**EqIA carried out:**

**YES**

**EqIA cleared by:**

Dave Corby

## **Section 4 - Contact Details and Background Papers**

### **Contact:**

Meghan Zinkewich-Peotti  
Housing Strategy Project Manager  
Housing Services  
Community Directorate  
[Meghan.zinkewich-peotti@harrow.gov.uk](mailto:Meghan.zinkewich-peotti@harrow.gov.uk)  
020 8424 1346

### **Background Papers:**

Housing Strategy 2013-2018  
<https://www.harrow.gov.uk/downloads/file/23790/housing-strategy-policy>

Private Sector Housing Strategy 2013-2018  
<https://www.harrow.gov.uk/downloads/file/23793/private-sector-strategy>

Homelessness Strategy 2013-2018 (extended to December 2019)  
<https://www.harrow.gov.uk/downloads/file/23786/homelessness-strategy>

**Call-In Waived by the  
Chair of Overview and  
Scrutiny Committee**

**NO**