

For General Release

REPORT TO:	CABINET 21 OCTOBER 2019
SUBJECT:	A housing and homelessness strategy for Croydon
LEAD OFFICER:	Hazel Simmonds, Executive Director – Gateway, Strategy and Engagement
CABINET MEMBER:	Cllr Alison Butler, Cabinet Member for Homes and Gateway Services
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON	
This report builds on the commitment in the Council's Corporate Plan (2018) for ' <i>good, decent homes, affordable for all</i> ' and sets out the Council's strategic approach to housing, in all its forms, reflecting the three themes set out in the Corporate Plan: <i>new homes, quality homes</i> and <i>homes for everyone</i> .	

FINANCIAL IMPACT

There are no direct financial implications arising from the recommendations in this report. Any specific proposals requiring capital investment or with implications for the Council's revenue budgets will need to be reviewed and approved via the appropriate approval route ahead of implementation.

FORWARD PLAN KEY DECISION REFERENCE NO.: 1919CAB

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to:

- 1.1 Agree the draft priorities for a Housing Strategy and Action Plan for Croydon and authorise the commencement of a process of consultation and engagement with key external stakeholders to develop the strategy and action plan.
- 1.2 Delegate authority to the Cabinet Member for Homes and Gateway Services to agree the final draft of the Housing Strategy and Action Plan for consultation (currently under development).
- 1.3 Delegate authority to the Cabinet Member for Homes and Gateway Services to recommend the updated Housing Strategy and Action Plan to full Council for adoption following consideration of the outcome of the consultation and engagement.

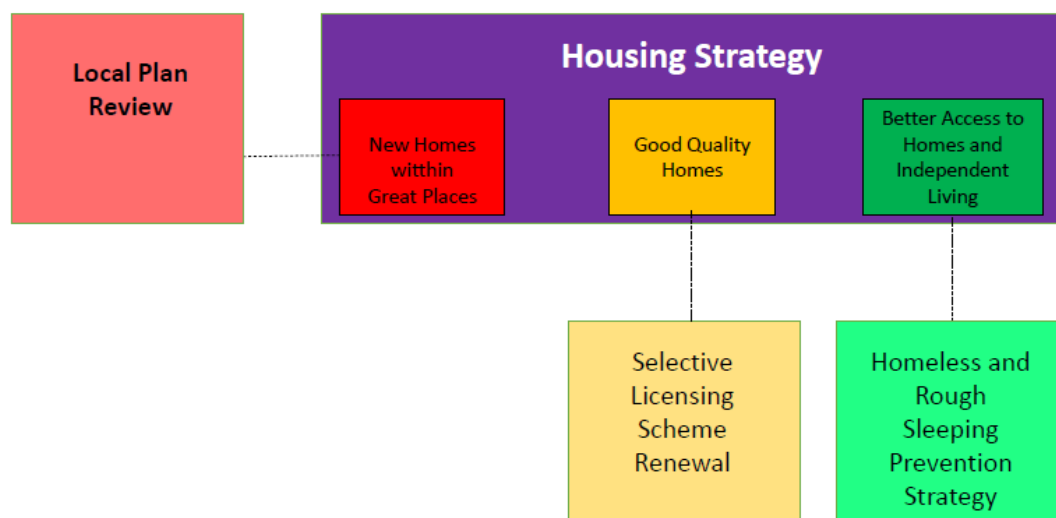
- 1.4 Agree the draft priorities for a Homelessness and Rough Sleeping Prevention Strategy for Croydon and authorise the commencement of a process of statutory consultation and engagement with key external stakeholders to develop the strategy.
- 1.5 Delegate authority to the Cabinet Member for Homes and Gateway Services to agree the final draft of the Homelessness and Rough Sleeping Prevention Strategy for consultation (currently under development).
- 1.6 Delegate authority to the Cabinet Member for Homes and Gateway Services to recommend the updated Homelessness and Rough Sleeping Prevention Strategy to full Council for adoption following consideration of the outcome of the consultation and engagement.

2. EXECUTIVE SUMMARY

- 2.1 Croydon is in the midst of a housing crisis. We are a growing borough, with more opportunities for education, employment and leisure than ever before, yet the supply of good quality housing is not increasing at a fast enough rate. What is more, many of our residents cannot afford to rent or buy a home that meets their needs and almost a quarter of private renters live in homes with a serious home hazard. A decent, stable home is a basic need for all of us: unsafe, expensive, overcrowded housing impacts on people's health and life chances. Securing safe, affordable, secure housing is often the first step to successful recovery and independence for individuals and families who have experienced addiction, trauma or violence.
- 2.2 We are determined to do everything required so that all in Croydon have the chance of a decent home that they can afford and call their own. Since it was introduced, the right to buy has reduced Croydon council stock by almost half. Council and housing association homes now make up just one in six of all housing in Croydon. This is fewer than in many London boroughs, even though Croydon is the second largest borough in London, and is not enough to meet the local need for affordable housing either now or in the future. Almost 1,000 more council homes will have been built or acquired by the Council by 2022. Nevertheless, the private rented sector must remain a strong part of housing provision in Croydon, as it has always been.
- 2.3 This Council rejects the Government's market-led definition of affordable housing (up to 80% of market rent) that many Croydon people in need cannot afford. 'Genuinely affordable' means different things to different people, depending on their income. We will adopt a definition based on local income levels to ensure homes of different types are created, from social rented, to intermediate rent and shared ownership, that suit various income levels in Croydon and provide options that do not force people to spend more than a third of household income on housing.

- 2.4 It's not just about new homes and better homes, but better places too, where residents want to live, work and socialise. To ensure our existing neighbourhoods are successful, and create new sustainable communities, the Council will engage with residents and partners on plans for the social and physical infrastructure required alongside new homes. This could include new schools, health and wellbeing centres, empty shops returned to use, new workspaces, and better community and leisure facilities; in short, all the other elements of social and civic life that make places work.
- 2.5 The Council declared a climate emergency on 8 July 2019 restating its commitment to tackle climate change. This strategy must play its part, as homes are currently directly responsible for [18%](#) of all carbon dioxide emissions in the UK. We will continue to seek high standards of sustainable design and construction from new developments, conversions and refurbishment work. However, existing homes have by far the greatest impact on carbon dioxide emissions. Investment in council homes will increase their energy efficiency. We must also enable private tenants and homeowners to access advice, and assistance if needed, to reduce their energy use.
- 2.6 This report outlines the Council's strategic priorities for improving the supply, quality and range of homes for Croydon residents, along with an initial series of workstreams to translate these priorities into action. We aim to make best use of our assets and resources, seek new opportunities and investment, and work with our partners to
- create **New Homes in Great Places** that local people can afford to rent or buy
 - ensure existing social and private homes become **Good Quality Homes**; and
 - provide **Better Access to Homes and Independent Living**, including ensuring people can live independently at home for as long as possible, and preventing and relieving homelessness.
- Our priorities under these three aims will form the basis of a housing strategy.
- 2.7 The report seeks authority to commence consultation and obtain delegated authority for the Cabinet Member for Homes and Gateway Services to recommend to full Council for adoption final versions of the Housing Strategy and Homelessness and Rough Sleeping Prevention Strategy following consultation. The Scrutiny and Overview Committee will scrutinise and review the draft strategies. The recommendations set out in this report do not have any direct impact on the Council's financial planning and budget strategy. Any specific proposals requiring capital investment or with implications for the Council's revenue budgets will be considered under the existing financial regulations and brought for Cabinet approval if required by the scheme of financial delegation.

2.8 The diagram below shows the interrelationship between the reports to be considered by this Cabinet.



3. Housing need in Croydon

3.1 Croydon's population is growing. In 2019 there are an estimated 164,763 households in the borough (2014-based projections). By 2029 this will increase by 24,726 (15%) to 189,489. People are living longer. More people are living on their own. We have the most schoolchildren in London – they will need homes in future, as well as young people ready to leave home. Based on household projections between 2019 and 2039, the Council's Strategic Housing Market Assessment (SHMA) has concluded that Croydon needs 46,040 new homes by 2039 to meet the borough's housing need. Given the planning constraints at the time it was adopted, the [current Local Plan \(2018\)](#) only plans for 32,890 homes up to 2036, which equates to 1,645 new homes a year. However, a Local Plan Review is now underway and is planning to meet the entire need of 46,040 homes. The Local Plan Review and the possible strategic options for how the planning process can assist in meeting the need for homes in the borough is subject of a separate Cabinet Report.

3.2 There is a need for both large and small homes across tenures, affordable rented, affordable home ownership as well as market housing for rent and sale. The Council is committed to securing an increase in supply for the borough across all tenures, creating mixed neighbourhoods. The size mix will vary according to tenure, recognising the role which larger family homes can play in releasing the supply of smaller homes and the role of smaller homes in providing housing options for new households and under-occupiers wishing to down-size.

- 3.3 Many local people cannot afford to buy or rent a home in Croydon. Median (average) house prices are over 11 times median incomes. Median rents are between £116 and £262 per month more expensive than Local Housing Allowance (LHA) rates, the maximum rent that could be covered by benefit. 5,468 households were on the Council's housing register on 31 March 2019, many more than can be housed either in council properties or through partner housing associations. In 2018/19 only 570 social homes were let to new tenants. Many thousands in housing need due to overcrowding do not meet the qualifying threshold for our housing register.
- 3.4 Between 2016 and 2036, older persons age groups in Croydon are forecast to experience the most significant proportional growth, with the 65 years and over age group increasing by 65% compared with an overall population increase in Croydon of 14.8%. Within the older population growth forecast the 70-74 age group increases by approximately 82%, 75-79 increases by approximately 70% and the 85 years and over group increases by 84% (Source: demographic projections/2014-based sub-national household projections). Some may age in private rented accommodation and find it harder to afford in later life. Some special sheltered (extra care) and sheltered accommodation is outdated and needs upgrading or replacing. Some people living in residential care homes are better suited to extra care housing. To meet this need and rising need in the wider population, a new scheme of 37 units of special sheltered accommodation is needed as well as the focussing of existing schemes on people needing more hours of care. The care provision in six special sheltered housing schemes will transfer to the Council by January 2020 and develop a service to deliver tenant-focused care in homes for life. The ability to deliver more care to tenants if they need it is intended to reduce the need for residential care. More detailed research is required to detail the housing requirements of older people in Croydon, including those who are under-occupying family homes. Our priority will be to enable people to remain independent in their own homes for as long as possible.
- 3.5 Of those households awaiting social housing on the Council's housing register, currently 109 need a home adapted for or built for wheelchair use. In addition, there is a need in the borough for the supply of private market (rent or sale) homes that are accessible and adapted or can be adapted for wheelchair users. Current planning standards and building regulations require new homes to be flexible for future adaptations, but we will seek to ensure that more new homes meet higher standards for meeting residents' needs as they grow older.
- 3.6 Croydon has the largest population of young people in London. Between 2016 and 2036 the 10-19 population is expected to increase by 18.0%. Unemployment remains higher amongst the younger population. Since 2014, there has been significant growth in the numbers of young homeless people. Croydon has around 500 care leavers who are currently accommodated in the

private rented sector including houses in multiple occupation (HMOs). In future demand is likely to be in the region of 150 a year. HMOs are not always suitable for these vulnerable young people. There is a need to develop options for self-contained accommodation to give them the best start in life.

3.7 The number of people with complex health and social care needs, such as people with physical or learning disabilities and people recovering from a mental health problem is increasing. There is currently a shortage of good quality housing for supported living in Croydon. Many people living in residential care homes could be managing their own tenancy and living more independently, with support. We also wish to move from a reliance on expensive nursing care provision towards the use of residential care for our residents, where appropriate. Some people with physical and learning disabilities are living with ageing parents and in future will need adapted accommodation with support. Currently there are 60 people in the borough waiting for supported living placements including 40 people with mental health needs; this is expected to increase to 112 by 2025. The ratio of people aged 25-65 with a learning and/or physical disability in residential care homes in relation to supported living in Croydon is 55:45. Improving this to 50:50 by 2025 would require another 61 units, bringing the total need to 173 units over five years. These figures do not take account of fortuitous vacancies within existing stock. When placing residents with external providers of supported living, the Council's strong preference is that this should only be with partners who are Registered Providers, as this enables 100% of supported exempt accommodation funding to be claimed back.

3.8 The Council published its Homelessness Review in August 2018. Its findings (updated where appropriate) may be summarised as follows:

3.8.1 Levels of homelessness

- **Homelessness demand:** the number of people approaching the Council annually for assistance has been consistently around 3,500, and more approach local advice services and community groups looking for help. In the last couple of years, however, we have changed our approach and put more resources into preventing homelessness, helping more than 1650 people at risk of losing their homes in 2018/19.
- **Causes of homelessness applications:** losing a private rented tenancy is the most common cause of homeless (and has been for a number of years), followed by someone's parents or relatives not being able to continue to accommodate them, and domestic violence.
- **Underlying drivers of homelessness:**
 - **Poverty:** Croydon residents earn less, and are employed in less well paid occupations than other parts of London. Welfare reform has

reduced the support that families and individuals receive to meet their housing and other vital needs. The Local Housing Allowance (LHA) has fallen far behind market rents. Universal Credit and other welfare reforms are associated with increased homelessness and poverty making it harder for many people to find a home.

- **The housing supply crisis:** Failure to build in sufficient volumes over the past 30 years compounded by the reduction in the government grant for social housing has led to an overall shortage of housing, including affordable housing in Croydon. The government introduced a definition of affordable housing as being up to 80% of market rent, which is not affordable for many people in Croydon
- **Housing affordability:** Average house prices are over 10 times average incomes. Because market rents in Croydon are so high, many people no longer have the option of saving while they rent. Changes to and freezing housing benefit rates until 2020, and the introduction of Universal Credit have made it harder for people to afford private rented homes even with benefit help.
- **Austerity:** Government austerity has impacted on services that help prevent homelessness, such as housing support, hostels, and mental health, drug and alcohol services.
- **Multiple needs:** Most support providers tell us that they are catering to people with more complex needs than before.
- **European Economic Area nationals and other migrants:** Since 2014 non-UK nationals have limited access to benefits and housing. Over 60% of the increase in rough sleeping in London is from non-UK nationals.
- **Temporary accommodation:** The Council has a significant number of people housed in temporary accommodation and emergency accommodation). In 2018/19 1,047 homeless households were in bed and breakfast, of which 52% were families and 48% were vulnerable single people. Most single people are placed in supported rather than general needs housing. On 31 March 2019 there were 653 homeless households in bed and breakfast hotels, including 1,010 children.
- **Rough sleeping:** We have around 15 people sleeping rough in Croydon on a typical night. In 2018/19, we were aware of 274 people sleeping rough in Croydon, of which only 27 had returned to the streets having slept rough previously.

4. National and regional policy

- 4.1 The Government set a target of increasing housing supply to 300,000 homes a year by 2022 and promised an Accelerated Planning Green Paper in 2019 with proposals to remove planning controls where local authorities fail to meet targets. Since 2010 the amount of government grant for each new social home has been lower, so higher rents must be set to make them viable. Croydon, like most London boroughs, has had to find other ways to fill this gap. The Government allowed more flexibility to fund affordable rented homes, lifted the borrowing cap on the Housing Revenue Account and allowed prudential borrowing, yet the Right to Buy continues to deplete current council stock and threaten the long-term viability of future investment in new council homes. In March 2019 79% of government investment was still devoted to supporting private market or homeownership. The Future Homes Standard, currently under consultation, aims to cut carbon emissions in new homes by almost a third from 2025. This Council is committed to increasing the sustainability of new homes.
- 4.2 Consultation on implementing Hackitt Review recommendations on building regulations and fire safety has concluded. LHA rates fell behind market rents for some years and have been frozen since 2016, making it harder for claimants to rent privately. A green paper proposes resetting the balance of rights and responsibilities between private landlords and tenants.
- 4.3 Government policy on homelessness has increased in priority and prominence in recent years. The Government has allocated £100m to deliver initiatives that will help to stop people becoming homeless in the first place, provide rapid rehousing (including piloting 'Housing First' for entrenched rough sleepers), and provide support to find work and live independently. The Homelessness Reduction Act 2017 placed new duties on local authorities to intervene at earlier stages to prevent homelessness and provide services to all affected by homelessness, whether or not they are in priority need for housing. Croydon's Gateway approach meant that the Council was prepared to meet this challenge, but the new burdens funding provided by Government is time-limited. There is a lack of consistent funding to support long-term programmes. The national Rough Sleeping Strategy (2018) aims to end rough sleeping entirely by 2027. The extent to which the Government will continue these policies will become clearer after the Queen's Speech, but early indications suggest a greater focus on home ownership rather than affordable housing.
- 4.4 The Mayor's London Housing Strategy aims to address the housing shortage through an intensive use of London's available land, focusing on more genuinely affordable housing and providing help for people feeling the effects of the housing crisis – from private renters to rough sleepers. It has five priorities:
1. building homes for Londoners;
 2. delivering genuinely affordable homes;
 3. high quality homes and inclusive neighbourhoods;

4. a fairer deal for private renters and leaseholders; and
5. tackling homelessness and helping rough sleepers.

In support of priority 4, the Mayor has published proposals for reforming tenure and rents in the private rented sector. The Mayor's priorities are reflected in the strategic priorities proposed for Croydon's Housing Strategy.

5. Our Priorities

- 5.1 Our priorities come under three headings: to create **New Homes** that local people can afford to rent or buy; ensure existing homes are **Good Quality Homes**; and provide **Better Access to Homes and Independent Living**.

New Homes within Great Places

1. Increase the supply of genuinely affordable homes that Croydon residents can afford to rent or buy
 - Develop an evidence-based approach to planning for a range of housing tenures and types that meet the needs of Croydon residents at rents and prices to suit a range of local incomes
 - Work with the Mayor of London to ensure genuinely affordable homes in new developments through planning policy and bidding for extra development funding
 - Brick by Brick, the Council's wholly-owned housing company, is building 2,000 homes on council land by 2022, selling or renting 50% at market prices creating profits to fund homes for shared ownership, intermediate rent or affordable rent. Thereafter it will build 500 homes a year.
 - Pilot community-led housing on small council-owned sites for resident-led schemes to produce 100% affordable homes
 - Develop plans to build additional new council homes to be let at rents that local people can afford.
 - Review options for developing or procuring homes that key workers can afford, and involve partner public sector employers.
2. Plan for new homes within sustainable neighbourhoods, where people want to live, work and socialise
 - Work with partners and the community to ensure there is sufficient social and physical infrastructure in each local area to support the new homes and create sustainable places.
 - Subject to consultation, adopt a revised Local Plan in 2022 to take account of the Mayor of London's new, higher target for new homes and affordable housing in Croydon.
 - Ensure that future development contributes fully to minimising carbon dioxide emissions and seek high standards of sustainable design and construction from new development, conversion and refurbishment

Good Quality Homes

3. Improve council homes in estates and neighbourhoods that residents are proud to call their home

Croydon has 13,475 council homes, including 1,221 sheltered and special sheltered homes. The Council has acquired 254 council homes, to be managed through its charitable partnership Croydon Affordable Homes, and leased 338 homes for homeless households let at LHA rents. In addition, Brick by Brick and the Hub will have completed 412 council homes for affordable rent by 2022. This will bring the total of additional council homes delivered to 998. The Council will:

- Continue to invest in council homes to ensure they comply with safety regulations, are decent and more energy efficient.
- Create new social/affordable homes by converting or extending existing buildings, replacing them if not cost-effective, and building on infill sites
- Consider outdated sheltered/special sheltered (extra care) housing for upgrading or conversion into general needs housing. Invest in new older people's housing and extra care homes that meet modern standards.
- Improve communal spaces, design solutions to anti-social behaviour and fly-tipping, and install full fibre broadband to council homes
- Involve residents of all ages and backgrounds in shaping our housing services
- Develop a disposals and acquisitions policy
- Ensure we achieve value for money and good performance from our contractors.

4. Improve private rented homes

Some 58,500 homes are rented privately (36% of all dwellings in Croydon). 24% have at least one serious home hazard. The number of private renters is rising as this is an important option for people who cannot afford to buy.

- Advise, train and support landlords, running the regular Landlords' Forum and newsletter, and enforce standards where necessary
- Following consultation, seek approval from the Secretary of State to renew the selective licensing scheme in 2020 to improve housing conditions in the private rented sector
- Require owners to seek planning permission from 2020 before converting properties into small houses in multiple occupation
- Support proposals for private rented sector reform including the Mayor of London's blueprint for reforming tenure and rents

5. Help with repairs to private homes for those who need it most

Continue to provide loans for owner occupiers and grants for private tenants to help fund essential repairs and energy efficiency improvements.

6. Bring empty homes back into use
 - Further develop referral arrangements to improve our intelligence and double Council Tax payable for long term empty properties.

Better Access to Homes and Independent Living

7. Make better use of existing social homes
 - Encourage under-occupiers to move to smaller council and housing association homes through grants, practical help and offers of alternative housing that genuinely meets their needs.
 - Research older people's needs to develop suitable homes for people as they age.
 - Review policy on adaptations of under-occupied council homes.
 - Improve processes to speed up the reletting of empty council homes, and better target homes which have existing adaptations to disabled households.
8. Increase the supply of temporary and permanent housing for those without a home
 - Update council temporary accommodation schemes, seek investment and develop a framework to assess opportunities to increase supply
 - Use private investment and receipts from Right to Buy house sales to purchase more new and existing homes for letting at the LHA to low income families, ensuring that they remain affordable and not subject to the Right to Buy by transferring them to charitable limited liability partnerships.
9. Enable people to rent decent homes in the private sector
 - Enable people to rent privately through information and advice, and place more people in private tenancies through Croydon Lettings, the Council's social lettings agency.
 - Publicise to landlords Council accommodation schemes, for example guaranteed rent and support for vulnerable people in rented properties.
 - Offer information, advice, access to training and support to homeowners thinking of letting properties.
10. Enable people to gain and maintain their independence in their home
 - Continue delivering major adaptations across all tenures of property.
 - Continue advising and assisting homeowners and private tenants to keep their homes warm and reduce their fuel bills.
 - Consider investment options to increase the supply of supported housing in Croydon, including the delivery of adaptations and support packages for people in their current homes, in order to progress towards meeting demand for independent living and moving away from over-provision of residential care.

- Review and update planning policy and design guidance for the development of new wheelchair accessible homes.
11. Prevent and relieve homelessness and end entrenched rough sleeping
- Consult on and adopt a homelessness and rough sleeping prevention strategy for Croydon, the priorities of which are set out under 6 below.
 - Embed the council-wide prevention and early intervention 'Gateway' approach with partners in all sectors: negotiation with landlords, tackling illegal eviction, family mediation, as well as wrap-around support to help people to help themselves covering debts, budgeting, maximising income, finding employment and services to tackle food poverty.

6. Homelessness and Rough Sleeping Prevention Strategy

6.1 The Council must review, renew and publish a homelessness strategy every five years, as a requirement of the Homelessness Act 2002. Croydon's [Homelessness Review](#) was published in 2018. It provided information about current levels of homelessness in Croydon, and how they might change over the next 5 years, the causes and underlying drivers of homelessness, and the profile of homelessness. To tackle homelessness and rough sleeping effectively requires taking wide-ranging actions, best organised through a strategic partnership approach. Some of the actions required cannot be taken forward at a local authority level, and we will need the support, and additional resources from central Government and the Mayor of London. The Review found that there appears to be little opposition to tackling homelessness judging by the engagement carried out so far. Differences of opinion seem to emerge around: how/whether we should prioritise support; how we enforce around begging/vagrancy; and, how Croydon will continue to support government funded projects once the current funding comes to an end. Following the completion of consultation on the Review in late 2018, the Council now proposes to commence consultation on a draft Homelessness and Rough Sleeping Prevention Strategy, including the key aims as listed at 6.2. This report seeks authority to consult with key partners and external stakeholders, and submit to full Council for adoption.

6.2 The draft Homelessness and Rough Sleeping Prevention Strategy has the following priorities:

6.2.1 Deliver early intervention services across the borough: We want more people to know about and use Croydon's public and voluntary sector services to help them avoid crisis. To provide support earlier we need to work in communities, delivering trusted services where they are needed most, based on local evidence and intelligence. We will build coordinated early identification networks and effective referral services linked to existing commissioned preventative services. More services in areas of high need will be delivered with

or by community projects. New adult social care customers will benefit from the Council's 'Gateway' service, which responds to a whole household's needs concerning income, employment, skills and training, as well as housing. The aim of this collaborative, holistic approach is to increase resilience and independence. We will train and share information with commissioned services and voluntary groups providing services to people in need, to build their capacity and improve collaboration.

- 6.2.2 Prevent homelessness:** We will continue to develop a more proactive, locally delivered, evidence-based prevention service. This will include more effective prevention of the three main causes of homelessness: the loss of private tenancies; exclusion by parents, relatives and friends; and domestic violence. We will promote housing advice and options services; work jointly with public authorities such as prisons, probation and health services; and extend the Gateway approach into more areas of high need through Community Connect/Food Stop projects to ensure that people at risk of homelessness approach the Council for advice as early as possible and understand how we can help them find alternative accommodation.
- 6.2.3 End entrenched rough sleeping and end core homelessness by 2030.** We will employ an effective 'No First Night Out' approach to tackle rough sleeping early, establishing rapid rehousing pathways from the street and opening a short stay centre to assess complex needs and develop swift person-centred solutions for rough sleepers and individuals at immediate risk of street homelessness. We will extend the Housing First approach to get the most vulnerable people off the streets and into their own home with support. Other actions include joint work with Police and local businesses to arrange support and reduce anti-social behaviour associated with some rough sleepers and sleeping sites. We will relieve homelessness among European Economic Area nationals and other migrants with no access to welfare benefits.
- 6.2.4 End youth homelessness in Croydon:** This priority covers services for young people aged 16-25 without dependents. It will include improving joint work between housing and children's services on housing and support for young people and care leavers. We will co-design housing advice and information with young people; develop a youth homelessness prevention peer education programme and a young persons 'tenancy ready' programme; and identify young people at risk of tenancy failure through eviction or abandonment. We will develop alternative emergency accommodation for young people and end the use of B&B hotels.
- 6.2.5 Ensure sufficient housing supply to meet the needs of homeless households:** This priority includes housing strategy actions set out at 5.1 (8) above to provide homes needed to discharge the Council's housing duty and provide housing options for moving on from supported accommodation. It will ensure sufficient supply for specific groups such as over-65s with complex

needs and young people; and enable the Council to reduce the use of B&B hotels with shared facilities as emergency accommodation.

6.2.6 Support our residents through localised support services based on local need: This will include support to enable vulnerable tenants to sustain their tenancies, reviewing the provision of health services for homeless households; and providing opportunities for volunteers to meet need in their local area.

6.2.7 Enter into a collaborative partnership with Crisis to develop and implement a ten year strategy to end core homelessness in Croydon.

Ending core homelessness means: no one sleeping rough; no one forced to live in transient or dangerous accommodation such as tents or squats; no one living in emergency accommodation such as shelters and hostels without a plan for rapid rehousing into affordable, secure and decent accommodation; no one homeless as a result of leaving a state institution such as prison or the care system; and everyone at immediate risk of homelessness getting the help that prevents it happening. Working with Crisis, the national homelessness charity and campaigning organisation, we will test innovative and effective ways of reducing homelessness and rough-sleeping in the borough, and lobby for further funding and research towards this end.

7. Action Plan

7.1 In line with the three key overarching themes set out above, and following engagement with Cabinet Members, relevant officers and key stakeholders, we have delineated a number of initial workstreams which will ensure progress against the 11 key priorities for Croydon's Housing Strategy. These are not exhaustive, but are the areas of immediate focus underneath the priorities outlined above, in addition to work already underway as described. As part of the action plan, the Council will take the opportunity to review all relevant policies to ensure they are fit for purpose and match the expectations of the strategy.

7.2 New Homes in Great Places

7.2.1 Updated borough-wide housing needs assessment to inform the Local Plan Review

As noted in the October 2019 Cabinet paper setting out the proposals and timeline for the review of the Croydon Local Plan (2018), a revised Strategic Housing Market Assessment (SHMA) has been produced by GL Hearn for the Council. A working group of relevant officers across the Council are reviewing the SHMA research to ensure that the findings accurately reflect current and projected population trends, and associated housing needs borough-wide. This

is prompting proposals for planning policy changes in order to best meet the borough's housing needs, which will be captured in any relevant amendments to the Croydon Local Plan as part of the current Local Plan Review process.

7.2.2 Affordable housing pipeline and engagement with Registered Providers

Building on the established relationships between Croydon's Spatial Planning team and Registered Providers (RPs), we will develop more regular and streamlined reporting and monitoring of new affordable housing supply/development in the borough, in order to better plan for the new homes being developed for a range of affordable tenures in Croydon. This will include improved engagement with developers and RPs focused on new homes developed for disabled households, in order to better specify for and target these homes at individuals and families with relevant needs.

7.2.3 Investment criteria and housing supply briefs for the Council's capital investment in new homes and for partners developing affordable housing in the borough

Building on the overarching governance route for asset disposals and acquisitions via an Assets Board the Council will develop clear procedural guidance for the consideration of asset/investment opportunities, including viability testing and legal and financial due diligence. Most importantly this will enable the Council to prioritise options for asset investment, procurement or development as assessed against agreed strategic objectives for planning and housing supply.

Informed by the SHMA and broader review of housing needs in the borough, we will develop a series of housing supply briefs for different types of housing, (e.g. extra care) in order to inform investment decisions, embed good design quality and ensure operational efficiency.

In particular, we will develop a proposal for a programme of investment into new homes for supported living for adults with learning and physical disabilities, as existing analysis of projected needs and supply indicates a requirement for 35 new units (including rooms in shared properties with shared communal facilities) a year for this cohort up to 2025. As noted above, we will set out how we can move closer to the national best practice ratio of 25:75% for residential care : supported living for individuals with disabilities. By investing directly in the provision of new homes for supported living, the Council would be able to recover the Supported Exempt Accommodation costs that are currently paid to landlords that are not registered providers to top up Housing Benefit to cover extra expenses for supported living. The Council would also encourage non-registered providers to register so that Supported Exempt Accommodation costs can be recovered this way also.

7.3 Good Quality Homes

7.3.1 Encouraging downsizing

Developing on previous research and policy development work undertaken by Croydon's housing solutions team, we will undertake a research and engagement project to capture any potential improvements to the Council's approach to households significantly under-occupying family homes, both in our own council homes and in the private sector. We need to strike an appropriate balance between helping our residents stay settled in neighbourhoods where they have local community links and support networks, whilst releasing family homes for occupation by larger households. This work may further inform the development of relevant housing supply briefs as set out in 7.2.3 above.

7.3.2 Accessible homes policy review

As part of the housing needs analysis summarised above, and aligned to the Local Plan Review process, we will analyse the existing 'waiting list' for wheelchair accessible and adapted homes on the Council's housing register. This will inform potential amendments to planning policy in relation to wheelchair design and specification requirements, and tenure mix as part of new developments. We will also work with developers and RPs to agree a wheelchair allocations and lettings protocol for new accessible and adapted homes, so that these are appropriately fitted out for the specific needs of such households, and the process of letting is as streamlined as possible.

7.4 Better Access to Homes and Independent Living

7.4.1 Housing and income dashboard and a borough-wide housing supply review

We are developing a dashboard to better map our current general needs housing register and homelessness applications against allocations and lettings activities, and monitor income for the Council's housing stock. In parallel, the Council has commissioned a strategic review of the private rented sector and the Council's emergency and temporary accommodation portfolio assessing exposure, risk and opportunity against demand and market profile. This will drive proposals for future investment, incentives and/or partnerships with private providers in order to best meet our need for emergency and temporary housing.

8 CONSULTATION

8.1 Previous consultation on Homelessness Review

The draft Homelessness and Rough Sleeping Prevention Strategy is being developed following significant input from community organisations, homelessness charities and housing providers in the borough, amongst other contributors. The Homelessness Review document was made available on the Council's website for 3 months, and relevant organisations and partners were invited to review and provide feedback. The document was also available for review by the general public.

8.2 Future consultation on the draft Homelessness and Rough Sleeping Prevention Strategy

The Council proposes to publish the draft Homelessness and Rough Sleeping Prevention Strategy for comment and feedback on our website for 6 weeks prior to final review and publication. During this period key local and national stakeholders will be invited to review and comment on the draft document, and where appropriate changes will be made to improve the strategy. Focus groups are planned with local housing providers and charities working with homeless households and rough sleepers, to ensure that the views of our key partners are reflected in the final strategy.

8.3 Future consultation on Housing Strategic Priorities and Action Plan

The Council will publish a more detailed version of the strategic priorities for housing, and the accompanying action plan (including relevant case studies and links) on our website for review and comment over a 12 week period. Individual workstreams set out as part of the Action Plan will require more detailed and specific engagement and consultation with relevant stakeholders and organisations, and communications and engagement plans will be prepared for approval by the Cabinet Member for Homes and Gateway Services prior to commencement. For example on the workstream relating to the design and letting of homes for wheelchair users, we would anticipate engaging with local organisations such as the Disability Croydon, alongside local NHS partners, housing associations and housing developers.

8.4 Scrutiny and Overview Committee

The Scrutiny and Overview Committee will review and scrutinise the draft Housing Strategy and the draft Homelessness and Rough Sleeping Strategy. The Committee's recommendations will inform the completion of the strategies before the Cabinet Member for Homes and Gateway Services recommends the updated strategies to full Council for adoption.

9 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

1 Revenue and Capital consequences of report recommendations

There are no direct financial implications arising from the recommendations in this report. As the proposals are developed, any requiring capital investment or with implications for the Council's revenue budgets will need to be reviewed and approved via the appropriate approval route ahead of implementation.

2 The effect of the decision

The decision to agree the strategies has no direct financial impact for the Council. The implementation of the strategies will have financial implications and these will have to be reviewed and approved to ensure the funding is available.

3 Risks

There is no risk associated with the development of the strategies. There could be a risk about affordability to deliver but at this stage this is unknown.

4 Options

None.

5 Future savings/efficiencies

At this stage these are unknown.

6 (Approved by: Lisa Taylor, Director of Finance, Investment and Risk (Interim S151 Officer))

10. LEGAL CONSIDERATIONS

- 10.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that under the Homelessness Act 2002 as amended, all housing authorities must have in place a homelessness strategy based on a review of all forms of homelessness within their district. Failure to produce an up-to-date strategy will leave the Council open to legal challenge.
- 10.2 In relation to the Housing Strategy and Action Plan beyond the statutory and national policy context set out within the report there are no specific legal considerations to note at this stage. Any specific proposals set out in the proposed Housing Strategy and Action Plan will need to be the subject of a separate authorisation process upon which advice can be given at the time.
- 10.3 As a public authority, the Council must always take account of the provisions of the Human Rights Act 1998 and not act in a way which is incompatible with a Convention right. Under Article 8, any interference with the right to respect for a person's private and family life and home must be proportionate and Article 14 requires that there must be no unjustified discrimination within the scope of human rights on any grounds, such as sex, race, colour, language, religion,

political or other opinion, national or social origin, association with a national minority, property, birth, or other status.

10.4 In discharging its functions the Council must also have due regard to the Public Sector Equality Duty (PSED) in Section 149 of the Equality Act 2010.

10.5 Section 149(1) provides that, in exercising its functions, a public authority must have due regard to the need to:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the 2010 Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

10.6 The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

10.7 Section 149(3) provides that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
- c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

10.8 *Approved by* Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer.

11. HUMAN RESOURCES IMPACT

11.1 There are no direct human resources impacts arising from the recommendations of this report.

11.2 (Approved by: Sue Moorman, Director of Human Resources)

12. EQUALITIES IMPACT

12.1 An Equality Analysis has been carried out to ascertain the impact of the proposed change on groups that share a protected characteristic. The key findings were that there is no potential negative impact on protected groups.

Maintaining sufficient supply of housing for the borough and improving the standards of existing homes will have a greater impact on the most vulnerable members of Croydon's communities, who are generally less able to afford higher quality, more secure housing. We are proposing specific improvements targets at sectors of our population covered by 'protected characteristics', in particular older people and residents with physical or learning disabilities. Opportunities to advance equality have been taken, so no change to the strategy priorities and initial action plan is suggested. The Equality Analysis will be reviewed alongside the strategy action plan to examine outcome of actions listed in section 12.4 below.

12.2 In developing the strategic priorities for a future housing strategy, regard has been had to the Council's Corporate Plan and its equality objectives contained in the Opportunity and Fairness Plan 2016-20.

12.3 The Council's equality objectives, adopted at Cabinet in April 2016, were developed on the basis of the findings of Croydon's Opportunity and Fairness Commission which provide a qualitative evidence base relating to the equality and inclusion issues in Croydon. Equality analysis of geographic inequality and that related to people who share a protected characteristic and those who do not is embedded in the Borough Profile that was published by the Council in December 2018. The equality objectives are:

- To increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market
- To increase the support offered to people who find themselves in a position where they are accepted as homeless especially those from BME backgrounds and women
- To reduce the rate of child poverty especially in the six most deprived wards
- To improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked After Children, particularly at Key Stage 2 including those living in six most deprived wards
- To increase the percentage of domestic violence sanctions
- To increase the reporting and detection of the child sexual offences monitored
- To reduce the number of young people who enter the youth justice system
- To reduce social isolation among disabled people and older people
- Improve the proportion of people from different backgrounds who get on well together
- To reduce differences in life expectancy between communities

The equality profile of homelessness

12.4 Homelessness is most likely to affect those individuals and families that are in low paid, insecure employment, or are out of work, or who struggle to secure employment due to caring/parental responsibilities. It also affects those whose

vulnerabilities make it more difficult for them to provide for themselves including market employment and housing. The key points are:

- **Gender:** More than 6 out of ten of homeless applicants are single women or many of whom are single parents
- **Children:** More than 8 out of ten households applying as homeless have dependent children.
- **Age:** Homeless households tend to be younger than the general population, with more than half of applicants being aged between 25 and 44.
- **Ethnicity:** Black households tend to be overrepresented among homeless households. In Croydon, 46% of homeless households are of Black ethnic background (compared to 20.2% of the general population on census day 2011).
- **Rough sleepers gender/ age:** Rough sleepers tend to be male (more than 7 out of 10), but younger than the general population.
- **Additional needs:** Most rough sleepers (6 out of 10) have additional needs (including substance misuse or mental health problems).
- **Institutional history:** More than half of rough sleepers have an institutional history, having spent time in care, prison or in the armed forces.

Housing strategy priorities and equality

12.5 A number of housing strategy priorities and workstreams will have a positive impact on aims of the Equality Act and address the Council's equality objectives and are set out below:

Age

The Council intends to develop proposals for investment in and procurement of housing both for older people (including sheltered housing and extra care) and young people leaving Care. Our focus on increasing the supply of new homes for affordable temporary and settled accommodation will also have a positive impact on the lives of children currently living in poor or inappropriate housing, waiting for a new home.

Disability.

The strategy proposes a number of activities that would have a positive impact on the lives of people with disabilities living in Croydon:

- Investment into extra care and supported living to enable people with learning or physical disabilities to live independently, reducing our proportion of placements into residential care
- Potential amendment of planning policy to increase the proportion of new build affordable wheelchair accessible/adapted homes
- improved engagement with developers and RPs focused on new homes developed for disabled households, in order to better specify for and target these homes at individuals and families with relevant needs

- Continuation of the existing funding and support for adaptations to homes for residents with disabilities living in the private sector and in Council properties

Gender

Although there are no proposals within the draft Housing Strategy which are gender specific, it is noted that increasing the housing supply in Croydon, particularly of affordable temporary and permanent housing for homeless households and those on our Council housing register would positively impact households headed by a single female applicant, who are the majority of homeless applicants in Croydon (over 60% in 2017-18).

The Homelessness and Rough Sleeping Prevention Strategy, which forms part of this work, will also focus partly on targeted housing and support for female rough sleepers, as Croydon has the highest percentage of female rough sleepers amongst our statistical outer borough neighbours.

Religion and belief.

The strategy does not specify any proposals or policy changes in relation to religion or belief, although a series of 'housing supply briefs' will be developed which may reference the inclusion of design guidance relevant to particular faith communities.

Race

Although there are no proposals within the main Housing Strategy which are specific to particular ethnic groups, it is noted that increasing the housing supply in Croydon, particularly of affordable temporary and permanent housing for homeless households and those on our Council housing register would positively impact BME households who are the majority of homeless applicants in Croydon (over 60% in 2017-18).

As noted above, the development of 'housing supply briefs' may reference the inclusion of design guidance relevant to particular ethnic groups.

Pregnancy and maternity.

The strategy does not specify any proposals or policy changes in relation to pregnancy or maternity, although as noted above increasing the supply of affordable housing and temporary housing for homeless households would disproportionately affect the majority of applicants who are lone parents (overwhelmingly women).

12.6 (Approved by: Yvonne Okiyo, Equalities Manager)

13. ENVIRONMENTAL IMPACT

13.1 The priorities and actions set out in this report have a limited positive direct environmental impact. Specifically the priorities and proposals relating to increasing the supply of new housing and improvements and adaptations to existing housing stock (both the Council's own housing and financial support for changes to private housing) would have a positive environmental impact. This would include the development of new sustainable, energy efficient homes, and making environmental improvements to existing housing.

14. CRIME AND DISORDER REDUCTION IMPACT

14.1 The priorities and actions set out in this report have no direct implications for the reduction/prevention of crime and disorder.

15. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

The report seeks delegated authority for the Cabinet Member for Homes and Gateway Services to approve the publication of final versions of the Housing Strategy and Homelessness and Rough Sleeping Prevention Strategy in order to set the Council's approach to housing in all its forms and the prevention of homelessness.

16. OPTIONS CONSIDERED AND REJECTED

As stated above, there is no current housing strategy for Croydon, and it was considered that the borough could continue without this strategic direction for housing. However, given the significant current and varied housing need in Croydon, as summarized above, and the need to coordinate a number of existing and emerging workstreams to ensure sufficient housing supply, range and quality for our residents, it was deemed appropriate to develop a new housing strategy.

As noted above, the publication of a homelessness strategy is a statutory requirement as set out by the Homelessness Act 2002.

17. DATA PROTECTION IMPLICATIONS

17.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

NO

HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN

COMPLETED?

The Director of Housing Assessment and Solutions comments that a DIA was not completed as no personal data was used to prepare the Strategy. Detailed anonymised data from the Council's housing register and other sources may be used to progress the actions under the strategy, and DPIAs will be completed for individual projects as they are scoped and progressed.

(Approved by: Yvonne Murray on behalf of the Director of Housing Assessment and Solutions)

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***APPENDICES TO THIS REPORT* None**

BACKGROUND PAPERS

None