For general release

REPORT TO:	Streets, Environment and Homes Scrutiny Sub- Committee				
	17 December 2019				
SUBJECT:	A HOUSING AND HOMELESSNESS STRATEGY FOR CROYDON				
LEAD OFFICER:	Hazel Simmonds, Executive Director – Gateway, Strategy and Engagement				
CABINET MEMBER:	CIIr Alison Butler, Cabinet Member for Homes and Gateway Services				
PERSON LEADING AT SCRUTINY COMMITTEE MEETING:	Caroline Toogood, Head of Strategic Projects; John Montes, Senior Strategy Officer; Julia Pitt, Director of Gateway Services				

CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:

This report builds on the commitment in the Council's Corporate Plan (2018) for *'good, decent homes, affordable for all'* and sets out the Council's strategic approach to housing, in all its forms, reflecting the three themes set out in the Corporate Plan: *new homes, quality homes* and *homes for everyone*.

ORIGIN OF ITEM:	This item has been identified by the Streets Environment and Homes Scrutiny Sub-Committee as an area of Scrutiny.
BRIEF FOR THE COMMITTEE:	To consider, comment and inform the plans for development of a Housing and Homelessness Strategy for Croydon.

1. EXECUTIVE SUMMARY

1.1 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.

- 1.2 Croydon's <u>last housing strategy</u> has lapsed. A <u>homelessness review</u> was published in 2018 and examines the causes of and trends in homelessness and the services available and how they need to change. We have also conducted a needs analysis and developed some strategic priorities for improving the supply, quality and range of homes for Croydon residents, along with an initial series of work streams to translate these priorities into action. 'Decent homes, affordable to all' (Appendix 2) sets out the full range of council services and current plans to meet housing need.
- 1.3 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. 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 the housing strategy.

- 1.4 These priorities were presented to cabinet in October 2019 (see Appendix 1: Cabinet report: A housing and homelessness strategy for Croydon). A homelessness and rough sleeping prevention strategy has been drafted for consultation. We are now developing a programme of engagement with stakeholders, partners and residents to develop the housing strategy for publication in 2020.
- 1.5 This report covers:
 - the Croydon housing context and key drivers for developing new strategies
 - national and regional policy
 - financial context
 - a SWOT analysis
 - the priorities for the housing and homelessness strategies
 - options for taking up opportunities and tackling challenges
 - a draft engagement plan.

2. A HOUSING AND HOMELESSNESS STRATEGY FOR CROYDON

2.1 Croydon Housing Context

- 2.1.1 Croydon's tenure profile has a relatively small social rented sector (15% of all homes); a relatively large and growing private rented sector (36%). Almost half of all homes are owner occupied (49%). The private rented sector has always been an important housing option for people, and will inevitably continue to be in coming years.
- 2.1.2 Croydon has 13,475 council homes, including 1,221 sheltered and special sheltered homes, fewer than many other London boroughs. There are also 2,400 leaseholders, who bought their homes through the Right to Buy. At least 99% of council homes meet the Decent Homes Standard at any one time. This is a technical standard for social housing: homes must meet the statutory minimum standard for housing, be in a reasonable state of repair, have reasonably modern facilities and services, and provide a reasonable degree of thermal comfort. Croydon's council homes have an average energy rating of 68.77, better than the national average of 65.6 points, so they cost less to keep warm. All 25 of our tower blocks of 10 or more storeys now have sprinklers, 1,252 homes in all.
- 2.1.3 An estimated 58,500 homes in Croydon are rented from private landlords (36%) of all homes in the borough, compared with 30% across London). Most landlords provide decent housing. However, 23.8% of tenants rent homes that are overcrowded, cold, damp, or put them at risk of tripping or falling. Houses in multiple occupation (HMOs) are some of the poorest quality housing, with greater health and safety risks for tenants. There may be up to 3,000 HMOs in Croydon. Currently owners can convert multi-bedroom properties to small HMOs under permitted development, which means they do not need planning consent. Overall, in 2018/19 we served 232 enforcement notices and 21 prohibition orders on landlords and imposed 16 financial penalties. Category 1 hazards (that pose a serious and immediate risk to the occupier's health and safety) were removed from 51 private rented homes as a direct result of action by the council. The Selective Licensing Scheme enables proactive inspections and targeting of rogue landlords. Since it was set up in 2015, the council has conducted 11,105 inspections (as of August 2019), 72% of which were satisfactory; 18% identified minor breaks of licensing conditions and 10% required enforcement action. 35,500 private rented homes are licensed on the scheme. There is extensive engagement with landlords via an accreditation scheme, landlord forums, and regular newsletters.
- 2.1.4 The council helps with repairs to private homes: 134 owner-occupied and 67 private rented homes were improved through grants and loans in 2018/19.

- 2.1.5 2,070 homes in Croydon had been empty for more than six months (as of 20 May 2019). We have a caseload of 800 properties. If appropriate we use enforcement powers. We also offer grants and loans to repair and renovate them in return for the ability to nominate future tenants for five years, saving £6,700 a year for each household no longer needing emergency housing.
- 2.1.6 Since 2013, Permitted Development Rights (which allow certain changes to be made to a building without requiring full permission from the Local Planning Authority) have been considerably expanded. These Rights now allow conversion from office and light industrial buildings to residential without full planning permission. Developers make an application through a 'prior approvals' process and the local council is not able to hold a scheme to the criteria set out in its Local Plan, or those set in the Mayor's London Plan, as it would for any other typical development. The authority may take into account impacts on highways and transport, the impact of noise from nearby commercial premises, but the converted dwellings do not need to meet minimum size standards or provide affordable housing.
- 2.1.7 A recent report prepared by London Assembly Member Tom Copley in May 2019, entitled 'Slums of the Future: Permitted Development Conversions in London' states that the London Borough of Croydon has seen the most residential units delivered via Permitted Development since 2013: 2,727, or 17% of the total across London. Of these, 80% are below the minimum size standard for new build homes, with 105 homes that are smaller than half the minimum standard.
- 2.1.8 The council introduced new planning policy in September 2015 which restricts such Permitted Development of office to residential conversions in the town centre 'Croydon Opportunity Area'. However, there remains concern regarding the quality of the existing converted properties.

2.2. Key drivers for developing new Housing and Homelessness Strategies

2.2.1 New homes

- Croydon's population is growing: in 2019 there are an estimated 164,763
 households; these are expected to increase by 15% to 189,489 by 2029; that is
 2,473 new households forming each year.
- Croydon's Strategic Housing Market Assessment concludes that Croydon needs 46,040 new homes by 2036 to meet the borough's housing need, compared with the current <u>Local Plan (2018)</u> that only plans for 32,890 homes up to 2036. A <u>Local Plan Review</u> is under way that aims to meet the need for new homes, whilst also considering how these must be delivered within the context of successful neighbourhoods, with appropriate associated transport, economic and social infrastructure.

- An increase in market housing supply has been shown to have minimal effect on affordability. Many residents cannot afford to rent or buy in Croydon. The market let definition of affordable housing (up to 80% of market rent) is beyond reach of many. Median house prices are 11.1 times median incomes (2018).
 Median rents were between £116 and £262 per month more than the maximum that Housing Benefit would pay (between July 2018 and June 2019).
- The Right to Buy has halved council stock since 1980 and following the reduction in grant funding housing associations have not built enough new homes to replace the homes sold.

2.2.2 Homelessness demand

- We currently have 2,129 homeless households in temporary accommodation (as at November 2019), 30% of which are in bed and breakfast emergency accommodation. We spend over £4m a year on properties obtained to house homeless households. In 2018/19 we secured settled homes for 220 homeless households to rent privately, discharging our housing duty.
- Around 3,500 households a year approach the council for assistance. More than 1650 at risk of losing their home were helped to avoid homelessness.
- The loss of a private tenancy is the most common cause of homelessness, followed by eviction by parents, relatives or friends, and domestic violence.
- Throughout 2018/19 we were aware of 274 people sleeping on Croydon's streets, only 27 of which had slept rough previously. In November 2018 there were 15 rough sleepers in Croydon on a typical night (excluding those sleeping in beds provided by night shelters). The figure from the 28.11.19 street count will be released by the Government in January 2020.
- The drivers of homelessness are:

o Poverty:

- Croydon residents earn less than elsewhere in London.
- Welfare reform has reduced households' ability to meet their housing and living costs (the household benefit cap, the four year benefit freeze till 2020, Local Housing Allowance falling far behind market rents, and Universal Credit).
- o Housing supply crisis: a shortage of social and affordable housing
- Housing affordability: market rents in Croydon are so high that many find it hard to access a private rented home, even with housing benefit

- Austerity and its impact on housing support, hostels, mental health, drug, alcohol services that help people avoid homelessness.
- Limited recourse to public funds: for non-UK nationals since 2014.

o Domestic Violence:

- The Family Justice Centre (FJC) is a multi-agency co-located service offering support for victims of domestic abuse and sexual violence (DASV) and their children. The FJC works closely with the Council's Housing Needs and Assessments Service where cases involve victims threatened with homelessness or needing to move to safe accommodation urgently.
- In 2018/19 the FJC made 428 housing referrals, a 33% increase on 2017/18. However, when they arrange refuge accommodation, residents will not necessarily approach Croydon Council as homeless. The number of households applying as homeless to this Council as a result of domestic violence has increased by 25% from 114 in 2014/15 to 143 in 2018/19. The council also funds the Sanctuary Service to install security measures to enable victims to remain in their homes in safety.
- Croydon Council commissions 20 refuge units for DASV victims from Hestia. In addition, Bromley and Croydon Women's Aid provides a refuge and support services. The Council has engaged with the FJC and they have not indicated additional need for refuge provision. In 2018/19 70 people left the Hestia refuge, 57 (85%) of which left in a planned way. 15 stayed for longer than the intended period. The reasons for this appear to be similar to those affecting single homeless people: where the individual is not owed the full homelessness duty, the move on route is the private rented sector, so delays result from limited availability of affordable private rented accommodation. On two occasions the delay was due to child safeguarding matters. (Data from Council's OHMS and the Supported Housing Market Position Statement, September 2019).

2.2.3 Need for affordable housing

• There were 5,458 households on the Council's housing register on 31 March 2019, many more than can be rehoused. 670 social homes became available for letting in 2018/19, of which 320 were let to new tenants from the housing register (the rest were let to homeless households as temporary or permanent accommodation). We offer grants and support to under-occupying tenants to encourage them to downsize, freeing up a family home; 37 were moved in 2018/19 and 31 in April to October 2019.

- People are living for longer: in Croydon the population age 65 years and over is expected to increase by 65% between 2016 and 2036, compared with an overall population increase of 14.8% in the same period. The highest projected increase (84%) is the 85 years and over age group. Some under-occupying their home may need better housing options and practical help to downsize. Others in residential care homes would be better suited to extra care housing: a new 37 unit scheme is needed and existing schemes need to be focussed on people needing more hours of care.
- The number of people with complex health and social care needs is increasing.
 This includes people with physical and learning disabilities and people with mental health support needs.
 - Some need adaptations to their current homes and others need to move to more suitable accommodation. 109 households on the council's housing register need a home adapted for or built for wheelchair use. Current planning standards and building regulations require new homes to be flexible for future adaptations, and 10% to be designed for full wheelchair accessibility, but only a small number of these are currently made available for affordable tenures.
 - 173 supported living units for council placements will be needed by 2025. This demand comprises the needs of people living in the community with ageing parents (expected to increase from 60 to 112 by 2025, two thirds being people with mental health needs) and people aged 25-65 with a learning and/or physical disability living in residential care homes who could live more independently with support (61 units to improve the ratio of people in residential care homes in relation to supported living from 55:45 to 50:50 over five years).
- 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 rates are higher amongst the younger population and their income and benefit rates are lower. Since 2014 there has been significant growth in the numbers of young homeless people. Croydon has around 500 care leavers, currently accommodated in the private rented sector, including houses in multiple occupation (HMOs), with estimated future demand of around 150 a year.

2.2.4 Sustainability

• The Department for Business, Energy and Industrial Strategy estimates that in the UK, ca. 18% of carbon dioxide emissions were generated from the residential sector. Croydon Council declared a climate emergency in July 2019, and intend to review all future policies to reduce our impact on climate change. This Council is committed to increasing the sustainability of new homes. It is setting up the independent Sustainable Croydon Commission. One of the Commission's themed strategy groups will examine how to reduce

- carbon emissions from housing, by increasing the sustainability of new homes and retrofitting existing homes.
- Government statistics for 2017 indicate that over 17,000 Croydon households risk being in fuel poverty. However, there have been significant reductions in national funding schemes to tackle fuel poverty over the last decade.

2.3 National / regional policy

- 2.3.1 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 reduced, so higher rents must be set to make them viable. These are 'affordable rents', up to 80% of market rent. Croydon, like most London boroughs, has had to find other ways to fill this gap. In 2018 the Government 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.
- 2.3.2 Consultation on implementing Hackitt Review recommendations on building regulations and fire safety has concluded. Local Housing Allowance (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 proposed resetting the balance of rights and responsibilities between private landlords and tenants.
- 2.3.3 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.

2.3.4 Conservative manifesto housing policies and implications for Croydon:

Home ownership is at the heart of the manifesto, with Right to Buy (RTB)

retained, shared ownership for housing associations standardised, and Help to Buy extended. The Council could use developers' planning contributions to discount homes in perpetuity by a third to people who cannot afford to buy locally and decide to support key workers in this way.

- A pledge to build 1m homes a year by 2025 covers all tenures.
- Renewing the Affordable Homes Programme could offer an opportunity to build more affordable homes in Croydon, but there are no targets for social or affordable rent.
- Croydon's Local Plan Review would be informed by ongoing Green Belt protection and prioritisation of brownfield development, and amended planning rules requiring the development of infrastructure before new homes. Residents would have more say on local development and the planning system would be simplified for the public and small builders and support modern methods of construction.
- A £10bn Single Housing Infrastructure Fund could provide opportunities to fund roads, schools, GP surgeries to support new housing supply in Croydon's growing places.
- Support for community housing to find land, access Help to Buy and support council tenants to take ownership of their estates.
- Private tenants would benefit from the abolition of 'no fault' evictions and 'lifetime' portable deposits, potentially reducing homelessness applications.
- Work would continue with housing associations and industry to remove unsafe cladding from high-rise homes
- Support for the creation of new kinds of homes that have low energy bills is undefined, as is housing's share of £9.2bn promised for energy efficiency
- Councils would have to implement measures in a Social Housing White Paper for better redress for tenants, regulation and better quality of social homes, but there is no mention of any funding for this.
- Expansion of pilots such as the Rough Sleeping Initiative and Housing First provides bidding opportunities for the Council to increase local provision

2.3.5 Labour manifesto housing policies and implications for Croydon:

- A £75bn programme to build 150,000 social homes a year by 2025 would be an opportunity for the Council and Brick by Brick to build more council homes and for housing associations to build affordable homes in Croydon. A new affordability definition would be linked to local incomes.
- More low-cost homes would be reserved for first-time buyers in every area and Help to Buy would be reformed to on first-time buyers.
- The Council would gain more freedom to set planning fees and require the environmental emergency to be factored into all planning decisions.
- RTB would be abolished and the Council could bid for funding to buy back homes sold under the RTB that are let privately; this is a low-cost, convenient way of increasing council stock

- New rent controls and open-ended tenancies, while offering more
 affordability and stability to private tenants, may reduce Council options to
 lease from landlords. Nationwide licensing of landlords would enable the
 Council to renew its borough-wide selective licensing scheme for maximum
 effectiveness in raising standards.
- Decent Homes would be funded for councils and housing associations.
- A pledge to upgrade existing homes to the highest energy efficiency standards is undefined. If there is funding, the Council could bid for it.
- A £1bn Fire Safety Fund would support housing associations to improve fire safety in tower blocks and removal of dangerous cladding would be enforced.
- The Council's ability to return empty homes to use would be strengthened by new powers to tax homes empty for more than one year.
- People on benefits would find housing costs more affordable through an increase in the Local Housing Allowance to the 30th percentile of local rents and the abolition of the Housing Benefit under-occupancy charge.
- The Council's plan to end core homelessness would draw on measures from the national plan to end rough sleeping in five years, bid for funding for additional homes for people with a history of rough sleeping, and the promised £1bn a year for councils' homelessness services.
- 2.3.6 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.

2.4 Financial context

2.4.1 Funding available

The council's principal funding stream for housing is the Housing Revenue
 Account (HRA), which is generated through rental income from council homes.
 There is strict governance over the use of this HRA funding, although it can be used for management, maintenance and investment in existing stock, as well as the development of new council homes, alongside services that are of direct

benefit to council tenants. Recently the government lifted the borrowing limit on councils' Housing Revenue Accounts, so borrowing against the HRA can now be utilised for the purchase or development of new council homes.

- The council can use the receipts from Right to Buy (RTB) sales to purchase or develop new homes. Central government requires that this money is used to provide additional properties within 3 years of the date of the RTB sale, or a proportion of the sale receipt has to be returned to the government, with 4% interest.
- This year Croydon received £6.8m from New Homes Bonus funding this is incentive funding from central government to encourage housing growth and the use of empty homes. This funding is not ring-fenced for housing, but instead is incorporated into the General Fund.
- **S.106 and Community Infrastructure Levy** (CIL) funding is provided by developers to fund the physical and social infrastructure required alongside the development of new homes.
- The council's wholly owned development company, Brick by Brick, will generate income from the market sale of new homes, which will cross-subside the development of new affordable homes. Brick by Brick's overall profits will be returned to the council.
- The GLA provide grant funding for new affordable housing development through the Affordable Homes Programme. This includes a higher grant rate for the provision of supported and specialist housing.
- The council can seek private investment for purchasing and developing homes, for example via institutional investors and pension funds. To date Legal and General has invested in Croydon Affordable Homes (CAH) and the associated purchase of 250 street properties.
- In addition there is funding from central government towards
 homelessness prevention and support activity, including the flexible
 homelessness support grant, rough sleeping initiative funding and
 Homelessness Reduction Act transition funding. The majority of these funds
 are time limited and run until 2020 or 2021.

2.4.2 Financial context – revenue costs to Croydon Council

• The council's net expenditure for housing homeless households in Croydon for the financial year 2018/19 was £3.5m; a cost primarily met from the General Fund.

- There is an average estimated cost of around £7,000 per year for a household in Emergency Accommodation (EA). The council almost consistently can't reclaim the full costs associated with EA tenancies, with the amount of shortfall varying by location, size and tenancy type as well as the presence of any adaptions to the property. Some funding shortfalls are currently being funded by Homelessness Flexible Support Grant from central government.
- Larger Households stay for more extended periods in EA, particularly 6, 7 and 8 person households, and to a lesser extent 4 and 5 person households. Of the council's top 50 most expensive EA placements by nightly charge around 70% are for 4 or more person households. EA and Temporary Accommodation (TA) properties of 5 or more bedrooms can create significant cost pressure to the council, as the maximum LHA rate is for a 4 bedroom property.
- However, some of our most expensive placements aren't driven by the size of the household but by the complexity of their cases. The top 3 most expensive households in EA require fully adapted units for disabled access along with further bedroom(s) for children and/or carers.
- For temporary accommodation (TA), the costs of properties owned by the Council or on long leases (e.g. the 230 homes in Concord, Sycamore and Windsor Houses) are cost neutral for the council. However 1-3 bedroom TA homes sourced via the council's existing 'Croylease' and private sector leasing schemes cost between £8 and £38 per week to the council, as they are above the equivalent local housing allowance rate.
- Residents of both extra care, supported housing and supported living accommodation generally qualify for additional welfare benefit, known as Support Exempt Accommodation funding (SEA) to top up existing housing benefit or the housing element of universal credit this supports the extra services and care provision in these types of homes. Additionally to the core rent, the council, through housing benefit, can pay up to 37% more than Local Housing Allowance per week per person for Supported Exempt Accommodation. Currently the council is unable to reclaim 40% of this additional SEA payment, although county councils, charitable organisations and registered providers can reclaim the full 100%. This creates a budgetary pressure on the general fund from Adult Social Care.

2.4.3 Financial context: affordability

In addition to the existing 'affordable' tenures funded as part of the GLA
affordable homes programme in London, the Mayor has introduced a new rent
level targeting those on middle incomes, known as 'London Living Rent'.
Analysis undertaken recently by the London Tenants Federation states that
London Living Rent is unfortunately unaffordable to the majority of households

with 'equivalised' median incomes in most London wards. In Croydon, according to the Federation's analysis, no 3 or 4 bedroom homes at London Living Rent levels would be affordable to households on 'equivalised' median incomes, and two bedroom properties would only be affordable as assessed on this basis in a single Croydon ward.

- There are an increasing number of new homes in Croydon being planned from the outset for the private rental sector known as 'build to rent'. These schemes are popular, particularly given their central, well-connected locations. However, there is no current analysis to confirm whether these new 'build to rent' homes are meeting local housing need in providing accommodation for existing Croydon residents, or, instead, attracting residents moving from elsewhere. Planning policy requires a proportion of these new rented homes to be for affordable tenures, but national planning policy guidance suggests that these should be generally marketed at rents 20% below local market rent levels. There is no requirement for such properties to be made available to nominees from the council's housing register, and typically these 'discount' rent levels would be above the Local Housing Allowance rate and therefore unaffordable for most households on the register.
- The council intends to undertake local research and develop a Croydon-specific definition of 'affordability' and a corresponding range of suitable tenure options, to inform local planning and housing policy. This would include assessment of affordable rent levels for households on our housing register, as well as those on higher or middle incomes who may not be able to afford typical market rents or private housing costs. As part of this research and analysis we will be reviewing our potential offer for 'key worker' housing, particularly in response to recruitment and retention issues for specific council roles where feedback suggests staff are struggling to find suitable affordable local accommodation.

3. Strategic Analysis of Strengths, Weaknesses, Opportunities and Tensions

STRENGTHS

New homes within great places

- Brick by Brick flexible commercial construction vehicle
- Croydon Affordable Homes; avoids RTB
- Local plan pipeline of sites for housing development
- Relatively low land and property values attractive for development investment
- Suburban housing design guide
- Place planning and regeneration
- Learning gained through first Community Led Housing (CLH) tender.

WEAKNESSES

New homes within great places

 Limited regular liaison and partnership with RP sector

Good quality homes

- Small social housing stock (15% of total)
- Housing stock borough-wide which does not meet current space, access or environmental efficiency/sustainability standards
- Inability to capture full supported exempt accommodation funding limits options for

Good quality homes

- Updated high quality council housing stock asset management data: 99%
 Decent Homes compliant, sprinklers installed to high rise blocks.
- Selective Licensing Scheme
- Established empty homes programme

Better access to homes and independent living

- Holistic and collaborative Gateway approach
- Development of Housing First model in Croydon
- Re-procurement of social care dynamic purchasing system including supported living and supported housing

- supported housing development and procurement
- Compulsory purchase and enforced sale policy re empty homes is very difficult and convoluted.

Better access to homes and independent living

- Overcrowding and under-occupation of homes, including council homes
- Confusing multi-layered offer and incentives for landlords letting property to LBC
- Under-provision of accessible and adapted homes for residents with disabilities
- Over-provision of residential care homes and under-provision of supported housing/living schemes

OPPORTUNITIES

New homes within great places

- Local Plan Review
- Borrowing cap removed from HRA
- Community Led Housing (CLH), including co-operative housing and the use of the GLA's small sites initiative
- Partnership with RPs research, policy development, land-assembly and homebuilding
- Major regeneration and development programmes
- GLA grant funding, inc. for supported housing, and closer working with GLA on funding bids
- Potential to develop a more comprehensive community engagement and resident involvement approach as part of planning for new housing development or regeneration
- Ongoing infill development via BxB
- Scope for further institutional investment and property purchases via CAH
- Modern methods of construction

Good quality homes

- Development of a Croydon Standard based on residents' priorities and contractor knowledge
- Sustainability Commission: council commitment to sustainability
- Renewal/expansion of selective landlord licensing in 2020

TENSIONS

New homes within great places

- Brexit rising construction costs, departure of EEA workforce
- Weak housing market reduces ability to cross-subsidise affordable housing
- Population growth
- Older people housing need (support, downsizing)
- Growing numbers of care leavers requiring transitional support and housing
- Ongoing losses of council homes to RTB
- Communities' concern over new development and opposition to new homes at a local level

Good quality homes

- Government limits range of renewed Selective Licensing Scheme, weakening the ability to tackle rogue landlords
- Less national funding to improve energy efficiency of homes; 17,000 Croydon homes at risk of fuel poverty (2017)
- Climate change and the need to improve housing fabric and fuel efficiency: council homes achieve an average energy rating of 68.77 (EPC rating D)

Better access to homes and independent living

 Large volume of emergency and temporary accommodation/need

- Introduction of article 4 direction for new HMOs
- Community Led Housing to bring empty homes back into use

Better access to homes and independent living

- Rationalise incentives and engagement with landlords for TA, forward plan procurement and reduce spotpurchasing
- Expansion of Croydon Lettings
- More strategic planning and policy for provision and allocation of accessible homes
- Capital letters London-wide collaboration for TA procurement
- London Councils working group on pan-London hostel commissioning
- Existing extra care schemes transferring to 'in house' management - potential to improve and rationalise provision
- Opportunity to procure/acquire or develop new supported living and extra care homes
- Develop more targeted approach to meeting the needs of downsizers, including high quality new homes for older people
- New Gateway homeless support hub
- Partnership with Crisis to end core homelessness

- Ongoing impact of austerity on services preventing homelessness: hostels, housing support, mental health, drug, alcohol services.
- Household benefit cap, benefit freeze, Local Housing Allowance uncoupled from market rents, and universal credit
- Competition for affordable market housing from other London boroughs seeking placements for their residents
- Homelessness Reduction Act new burdens funding ends 2020
- Build to rent market unaffordable to Croydon residents and does not fulfil local housing need

4. Priorities of housing and homelessness strategies.

4.1 Housing strategy priorities (See Appendix 1 Cabinet report: Section 5)

New Homes in Great Places - we will:

- 1. Increase the supply of genuinely affordable homes that Croydon residents can afford to rent or buy.
- 2. Plan for new homes within sustainable neighbourhoods, where people want to live, work and socialise

Good quality Homes - we will:

- 3. Improve council homes in estates and neighbourhoods that residents are proud to call their home
- 4. Improve private rented homes
- 5. Help with repairs to private homes for those who need it most

6. Bring empty homes back into use

Better Access to Homes and Independent Living - we will:

- 7. Make better use of existing social (council and housing association) homes
- 8. Increase the supply of temporary and permanent housing for those without a home
- 9. Enable people to rent decent homes in the private sector
- 10. Enable people to gain and maintain their independence in their home
- 11. Prevent and relieve homelessness, and reduce rough sleeping in Croydon

4.2 Homelessness and Rough Sleeping Prevention Strategy (See Appendix 1 Cabinet report: Section 6)

- 1. Increase use of engagement and early intervention services
- 2. Prevent homelessness
- 3. Ensure sufficient sustainable accommodation to meet the needs of homeless households
- 4. Support our residents though localised support services based on local need
- 5. End entrenched rough sleeping
- 6. End youth homelessness in Croydon

5. Options: current work programme (See Appendix 1 Cabinet report: Section 7)

5.1 Updated borough-wide housing needs assessment for Local Plan Review A working group of officers across the council is reviewing a revised Strategic Housing Market Assessment to ensure that the findings accurately reflect current and projected population trends and associated housing needs. In addition, as part of the development of an updated Local Plan, to be adopted in 2022, we will work to ensure plans are in place for sufficient physical and social infrastructure across all neighbourhoods to accompany new housing development, and ensure that new and refurbished homes meet excellent standards for environmental sustainability.

5.2 Develop a Croydon-specific definition of affordable housing

As noted above, we will 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. We will work with the

Mayor of London to ensure genuinely affordable homes in new developments through planning policy.

5.3 Affordable housing pipeline and engagement with Registered Providers The council will develop more regular and streamlined reporting and monitoring of new affordable housing supply/development 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. We will engage with RPs to build a more

developed for disabled households. We will engage with RPs to build a more positive and proactive partnership approach, including research and strategic analysis, and joined-up approaches to creating new housing supply such as shared land assembly and regeneration.

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

The council will develop agreed procedures and prioritisation for the assessment of asset/investment opportunities, to enable the council to consider options for asset investment, procurement or development as assessed against agreed strategic objectives for planning and housing supply. We will prepare housing supply briefs for different types of housing to meet a range of needs, (including supported living, extra care and wheelchair accessible homes) to inform investment decisions, embed good design quality and ensure operational efficiency.

5.5 Investigating new ways of developing new council homes.

Building on the programme of new build homes set up by the council's development company, Brick by Brick, we will review and develop new ways to build additional new homes. This investment will run alongside continued investment in existing council homes including consideration of conversions, extensions and refurbishment to achieve improved energy efficiency and increased standards for residents. We will develop a cross-departmental approach to the evaluation of poorly performing council housing assets, including the development of clear guidelines for the consideration of emerging estate regeneration opportunities. This would involve developing clear offers to residents, and guidance around appropriate and timely local community engagement and resident involvement, both pre- and post-planning, building on best practice in the sector.

5.6 Supporting Community Led Housing

The Council is piloting the development of community-led housing (CLH) in Croydon by offering small council-owned sites for resident-led schemes that produce 100% affordable housing. <u>Crystal Palace Community Land Trust</u> was chosen to develop homes on the first site with support from Brick by Brick. We

will review other potential types of CLH including housing co-operatives and self-help housing to bring private sector empty homes back into use.

5.7 Encouraging downsizing

The council's housing team will research and test improvements to our approach to households significantly under-occupying family homes, both in the social and private sector. We will improve the effectiveness of incentives and housing options, with provision of alternative housing that genuinely meets downsizing residents' needs, and the development of associated policy and guidance which reflects this.

5.8 Accessible homes policy review

We will analyse the waiting list for wheelchair accessible and adapted homes to inform potential amendments to planning policy in relation to wheelchair design and specification requirements and tenure mix as part of new developments and agree a protocol with RPs to improve the allocation and letting of such properties.

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

A review will be undertaken of the private rented sector and the council's emergency and temporary accommodation portfolio, assessing exposure, risk and opportunity against demand and market profile, in order to shape proposals for future investment, incentives and/or partnerships with private providers to best meet our need for such accommodation.

5.10 Homelessness and Rough Sleeping Prevention Strategy - key actions

5.10.1 Develop a new partnership with Crisis and prepare a new 10 year strategy The aim is to end core homelessness in Croydon. This 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.

5.10.2 Develop 'Croydon Lettings', the Council's Social Lettings Agency from pilot to full service offer.

Croydon Lettings placed 47 households in private tenancies at LHA rents in its first year, with a support package for landlords. In some cases it provides extra help, such as the deposit, rent in advance or essential items needed to make a

house a home. The service will continue to prevent homelessness, crises and demand for statutory services.

5.10.3 Explore the development of a local homelessness reduction board

Developing a board would strengthen local accountability. Croydon has excellent examples of collaborative working and integrated approaches, but the local delivery landscape is complex, with a number of agencies and bodies with different priorities and funding constraints operating under a variety of accountability arrangements.

5.10.4 Establish a 24/7 assessment hub for rough sleepers

24 hours a day, seven days a week this space will provide instant respite with an average stay of 72 hours for up to 15 people who are street homeless or at risk of sleeping on the street that night. A comprehensive assessment will develop personal plans for them to move off the streets into suitable accommodation with intensive support.

5.10.5 Develop the Housing First model to become integral to the Croydon homelessness offer

This provides a stable, independent home, intensive personalised support and case management to people with multiple and complex needs who are street homeless.

6. Engagement plans

- 6.1 The approach to engagement to inform the development of the housing strategy will involve:
 - Themes/work streams for engagement, developed from the housing strategy cabinet report (see Appendix 4 for a table of work streams).
 - Working groups set up by theme, including internal and external stakeholders. These would inform our understanding of the issues, opportunities and challenges, and help us to identify and develop joint actions to address them. The themes cover:
 - Increasing supply of new affordable housing (and developing a Croydon-specific affordability definition)
 - Key worker housing
 - Neighbourhood infrastructure for homes
 - Environmental sustainability (of new and existing homes)
 - Council homes and estate investment
 - Older people's housing needs (including downsizing)
 - Accessible homes policy review
 - Private sector housing improvement and empty homes

- Borough-wide housing supply review (for temporary and emergency accommodation for homeless households)
- Access to private rented housing
- Young people's housing issues
- Supported Housing/Independent Living
- Targeted involvement of local residents (council tenants, housing association tenants, private tenants and owner occupiers) supported by the council's Communications, User Research and Resident Involvement Teams to understand their housing aspirations with regard to tenure and security (home ownership, social rent, community-led housing) and their expectations in terms of the quality of existing housing
- Reaching out to established local networks and organisations, e.g.
 Croydon's Landlords' Forum, Disability Croydon, Age UK Croydon and the Croydon Neighbourhood Care Association
- Use of the Registered Provider Forum, established by the council's Spatial Planning Team, to review and feedback policy/procedural proposals and opportunities to partner in further research and development
- Review of current best practice that could be adopted (rather than necessarily creating LBC-specific guidance or policy), e.g. University of Research DWELL research on homes and incentives for downsizers, Housing LIN guidance on Extra Care design.
- 'Decent homes, affordable to all' (Appendix 2), a document setting out current council services to meet housing need and existing plans, together with an abbreviated, more accessible version, will be available on the council website to set the context for the engagement.
- 6.2 Consultation on the draft Homelessness and Rough Sleeping Prevention Strategy will have three elements:
 - An online consultation of the Homelessness and Rough Sleeping Prevention Strategy will take place for a period of 6 weeks.
 - Focus groups with stakeholders including providers and the voluntary, community and faith sector will take place within the 6 week consultation period
 - Focus groups with service users will take place within the 6 week consultation period.

7. Next steps (timetable)

- 7.1 The engagement and consultation processes for both strategies are set out below:
 - The engagement process to inform the development of the housing strategy and the consultation on the draft Homelessness and Rough Sleeping Prevention Strategy will both commence at the beginning of 2020.
 - The Homelessness and Rough Sleeping Prevention Strategy will then be finalised for publication in March 2020, subject to approval by full council.
 - It is anticipated that following a 2 month engagement period, a draft Housing Strategy will go out for public consultation for a 6 week period, including online feedback/surveys and focus groups with key stakeholders. A final version would then be published, subject to full council approval, in Spring 2020.
- 7.2 A summary of the programme for the next steps towards publication of both strategies is set out below:

Activity	December	January	February	March	April	May
Selective						
Licensing						
Consultation						
Local Plan Review						
Issues and						
Options						
consultation						
Homelessness						
and Rough						
Sleeping Strategy						
Consultation						
Homelessness						
and Rough						
Sleeping Strategy						
approval and						
publication						
Housing Strategy						
engagement						
programme						
Draft Housing						
Strategy						
Consultation						
Housing Strategy						
approval and						
publication						

7.3 As detailed in the table above, the public consultation regarding the proposals for a renewal of the council's selective landlord licensing scheme, and the consultation on the local plan review 'issues and options' will both be running in parallel with the engagement and consultation around the homelessness and

housing strategies. The council will ensure that relevant feedback and amendments to the licensing scheme proposals are considered as part of the development of the final Housing Strategy. The timescale for the development of the updated Local Plan is such that there will still be scope for officers and relevant representatives from the housing strategy theme groups to feed into the Local Plan Review process, including informing any proposals for relevant planning policy amendments that emerge from the current Local Plan consultation.

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BACKGROUND DOCUMENTS: None

APPENDICES: Appendix 1 Cabinet report: A housing and homelessness strategy for Croydon (October 2019).

Appendix 2 'Decent homes, affordable to all': current council services to meet housing need.

Appendix 3 Draft Homelessness and Rough Sleeping Prevention Strategy.

Appendix 4 Draft engagement plan