



Cabinet
21 July 2014

**Report from the Director of
Regeneration and Growth**

Wards affected:
ALL

Housing Strategy 2014-19

1.0 Summary

- 1.1 This report presents the draft Housing Strategy, covering the period 2014-19, for approval.

2.0 Recommendations

- 2.1 That the Cabinet approve the Housing Strategy 2014-19 as appended to this report.
- 2.2 That the Cabinet note that the Evidence Base for the Strategy will be published online simultaneously and that the Action Plan setting out the detail of delivery will be completed following approval of the Strategy.

3.0 Detail

3.1 Context

- 3.1.1 The strategy has been developed against a challenging background, driven in large part by the economy and the government's policy response. As well as the overall financial pressures imposed by austerity, the government has implemented a wide-ranging programme of reform and policy change, which has rendered the approach taken in the council's existing strategy (2009-14), which was approved by the Council's Executive on 16 March 2009, largely obsolete and requires a response that encompasses changed conditions.

- 3.1.2 In the housing market, purchase and rental costs have risen to levels that put home-ownership and private renting beyond the means of many households, including those on middle incomes, while supply of social and affordable housing is limited and access is rationed. The growth of the private rented sector presents challenges around quality and standards of management, while homelessness demand has risen, partly as a result of evictions from the sector, putting further pressure on Brent's existing high temporary accommodation use. New supply will be insufficient in the short term to meet demand from a wide spectrum of household and income types.
- 3.1.3 Welfare reform has increased housing pressures, for example through changes to Housing Benefit and the imposition of the overall benefit cap and the social sector size criteria (the "bedroom tax"), and has driven an increased emphasis on employment and employment support as the main mechanism to mitigate the impact on affected households.
- 3.1.4 The Affordable Rent programme has reduced subsidy for new affordable housing and permitted rents to be charged at up to 80% of market levels and the 2015-18 programme in London introduces new variants on the Affordable Rent product: Capped and Discounted Rents, with rent levels respectively ranging from 50% to 80% of market rates. At the same time, the Localism Act introduced tenure reform with the encouragement of fixed terms in the social sector and permitted local authorities to discharge their homelessness duties through the private rented sector: Brent has already responded to these changes through the Tenancy Strategy and the revised Allocation Scheme and the new approaches are reflected in the strategy.
- 3.1.5 The advent of Housing Revenue Account self-financing has allowed the council and BHP to agree a plan for the management and maintenance of the housing owned by the council that uses borrowing headroom to pursue new opportunities, including borrowing to support new council housing as well as maintenance and improvement of the stock.
- 3.1.6 Although the general employment position in Brent is improving, average income levels rising and the number of residents with higher skills levels increasing, further analysis suggests that not all residents are benefitting from this improved picture. There is a higher level of worklessness and deprivation in some wards and neighbourhoods that has persisted for over twenty years. The number of residents earning less than the London Living Wage is significantly higher than the London average and the number of residents with no recognised qualification has also increased. This points to a growing polarisation within the borough.

3.2 Consultation

- 3.2.1 Formal consultation on the draft strategy ran between August and October 2013 and there has been continuing engagement over the last nine months. The draft document was published on the council's website and responses were invited through a dedicated email address. Presentations were made to

a range of meetings and events, including the Brent Connects Forums, and a consultation seminar was run on 28th October for partners, including Registered Providers, voluntary sector organisations and tenants and residents. Development of the strategy also drew on other consultation exercises, including those undertaken around the Tenancy Strategy, the Allocation Scheme, the Asset Management Strategy for the Council's own housing and proposals for the introduction of licensing in the private rented sector, as well as on feedback from meetings with colleagues and partners in the intervening period.

- 3.2.2 In broad terms, consultation demonstrated strong support for the approach set out in the draft document. There was a general recognition that the changing policy landscape, Brent demographics and prevailing economic conditions have changed the nature of housing need and demand in London as a whole and in Brent in particular.
- 3.2.3 When completed, the strategy must be submitted to the Mayor of London for review to demonstrate that it is in general conformity with the Mayor's strategy. Officers from the GLA were invited to take part in the consultation workshop in October 2013 but were unable to attend. However, full account has been taken of the Mayor's revised strategy in drafting the strategy and it is not anticipated that there will be any issues around conformity. It should also be noted that the process through which GLA officers will undertake a review remains unclear (no responses was received when the current strategy was submitted in 2009). The council is required to have a published homelessness strategy and the housing strategy incorporates this.

3.3 Strategic Direction and Priorities

- 3.3.1 Against the background described, the draft strategy seeks to establish a policy approach that responds to current conditions in a way that maximises opportunities, recognises the changing shape of demand and the London-wide context in which Brent sits and provides solutions across tenures, household and income groups. It is clear that, while a primary aim for housing policy and for social housing in particular is to meet urgent and severe housing need – for the homeless and for the poorest and most vulnerable, for example – there is also a requirement to address the growing demand from those whose housing aspirations are not being met by the market – those on low or middle incomes, newly forming households and those seeking to move between tenures, for example. The findings from the Social Mobility Commission illustrate the changing picture, noting that *“suitable and affordable accommodation is a defining factor in social and economic well-being and people's ability to progress aspects of their life such as education, employment and financial security”*.
- 3.3.2 The strategy therefore adopts an approach that can be broadly characterised by mobility – encouraging mobility between and within tenure types and with a focus on a range of housing that is affordable and accessible to households in a wide range of circumstances addressing the needs in particular of those on low and medium incomes.

3.3.3 The council has already begun to align housing and employment services: responsibility for both areas now sits within a single division in the Regeneration and Growth department and the Tenancy Strategy and the Allocation Scheme give additional priority to working households in the grant and renewal of tenancies, while a joint housing, benefits and employment team are focussed on households affected by welfare reform. The intention is that the Housing Strategy will be aligned closely with the emerging Employment, Skills and Enterprise Strategy. A primary aim for both strategies will be to continue to develop an approach that incentivises and supports employment, maximising the ability of housing provision to act as a lever for economic growth, while meeting residents' diverse housing needs.

3.3.4 From this broad context, the following priorities and strategic objectives emerge and will be the focus for action by the council and its partners over the next five years.

3.3.5 The overriding vision for the strategy is to support:

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

3.3.6 Related to this vision, the strategy has five clear strategic priorities, with specific outcomes identified in each area and these are summarised in the following paragraphs.

3.4 Housing Supply

3.4.1 Increasing supply across all tenures is fundamental but, as noted above, the resources available and the scale of the challenge mean that the impact of new supply on meeting demand will be limited and long-term. Increasing the number of new homes alone will not suffice: the mix of new housing types and tenures and questions of affordability are just as important.

3.4.2 The identified priority is to significantly increase the supply of affordable housing. Within this, target outcomes include providing 5,000 new affordable rented and low-cost home ownership homes including 700 new council homes over the next five years and the supply of 200 new supported housing units by 2016. In addition, the strategy will support provision of 1,000 new private rented homes, of which at least 30% should be affordable to those on lower incomes.

3.4.3 This mix of provision will depend upon a range of funding sources is intended to maximise opportunities for new homes across tenures, supporting a mix that matches the changing pattern of need and demand.

3.5 Employment

- 3.5.1 As noted above, the strategy reflects the centrality of employment: in improving life chances, encouraging physical and social mobility, tackling exclusion, improving health and well-being and, most immediately, mitigating the impact of welfare reform.
- 3.5.1 The strategic aim is to increase employment and reduce economic exclusion through an integrated approach to housing and employment provision and support. As a result, outcomes will include raising employment levels among social housing tenants and in priority neighbourhoods significantly, reducing the gap between Brent's most deprived neighbourhoods and the rest of the borough, drawing on the findings of the Social Mobility Commission and the emerging priorities for the Employment, Skills and Enterprise Strategy. Increasing employment levels and increasing opportunities for progression in employment will be crucial in improving access to housing options for Brent residents who currently face severe difficulties with affordability.

3.6 Private Rented Sector

- 3.6.1 The sector has grown in response to demand, presenting both opportunities and challenges. Realistically, the sector will remain the primary source of accommodation for many Brent households for the foreseeable future and the strategy therefore needs to foster and support the market while addressing the negative elements of its expansion and its relative lack of regulation.
- 3.6.2 The strategic priority is to maximise the contribution of the private rented sector to meeting housing need and demand through the provision of decent and well-managed accommodation. Central to this is the introduction of borough-wide licensing of HMOs in early 2015 and the potential introduction, subject to consultation and Cabinet approval, of Selective Licensing in certain wards.
- 3.6.3 The expectation is that licensing, together with use of the council's enforcement powers and increased partnership working with Brent landlords through accreditation schemes and the development of support and incentives for letting, will encourage a more effective and responsive market in which good landlords will operate effectively and profitably. Access to and quality in the sector will be improved through support for new development as noted above and by provision of lettings agency services by Brent Housing Partnership.

3.7 Homelessness and Allocations

- 3.7.1 Rising homelessness is the most acute symptom of London's housing crisis, as well as the most difficult and disruptive experience for affected households and the source of significant costs for the council.

3.7.2 The strategic priority is therefore to significantly reduce levels of homelessness through an increased focus on prevention and by increasing access to private rented properties, both within Brent and as close to the borough as is affordable. The aim is to minimise the use of Bed & Breakfast Accommodation in the short-term. A high proportion of allocations to homeless households will have an immediate impact, and the long-term aim being to substantially reduce temporary accommodation levels and costs.

3.8 Social Housing Improvement

3.8.1 The social housing stock is a vital resource and significant progress has been made in improving quality, in particular through the Decent Homes programme. However, there are areas where further progress can be made, in particular with regard to energy efficiency, and it is also essential that the stock is used in the most effective way.

3.8.2 The strategic priority is to improve the quality of the existing social housing stock and ensure its efficient use. A major 7-year investment programme, set out in the Asset Management Strategy, to all the Council's tenanted and leasehold stock commences this year and will sustain and build on the improvements achieved through Decent Homes. The council has appointed an Energy Efficiency partner and they will develop and lead a programme of retrofit works to both social housing and private sector properties across the borough, maximising applicable ECO and Green Deal funding to improve efficiency, tackle fuel poverty and reduce carbon emissions.

3.8.3 The Tenancy Strategy and Allocation Scheme will ensure that the stock is let and managed effectively, with use of fixed terms and under-occupation incentives, among other initiatives, assisting in increasing mobility within the stock and raising the number of available lettings. A programme of stock re-balancing, together with the development programme noted above, will also ensure that the stock better matches need and demand, for example through increased provision of larger homes.

3.9 Delivery and Monitoring

3.9.1 To ensure achievement of the identified objectives and outcomes a detailed action plan covering an initial period of three years will be drawn up following approval of the strategy. The action plan will be reviewed and monitored regularly so that it is a live document guiding activities and focus. Mirroring the strategy, the action plan depends on Brent Council and its partners from all sectors working closely together to develop and deliver against it.

4.0 Financial Implications

4.1 In general terms the Housing Strategy is supported by a combination of the Council's General Fund, The Housing Revenue Account and the Council's Capital Programme. Elements of Housing provision are also supported from Central Government funds in respect of Housing related benefits and in the form of grants.

4.2 Delivery of the Housing Strategy will need to be undertaken within the limited resources available to the Council. Officers will continue to review and monitor expenditure and income and identify funding opportunities in order to maximise the availability of funds to support the strategy in line with corporate priorities.

5.0 Legal Implications

- 5.1 Under section 41 of the Greater London Authority Act 1999, as amended, (“GLA Act 1999”), it is a general duty of the Mayor of London to prepare and publish a London Housing Strategy. Under section 333D of the GLA Act 1999 (as amended), any local housing strategy prepared by a local housing authority in Greater London must be in general conformity with the Mayor of London’s London Housing Strategy,
- 5.2 Under section 8 of the Housing Act 1985, local housing authorities (including Brent Council) shall consider and review on a periodical basis the housing conditions in their area and the housing needs of the area with respect to the provision of further housing accommodation. Section 3 of the Housing Act 2004 imposes a duty on local housing authorities to keep housing conditions in their area under review.
- 5.3 Under section 87 of the Local Government Act 2003 (as amended), the Secretary of State for Communities and Local Government has the power to require local housing authorities to have a housing strategy and impose requirements with respect to the ends that the strategy is to be designed to achieve, the formulation of policy for the purposes of the strategy or review of the strategy. The Secretary of State also has the power to order local housing authorities to prepare a statement setting out their housing strategy and other material relating to housing. To date, the Secretary of State has not exercised these powers. Section 225 of the Housing Act 2004 states that “housing” (for the purposes of carrying out a review of the housing needs of an area under section 8 of the Housing Act 1985 and for the purposes of preparing a statement setting out a housing strategy and other material relating to housing under section 87 of the Local Government Act 2003) includes the accommodation needs of gypsies and travellers residing in their area.
- 5.4 The Council also has a statutory duty to prepare other housing related strategies, which include a homelessness strategy and a tenancy strategy. The Council is under a duty to have in place a “Homelessness Strategy” under section 3 of the Homelessness Act 2002, which must have regard to the Mayor of London’s London Housing Strategy, the Council’s Allocations Scheme under section 166A of the Housing Act 1996 and the Council’s Tenancy Strategy under section 150 of the Localism Act 2011. In turn, under section 151 of the Localism Act 2011, the preparation or modification of the Council’s Tenancy Strategy must have regard to the Mayor of London’s London Housing Strategy, the Council’s Allocations Scheme and the Council’s Homelessness Strategy. In turn, under section 166A(12) of the Housing Act 1996, the preparation or modification of the Council’s Allocations Scheme

must have regard to the Mayor of London's London Housing Strategy, the Council's Homelessness Strategy and the Council's Tenancy Strategy.

- 5.5 With regard to decisions to introduce additional licensing and selective licensing, sections 57(2) and 81(2) of the Housing Act 2004 respectively state that any exercise of such powers must be exercised in accordance with the Council's overall housing strategy.
- 5.6 The public sector equality duty, as set out in section 149 of the 2010 Act, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic
- 5.7 The "protected characteristics" are: age, disability, race (including ethnic or national origins, colour or nationality), religion or belief, sex, sexual orientation, pregnancy and maternity, and gender reassignment. Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.
- 5.8 Having "due regard" to the need to "advance equality of opportunity" between those who share a protected characteristic and those who do not includes having due regard to the need to remove or minimise disadvantages suffered by them. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and to encourage those who have a protected characteristic to participate in public life. The steps involved in meeting the needs of disabled persons include steps to take account of the persons' disabilities. Having due regard to "fostering good relations" involves having due regard to the need to tackle prejudice and promote understanding.
- 5.9 The Council's duty under section 149 of the Equality Act 2010 is to have "due regard" to the matters set out in relation to equalities when considering and making decisions on the introduction of additional licensing for the area of Brent and the introduction of selective licensing. Due regard to the need to eliminate discrimination, advance equality and foster good relations must form an integral part of the decision making process. When the decision comes before the Executive, Members of the Executive must consider the effect that implementing a particular policy will have in relation to equality before making a decision. An Equality Impact Assessment will assist with this.
- 5.10 There is no prescribed manner in which the equality duty must be exercised, though producing an Equality Impact Assessment is the most usual method. The Council must have an adequate evidence base for its decision making. This can be achieved by means including engagement with the public and interest groups and by gathering relevant detail and statistics.
- 5.11 The Equality Impact Assessment is set out in Appendix 1 to this report.

6.0 Diversity Implications

- 6.1 An Equality Impact Assessment has been undertaken and is attached as Appendix 1 to this report.
- 6.2 In summary, the assessment concludes that the impact of the strategy is likely to be generally positive for all protected groups and, in some areas such as tackling overcrowding and improving energy efficiency, activity will be particularly positive for protected groups who are more likely to be affected by housing problems.

7.0 Staffing/Accommodation Implications (if appropriate)

- 7.1 There are no immediate staffing or accommodation issues arising from this report.

Background Papers

Housing Strategy Evidence-base, 2014

Contact Officers

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ANDREW DONALD
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Appendix 1: Equality Analysis

1. Roles and Responsibilities:	
<p>Directorate: Regeneration and Growth</p> <p>Service Area: Housing and Employment</p>	<p>Person Responsible: Name: Tony Hirsch Title: Head of Policy, Housing Contact No: 020 8937 2336 Signed:</p>
<p>Name of policy: Housing Strategy 2014-19</p>	<p>Date analysis started: March 2014</p> <p>Completion date: 30th June 2014</p> <p>Review date: June 2015</p>
<p>Is the policy: New <input checked="" type="checkbox"/> Old <input type="checkbox"/></p>	<p>Auditing Details: Name: Elizabeth Bryan Title: Equality Officer Date June 2014 Contact No: 020 89371190 Signed:</p>
<p>Signing Off Manager: responsible for review and monitoring Name: Jon Lloyd-Owen Title: Operational Director, Housing and Employment</p> <p>Date: 30th June 2014 Contact No: 07867169854 Signed:</p>	<p>Decision Maker: Name individual /group/meeting/ committee: Cabinet</p> <p>Date: July 2014</p>

2. Brief description of the policy. Describe the aim and purpose of the policy, what needs or duties is it designed to meet? How does it differ from any existing policy or practice in this area?

The Housing Strategy sets out the council's high-level objectives for policy and service delivery on all aspects of housing and related matters. It also comprises the council's statutory Homelessness Strategy. The Strategy is also informed by the emerging priorities in the draft Employment, Skills and Enterprise Strategy, recognising the essential links between housing and employment and housing's role as a lever for /economic growth.

The Housing Strategy identifies five priority objectives and associated outcomes that are the subject of this analysis.

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

Outcomes:

- 5,000 Affordable Rent and Low-Cost Ownership homes delivered by 2019
- A minimum of 35% of new Affordable Rent homes to be 3 bed or larger
- Severe overcrowding cut by half by 2019
- 700 affordable council homes delivered by 2019
- 1,000 new private rented homes of which at least 30% are aligned to LHA levels
- Two hundred additional supported housing units provided by 2016

2. Housing and Employment - To increase employment and reduce economic exclusion through an integrated approach to housing and employment provision and support

Outcomes:

- Reduce economic exclusion in priority areas and to halve the average difference between the priority areas and the borough as a whole by 2019
- To increase employment levels among social housing tenants by 20% by 2019
- To increase the proportion of allocations to those in employment by one-fifth
- To pilot frontline integrated housing options and employment advice in 2014-15

3. Private Rented Sector – To maximise the contribution of the private rented sector to meeting housing need and demand through the provision of decent and well-managed accommodation

Outcomes:

- All HMOs licensed under Additional Licensing by 2015 – estimated at up to 15,000
- Lettings Agency operational by March 2015 and a minimum of 400 properties let/managed per annum by 2019
- Minimum of 100 empty properties brought back into use per annum

4. Homelessness - To significantly reduce levels of homelessness and the use of temporary accommodation

Outcomes:

- Homeless acceptances below London average by 2019
- Number in temporary accommodation to the London average by 2019
- Families in B&B for more than six weeks to nil in 2014/15 and thereafter
- Number in B&B below 100 from 2015/16 onwards
- Number of households affected by the benefit cap in temporary accommodation to 200 by 15/16 and to 100 from 16/17

5. Social Housing Improvement - To improve the quality of the existing social housing stock and ensure its efficient use

Outcomes:

- All Council homes improved by 2021 within budget and Decent Homes standard maintained
- Top quartile performance for management quality and efficiency achieved from 2016 onwards
- Improved energy through treating all cavity walls where economically feasible by 2016 and targeted improvements to worst performing 10% of council homes

The document builds on previous strategies and, in many areas, identifies similar objectives and actions. However, it also identifies new directions that are a particular focus for this assessment.

3. Describe how the policy will impact on all of the protected groups:

The strategy is concerned with housing across all tenures and therefore, in principle, could impact on all Brent residents and all protected groups. In broad terms, certain protected groups are disproportionately affected by housing problems; for example, some ethnic groups such as Black Africans are over-represented among homeless applicants, while the Other White group, including large numbers of European migrants, are over-represented among private tenants (see evidence section below). Policies intended to address these problems are therefore likely to impact on these groups in a similarly disproportionate way, although the impacts are expected to be broadly positive. It should be stressed that elements of the strategy have been developed specifically to respond to identified equality issues; for example, objectives concerning larger homes respond to Brent's larger than average family size, which is partly a result of larger families within certain ethnic groups. It should also be noted that the strategy reflects policy decisions that have already been taken in a number of areas and have already been subject to detailed equality analysis. This document therefore does not repeat the exercise in these areas, which are:

- Tenancy Strategy, addressing the Affordable Rent regime, use of fixed-term tenancies and the power to discharge homelessness duties through the private rented sector
- Allocation Scheme, addressing the way in which eligibility and priority for social housing are calculated, eligibility for particular types of property and related issues
- Licensing in the Private Rented Sector, addressing the implementation of Additional and Selective Licensing schemes with effect from 2015 (subject to further consultation and consideration by the Executive in the case of the latter).

The following sections consider each of the protected groups

Age

There are several issues potentially affecting older people. First, the implementation of the social sector size criteria (the bedroom tax) has prompted changes to the council's policy on under occupation, with the offer of more generous compensation for households moving to smaller homes. Although older people are protected from the bedroom tax, they are more likely to be under-occupying and still able to benefit from additional support to move.

Second, the strategy specifically identifies a need for more Extra Care housing, in response to the increasing numbers of older people in the Brent population as indicated in the 2011 Census and, in particular, to enable people to move from unsuitable and expensive residential care. This will also have a positive impact for older people in widening opportunities to move to suitable and affordable housing and, in the case of older people in affordable housing, freeing up homes for re-letting. Although poor energy efficiency and lack of affordable warmth can affect households across all ages and all tenures, older people are particularly vulnerable due to generally low incomes and more at risk from the health impacts of fuel poverty. Programmes to deliver improvements to the stock, including partnership arrangements to deliver the Green Deal and ECO, will benefit older people in particular.

Younger people face particular problems in accessing housing, related to employment and income and to benefit restrictions, in particular the Single Room Rate for Housing Benefit for unemployed single people under 35. This contributes to overcrowding, with young people obliged to remain with the families as well as restricting the available options more generally, with young people often forced to share or occupy single rooms. The strategy sets out objectives around reducing overcrowding which will positively benefit this group

Disability

The strategy has identified a shortage of supported and specialised provision and sets objectives for delivery of more supported housing for broad needs groups including physical and learning disabilities and those with mental health needs. As with older people, one priority in this area is to reduce reliance on residential care and promote independent living.

Health and disability needs are taken into account in assessing priority for housing and there are targets for wheelchair accessible and Lifetime homes within the overall targets for new supply: where possible, all new homes will be built to Lifetime Homes standards and 10% will be wheelchair accessible. A programme of Disabled Facilities Grants provides funding to deliver improvements to homes across tenures to support independent living.

The impact of the policy and service delivery is therefore expected to be positive for this group.

Gender re-assignment

No particular impacts have been identified for this group and there is insufficient data to draw any specific conclusions beyond the general benefits identified for the key objectives that would apply to all groups. Data is now being collected and, as with other protected groups where data is lacking, acquiring improved information is a priority for the action plan.

Marriage and civil partnership

No particular impacts have been identified for this group and there is insufficient data to draw any specific conclusions beyond the general benefits identified for the key objectives that would apply to all groups.

Pregnancy and maternity

No particular impacts have been identified for this group beyond those already addressed in assessment of the Tenancy Strategy and Allocation Scheme, other than the positive impact of a move away from the use of bed and breakfast accommodation, which is unsuitable for households with children. It should be noted that households with children or containing someone who is pregnant fall into the priority need group where they are homeless or at risk of homelessness.

Race

Patterns of inequality linked to race are complex, perhaps even more so in a borough as diverse as Brent. While it is well-established that certain groups tend to be over- or under- represented within certain categories, the issues are not always clear cut. For example, Black Africans are over-represented among homeless applicants and

among households experiencing overcrowding, but within this it is apparent that nationality, culture and faith may be more relevant factors than a broad attribution of ethnic origin (see evidence section below). Analysis indicates that, for example, Somali households are more likely than some other Black Africans to experience overcrowding and this is connected to the tradition of larger families in Somali society. It is also apparent that experience of housing problems is different for newly forming communities than it is for established ones. For example, households of Indian origin are much more likely to be owner-occupiers while less well-established communities, in particular recent migrants from Europe, tend to live in private rented housing. Their concerns and the impact of the objectives in the Strategy are therefore likely to be very different. In this broad context, the objectives and outcomes identified in the strategy may have a greater or lesser importance or impact for different ethnic groups. Significant areas are:

- Housing need and homelessness

Certain groups are over-represented on the Needs Register and among homeless applicants (see evidence section below). The implications of policy for these groups have been considered as part of the Equality Analysis of the Tenancy Strategy and the Allocation Scheme.

The strategy sets targets for reduction in the use of temporary accommodation. This is likely to mean that an increased number of households will need to be placed in more suitable temporary accommodation or in affordable private rented accommodation outside Brent – both elsewhere in London and outside London. The positive benefit will be in the improved quality and settled nature of the accommodation; the dis-benefit for some will be in the more dispersed location of this accommodation. This has a potential impact on all protected groups within the homeless cohort, but households from some ethnic minorities are, as noted above, over-represented.

- Impact of welfare reform

Welfare reform has an impact across all groups but some ethnic minorities are more likely to be affected, especially since the worst impact is felt by larger households. This strategy aims to support the council's overall response to welfare reform and, while negative impacts on particular groups are due to national rather than local policy, seeks to mitigate the impact where possible and this is considered further below.

Religion or belief

No specific impacts have been identified beyond those which may also be linked to race (e.g. prevalence of larger families) that have been addressed above and data is not sufficient to draw any further conclusions.

Sex

Women (almost exclusively single parents) are over-represented in homeless approaches and acceptances and are also more likely to be unemployed. The implications of this have been considered in the assessment of the Tenancy Strategy and the Allocation Scheme and in the assessment of the Employment, Skills and Enterprise Strategy.

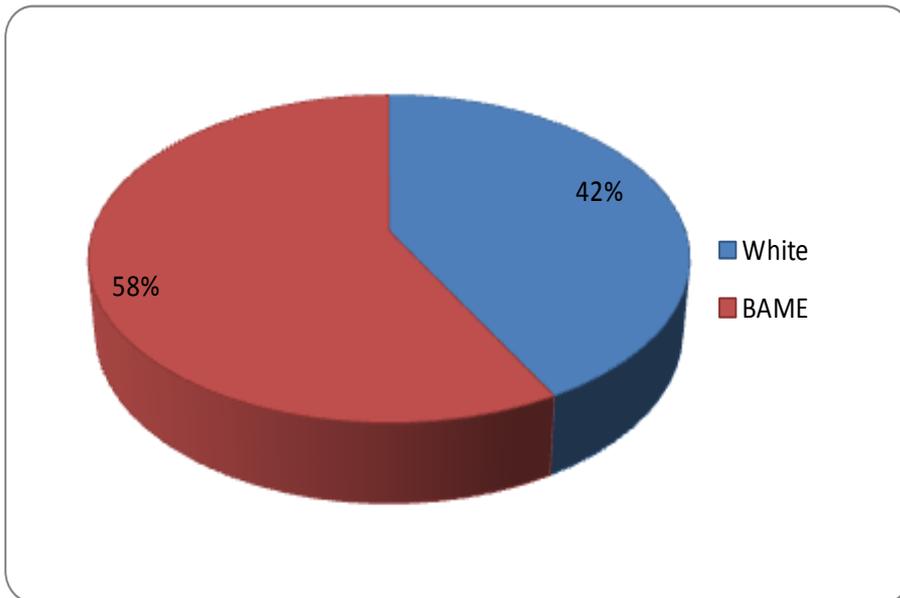
Sexual orientation

No particular impacts have been identified for this group and there is insufficient data to draw any specific conclusions beyond the general benefits identified for the key objectives that would apply to all groups.

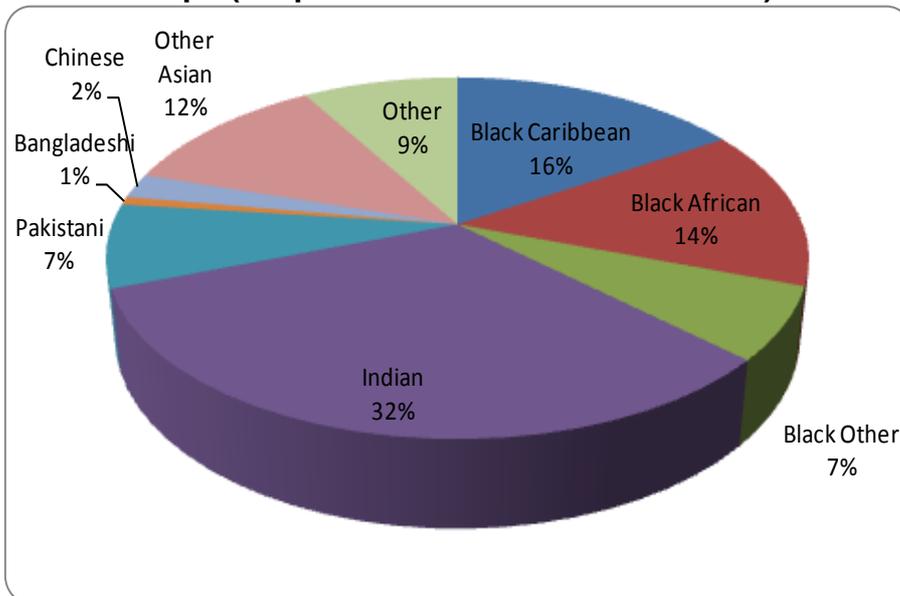
Please give details of the evidence you have used:

The first chart below summarises the overall population split between white British and BAME households, while the second provides a breakdown of the 58% who identified themselves as from a BAME group in the 2011 Census. These figures provide the basis for analysis of any divergence between the general population figures and other data with regard to ethnicity.

Brent: Overall Population (2011 Census)



BAME Groups (Proportion of the overall 58% total)

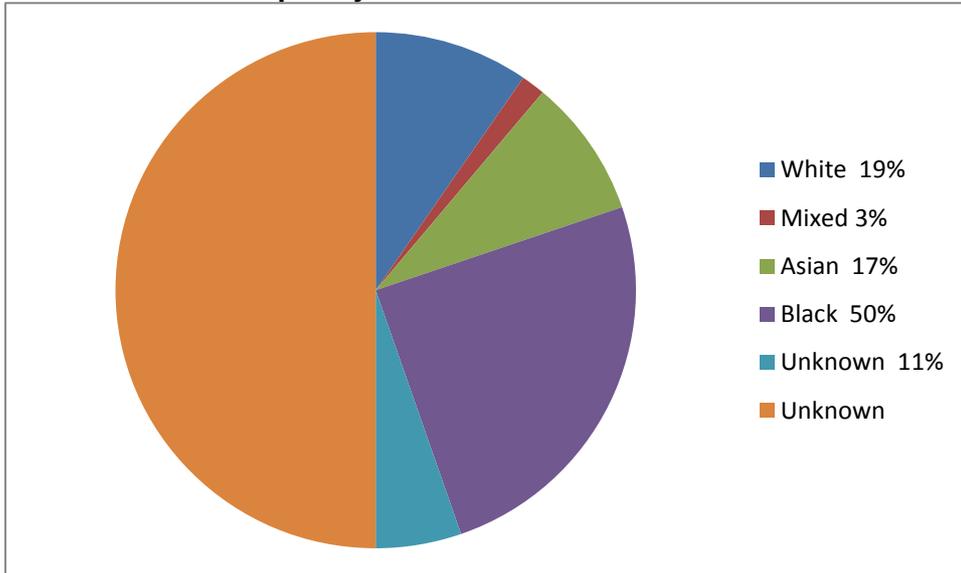


Households from ethnic minority groups are disproportionately likely to become statutorily homeless, reflecting greater exposure to risk factors such as poverty, deprivation and overcrowding. Households with a White head (including both White British and other White ethnic groups) comprised 67% of all households in London in 2011, but just 38% of households accepted as statutorily homeless in 2012/13. Black

or Black British households comprised 13% of all London households in 2011 but 37% of those accepted as homeless in 2012/13.

Brent's ethnic mix is both more diverse than London as a whole and includes a greater proportion of BAME households, but shows a similar pattern in the disproportionate numbers of BAME households experiencing housing problems.

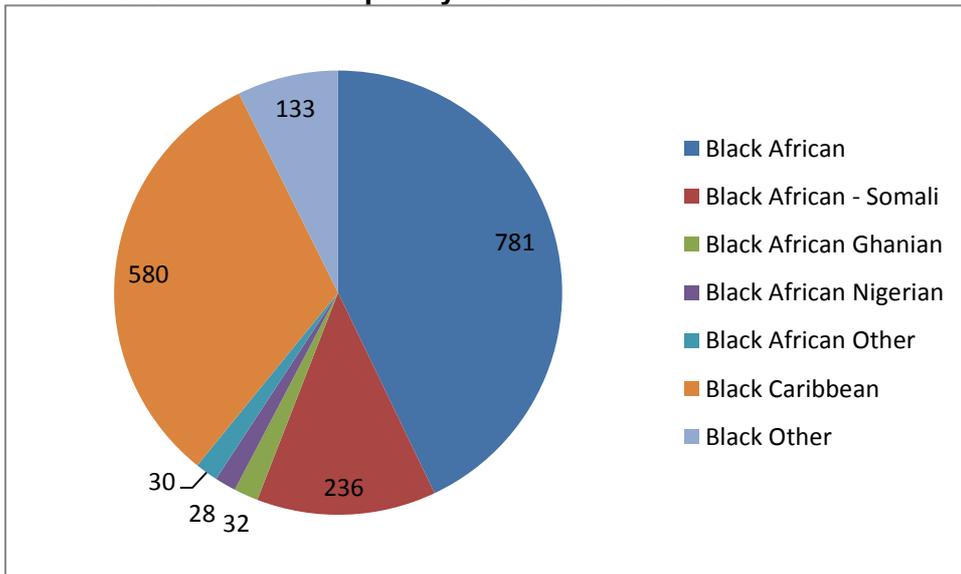
Households in Temporary Accommodation



The chart shows the broad ethnicity of household in temporary accommodation, where the Black group makes up 50% of the total but 37% of the overall population (note that all percentages have been rounded to the nearest whole number here and elsewhere in this section) and BAME groups as a whole make up 81% as opposed to 58% of the total in the general population.

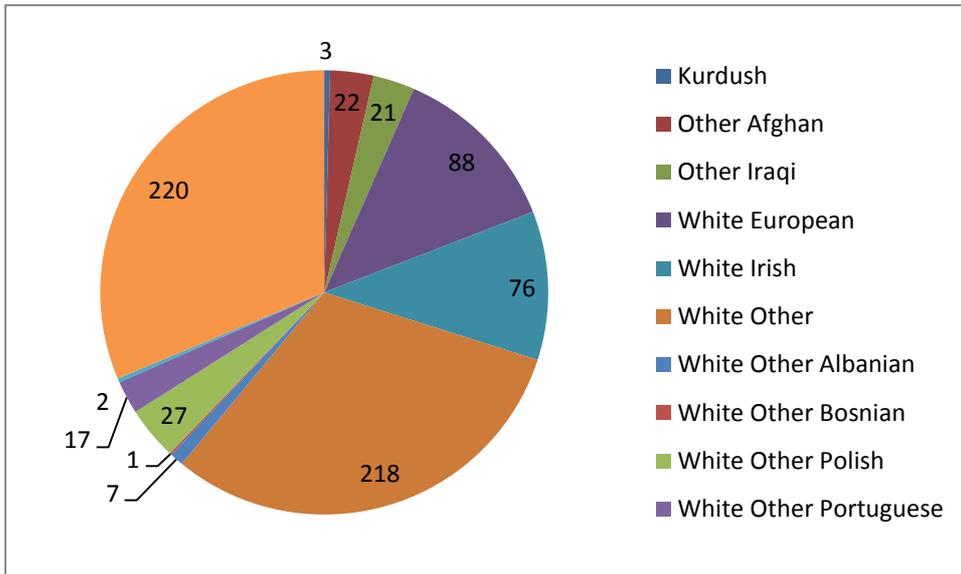
Breaking down the total above indicates that, among the broad Black category, Black African households are over-represented, with a particularly high number of Somali households

Black Households in Temporary Accommodation



It is also worth noting that, among the broad White category, White UK households make up a relatively small proportion of the total compared to the general population.

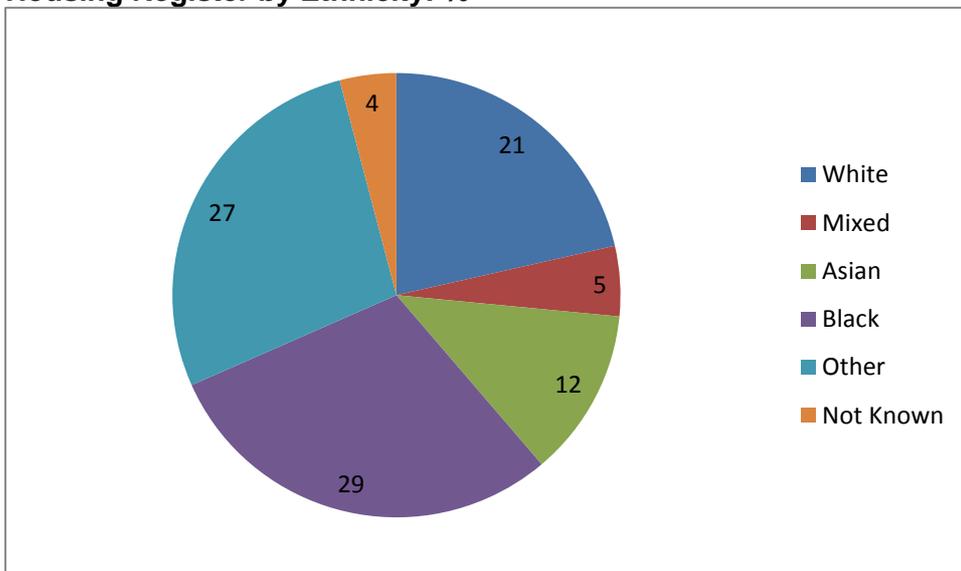
White Households in Temporary Accommodation



Although there has been much publicity concerning the impact of migration from eastern Europe, numbers of households from this group are small compared to their presence in the general population (although it should be noted that it is difficult to obtain accurate figures for the total number of such migrants).

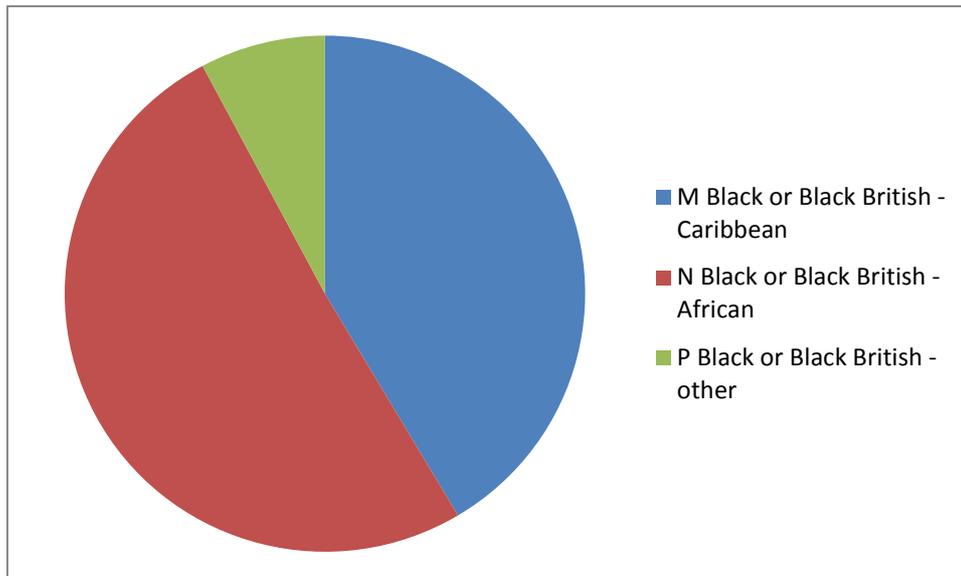
The Housing Needs Register shows a similar pattern, in which BAME groups are over-represented in comparison to the general population.

Housing Register by Ethnicity: %



Similarly, with the broad groupings, further analysis reveals over-and under-representation of certain groups. Within the Black category, the chart below demonstrates the relatively high numbers of Black Africans, who make up over half of the category.

Housing Register: Proportion of Black Ethnic Groups



Black or Black British African households make up around half of the total.

Social housing is allocated through a choice-based lettings system. Applicants are able to bid based on their assessed priority, identified by placement within a band, and on their date of application, meaning that those who have been on the register longest get the highest preference within each band. Allocations therefore reflect priority and, for protected groups, will be proportionate to the numbers of each group within each band.

Welfare Reform

The overall benefit cap has differing impacts for different groups:

- **Age**
 - 37% of the caseload affects 25-44 year olds, of which 74% have been resolved but cases involving under 25's and over 55's are harder to resolve
- **Ethnicity**
 - The Black group makes up under 25% of the HB caseload but almost a third of OBC cases, while OBC cases in the White group are below the overall HB caseload percentage.
 - The Asian group makes up 13% of OBC cases but 17% of those resolved (e.g. through finding employment). The White group makes up 16% of OBC cases, but the percentage resolved is under 10%.
- **Gender**
 - Females make up over half the HB caseload but three quarters of OBC cases in Brent.
 - Proportion of cases resolved for each gender is almost identical.

4. Describe how the policy will impact on the Council's duty to have due regard to the need to:

(a) Eliminate discrimination (including indirect discrimination), harassment and victimisation;

The strategy aims to ensure that policy and service delivery are centred on identified need and demand, based on an analysis of local market conditions and demographics, including the specific needs of protected groups.

(b) Advance equality of opportunity;

The Housing Strategy aims to enhance the availability of and access to appropriate housing for all Brent residents and, in particular, for those most likely to struggle to obtain suitable, secure and affordable homes.

(c) Foster good relations

The intention is that the strategy will support a suite of policies and practices that are transparent and fair so that access to housing, particularly to social and affordable housing, is seen to be based on appropriate criteria. Similarly, the Strategy seeks to ensure that housing across all tenures is managed and maintained to high standards.

5. What engagement activity did you carry out as part of your assessment? Please refer to stage 3 of the guidance.

i. Who did you engage with?

Extensive consultation was carried out during 2013 on the key themes and challenges and possible responses with:

- Residents in all housing tenures
- Partner organisations including Registered Providers, Health, Police and other emergency services
- Voluntary Sector agencies
- Landlords
- Council departments

ii. What methods did you use?

- Draft published on website inviting responses

- A workshop sessions with partners including Registered Providers and voluntary sector agencies
- 2 Staff briefings/workshops
- 2 Member workshops attended by 15 members

iii. What did you find out?

The overall direction set out in the strategy attracted wide support and feedback tended to be focussed on very specific issues and questions of detail or clarification, with limited relevance to the impact on protected groups. The following points summarise relevant comments.

New Supply

- Need to look at how more housing for single, specifically young, people can be incorporated within developments.
- Need to review planning policy on tenure, mix and bed size? Policy must meet local housing needs, as well as viability. Is policy robust enough to ensure sustainable development?

Homelessness

- Pathways from supported housing accommodation, as support needs decrease, need to improve
- Need to engage more effectively with key stakeholders on the reasons for use of out of borough placements
- Move on from support schemes for mental health needs to improve with better partnership with floating support providers and better information for landlords in the PRS about support services
- Create a register of landlords who are willing to accept clients with MH problems

Private Sector

- Can subsidies be given to landlords to improve housing stock in the borough as a condition of licensing?
- Training should be provided to other departments, e.g. social care, so that they are aware of what to look for in terms of condition when visiting.
- London rental standard should be applied not only to landlords acting within the law

Employment

- Need to recognise that employment isn't an answer for many people, e.g. those suffering mental health issues, drug and alcohol use.
- Importance of local and specialised services was stressed, with the example of Ealing's work with Somali families impacted by the benefit cap, where training was provided to help women get childcare qualifications.

- Childcare provision would remove some barriers to employment.
- Need to encourage and assist self employment for people facing particular barriers to full time employment, and provide flexible employment spaces.

Welfare

- Money management is essential to avoid 'revolving door' situations.
- Benefit caps - more emphasis needed on planning for UC - e.g. household financial management

Young People

- Not enough focus on young people, in particular young care leavers.
- Co-housing may be an option for young people
- Is there potential for lodging schemes – young single people living with elderly people with low level support needs.

Older People

- Bespoke smaller accommodation for the elderly in order to free up under-occupied homes.
- More initiatives and help for elderly single people looking to downsize, e.g. purchase by BHP/RP and rehousing to smaller home.

iv. How have you used the information gathered?

Responses to consultation have fed into the development of the strategy at all stages.

v. How has it affected your policy?

A number of suggestions from consultation have been incorporated into the strategy or have influenced amendment and clarification within the document. Examples include:

- Proposals for a short-life scheme aimed at young single people
- Development of more supported and specialised housing
- Consideration of incentives for private sector landlords as part of the licensing proposals
- Improved incentives for under-occupiers

6. Have you identified a negative impact on any protected group, or identified any unmet needs/requirements that affect specific protected groups? If so, explain what actions you have undertaken, including consideration of any alternative proposals, to lessen or mitigate this impact.

No potential negative impacts have been identified beyond those already addressed in assessment of related policies referred to above. However, it should be stressed that the impact of welfare reform on local affordability means that some households, including some homeless households moving on from temporary accommodation into private sector lettings, may need to move out of the borough or, in some cases, out of London.

This issue has been considered as part of the earlier impact assessment on the Tenancy Strategy and Allocation Scheme. The intention is to use out of borough accommodation only where it is necessary and where suitable and affordable accommodation can be secured. At the same time, the council will work with private landlords and developers to improve supply and secure housing affordable within LHA limits in Brent wherever possible.

Please give details of the evidence you have used:

See section 3 above

7. Analysis summary

Please tick boxes to summarise the findings of your analysis.

Protected Group	Positive impact	Adverse impact	Neutral
Age	x		
Disability	x		
Gender re-assignment			x
Marriage and civil partnership			x
Pregnancy and maternity	x		
Race	x		
Religion or belief			x
Sex	x		
Sexual orientation			x

8. The Findings of your Analysis

Please complete whichever of the following sections is appropriate (one only). Please refer to stage 4 of the guidance.

No major change

Your analysis demonstrates that:

- *The policy is lawful*
- *The evidence shows no potential for direct or indirect discrimination*
- *You have taken all appropriate opportunities to advance equality and foster good relations between groups.*

Please document below the reasons for your conclusion and the information that you used to make this decision.

The evidence outlined above and in the main document and the outcomes from consultation do not indicate any reason to consider the policy unlawful or discriminatory. Rather, the evidence suggests that, beyond some issues referred to above and covered in separate Equality Assessments, the impact of the policy will be positive for protected groups (where there is sufficient data to make a judgement)

Adjust the policy

This may involve making changes to the policy to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential adverse effect on a particular protected group(s).

Remember that it is lawful under the Equality Act to treat people differently in some circumstances, where there is a need for it. It is both lawful and a requirement of the public sector equality duty to consider if there is a need to treat disabled people differently, including more favourable treatment where necessary.

If you have identified mitigating measures that would remove a negative impact, please detail those measures below.

Please document below the reasons for your conclusion, the information that you used to make this decision and how you plan to adjust the policy.

Continue the policy

This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not amount to unlawfully discrimination, either direct or indirect discrimination.

In cases where you believe discrimination is not unlawful because it is objectively justified, it is particularly important that you record what the objective justification is for continuing the policy, and how you reached this decision.

Explain the countervailing factors that outweigh any adverse effects on equality as set out above:

Please document below the reasons for your conclusion and the information that you used to make this decision:

Stop and remove the policy

If there are adverse effects that are not justified and cannot be mitigated, and if the policy is not justified by countervailing factors, you should consider stopping the policy altogether. If a policy shows unlawful discrimination it must be removed or changed.

Please document below the reasons for your conclusion and the information that you used to make this decision.

9. Monitoring and review

Please provide details of how you intend to monitor the policy in the future. Please refer to stage 7 of the guidance.

The evidence base for this Strategy and the Employment, Skills and Enterprise Strategy will be reviewed and updated annually. The Action Plans for both strategies will be monitored quarterly (or annually in the case of some actions and indicators) with a view to assessing progress and impact. This will include regular consideration of any evidence for impact on protected groups.

10. Action plan and outcomes

At Brent, we want to make sure that our equality monitoring and analysis results in positive outcomes for our colleagues and customers.

Use the table below to record any actions we plan to take to address inequality, barriers or opportunities identified in this analysis.

Action	By when	Lead officer	Desired outcome	Date completed	Actual outcome
Monitoring of Housing Register	June 2015	Laurence Coaker	Comprehensive monitoring across all protected groups, including those where current data is inadequate Demonstrate positive impact of policy Identify actions to mitigate any negative impact		
Monitoring of Homeless Applications and Acceptances	June 2015	Laurence Coaker	Comprehensive monitoring across all protected groups, including those where current data is inadequate Demonstrate positive impact of policy Identify actions to mitigate any negative impact		
Monitoring of TA occupancy	June 2015	Laurence Coaker	Comprehensive monitoring across all protected groups,		

			<p>including those where current data is inadequate</p> <p>Demonstrate positive impact of policy</p> <p>Identify actions to mitigate any negative impact</p>		
Monitoring of Allocations	June 2015	Laurence Coaker	<p>Comprehensive monitoring across all protected groups, including those where current data is inadequate</p> <p>Demonstrate positive impact of policy</p> <p>Identify actions to mitigate any negative impact</p>		
Monitoring of Out-of-Borough Placements	June 2015	Laurence Coaker	<p>Comprehensive monitoring across all protected groups, including those where current data is inadequate</p> <p>Demonstrate positive impact of policy</p> <p>Identify actions to mitigate any negative impact</p>		



HOUSING STRATEGY

2014- 19

Contents

To be completed for final draft

1. INTRODUCTION

- 1.1 This strategy sets out the council's objectives for housing over the next five years, in relation to the national and local policy context and building on an evidence base that considers trends in the housing market and related areas, in particular the employment and labour market. An associated Action Plan sets out in detail how these objectives will be achieved, working in close collaboration with partners in the statutory, voluntary and private sectors
- 1.2 The Strategy draws on and supports the Borough Plan, the Regeneration Strategy and other policy documents. It also takes account of the London Housing Strategy, with which this document is obliged to demonstrate general conformity. The council has a statutory responsibility to publish a Homelessness Strategy and this document incorporates that strategy.
- 1.3 In particular, the strategy reflects the close links between employment and housing; employment and earnings are crucial in supporting housing choices and decent and affordable housing plays a major role in supporting individuals to secure employment and progress within it. This document is therefore aligned with the emerging priorities that will shape the 2014-19 Employment, Enterprise and Skills Strategy (the Employment Strategy) that is currently in development. The intention is that the objectives and actions in each will be mutually supportive.
- 1.4 The strategy has been developed in consultation with a range of partners including Registered Providers (RPs), representatives from the voluntary and community sector (VCS), landlords, tenants and residents as well as other council departments. Research and consultation undertaken in connection with other projects have also informed the development of this strategy, in particular the findings of the Social Mobility Commission, consultation on licensing in the private rented sector and earlier consultations on the council's Tenancy Strategy and its approach to allocations and lettings.
- 1.5 The strategy sits within ambitious local growth and regeneration agenda, which it aims to support by maximising opportunities for local people and businesses as a result of regeneration and recognising the changing make-up of demand across all tenures and household types. It also takes account of the local response to the Government's welfare reform agenda, aligning with and supporting wider partnership efforts to minimise adverse impact on residents.

2. CONTEXT

- 2.1 The evidence base supporting this document is published separately, will be updated along with the strategy over its five-year life and will be incorporated with the evidence base for the Employment Strategy in due course. The bulk of the background data is contained in that document, while this chapter highlights elements of the national, regional and local context.
- 2.2 Overall, the economy continues to dominate the policy debate and it is clear that a climate of austerity will continue through the current parliament and beyond, with resources remaining scarce. This strategy recognises the limitations that this imposes and the difficult decisions about services and imaginative approaches to doing and paying for things that will be necessary. Effective partnership working to maximise the impact of available resources is essential, alongside a focus on developing resilience within communities and individual households that will help them find solutions where the council and its partners cannot provide them.

2.3 Demographics and Tenure

- 2.3.1 Brent's population has grown significantly, with a marked increase in average family size and the numbers of children. Demand for homes is rising in consequence, accompanied by rising rents and prices, with demand for larger homes in particular above the London norm.
- 2.3.2 Significant change to the tenure pattern in London is even more pronounced in Brent, where owner occupation has declined while the private rented sector grew from just over 17% of the stock in 2001 to 28.8% by the 2011 Census and around 32% now, making it a larger source of supply than the social sector. The proportion of social housing has remained broadly unchanged and the majority (around 16,000 homes) is owned and managed by RPs, while the council owns just fewer than 9,000 rented and 3,000 leasehold homes, managed by Brent Housing Partnership (BHP).

2.4 Housing Market

- 2.4.1 Purchase prices in Brent have risen steadily. Approaches to lending hardened after the 2008 banking crisis, especially for first time buyers, while shortage of affordable housing and population increase have driven growth and rising costs in the private rented sector and changes to the characteristics of renters. Help to Buy and the Mortgage Guarantee Scheme aim to support new building and improve loan availability, although there are fears that the main outcome will be further price inflation and take-up in London has been limited. Recent evidence shows sharp rises, especially in London, prompting fears of a price bubble not sustainable in the long term but exacerbating

immediate affordability issues. While lender attitudes had relaxed to some extent, recent moves to impose stricter loan conditions and calls from some quarters for intervention to raise interest rates reflect market concerns and purchase remains out of reach for many: the London Housing Strategy states that eighty per cent of new market housing is affordable to only twenty per cent of working households.

- 2.4.2 The private rented sector includes a high-cost, high-quality market for those able to pay and this segment has grown in recent years, especially in the south of the borough with its good transport links to central London and the City. At the other extreme is a sector operating outside the law and regulation, characterised by so-called beds in sheds and unauthorised use of commercial premises. Between these poles is a large and diverse market, owned and managed almost exclusively by small landlords and catering for a range of incomes and household types. Much of the sector functions well but problems of poor management and maintenance persist and have increased as the sector has expanded. A notable feature is the growth of renting, including an increase in HMOs, in the north of the borough, where owner-occupation has historically been the dominant tenure. High demand has driven rents upwards and affordability is a serious problem.
- 2.4.3 Disparity between earnings and housing costs indicates clearly that Brent's housing market is dysfunctional. At the same time, the local economy is not delivering the jobs or salaries that might allow residents to enter the market locally or elsewhere in London. A focus on employment, support for local business, encouragement of inward investment and action to raise incomes in line with the Regeneration Strategy and the emerging Employment Strategy is therefore as important as new housing development in meeting demand.
- 2.4.4 A particular cause for concern is landlord reluctance to let to households claiming Housing Benefit; a 2013 study indicated universal rejection of HB claimants by local accommodation agencies. This may be driven by concern about the impact of welfare reform on ability to pay rent but higher demand from a more affluent renter group is also a probable factor, reflecting the borough's changing demographics. Conversely, there is evidence of a move in the other direction, with a growth in sub-division of larger properties to be let as single rooms, as well as the beds in sheds phenomenon. Whatever the cause of this polarisation, there is strong evidence that unemployed and lower income households are struggling to access the sector while the council experiences problems in procuring homes as temporary or permanent accommodation for homeless households.
- 2.4.5 The most striking change in patterns of need and demand has been the impact on low or middle income households, who might once have met their own needs quite readily but are increasingly unable to afford

private purchase or renting and have no access affordable housing. This has worrying implications for London's economy, as well as for the households concerned. This is paralleled by the emergence of the so-called "generation rent" – people unable to buy even though they may have incomes that could cover a mortgage and unable to access affordable housing because access is restricted by overall shortage and a specific shortage of appropriate mid-range products. These groups fall outside traditional definitions of housing need but are vital to Brent's social and economic mix and the strategy needs to respond to emerging demand.

2.5 Welfare, Employment and Deprivation

- 2.5.1 The welfare reform programme has been wide-ranging, with further changes in train or proposed. Limits have been placed on Housing Benefit through the Local Housing Allowance cap and the social sector size criteria (the so-called bedroom tax). The Overall Benefit Cap has imposed further constraints since August 2013 and phased (albeit delayed) introduction of Universal Credit (UC) will pose further challenges. Although the numbers change over time as claims end or begin, there were 1424 live cases affected by the cap at the end of March 2014. Worst affected are large families in high rent areas, with private rented housing simply unaffordable for most workless households requiring three bedroom or larger homes and even two bedroom homes at manageable rents in very short supply.
- 2.5.2 In broad terms, finding employment is the most direct way for households to mitigate the impact of welfare reform. Where this is not possible, the only realistic alternative may be to secure cheaper accommodation; for the worst affected this may only be practicable outside Brent or outside London, although it should be stressed that the number of households obliged to move out of the capital has been lower than anticipated.
- 2.5.3 The social sector size criteria also mean that affected tenants unable to find employment will need to move to smaller homes or meet the cost from existing household budgets. The council is keen that under-occupiers should move to free up much-needed family housing and offers high priority and incentives to assist but many are reluctant to do so and rent arrears among this group have increased markedly.
- 2.5.4 Implementation of welfare reform in a difficult economic climate in which wages are static or falling in real terms for many workers has increased the risk of rent arrears, evictions and homelessness and could also impact on cash flow for housing providers and affect borrowing capacity. There are indications that some providers are seeking to impose conditions such as requesting deposits or restricting nominations to working households for example, to reduce risk.

- 2.5.5 The council has already responded to the government's approach to employment, which is closely linked to its approach to welfare and centred on the Work Programme, by developing new partnerships and service arrangements and work is now underway on the development of an Employment Strategy as noted above. At this stage, the following key features in Brent have been identified.
- 2.5.6 There are pockets of significant entrenched unemployment and what is particularly stark is the persistence of poverty and worklessness in certain neighbourhoods. The Index of Multiple Deprivation (updated in 2010 but based mainly on 2008 data) highlights concentrations of deprivation in the south of the borough, centred in particular on social housing estates; a picture that has remained largely unchanged for many years. Although there has been great progress in improving the physical quality of homes and neighbourhoods, there has been less impact on unemployment, low incomes, child poverty, educational attainment and health inequality. Mainstream interventions such as the Work Programme have made little or no impact in areas such as Harlesden, Stonebridge and South Kilburn. This level of exclusion from the labour market requires a far more intense, targeted, personalised and community-led intervention to make significant and sustainable changes.
- 2.5.7 The distinction between registered unemployment (claimant count) and worklessness needs to be recognised and understood. Brent's unemployment rate partly reflects those residents who are actively claiming JSA and analysis shows that this is an improving picture. However, attention on this alone masks the more significant challenge of the number of residents who are economically inactive (on inactive benefits): the JSA count in Brent is 9,117 while economic inactivity is 31,600. Particularly significant here are the numbers who are economically inactive due to health reasons (over 23%) and those who are looking after a family or home (33%).
- 2.5.8 Low-paid employment is prevalent in the borough. Although Brent's employment rate may demonstrate a positive picture it masks the number of residents in established Brent communities who are trapped in low-skilled/low paid employment.
- 2.5.9 Brent's economy is a low skilled, low value one. This requires Brent to not only assess its economic development plans but to recognise that it is part of a wider sub-regional and London economy and labour market. Brent residents need to be skilled and equipped to benefit from the higher skilled and higher value jobs in the wider economy.

2.6 Housing Need and Housing Supply

- 2.6.1 In short, demand is growing and supply has failed to keep pace, with access to all sectors increasingly restricted, either by price or by policy.

Growth in private renting has come mainly from shrinkage in the owner occupation market; GLA analysis indicates that 80% of the growth consists of properties that would have gone into owner occupation in the past. There has been a shift in tenure, rather than real growth in supply.

- 2.6.2 There is a related shift in the nature of need and demand, with households who would once have found their own solutions struggling to do so and increasing demand for scarce affordable options. Within any response to demand across all sectors and household types there is a need to support a better market balance, including provision for what might be characterised as mid-market households: in work, unable to buy and struggling to rent. In addition, Brent still has high housing register demand, rising homelessness applications and the highest number of households in temporary accommodation in the country, all primary indicators of acute housing need and high overall demand.
- 2.6.3 The Affordable Rent programme aims to maintain output while reducing subsidy by permitting rents up to 80% of market levels, although average actual rent levels in the current programme are below that maximum, with subsidy skewed towards larger homes. 2014/15 is the last year of the current programme and the 2015-18 version introduces variants on the Affordable Rent product: Capped and Discounted Rents, with rent levels respectively ranging from 50% to 80% of market rates. The London Housing Strategy proposes further changes of approach in London, considered in more detail below.
- 2.6.4 The scale of demand and the limitations on resources are such that the council and its partners will not build enough to meet all housing need. Even if resources were available, there is a limit to capacity; like most London boroughs, the opportunities for large-scale new development in Brent are constrained by land availability and costs. The key question therefore concerns the mix, density and amount of housing that is desirable and sustainable to meet housing need and support employment and the London economy and how far it can be delivered within borough or London boundaries. In this context, and to deliver the mix of housing types and tenures required to respond to demand, there is an increased reliance on the private sector to deliver homes for rent as well as for sale and for RPs to provide market products to cross-subsidise affordable provision
- 2.6.5 Coupled with this is a growing crisis of affordability that is forcing households hoping to buy or rent privately out of the centre and into the suburbs or out of London altogether, driven by high prices and, in some cases, the impact of welfare reform. There is evidence that this is leading to a demographic shift, both in terms of overall population and the household mix, that will not be countered by the levels of new social housing deliverable within current resources.

2.7 Brent's Social Housing

- 2.7.1 The social housing stock has not grown significantly despite investment, mainly due to concurrent loss through Right to Buy and regeneration programmes. The Localism Act introduced tenure reform, flexibilities around allocations and lettings, changes to homelessness duties and planning reforms and Brent's response to these is set out in the Tenancy Strategy and the Allocation Scheme. Further change is proposed by government, including an income limit beyond which social housing tenants may be obliged to pay market rents.
- 2.7.2 The council and BHP have agreed a plan for the management and maintenance of the housing owned by the council in light of the introduction of the self-financing Housing Revenue Account (HRA). Under self-financing, the income from rents and other funds generated through the stock is no longer subject to a national subsidy regime but retained locally, with a set level of borrowing headroom available. This means new opportunities, including borrowing to support new council housing as well as maintenance and improvement of the stock.
- 2.7.3 Other possibilities for direct investment by local authorities are being discussed and the GLA and London Councils are leading a campaign to support options such as removal of the borrowing headroom cap and retention of property taxes by the Mayor for investment in new homes. Through the London Enterprise Partnership, a City Growth Deal bid has been submitted and developments in this area will be kept under review and incorporated in this strategy as details emerge. In the meantime, the council will support efforts to argue for an improved settlement for London and local government in general.

2.8 Social Mobility Commission

- 2.8.1 In the summer of 2013, the council set up a Social Mobility Commission; an independent examination of the ways in which the council can support increased resilience within communities. The final report will be published in summer 2014 but interim findings and recommendations include:
- Suitable and affordable accommodation is a defining factor in social and economic well-being and people's ability to progress aspects of their life such as education, employment and financial security.
 - Price and rent rises have made home ownership a remote prospect, limiting choice and impacting on quality of life and social inclusion.
 - Severe housing need is often the presenting problem for a complex set of circumstances involving employment, health and family issues. The model used by the council to support those affected by the benefit cap was viewed as a positive and successful intervention, meriting further development and expansion.

- Data on clients using council services could be used better to target preventative interventions and respond in a seamless way to reduce longer term dependence.
- There should be much closer integration of housing and employment services.
- Increasing the supply of affordable housing options is fundamental.
- There needs to be debate on the reasonable expectations the council can have of service users. Future relationships will need to both support people when they are in need and equip them with the necessary skills and attitudes to maintain their future independence.

2.8.2 The findings of the Commission chime with the evidence underpinning this strategy, which draws on them and includes some further consideration of ways in which the approach recommended by the Commission can be implemented in housing and related services.

3. SUMMARY - ISSUES AND CHALLENGES

3.1 Vision

3.1.1 The overriding ambition for this strategy is to support:

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

3.1.2 Objectives for the Housing and emerging Employment Strategies have been set in the context of some key underlying principles:

- That the strategies are for the borough as a whole, not just the council. Partners will need to work together to achieve the stated ambitions and this will involve, as far as possible, alignment of priorities and better coordination of resources;
- That the role of the voluntary and community sector is crucial in achieving the objectives, recognising the strength, value and unique position of the VCS, particularly in engaging with some of Brent's most excluded communities;
- That, as far as possible and reasonable, Brent Council will adopt a leadership position, taking a strategic rather than delivery role. However, the council's unique position as a provider or enabler of related services, means that better outcomes for residents may be achieved through direct delivery where appropriate;
- That Brent is part of a wider housing and labour market encompassing not just the 'travel to work' area but London as a whole and residents need to be equipped to access opportunities in these wider markets;
- That local residents will be prioritised for housing, employment and related opportunities as a result of regeneration in the borough.

- 3.1.3 Some clear messages emerge from the evidence and context that govern the overriding themes and objectives to realise this vision. In general, the council's approach will be one that supports and encourages mobility: movement within and between tenures appropriate to changing housing requirements and life stage and economic and social mobility through the establishment of policies and service frameworks that enable Brent residents to maximise employment opportunities and improve financial well-being.
- 3.1.4 Problems and solutions in Brent cannot be divorced from the wider London context: the housing and employment markets are not confined to borough or London boundaries and opportunities and risks arise because of this. The strategy therefore takes full account of the London Housing Strategy and the collective policy positions of the GLA and London Councils and recognises that the council's ability to influence a volatile London housing market is limited in many respects. Similarly, the council is reliant on government in many areas, for example the resources available for new supply through the main grant programme and borrowing capacity and for the overall direction of national housing policy. The strategy therefore seeks to identify and make best use of the leverage that the council possesses through its statutory powers and duties, its resources and its ability to influence the approach taken by its partners and by regional and national government.

3.2 Housing Supply

- 3.2.1 There is high demand and shortage of supply across all tenures and, within this, significant problems of affordability. There is a need not only for traditional affordable housing provided by the council and RPs but also for new products that will be accessible to low and middle income households, provided by the market and by social landlords. Alongside this, there is a need to ensure that existing and new supply is matched effectively to demand, for example in the way it is let and managed.
- 3.2.2 Over the long term, this strategy needs to promote delivery of a range of products that respond to the changing shape of demand, offer options to households with a range of needs and a range of incomes that are appropriate to different stages of life and support physical and social mobility.

3.3 Employment

- 3.3.1 Although Brent's unemployment levels are now closer to the London average, they are still high while average incomes are relatively low. Many Brent residents struggle to afford accommodation in the borough

and there are pockets of entrenched deprivation in which low levels of employment are a significant factor. Raising employment levels and incomes is central to building resilience within communities and growing the local economy.

- 3.3.2 This strategy seeks to align the work of the council and partners to ensure that the link between housing and employment is strengthened, both for existing tenants and those seeking housing in the borough

3.4 Private Rented Sector

- 3.4.1 There are opportunities for the sector to play an important role in delivering new supply but there are serious concerns over standards, access and affordability.
- 3.4.2 This strategy needs to work with the sector to deliver supply that meets required standards of management and maintenance and is accessible to people on a range of incomes in a market that is well regulated, supports and enables landlords and offers appropriate protection to tenants.

3.5 Homelessness and Allocations

- 3.5.1 Applications and acceptances have increased and there is a continued reliance on high levels of temporary accommodation.
- 3.5.2 This strategy must address the causes and effects of homelessness, offering appropriate support and solutions to affected households while minimising reliance on temporary accommodation.

3.6 Social Housing Improvement

- 3.6.1 The existing social housing stock is a key resource and constitutes nearly a quarter of housing in Brent. The council is by far the single largest provider of housing but the majority of social and affordable housing is owned and managed by Registered Providers and a shared commitment to raising standards will be central.
- 3.6.2 Increased investment to maintain and improve the quality and performance of the stock is needed as well as increased efficiencies in its use. Measures to support income collection in the context of welfare present a challenge.
- 3.6.3 While the council reached the decent homes standard in the last decade, investment over the last five years has been limited and focused on statutory works. The devolution of control of housing finances provides resources for a major programme of planned maintenance and improvement across the council's stock. The renewal

of BHP's Management Agreement provides the foundation for the delivery of first class housing management services.

3.7 Strategic Objectives

- 3.7.1 The following chapters address these themes, clarifying the challenges, setting the objectives and identifying the outcomes that this strategy seeks to achieve, the actions required and the measures for success. Further detail on delivery is set out in the Action Plan.
- 3.7.2 The broad areas outlined above are not discrete and there are many areas of overlap between them but they have been grouped in this way to provide a structure, within which cross-cutting issues such as welfare reform and health and wellbeing can also be addressed.

4. HOUSING SUPPLY

Objective One: To significantly increase the supply of affordable housing
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- 4.1 This chapter sets out opportunities and identifies priority outcomes to be achieved over the course of this strategy. Affordable housing in this chapter includes all provision offered at below market prices or market rents, while "social housing refers to homes for rent at target or Affordable Rents, including Capped and Discounted rents within the 2015-18 programme. Delivering new supply across all tenures is a central aim for this strategy, in particular provision of a range of housing, including both rented and shared ownership, that is affordable to Brent residents. The Core Strategy projects development of at least 22,000 homes between 2007 and 2026 of which 11,000 (50%) will be affordable housing.
- 4.2 Much of the new development will be in the five Growth Areas identified in the Core Strategy and the Regeneration Strategy (Wembley, Alperton, Burnt Oak/Colindale, Church End and South Kilburn) but the aggregate contribution of smaller-scale developments across the borough will also be significant. Estate-based regeneration schemes in South Kilburn, Barham Park and St Raphaels are also expected to deliver new supply alongside improvement or replacement of existing stock in line with regeneration priorities.

4.3 Outcome A - Affordable Housing Supply

To significantly increase the capacity to meet housing needs and support social mobility through the provision of 5,000 Affordable Rent and Low-cost Home Ownership properties by 2019
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- A.1 This scale of new provision is challenging but deliberately so and is the level required to have a real impact in addressing current and

anticipated future levels of need for affordable housing. Achievement of this objective will require a suite of approaches, the combined efforts of a wide range of partners and innovative approaches by the council.

A.2 Mayor's Housing Covenant

A.2.1 One primary source of new social housing will be the HCA-funded programme, branded in London as the Mayor's Housing Covenant Programme. 2014/15 is the last year of the current programme and is succeeded by the 2015-18 programme, under which grant allocations will be made early in 2014/15. The majority of provision under the GLA's grant funded programme will be by the main Registered Providers active in the borough with the council playing a central role in facilitating development by them.

A.2.2 The GLA's programme provides for a Local Framework Agreement to be agreed between each London council and the GLA reflecting local conditions and priorities. Provisional agreement has been reached consistent with the council's published Tenancy Strategy (2013) designed to ensure that homes are genuinely affordable to those in housing need. This provides for:

- Social housing for rent that is affordable within the Overall Benefit Cap, which will require the provision of larger properties as Capped Rent homes with rent levels up to 50% of market rents and close to target rent levels
- Discounted Rent housing, typically one and two bed properties, affordable to those claiming Housing Benefit, with rents pegged to LHA levels, including as part of mixed market rented developments
- A range of low-cost home ownership products that can be accessed by those on middle incomes

A.2.3 In addition to grant support, funding under this programme will come from cross-subsidy arising from private sale development in mixed-tenure schemes and from selective disposals of high-value affordable housing units in order to release resources for investment.

A.3. Development by the Council

A.3.1 The council will itself provide a minimum of 700 new affordable homes by 2019 (and 1,000 new homes by 2021/2). The council will use available HRA borrowing under the debt cap to support this and seek additional borrowing capacity. Capital receipts arising from Right-to-Buy sales and from disposal of high-value and poorly-performing units, and from selective disposals to rebalance the stock towards larger units will be ring-fenced and re-invested in new homes. Grant funding will be sought where the terms are consistent with the priorities of this strategy. New homes delivered through the HRA will be let on

Affordable Rents, and a proportion of existing homes will be re-let at Affordable Rents to provide cross-subsidy, with the overall approach designed to ensure that rent income can continue to support new building.

A.3.2 In order to achieve the target level of provision it is probable that the council will also need to use its wider General Fund prudential borrowing capacity, provided this is financially self-supporting. Appropriate structures and delivery arrangements will be developed to enable this.

A.3.3 The potential for BHP to bring forward additional development will be explored and external partnership arrangements, to leverage additional funding and development capacity will also be examined and entered into where advantageous.

A.3.4 The council will, through BHP, undertake an initial programme of infill development on existing council estates and consideration will be given to redevelopment of some existing estates to provide more and better quality homes. Development will focus on larger family homes, as these are most acutely undersupplied, as well as provision for people with disabilities.

A.3.5 Corporate land assets will be appraised for affordable and mixed-tenure development by the council alongside consideration of alternative uses such as for education provision and for disposal to generate capital receipts. Acquisition of privately-owned sites will be required to provide additional development capacity for the council and an active site-finding programme will be instituted.

A.4 Regeneration and Development

A.4.1 The majority of new housing over the next five years will come forward in the Growth Areas identified in the council's Regeneration Strategy. The Borough Investment Plan details priorities for housing and expectations for delivery and spatial distribution - that is, what will be built and where. Discussions with the GLA have confirmed that the Mayor expects the BIP to remain the principal document governing delivery and it will be the vehicle for some of the priorities identified above. In 2014-15 an investment plan for each growth area will be developed to direct the council's efforts and approach to advance housing and other development and regeneration activity.

A.4.2 The Mayor's strategy includes a proposal for the creation of 'Housing Zones' based on the Enterprise Zone model and centred on the opportunity areas identified in the London Plan. The council will consider the implications of the prospectus published in June 2014 as part of its priority to bring forward housing development in the growth areas and this document will be updated as appropriate.

A.4.3 In South Kilburn the council is acting as the master-developer for the regeneration of the estate and will shortly be consulting on a revised SPD for the area. A review will also be made of strategic delivery options for remaining phases to advance development and widen the mix of tenures.

4.4 Outcome B - Providing Larger Homes and Reducing Overcrowding

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

To halve severe overcrowding in the social housing sector by 2019

B.1 In a context in which there is no short-term prospect of building enough to meet all housing need the focus will be on development weighted towards the provision of larger homes, reflecting the significant shortage, the demand arising from Brent's large average family size and the need to mitigate the impact of the overall benefit cap .

B.2 Overcrowding is a significant problem and impacts on health and wellbeing in many ways, for example through the mental health impacts of stress, as well as on children's educational attainment. The London Housing Strategy sets a target to halve severe overcrowding in social housing by 2016. As noted earlier, Brent faces particular demographic challenges with exceptionally high demand for larger family homes and high current levels of overcrowding. In light of these a target date of 2019 has been set to reduce overcrowding by half.

B.3 This will be achieved in part by securing a high proportion of family homes and larger homes in new supply. It will also be supported by:

- The revised Allocations Policy (2013), which gives additional priority for social housing to those who are severely overcrowded
- Enhanced incentives to under-occupiers to move to smaller homes, including assisting those affected by the social sector size criteria
- Examining development of bespoke new-build housing for older under-occupiers to release larger homes and support long-term independence.
- Use of fixed-term tenancies to minimise under-occupation

4.5 Outcome C - Private Renting Supply

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

- C.1 While the planned increase in affordable rented provision will make a significant contribution to more acute housing needs, the private rented sector will need to provide accommodation for a greater number of households.
- C.2 In recent years, both nationally and in London, there has been an increasing emphasis on investment in purpose-built private rented housing. The council will encourage development of well-managed private rented housing designed and built to meet emerging demand, including provision by Registered Providers, where appropriate. This has the potential to meet a wider range of needs – for accessible and decent accommodation that can be afforded – and the expectation is that such developments will include a significant proportion of units aligned with LHA levels in order to assure affordability for those on lower incomes.
- C.3 The council will consider whether it should play a direct role in mixed-rental development. Examination will be undertaken of the scope to introduce such provision in the Growth Areas including at South Kilburn where the council is acting as the master-developer.
- C.4 More widely, the council will support the Mayor's efforts to secure private rented sector investment in London. This will assist in establishing a better mix, raising the overall standard of private sector housing in the borough and improving access and stability in the sector.
- C.5 The council will also support the provision of a range of intermediate housing, including shared-ownership and sub-market renting, to meet increasing demand from middle income households. In particular, the council will consider options for direct engagement that could deliver genuinely affordable sub-market opportunities suitable for facilitating move-on from social rented housing linked to employment.

4.6 Outcome D - Supported Housing Supply

To provide an additional 200 extra-care and specialist supported housing units by 2016 to widen housing options and reduce reliance on residential care

- D.1 There is a particular need to improve the supply of housing with support to widen housing options for vulnerable residents, enable independent living and provide alternatives to residential care. Significant additional Extra-care provision is required to meet the needs of older residents and there is a similar need for other specialist provision, for example cluster developments for people with physical or learning disabilities or mental health issues to support independent living and reduce residential care placements.
- D.2 Alongside this, the council will explore ways in which provision of grants and adaptations can maximise the demonstrable savings to health and other budgets that can be achieved through assisting older, sick or disabled people to remain in their homes.
- D.3 Initially, in addition to new schemes already underway, a further two hundred units will be provided for these groups by 2016. These will be delivered through a combination of approaches including direct provision, through registered provider and voluntary sector partners and by the private sector. Further provision will be planned and delivered over the remainder of the life of the strategy.

4.7 Objective One Outcomes – Target Summary

4.7.1 To significantly increase the supply of affordable housing:

Priority Outcomes
5,000 Affordable Rent and Low-Cost Ownership homes delivered by 2019
A minimum of 35% of new Affordable Rent homes to be 3 bed or larger
Severe overcrowding cut by half by 2019
700 affordable council homes delivered by 2019
1,000 new private rented homes of which at least 30% are aligned to LHA levels
Two hundred additional supported housing units provided by 2016

5. HOUSING AND EMPLOYMENT

Objective Two – To increase employment and reduce economic exclusion through an integrated approach to housing and employment provision and support

- 5.1 Work to promote employment, tackle poverty and increase incomes is a central feature of the Regeneration Strategy. Housing is an essential support to the local economy through provision that meets the most acute needs but also supports the local and London workforce. In the context of high house-prices and rents and welfare reform employment is, for many households, a pre-requisite to obtaining accommodation in Brent. Equally, decent and secure accommodation is critical in assisting residents to secure, sustain and progress within employment.
- 5.2 While employment levels have improved generally in the borough over the last decade, levels of worklessness among tenants of social housing are disproportionately high and mapping the Index of Deprivation shows a correlation between deprivation and concentrations of social housing.
- 5.3 The council has implemented a new employment offer, to be supported by the development of the Employment Strategy, which will complement this strategy alongside the Tenancy Strategy and the Allocation Scheme, which also seek to support employment.
- 5.4 Brent is among the boroughs most affected by welfare reform and the overall benefit cap in particular. The best solution for affected households is to find employment and the council is working closely with DWP, JCP, Work Programme providers and others to ensure that all options to support Brent residents are pursued. Initial work on the Employment Strategy has identified the need to reduce polarisation in the borough by reducing economic and social exclusion in the borough's worst performing neighbourhoods, and addressing the strong correlation between housing tenure and need and employment status.
- 5.5 To address these priorities, the Employment Strategy will propose:
- A place-based approach, focusing on workless residents and communities in neighbourhoods that continue to experience above borough average levels of unemployment and economic inactivity;
 - A preventative model, working with young people from these communities and places to support them to make informed life choices in order to break the cycle of poverty;
 - A strong partnership approach, bringing key partners in the VCS, housing, employment and skills and other sectors together to work with affected individuals and communities.
 - Integrated housing and employment support to those affected by welfare reform including the overall benefit cap
- 5.6 This approach is consistent with the findings and recommendations of the Social Mobility Commission. The Commission emphasised the link between housing and employment and, in particular, highlighted the desirability of building an approach to service delivery based on partnership rather than entitlement, a model pursued successfully in the voluntary sector. This assumes that, where someone receives a

service, there should be some reciprocation in the sense that the service user will undertake to do something as well; in this context, a commitment to employment or employment support aligned with access to housing.

5.7 Outcome E – Economic Deprivation

To reduce economic and social polarisation by achieving significant convergence between priority neighbourhoods and the borough as a whole by 2019

- E.1 Levels of worklessness among social housing tenants and in neighbourhoods where social housing is concentrated are markedly above the average for the borough. In addition, many of those in employment are on low wages. The priority neighbourhoods identified for particular attention within the emerging Employment Strategy are Stonebridge, Harlesden, South Kilburn, St Raphael's, Chalkhill and Church End, all of which, with the exception of Harlesden, have particularly high levels of social housing
- E.2 It is proposed that a partnership approach should be taken in each neighbourhood, tailored to the needs and context of each area. Partners will include BHP and Registered Providers with significant local ownership and management operations, local voluntary and community organisations as well as council housing and employment services and other council and statutory services.
- E.3 The council will examine opportunities to diversify tenure in areas where social housing stock is currently concentrated so that these do not continue to be neighbourhoods of entrenched worklessness. This is already underway in South Kilburn through the redevelopment of the estate and the provision of private housing. Housing development in other priority areas will take account of the need to promote an improved mix and balance of tenure and incomes in these areas.

5.8 Outcome F - Tenancy Strategy and Allocations

To foster and support social mobility by providing enhanced access to affordable housing for those in employment and training

- F.1 The council's Allocations Policy (2013) provides some additional priority to those in employment. The Tenancy Strategy, also published in 2013, includes a commitment to carry out a review after one year, which is now underway, and a number of factors suggest a need to consider, in particular, the links between the council's approach to tenure and allocations and its approach to employment, including the development of the Employment Strategy with its focus on tackling

entrenched pockets of deprivation and the London Housing Strategy, which highlights the needs of working households.

- F.2 Further consideration may be given to granting additional priority to working households and options could include:
- Additional priority for households in temporary accommodation who move into work or training.
 - Alterations to the banding system within the Locata scheme to create additional or sub-bands focussed on households in employment or undertaking employment support.
 - A quota of employment-related allocations to be made outside the scope of the Allocation Scheme
- F.3 Within the above, the intention would be to focus on those most removed from the job market and most likely to be adversely affected by welfare reform and to promote employment as a route to speed up the waiting process. Any change to the current approach would be subject to Cabinet approval and may require formal consultation.
- F.4 Through regeneration schemes, for example in South Kilburn, the opportunity arises to make use of homes scheduled for demolition as short-life housing. The council intends to develop a scheme to use these properties, many of which are one bedroom or bedsits, to target assistance at young people in employment or training, particularly those living with family in overcrowded conditions. The aim would be to provide support for these young people to train and secure employment and gain independence.
- F.5 As noted earlier, there is a need to increase supply of intermediate and mid-market housing generally. More specifically, such provision is essential if households are to have realistic opportunities to move on from social rented homes subject to fixed-term tenancies where their circumstances allow it. Given Brent's low average incomes, it is likely that current intermediate products may still be unaffordable to this group and the council will therefore explore options to support delivery of affordable sub-market products that could facilitate mobility.

5.9 **Outcome G – Integrated Housing and Employment Support**

To integrate housing advice and management services with employment guidance and support
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- G.1 It is essential that housing provision is coupled with effective employment guidance and support, both for applicants and existing tenants. The council has already brought housing and employment services together in the same division and will further integrate these services at an operational level to ensure that employment advice and support is delivered alongside housing options provision. This is

already a central feature of the council's and partners' work with those affected by the benefit cap and will be extended to those seeking housing advice, applying to the housing register and those who are homeless or threatened with homelessness.

- G.2 There will also be a particular emphasis on assisting households on fixed term tenancies to move on to other options, such as shared ownership or other market and sub-market products, to free up rented accommodation. The council offers fixed-terms as the default option through the Allocation Scheme. One purpose in doing this is to encourage mobility and best use of the housing stock and the council will work with tenants on fixed-terms to provide the advice and support necessary to enable them to move on into other tenures – for example, low-cost home ownership – on expiry of the tenancy term, in line with the provisions of the Tenancy Strategy. Advice and support would also be made available to any other tenants who express a wish to move on from social rented housing, although there is no expectation that existing tenants with Secure Tenancies should move.
- G.3 In this context, BHP and other Registered Providers of social housing have an important role to play in supporting their tenants through initiatives to promote employment, training and financial inclusion and partners are involved in a range of relevant programmes.
- G.4 The widespread adoption of fixed-term tenancies could provide a mechanism to incentivise employment for new affordable housing tenants. The council will explore with other providers arrangements for how the grant and renewal of such tenancies could be used to incentivise training and employment.
- G.5 The council will ensure that training and employment activity by providers is coordinated and consistent, with a deliberate focus on priority areas, and ensure that partners maximise the opportunities to use their considerable procurement power to promote local employment and local business, including the employment and training opportunities arising from BHP's new long-term asset management contract arrangements.
- G.6 The council will also work with partners to develop strategies for financial inclusion to ensure that Brent residents have access to and understanding of appropriate financial services and products and to support engagement with Universal Credit.
- G.7 Research has established clear links between employment and improved mental health and programmes to support employment and training are intended to have an impact in this area. The council will seek to establish mechanisms through which improvements in health can be measured and monitored.

5.10 Objective Two Outcomes – Target Summary

Priority Outcomes

Reduce economic exclusion in priority areas and to halve the average difference between the priority areas and the borough as a whole by 2019

To increase employment levels among social housing tenants by 20% by 2019

To increase the proportion of allocations to those in employment by one-fifth

To pilot frontline integrated housing options and employment advice in 2014-15

6. PRIVATE RENTED SECTOR IMPROVEMENT

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

- 6.1 The private rented sector is a valuable resource but its growth is also a symptom of excessive demand fuelled by restricted access to home ownership and the lack of affordable alternatives. The sector is becoming increasingly unaffordable and Housing Benefit policy is exacerbating this. The sector is dominated by small landlords, most with limited ability to invest, while access for most households is through private letting agents. Some proposals for greater regulation of agents have emerged, including the London Rental Standard, but the council is not convinced that they promise widespread improvement. The government is also consulting on options for better regulation of the sector, including an obligation for agents to enter into a redress scheme. This strategy aims to identify how best to use the tools available to influence the quality of management and maintenance, affordability, security and accessibility in the sector.
- 6.2 The council's Housing Need and Stock Condition Survey is out of date and, although Brent participated in the West London Strategic Housing Market Assessment (SHMA), this was published in 2010 and based largely on data from 2008/09, leaving some doubt about its relevance and lack of local focus. In a rapidly shifting environment, there is limited value in a study that only provides a snapshot of a particular time and may date quickly. The council will therefore explore options for a study that will provide a clear picture of the market, housing need, housing demand and housing conditions and which will enable regular and cost-effective updating to provide continuing intelligence on the changing housing market in Brent, including the effect of this strategy.

While this study will look at areas beyond the private market, developing a better understanding of market conditions is essential.

6.2 Outcome H – Standards

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

H.1 Voluntary Accreditation

H.1.1 The council supports the London Landlord Accreditation Scheme. The Mayor's Housing Covenant (December 2012) sets out policies and approaches around investment, accreditation and standards and he has recently published his London Rental Standard. The council welcomes, with some reservations, the Covenant and will draw on it in developing its own approach.

H.1.2 At the same time, the council is keen to work in partnership with private landlords, building on the work it has already done in this area through mechanisms such as the Landlord Forum. The council will support the use of voluntary accreditation schemes for both landlords and agents and encourage the dissemination of best practice across the sector.

H.2 Regulation

H.2.1 Although the majority of the sector is well-managed, there is a significant proportion of poor quality and badly managed properties and there is evidence that this is a growing problem as the sector expands. This includes concerns about the association between high levels of private renting, in particular in Houses in Multiple Occupation (HMOs), and the incidence of anti-social behaviour in the borough and in some neighbourhoods in particular. There is concern that Housing Benefit restrictions are forcing some households into the poorest quality housing, exacerbating other inequalities, for example around health, and leading to increased overcrowding among other problems. Lack of long-term security can deter tenants from reporting disrepair or poor management, as can lack of awareness of rights and responsibilities among both tenants and landlords. Action to raise awareness and enforce standards will be important in raising quality.

H.2.2 In order to raise standards, exclude rogue landlords and enhance the reputation of the sector the council intends to extend the existing programme of mandatory licensing of HMOs. An Additional Licensing Scheme will be introduced from January 2015 that will require all properties let as HMOs to be licensed. A Selective Licensing Scheme will also, subject to consultation and Cabinet approval, be introduced from that date in particular wards where there is evidence that the scale and management of the private rented sector is linked to problems of

anti-social behaviour. In these wards all privately let accommodation will be licensed.

- H.2.3 The schemes will incorporate a range of incentives to landlords, including discounts for early applications and support to access Green Deal and ECO funding to improve properties (see 8.9 below).

H.3 Enforcement

- H.3.1 The council will review its use of enforcement and grant making powers and the outcomes will be incorporated into this strategy when work is complete.

- H.3.2 Poor conditions, such as damp and disrepair, contribute to health problems such as respiratory conditions and falls. Actions to tackle this will depend largely on the use of enforcement powers, grants and, in the longer term, encouraging investment by existing and new landlords in the private sector that will alleviate risks under the Housing Health and Safety Rating System. Enforcement will operate in tandem with the conditions imposed under licensing.

H.4 Energy Efficiency and Fuel Poverty

- H.4.1 The implementation of the Green Deal and the Energy Company Obligation provide new opportunities to improve conditions and tackle fuel poverty in the sector. Details of the partnership arrangements for delivery of Green Deal and ECO are set out at 8.9 below and this work will also cover the private rented and owner-occupied sectors.

6.3 Outcome I - Access

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

- 6.3.1 The sector is an essential resource for the council in addressing housing need. The council has worked with private sector landlords for many years to secure temporary accommodation for homeless households and, increasingly, is working with landlords to secure permanent solutions (see also chapter 7).
- 6.3.2 The private sector is also an important source of housing for people moving on from short-term or supported housing. In all these areas, HB restrictions have made landlords wary of accepting households who may struggle to afford rents. The council will work closely with landlords and agents to understand what is needed to improve access

I.1 Lettings Agency

- I.1.1 BHP will establish a Lettings Agency in 2014/15. It is envisaged that it will provide lettings and managing agent services to landlords and

tenants. It will operate on a commercial footing but provide an exemplar of high standards within the market.

- I.1.2 The scale of operations will depend on market conditions and competition but it is intended that the agency will establish an extensive portfolio of landlords and properties. A central objective will be to provide increased access for the council to private rented properties for those approaching as homeless or in need of housing assistance.

I.2 Empty Homes and Acquisition

- I.2.1 The council has a well-established Empty Homes Programme and will build on this. This will include where appropriate supporting the conversion of existing non-residential buildings to provide accommodation.

- I.2.2 In addition the council will explore the feasibility of gaining access to a portfolio of private rented properties through direct acquisition or by arrangements with a private rented investor.

6.4 Objective Three Outcomes – Target Summary

PRIORITY OUTCOMES
All HMOs licensed under Additional Licensing by 2015 – estimated at up to 15,000
Complete consultation on Selective Licensing and, if appropriate, prepare proposals by autumn 2014
Lettings Agency operational by March 2015 and a minimum of 400 properties let/managed per annum by 2019
Minimum of 100 empty properties brought back into use per annum

7. HOMELESSNESS & ALLOCATIONS

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

- 7.1 Homeless applications and acceptances have been increasing and this trend is expected to continue, at least in the short term, owing to the impact of the overall Benefit Cap and other factors noted earlier.
- 7.2 As a result of past high levels of homelessness and the limited supply of social housing Brent has more households in temporary accommodation than any other authority, totalling some 3,300 at April 2014, including some 300 households in Bed & Breakfast accommodation. Over 400 households in temporary accommodation are affected by the overall

benefit cap and are being supported with discretionary housing payments and this position is not sustainable.

- 7.3 Limitations to Housing Benefit, and rising rents, have restricted access to temporary accommodation within Brent with increased reliance in recent years on properties and placement elsewhere in London and further afield.
- 7.4 Since November 2012 the council has been able to discharge its duties by securing private rented housing for homeless households. This reform means that the housing waiting list, rather than homelessness, is seen as the primary route into affordable housing and in this context the council has already taken the decision to use the power to discharge homelessness duties through the private sector.
- 7.5 Given the affordability issues already discussed, this may result in a higher number out-of-borough discharges of duty, particularly for larger households. The council will continue to have regard to regulations on the suitability of accommodation and intends to minimise such placements, using them only where other options are not available or where the household chooses to move out of the borough.
- 7.6 In 2013 the council revised its Housing Register rules to provide for a concentration on those in the greatest housing need and with a realistic prospect of being rehoused. The number of households registered and eligible to bid for social housing has consequently fallen from some 21,000 to 5,000, but it should be noted that this excludes a large number of households with lesser but still significant unmet housing needs.

7.7 Outcome J - Prevention

To reduce the number of homeless acceptances to below the London average by 2019
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- J.1 Brent has had significant past success in preventing homelessness and this will be central to the approach for the future. The primary cause of homelessness in Brent is eviction from private rented housing. It is possible that this is a short-term phenomenon as landlords move out of renting to HB claimants in the wake of welfare reform.
- J.2 The council will continue to work with landlords individually and collectively to sustain tenancies. The council will extend its engagement with landlords and in the short-term will use discretionary housing payments where appropriate to secure the accommodation of those affected by the overall benefit cap.
- J.3 Where this is not possible and households are threatened with homelessness the council will provide advice and assistance to enable them to secure a private let. This will require increased access to these properties, through the proposed Lettings Agency and through the

breadth of engagement with landlords afforded by the introduction of the licensing schemes and by active procurement.

7.8 Outcome K – Temporary Accommodation

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

- K.1 A fundamental review of temporary accommodation is underway, with the intention to greatly reduce reliance on it over the lifetime of this strategy. In the near term, the council is committed to greatly reducing the use of B&B accommodation, with its use to be confined to providing genuine emergency accommodation for a short-period while homelessness duties are assessed.
- K.2 The council has recently opened a temporary accommodation facility at Knowles House which will be available for up to four years. A permanent hostel to provide emergency and short-term accommodation will be established.
- K.3 In order to meet the six-week statutory limit for accommodating families in non-self-contained B&B the council will make arrangements for recourse to self-contained annexes as near to Brent as can be achieved.
- K.4 Increased access to private rented properties is required as the alternative to temporary accommodation. In addition to the Lettings Agency, the council will pursue a range of approaches to enhance procurement and access to properties in and near to Brent.
- K.5 It will also be central to convert existing temporary accommodation properties to private rented accommodation available for let at LHA-compatible rents to support private sector discharge.
- K.6 The acquisition, either directly or through an investor partner, of a portfolio of private rented properties will also be examined.
- K.7 In 2013 the council instituted changes to the balance of priorities within its Allocation Scheme to provide that a higher proportion of lettings are targeted for homeless households. This is a short-term measure with the clear intent to provide that in the longer-term the Housing Register is the primary route into permanent social housing. There is an immediate need to address the rehousing needs of a large number of existing homeless households in temporary accommodation, including those affected by welfare reform. It is proposed to use a combination of direct offers and supported bidding for these groups.
- K.8 A significant number of those on the housing register are existing social housing tenants needing to transfer to alternative properties. These

moves in turn free up existing units and the scope to maximise transfers and increase the overall capacity to meet housing need will be explored. A revised incentive policy was approved in April 2013 to mitigate the impact of the social sector size criteria and encourage down-size moves and this will continue.

7.9 Objective Four Outcomes – Target Summary

Priority Outcomes
Homeless acceptances below London average by 2019
Number in temporary accommodation to the London average by 2019
Families in B&B for more than six weeks to nil in 2014/15 and thereafter
Number in B&B below 100 from 2015/16 onwards
Number of households affected by the benefit cap in temporary accommodation to 200 by 15/16 and to 100 from 16/17

8. SOCIAL HOUSING IMPROVEMENT

Objective 5: To improve the quality of the existing social housing stock and ensure its efficient use

- 8.1 The social housing stock in Brent is a key resource. Over the last decade estate regeneration has renewed a significant proportion of the stock with the South Kilburn estate a continuing priority. The Decent Homes standard has been achieved and maintaining it is a priority but a wider range of improvements is needed, in particular in relation to fire safety, energy efficiency and, on some estates, environmental improvement.
- 8.2 For its own stock the council has adopted an Asset Management Strategy which provides for a high level of investment over the next seven years.
- 8.3 Brent has the 3rd highest level of fuel poverty in London, with between 13% and 18% of households considered fuel poor depending on the income measure used. This is partly a result of low average incomes but is also due to the high percentage of hard to treat homes (c 45%)
- 8.4 The size-mix of social housing is poorly aligned with the profile of housing need with an acute under-supply of larger homes. Programmes to achieve a better balance of units are required, in addition to new provision weighted to larger units.

- 8.5 Social housing tenants and leaseholders have no individual and limited collective choice over who manages their homes. In this context the council and other providers need to make resident involvement and customer insight and choice central to their operations. In 2013 the council entered into a new management agreement with BHP for the management of its stock with the requirement that service quality and efficiency reach the highest standards.
- 8.6 The introduction in 2013 of the social sector size criteria has affected over 1,600 tenants in Brent, with rising arrears resulting for many. The introduction of Universal Credit and direct payments is likely to put increased pressure on households and housing provider finances.

8.7 Outcome L - Council Housing Investment

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

- L.1 The council's HRA Asset Management Strategy provides for the largest investment in the council's stock in a decade. Over the next seven years a comprehensive £160m programme of maintenance and improvement works will be carried out across the council's 13,000 tenanted and leasehold properties.
- L.2 BHP have procured a long-term Asset Management contractor, Wates, who will be responsible for both planned maintenance and responsive repairs over an initial period of five years, with the option to extend for a further five. This strategic approach will enable an integrated approach to the programming and delivery of works. The contract provides for significant economies of scale and efficiencies that will release resources for other purposes, including further new-build development.

8.8 Outcome M - Maximising Use of Social Rented Homes

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

- M.1 The council's Tenancy Strategy is in place to support best use through provision of fixed term tenancies and other means. The council and other providers will continue to prioritise action to tackle empty homes in the public as well as the private sector, action to tackle tenancy fraud, action to tackle overcrowding and under-occupation and initiatives to find temporary uses for stock that would otherwise be left empty due to regeneration programmes.

- M.2 An additional factor has been introduced by the social sector size criteria and as part of its response to this the council has revised its under-occupation incentive scheme for all affected social housing tenants to encourage take-up.
- M.3 The council and BHP will set demanding targets to achieve top quartile performance, and seek commitment from other providers to these.
- M.4 In order to better align social housing provision and housing need the council will implement a programme of stock reform which will see selective disposal of some smaller units and of poorly-performing units to release resources for investment in larger homes.

8.9 Outcome N - Energy Efficiency and Fuel Poverty

To improve the energy efficiency of the social housing stock through a programme of retrofit works by 2019

- N.1 The council has recently appointed an Energy Efficiency partner. They will develop and lead a programme of retrofit works to both social housing and private sector properties across the borough, maximising applicable ECO and Green Deal funding.
- N.2 In the council’s own stock the partner will directly take forward energy efficiency works where this is most efficient but these will be integrated with wider asset management works where appropriate.
- N.3 The council will actively promote engagement with the programme by Registered Providers as well as maximum penetration and take-up in the private sector by landlords and private owners.

8.10 Objective Five Outcomes – Target Summary

Priority Outcomes
All council homes improved by 2021 within budget and Decent Homes standard maintained
Top quartile performance for management quality and efficiency achieved from 2016 onwards
Improved energy through treating all cavity walls where economically feasible by 2016 and targeted improvements to worst performing 10% of council homes

9. IMPLEMENTING THE STRATEGY

- 9.1 Brent Council is committed to facilitating community-driven approaches, where barriers are identified and solutions developed and delivered by community partners and, most crucially, our residents. The Employment Strategy emphasises support for partners so that delivery of employment and skills related provision can be by those who best know workless communities and can offer the most appropriate support, in particular through the role of the voluntary sector. This strategy aims to take a similar approach, while recognising that the issues and the mechanisms through which solutions will be delivered differ.
- 9.2 Given the close correlation between worklessness and social housing, the council will work with Registered Providers, who own and maintain the majority of social housing in the borough, to ensure employment, skills and enterprise efforts are coordinated and linked effectively to approaches to delivering new supply and the letting and management of affordable housing.
- 9.3 As noted earlier in this document, effective partnership working across all sectors will be essential to ensure that the impact of reduced resources is mitigated. The council will take a leadership role, working with partners to guide, steer and set the direction of travel for the borough. The council will coordinate activities to avoid duplication and achieve synergies, support the capacity building of VCS partners, as appropriate, take a strategic overview and lead by example.
- 9.4 To ensure the achievement of the identified objectives and outcomes a detailed action plan covering an initial period of 3 years has been drawn up. The action plan will be reviewed and monitored regularly so that it is a live document guiding activities and focus. Mirroring the strategy, the action plan is a borough plan and responsibility for delivery falls across departments and relies on a range of partnerships. Brent Council and its partners from all sectors will need to work closely together to develop and deliver against this action plan. This will particularly include those from the VCS, housing sector and established deliverers of nationally commissioned services.