

## **Harrow Council Housing Strategy 2019-2024**

### **1. Introduction**

This Housing Strategy sets out our overarching vision and objectives for housing in Harrow over the next five years. These remain broadly similar to the objectives set out in our previous housing strategy but the environment in which we operate and the way in which we will achieve these have changed.

Our Housing Strategy objectives are to:

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

These objectives are based on the priorities identified during consultation with stakeholders.

The Housing Strategy objectives contribute to meeting the Council's priorities, as outlined in the Harrow Ambition Plan, and the Housing Services priorities, as outlined in the Smarter Housing Plan.

The accompanying documents are:

**Tenancy Strategy & Policy** which sets out how flexible/fixed term tenancies are used locally to make best use of our small social housing stock and how the Council as a landlord manages flexible/fixed term tenancies for new Council tenants, as well as provides guidance for other registered providers of social housing in Harrow.

**Homelessness & Rough Sleeping Strategy** which sets out how we will prevent and address homelessness and rough sleeping and help people access economically realistic housing options.

**Allocations Scheme** which sets out who will get social housing in Harrow to ensure we meet local priority housing need and make best use of limited social housing opportunities.

**Asset Management Strategy** which maps stock condition, investment needs, takes account of the wider sustainability agenda and looks at how best we strategically use all of our housing assets.

### **2. Context, drivers and key data**

The context, drivers and key data can be found in the **Housing Evidence Base**.

Harrow is an outer London borough with excellent transport links to central London, schools and access to Green Belt and other open space. Harrow is primarily a residential suburban area and compared to other outer London boroughs Harrow has a relatively small area of land devoted to employment and industrial use.

Home ownership in Harrow has declined to around 60% from 66% at the 2011 Census and the private rental sector (PRS) has increased from 22% to around 30% over the same period. 10% of Harrow's households live in social housing, a mixture of 4,762 Council properties and 4,327 Housing Association properties.

Harrow Council has a small social housing stock, the smallest in West London and one of the smallest across London. The Council owns just under 4,800 homes within its Housing Revenue Account (HRA) and is also responsible for the management of 1,200 leasehold properties (largely former council flats sold under the Right to Buy), nearly 800 garages and 11 community centres. Harrow's council homes were mainly built between 1950 and 1970, as the area was a focus of efforts to tackle shortages of good quality housing following the Second World War, and are concentrated in the Harrow Weald, Roxbourne, Pinner and Stanmore Park wards. Around half of the council's general needs housing stock has been sold under the Right to Buy since 1980. Of the properties sold under the RTB as leasehold approximately half are owned by non-resident leaseholders, many of whom are private landlords. Properties are managed from the Council offices in Harrow, with repairs services currently provided by three external contractors. Core activities relating to homes within the HRA are housing management, repairs and maintenance, and the improvement of housing and related assets. The Council has an ambitious development programme, and a major regeneration programme is underway at Grange Farm Estate.

Harrow has some pockets of multiple deprivation, which closely correlate to social housing estates. We have targeted the regeneration of these estates. Rayners Lane and Mill Farm have been redeveloped and the regeneration of the Grange Farm Estate is underway. Outside of these, Harrow's social housing estates are generally small and well integrated with the wider community and therefore most do not suffer to the same extent with physical and social deprivation as seen in other London boroughs.

The 2019 English Indices of Deprivation (IoD2019) shows that two of Harrow's Lower Super Output Areas (LSOAs) are amongst the top 20 per cent most deprived in England for Multiple Deprivation. Harrow's most deprived LSOA is in Stanmore Park ward and is the area covering the Woodlands and Cottesmore Estates. The second most deprived LSOA is in Hatch End ward and includes parts of the Headstone and Headstone Lane Estates. Previously Harrow's most deprived LSOA was in Roxbourne ward and encompassed the Rayners Lane Estate but this LSOA's position has improved in Harrow's LSOA rankings. Harrow performs worse for Barriers to Housing & Services than any other deprivation indicator, now falling within the top decile of local authorities in England for this domain. Deprivation is addressed in more detail in the Council's Health and Wellbeing Strategy.

There is a low turnover of rented homes and some permanent Council stock is used as temporary accommodation to address homelessness.

There is a high demand for housing, from both home seekers on the housing waiting list and existing social housing tenants waiting to move to alternative social housing. There is also a high demand for housing from homeless households.

The main reason for homelessness in Harrow is loss of private rented accommodation, followed by parents no longer willing or able to accommodate and a range of other reasons.

Different types of temporary accommodation are used to house homeless households including bed and breakfast accommodation, homeless hostels, private sector leasing, permanent council stock and homes acquired by the Council.

We rely heavily on the private rented sector for both temporary and permanent housing solutions. Private rents are not affordable for many households because private rents have increased but incomes have not kept up.

The Local Housing Allowance (LHA) rates are the maximum amount of Housing Benefit or

Universal Credit that can be awarded to tenants for housing costs who rent from a private landlord. Many private rents in Harrow are above the LHA rates and tenants must make up the shortfall from their other income.

Due to the challenging context in which we operate difficult choices and decisions have to be made to ensure that we make the best use of our existing social housing stock to help those who are most in need.

The Council is building new homes for the first time in decades and making use of other opportunities to increase the supply of affordable housing in the borough.

35 Registered Providers of social housing operate in Harrow, a mixture of large and specialist providers. Those with the largest amounts of stock are Home Group, A2 Dominion, Metropolitan Thames Valley, Notting Hill Genesis, Network Homes, Inquilab and Paradigm.

### National

There have been a number of important changes to housing policy and legislation in recent years.

The Welfare Reform Act 2012 made changes to a number of benefits and aimed to reduce welfare spending, simplify administration and improve incentives to work. This included the introduction of Universal Credit, which replaces six of the main means-tested benefits and tax credits, and the reform of Housing Benefit, including the introduction of the under-occupancy penalty (often referred to as the bedroom tax). The Welfare Reform Act also limits the total amount of money available to social security claimants who claim certain benefits, known as the benefit cap.

The Welfare Reform and Work Act 2016 introduced further changes, reducing the benefit cap, freezing a number of benefits for four years and requiring social housing providers to reduce rent levels by 1% each year for four years beginning from 2016/17. While the changes to welfare benefits have had a significant impact on the income of individual claimants the policy to reduce social rents has affected the rental income of social landlords and has in some case prevented the development of new social housing.

The Housing and Planning Act 2016 made changes to housing policy and the planning system to promote home ownership and boost housebuilding. A number of policies contained in the Housing and Planning Act 2016 have not been implemented, such as charging higher earning tenants higher rents (referred to as 'pay to stay'). The policy requiring local authorities to sell off vacant higher value stock has been cancelled. The policy to make the use of fixed term tenancies compulsory has not been implemented. A pilot of the Voluntary Right to Buy for housing association tenants is currently running in the Midlands and future policy decisions will be taken following the evaluation of the pilot when it finishes in 2020.

The Homelessness Reduction Act 2017 is one of the biggest changes to the rights of homeless people in England for 15 years. It places new legal duties on local housing authorities and amends the existing homelessness legislation in the Housing Act 1996. These new duties apply to all eligible applicants irrespective of intentionality and priority need. The prevention duty is also irrespective of local connection. Further detail is contained in the **Homelessness and Rough Sleeping Strategy**.

The fire at Grenfell Tower in the Royal Borough of Kensington & Chelsea on 14 June 2017 caused 72 deaths and profoundly shocked London and the entire country. The tower block was managed by Kensington & Chelsea TMO and the tragedy highlighted many key issues including the complexity of managing and refurbishing high rise blocks. Although Harrow

Council does not own or manage any high rise blocks it highlighted the challenge of fire safety and compliance in leasehold properties bought under the Right to Buy, particularly when these are then let as private rented housing which is a major challenge for Harrow.

Following the Grenfell Tower fire an independent review of the building regulations and fire safety was carried out by Dame Judith Hackitt. The Independent Review of Building Regulations and Fire Safety 'Building a Safer Future' (2018) makes recommendations to ensure that there is a sufficiently robust regulatory system for the future and provide further assurance to residents that the buildings they live in are safe and will remain so.

The social housing green paper 'A new deal for social housing' (2018) aimed to 'rebalance the relationship between residents and landlords, tackle stigma and ensure that social housing can be both a stable base that supports people when they need it and support social mobility'.

The green paper set out 5 core themes:

1. Tackling stigma and celebrating thriving communities
2. Expanding supply and supporting home ownership
3. Effective resolution of complaints
4. Empowering residents and strengthening the regulator
5. Ensuring homes are safe and decent

The main proposals included greater access to shared ownership, improving tenant involvement and complaints procedures, tougher regulation of social housing providers and increased accountability through performance data and league tables. The green paper also proposed the review of the Decent Homes Standard.

Another significant change in housing policy has been the lifting of the Housing Revenue Account (HRA) borrowing cap. The HRA is a ring-fenced budget containing local authority housing which operates separately to the council's other operations and budget. The HRA income comes mainly from rents and service charges and can only be spent on managing, maintaining and building council housing. Following introduction of Self Financing in 2012 a maximum borrowing limit was set for each Council. Harrow is one of only two councils in London that had reached its maximum borrowing limit as a result of self financing. From October 2018, following announcement by Theresa May at the Conservative Party conference, the Council can borrow for new home building only. This new borrowing is currently regulated under the prudential borrowing framework, pending new regulations.

The social housing sector has been warned of a range of risks associated with Brexit including deteriorating housing market conditions, the impact on interest, inflation and currency, access to finance, availability of labour, access to materials and components, access to data which the council is monitoring.

### Regional

Since April 2012 the Mayor of London has had strategic oversight of housing, regeneration and economic development in London and the Greater London Authority has taken over responsibility for affordable housing in London from the Homes and Communities Agency (HCA).

The London Housing Strategy sets out the Mayor's plans to tackle the capital's housing crisis and his vision to provide all Londoners with a good quality home that meets their needs and that they can afford.

The five priorities of the Mayor's London Housing Strategy are:

1. building homes for Londoners;

2. delivering genuinely affordable homes;
3. high quality homes and inclusive neighbourhoods;
4. a fairer deal for private renters and leaseholders; and
5. tackling homelessness and helping rough sleepers.

Strategic planning in London is the shared responsibility of the Mayor of London, 32 London boroughs and the Corporation of the City of London. The Mayor has to produce a spatial development strategy (SDS), known as the London Plan, and to keep it under review. Boroughs' local development documents have to be 'in general conformity' with the London Plan, which is also legally part of the development plan that has to be taken into account when most planning decisions are taken in any part of London.

The current Mayor of London's draft new London Plan is underpinned by the concept of 'Good Growth', meaning growth that is socially and economically inclusive and environmentally sustainable, and it is focused on sustainable development.

#### Sub-regional

Harrow Council works with the West London Alliance and the West London Housing Partnership to address housing and homelessness issues. West London boroughs collaborate on projects and responses to challenges and opportunities.

The West London Strategic Housing Market Assessment (SHMA) is a framework for councils to follow to develop their understanding of how housing markets operate and to establish 'objectively assessed housing need (OAN)' which borough Local Plans should seek to meet.

The recent SHMA completed in 2018 shows that:

- Five of the seven West London boroughs have average lower quartile house prices higher than Greater London as a whole. In Harrow the increase in lower quartile house prices over the previous 5 years has been lower than for Greater London as a whole, but prices remain above the Greater London lower quartile average;
- Average monthly rents in West London and in Harrow have increased, though by less than for Greater London as a whole;
- Whilst the affordability ratio has increased over 5 years by less than the percentage increase for Greater London in four out of the seven West London boroughs (including Harrow), affordability is worse than for Greater London in five of the seven West London boroughs (including Harrow);
- The percentage of overcrowded households has increased by more than for Greater London in four of the seven West London boroughs (including Harrow) but in Harrow remains below the Greater London average;
- Housing delivery relative to stock has increased by more than for Greater London in four of the seven West London boroughs since 2011, though not in Harrow.

For Harrow the SHMA indicates that depending on the method of analysis used household numbers will increase by an average of between 1,266 and 1,324 per year over the next 25 years.

The housing need (OAN) for West London has been estimated as 322,000 dwellings over 25 years (2016-2041), equivalent to an average of 12,879 dwellings per year. For Harrow, the figure is 1,477 dwellings per year. Based on evidence of current unmet need for affordable housing and the future household growth projections, the SHMA analysis indicates that there is a need to provide 9,600 additional affordable housing homes in Harrow over 25 years (2016-2041), equivalent to 384 homes per year. This figure takes into account the 5,155 households in affordable housing need in 2016 in Harrow.

Any losses from the current social stock such as demolition, clearance or Right to Buy sales will increase the number of affordable dwellings needed by an equivalent amount.

The SHMA indicates that the vast majority of households who require affordable housing in Harrow would need housing benefit/Universal Credit support to afford housing at London Living Rents or Affordable Rent levels.

### Local

The Harrow Ambition Plan sets out a clear set of priorities and outcomes which together with continued effective management of resources will mean that the Council will be able to continue to make a difference to the lives and well-being of all who live, work and study in Harrow.

The Council's priorities for Harrow are:

1. Building a Better Harrow
  - Create a thriving modern, inclusive and vibrant Harrow that people can be proud to call home
  - Increase the supply of genuinely affordable and quality housing for Harrow residents
  - Ensure every Harrow child has a school place
  - Keep Harrow clean
  - More people are actively engaged in sporting, artistic and cultural activities in ways that improve physical and mental health and community cohesion
2. Supporting Those Most in Need
  - Reduce levels of homelessness in the borough
  - Empower residents to maintain their well-being and independence
  - Children and young people are given the opportunities to have the best start in life and families can thrive
  - Reduce the gap in life expectancy in the borough
3. Protecting Vital Public Services
  - Harrow has a transport infrastructure that supports economic growth, improves accessibility and supports healthy lifestyles
  - Healthcare services meet the needs of Harrow residents
  - Everyone has access to high quality education
  - A strong and resourceful community sector, able to come together to deal with local issues
  - Harrow continues to be one of the safest boroughs in London
4. Delivering a Strong local Economy for All
  - A strong, vibrant local economy where local businesses and thrive and grow
  - Reduce levels of in-work poverty and improve people's job opportunities
  - Harrow is a place where people and businesses invest
5. Modernising Harrow Council
  - Deliver excellent value for money services
  - Reduce the borough's carbon footprint
  - Use technology and innovation to modernise how the Council works
  - Improving access to digital services

The Housing Strategy contributes to meeting these priorities.

### Climate Change, Energy and Fuel Poverty

Harrow Council recognises the far reaching effect of climate change on the UK's people and places, economy, society and environment. Harrow Council has demonstrated its commitment to addressing climate change through signing the Nottingham Declaration in July 2007 and the Climate Local Commitment from the LGA (Local Government Association) in March 2013.

The council has published its **Climate Change Strategy** which sets out the Council's plan to tackle climate change, increase energy efficiency and reduce spending on energy. Harrow Council declared a climate emergency on 18 July 2019 and set an aim of becoming a carbon neutral borough by 2030.

Housing has a major role to play in meeting the climate change agenda and delivering affordable warmth; these are particularly important priorities in relation to low income households, for whom fuel poverty is an important issue.

Housing is responsible for a significant proportion of static carbon emissions in the borough (excluding transport) so improving the energy efficiency of the housing stock significantly contributes towards reducing the levels of carbon emissions and addressing fuel poverty for low income households.

Housing in the PRS is often less energy efficient than in other tenures. This is particularly the case at the lower end of the market, where the majority of households are on low incomes and where market forces are less likely to be effective, particularly if higher thermal efficiency leads to higher rents.

Under the Energy Performance Certificate (EPC) Regulations it is the property owner's responsibility to supply potential buyers or tenants with a valid Energy Performance Certificate (EPC) for all property that is marketed for sale or to let.

The EPC contains information about a property's energy use, typical energy costs and recommendations on how to reduce energy consumption. An EPC gives a property an energy efficiency rating from A (most efficient) to G (least efficient) and is valid for 10 years.

From 1st April 2018, changes to the Regulations have meant that owners of the least energy-efficient buildings, with an EPC Rating of 'F' or 'G', in the UK are unable to let or renew a lease of their property.

Landlords are expected not to refuse any reasonable request from tenants for energy efficiency measures to be installed in their property.

The Council's empty property grant initiative can include energy efficiency works such as new boilers, heating controls, loft insulation and new windows to reduce CO2 emissions, with a target of 90% of properties to have energy saving improvements on larger externally funded grants.

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

Other environmental improvements often included in new housing developments include: provision of green roofs, solar thermal hot water systems to meet the target for use of renewable resources and resulting reduction in CO2 emissions, improved biodiversity as a result of increased tree planting and landscaped communal open spaces, provision of

Sustainable Urban Drainage Systems, and green travel plans to encourage use of public transport and walking. Where possible, we will endeavour to recycle demolition material recognising this may be limited due to the construction type of some properties.

Properties acquired by the Council for use as temporary and permanent housing are refurbished in the same way as empty property refurbishments to reduce CO2 emissions. This can include energy efficiency works such as new boilers, heating controls, loft insulation and new windows.

Fuel poverty in England is measured using the Low Income High Costs (LIHC) indicator. A household is considered to be fuel poor if they have required fuel costs that are above average (the national median level) and were they to spend that amount, they would be left with a residual income below the official poverty line. The elements that are taken into account are household income, household energy requirements and fuel prices.

Aside from the environmental and financial impacts poor energy efficiency can also impact on the wellbeing of residents and the links between cold homes and poor health are well established. The benefits of warm homes are increased life expectancy, reduced health inequalities, improved mental and physical health, improved school attendance and educational achievements, reduced incidence of childhood asthma, promotion of social health and independent living, and reduced admissions to hospitals and care homes.

The factors that make people vulnerable to the impacts of climate change are most acute amongst particular groups, typically older people. Older people are physiologically at most risk of health impacts from extreme heat and cold. Childhood asthma incidence also increases significantly with cold. People with limited incomes may not be able to afford air conditioning in their home during heat waves, increasing their risk of heat stroke, or adequately heating their home during cold weather. Work to improve housing standards helps to mitigate the risk and effect of climate change on people in this group.

Reducing fuel poverty and increasing energy and water efficiency at home are important to address financial inclusion. Digital inclusion is closely linked to this, as this allows households to compare energy tariffs and switch suppliers more easily.

Housing Services has been working with LEAP (Local Energy Advice Partnership), a free service that is helping people in all housing tenures keep warm and reduce their energy bills without costing them any money. Home visits are carried out by a trained Home Energy Advisor who can install simple energy efficiency measures such as draught proofing, chimney balloons, hot water cylinder jackets, LED lamps, radiator panels, TV standby plugs and shower aerators.

### **3. Meeting our Housing Strategy Objectives**

The objectives of the Housing Strategy will be delivered through Harrow Council Housing Services' Smarter Housing Plan and Harrow Councils' Harrow Ambition Plan.

#### **1) Prevent and tackle homelessness and rough sleeping**

Preventing and tackling homelessness and rough sleeping is a priority nationally, regionally and locally.

Homelessness continues to be a challenge in Harrow due to a very limited supply of social housing, high property prices, a competitive private rented market and the impact of welfare reform.



Harrow Council will continue to provide housing advice to households with a focus on preventing homelessness and on meeting its statutory requirements, including the use of personalised housing plans.

Services for rough sleepers have historically been provided by local charities but Harrow Council is now developing services to meet the needs of this client group as well as improving services on offer to single homeless people.

As part of its work to tackle homelessness and rough sleeping Harrow Council will provide information to local residents, statutory agencies and voluntary and community sector organisations about housing and homelessness in Harrow in order to manage expectations and help people make informed choices.

This objective is addressed in more detail in the **Homelessness and Rough Sleeping Strategy**.

## **2) Promote realistic housing options for people who need to move**

Affordability is a key challenge in Harrow and information and advice is provided to residents and other stakeholders about realistic housing options.

Due to the shortage of social housing in Harrow households are likely to be offered both temporary and permanent housing solutions in the private rented sector. As market rents are often above the maximum amount of assistance that can be claimed for housing costs under Housing Benefit or Universal Credit it is likely that households will need to meet the gap from their other income.

Households need to consider choices such as increasing their income, finding a more affordable home that is smaller than they ideally need or moving away from Harrow where there is more choice in the private rented sector. Social housing may be available in some areas of the country.

Harrow Council will continue to provide information and advice on realistic housing options to people who need to move as well as to statutory agencies and voluntary and community sector organisations that provide information and advice to local residents.

Households may need to move to a different area for a variety of reasons, such as for a new job or to be closer to family. Harrow Council will continue to provide advice on moving away from Harrow. Different schemes are available to facilitate moves for existing social housing tenants.

### **Under-occupation**

Making family size council homes available for letting by assisting under-occupiers to move to a smaller property is one way to increase availability and meet housing needs.

Moving somewhere smaller can be cheaper and may make tenants financially better off. Additional benefits of moving to a smaller property include a more manageable smaller home, lower running costs, help with the removal costs (council tenants only), high priority on Locata and a personal service (including assisted bidding and accompanied viewing). Council tenants who are under-occupying their property may be eligible for a financial incentive when down-sizing. Some housing associations may also pay incentives.

We will continue to develop measures to facilitate downsizing, including the provision of financial assistance, advice, support and encouragement to under-occupiers.

However as under-occupiers often have specific requirements and preferences (for example a smaller home on the same street or the same estate) increasing the supply of available family size homes in this way alone will not be sufficient to meet growing demand. It is therefore important that new and alternative ways of increasing the supply of available family sized affordable housing are explored when opportunities arise.

This objective is addressed in more detail in the **Homelessness and Rough Sleeping Strategy**.

### **3) Prioritise new homes for people living or working in Harrow**

The Housing Allocations Scheme explains how social housing is allocated in Harrow. When we are able to offer social housing, whether newly built or existing, our priority is to allocate it to households with the highest housing need. These are people on the housing register who have an exceptional need to move, or have another serious need to move, and/or haven't been able to resolve their housing problem in another way - they will have usually been waiting a long time. Occasionally, accepted homeless households, who have been living in temporary accommodation for a very long time (usually well over 10 years) can be offered accommodation. Most people who apply for social housing will never be rehoused.

The Council promotes a range of affordable home ownership products for people who cannot afford to purchase a property on the open market, including shared ownership. Harrow Council has built its first shared ownership properties and plans to build additional units. Existing Council tenants will be prioritised for purchase of these homes so that the properties they currently live in can be re-let to other households requiring affordable housing in the borough.

The eligibility and priority criteria for accessing shared ownership in Harrow is set out in our Nomination Agreements with RPs. They allocate applicants to their shared ownership units but must use our priority criteria which gives priority to local people for the initial sale and any resales.

All short listed applicants for intermediate housing units (such as shared ownership) should be prioritised by the RP as follows:

- Priority 1 Existing Council or housing association tenants in Harrow
- Priority 2 Active MOD staff
- Priority 3 Those in high priority need on the Council's Housing Register
- Priority 4 Key Workers (preference to be given to those living or working in Harrow)
- Priority 5 Any person living or working in Harrow
- Priority 6 All others

### **4) Increase the supply of affordable homes to rent and buy**

Increasing the supply of affordable homes to rent and buy is seen as a key priority by all stakeholders.

There is no all-encompassing statutory definition of affordable housing in England but definitions can be found in the Housing and Regeneration Act 2008, the National Planning Policy Framework (NPPF) and the Greater London Authority's draft New London Plan.

Affordable housing is low-cost rented and homeownership accommodation that is let or sold to eligible people whose housing needs are not adequately served by the commercial housing market. Eligibility is determined with regard to local incomes and local house prices.

Low-cost rented accommodation is let at rents below market rents and includes social rent, Affordable Rent and London Affordable Rent. Affordable rent must be at least 20% below market rent.

Low cost home ownership accommodation is a form of intermediate housing and is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, London Shared Ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy / London Living Rent (which includes a period of intermediate rent).

Provision is usually made for affordable housing to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Affordability is a key consideration. The National Planning Policy Framework (NPPF) does not make reference to the proportion of a household's income or earnings that should be spent on housing costs. Housing costs can be compared to earnings or to household income. Earnings data is often used because it is available at local level but income data provides a more complete picture. The London Plan Annual Monitoring Report sets affordability at 40% of net income for housing costs inclusive of service charge.

The current Mayor of London does not consider 80% of market rents to be genuinely affordable in most parts of London and has set a benchmark London Affordable Rent which is substantially below this level and is reviewed and published annually by the GLA.

Harrow Council is building and buying new affordable homes to meet housing demand and agrees with the Mayor's definition of genuinely affordable homes. All new homes for rent being built with the benefit of grant will be let at London Affordable Rents. Where new homes are part of a regeneration scheme (such as Grange Farm) the rents for existing tenants will be lower than London Affordable Rents but higher than the current social rent to reflect they are new homes. Some of the homes we build without grant will have rents higher than the London Affordable Rent benchmark but still below 80% of market rent.

New affordable homes are achieved in the following ways:

- Building new Council Homes on infill development sites on existing housing estates or other council owned land
- Buying homes for the Housing Revenue Account (HRA) for permanent housing
- Buying homes for the General Fund for temporary accommodation
- Estate regeneration e.g. Grange Farm regeneration project
- Registered Providers/Housing Associations building affordable housing
- Partnerships with private developers (Gayton Road and the HSDP)
- Private housing developers building affordable homes required by Harrow Council's and the Mayor's Affordable Housing Policy

Council assets are regularly reviewed to see what land could be brought forward for development and new methods of developing new affordable homes are explored, such as modular construction and airspace development.

The revised National Planning Policy Framework (NPPF) states that where major development includes the provision of housing, at least 10% of the housing provided should be for affordable home ownership, subject to some exceptions. There is no requirement to provide affordable housing on sites with fewer than 10 units of housing or on permitted development and prior approval schemes, such as office to residential conversions.

The London Plan requires the provision of affordable housing to be the maximum reasonable amount for each individual development (based on development viability) with priority accorded to the provision of affordable family housing. It establishes that within the maximum reasonable amount of affordable housing for a development, 60% of this should be for social and affordable rent, and 40% for a range of intermediate housing products.

Developments providing 35% or more affordable housing without grant can currently follow the Mayor of London's Fast Track route through the Planning process. For developments proposing less than 35% affordable housing the submission of a Financial Viability Assessment by the applicant is required to inform affordable housing negotiations. The maximum reasonable amount of affordable housing for individual sites is determined by development viability, scheme design and availability of grant. Viability is influenced by the affordable housing tenure mix and the rental levels for the affordable rent housing so a greater proportion of affordable rent units will reduce the overall amount of affordable units provided. Heavily discounted affordable rent units (i.e. London Affordable Rent or social rent rather than a 20% discount to market rent) will further reduce the viability of a scheme and overall total number of affordable units.

Section 106 agreements, also known as planning obligations, are agreements between developers and local planning authorities that are negotiated as part of a condition of planning consent. The Town and Country Planning Act 1990 enables local authorities to negotiate contributions towards a range of infrastructure and services, such as community facilities, public open space, transport improvements and/or affordable housing.

Harrow has a borough wide Affordable Housing Policy. The maximum reasonable amount of affordable housing will be sought from residential schemes that are capable of providing 10 residential units or more. This is in line with the London Plan and Local Development Framework (LDF) Policy. Harrow's affordable housing target for developers is 40%, with a target mix of 60% affordable rent and 40% low cost home ownership units. Developers are expected to submit a Financial Viability Assessment if required to do so under London Plan policy, to evidence how much affordable housing can be delivered on their scheme. Viability Assessments submitted by developers are published on the Harrow Council website.

The Council delivers new affordable housing direct and monitors the delivery of new affordable housing and aims to provide as much affordable housing as possible. The Greater London Authority (GLA), Registered Providers (RPs) and private developers help us with this aim. 1143 new affordable homes have been built in Harrow since 2012, 661 for rent and 482 for shared ownership.

The Council is now contributing directly towards the delivery of new affordable housing now that it has the freedom and funding to do so. 98 new council homes have been completed or are on site. Since 2016, 100 homes have been purchased for use as temporary accommodation from the General Fund under the Property Acquisition programme, with a further 32 purchases planned. 8 homes have been purchased from the HRA for use as permanent housing.

There is a target of 226 council home starts in 2019/20 and 639 new council homes built by 2022, including the regeneration of the Grange Farm estate, with £42m of GLA and MHCLG funding secured for the affordable housing programme.

The Council also recognises that the delivery of affordable housing can only be achieved with the delivery of new housing and growth generally. We are therefore proactively bringing forward Council land for redevelopment. The Council is currently selecting a strategic development partner to deliver the innovative regeneration of three core Council sites comprising Poets Corner, Peel Road and Byron Quarter (Phase 1). This substantial

opportunity spans three sites in the Harrow & Wealdstone area and includes the potential to deliver over 1,400 residential units and a new civic centre. It is anticipated that their strategic locations within the Borough will have significant wider regeneration benefits across Wealdstone Town Centre. The Harrow Strategic Development Partnership (HSDP) has the potential to develop additional opportunities beyond the specified core sites. The Council hopes this development will encourage further high quality development by others in the immediate location and wider Harrow area.

### **Community-led housing**

Community-led housing is a way of introducing needed affordable housing where local people play a leading role in solving their own local housing needs, by working together alongside housing partners (including the LA) with the aim to create genuinely affordable homes and stronger communities in ways that are difficult to achieve through mainstream housing.

The community-led housing sector comprises a wide range of ownership, occupancy and management models, the most common types being development trusts, community land trusts, cohousing, co-operative housing, self-help housing, group or community self-build.

Within the community-led housing sector a range of tenures are possible, including rent, shared ownership, and market sale, to best suit the local circumstances and preferences.

There are three main delivery routes for community-led housing.

- 1) Grassroots group responding to housing need or demand, or a group of people seeking to deliver their own homes
- 2) An existing community based organisation extending a community based activity by providing housing (or increasing housing provision) for and on behalf of the local community
- 3) A Developer-Community partnership between a local authority, landowner, housing association or small builder who want to provide housing that benefits the local area in perpetuity by either recruiting founder members from within the community and supporting them to take over ownership, stewardship and/or management of the homes, or by supporting an existing group or organisation to deliver their ambition.

In 2017, Homes England made £37,747 funding available to Harrow Council to fund Community-led housing projects in the borough.

There is interest locally in community-led housing. Harrow currently has two active community-led housing projects underway and one cohousing project in the discussion stage.

Cohousing usually comprises residential units and communal facilities, collectively created by members of the cohousing community to benefit the social and environmental wellbeing of all its members and the wider area. The management of a cohousing community is shared by all its members, including ownership and occupation agreements and decision making arrangements.

### **5) Meet the needs of older and vulnerable residents**

Older people and vulnerable households may have specific housing needs that require particular solutions.

This objective is addressed in more detail in the section on Supported Housing and in the **Homelessness and Rough Sleeping Strategy**.

## **Housing for Older People**

Older people are a diverse group of people and have a range of different housing needs and preferences. Older people may choose to live in mainstream housing or in specialist housing, such as retirement and extra care housing, though there are many other options. The type of housing and location that meets the housing needs and preferences of older people will be determined by factors such as age, income, equity, health, mobility and support or care requirements.

Mainstream housing is usually general needs housing in the social or private sectors, either rented or purchased. Aids and adaptations can help to meet the changing needs of older people in this type of housing.

Specialist housing is used to describe a range of types of housing for older people, other than residential and nursing care homes. Around 5% of the population aged over 65 live in specialist housing, though it could suit and meet the needs of more older people.

Living in specialist housing has health and wellbeing benefits for older people and can result in savings for the NHS and adult social care, particularly when there are care and support services onsite and communal facilities.

Specialist housing provides enables an older person to live independently in their own living space with varying levels of support. This can include age restricted housing for people aged 55 or above, retirement living or sheltered housing for older people aged 60 and above (usually with on-site support and some communal facilities), extra care housing (with on-site care services) and care villages or continuing care retirement communities (with higher levels of care).

### **Sheltered Housing**

Sheltered housing is accommodation specifically designed for older people aged 60 and over who can continue to live independently and manage their own tenancy, sometimes with some support from family, friends or support services. It offers a community, communal facilities and the security of knowing that help is close by if needed. Personal care is not provided by sheltered housing staff.

This may be an option to secure permanent accommodation for people who are aged over 60 and who need to move quite quickly or are at risk of becoming homeless, as sheltered housing may be more frequently available than for general needs housing.

There are 17 Council rented sheltered schemes and 13 registered provider rented sheltered schemes in Harrow.

### **Extra Care Housing**

Extra Care Housing is defined in Harrow as:

- A form of sheltered housing for older people who are becoming frailer and less mobile and have higher support and care needs than those that can be met in general needs or sheltered housing
- Self-contained homes and communal facilities with design features and care and support services which enable self-care and independent living
- Enabling older people with a wide range of needs to remain living independently in the community, whilst being able to access care from staff available 24 hours per day if needed with an increasing use of assisted technology to maintain independence.

The overarching need is for affordable extra care housing for rent. It is also possible to provide combined schemes that allow for self-funders to buy or rent units. Demonstrating the demand for extra care housing for sale in Harrow is an area that requires further research.

Extra care housing has the potential to achieve a range of improved outcomes for Harrow's citizens including:

- support the prevention agenda
- reduce the number of hospital admissions, re-admissions and long term stays
- facilitate safe and timely transfer of care from hospital to home avoids prolonged and expensive in-patient stays
- prevent or delay more costly moves into residential care or nursing care
- provide dementia-friendly accommodation
- future-proofing and flexibility built into the design that can prevent the need for costly adaptations and home energy improvements at a later date
- free up under-occupied homes (often with gardens) to meet the needs for family sized housing
- health and wellbeing benefits from ability to live independently for longer.

The demand for extra care housing in Harrow has been estimated using a range of data such as population projections, current patterns of social care placements, trends in primary needs and case studies.

Extra Care Housing could be an alternative to residential placements for some older people. Over 6 years to 2025 between 33 and 94 clients could be suitable for placement as an alternative to residential care, or up to 16 per year, on average. A number of practical and financial issues, such as those relating to home owning self-funders, continue to be explored.

Extra Care Housing could be an alternative to high cost community based support for some older people. By 2025, it is expected that a maximum of 119 new clients could be suitable for placement in extra care housing as an alternative to high cost support in their own homes, or up to 20 per year on average.

Extra Care Housing could be an alternative housing solution for some people older people with higher level care needs, though this may not be possible in all schemes. If Extra Care facilities could cater for higher levels of care needs, then additional clients could be placed. This type of advanced Extra Care provision would need to be able to cater for needs such as hoisting, double-handed care, severe dementia etc.

By 2025 a range of between 153-580 people referred to the local authority could be catered for by extra care housing, depending on the type of provision and financial arrangements. Over time it is expected to develop the extra care model so that these more complex care needs can be met by extra care provision. On this assumption the upper end of the range would apply.

To meet the projected demand for extra care housing it is proposed to develop a phased approach to bringing forward additional schemes, with each scheme supported by an individual business case.

A phased approach is necessary for the following reasons:

- Assessment and monitoring of impact on client needs and outcomes, to enable any revisions required to the wellbeing specification to promote greater independence and resilience, secure quality and value for money and meet evolving needs
- Inclusion of developments in assistive technology

- Identification and commissioning of sites and providers
- Avoidance of an oversupply of units leading to a higher level of voids following completion.

An implementation plan for each phase will therefore be developed.

## **Supported Housing**

There is a continuing need for supported housing to meet the needs of vulnerable people, including extra care housing for older people with support needs and supported accommodation to meet the needs of other groups such as people with learning disabilities, people with physical disabilities, individuals and families at risk of or recovering from homelessness and rough sleeping, people recovering from drug or alcohol dependency, people with mental ill health, vulnerable young people (such as care leavers and teenage parents) and people fleeing domestic abuse.

We are working with partners to increase the supply of extra care housing for older people in Harrow with frailty, mild to moderate dementia, physical disabilities and mild learning disabilities who can continue to live independently with appropriate support in place as an alternative to residential care. Ewart House provides good quality extra care housing for older people and Harrow Churches Housing Association is now redeveloping Watkins House to provide additional units in Harrow. Further schemes are in the pipeline to meet demand.

There is also a need to develop specialist housing solutions for people with dementia, through an approach that integrates housing, adult social care and health. New developments in assistive technology offer new opportunities in this area.

Floating support services continue to provide some local residents in different housing tenures with help to maintain their housing and independence but not on the scale seen in previous years due to changes to funding. The services are now often more focused on shorter periods of more intensive support. Work has also been undertaken by Harrow Council and local partners to address hoarding and support residents who engage in hoarding behaviours.

Different schemes are available to help people in all housing tenures who require aids, adaptations and home improvements to stay in their own home and continue to live independently. Harrow Council will continue to support eligible residents through promoting and delivering major adaptations (funded through the HRA for council tenants and Disabled Facilities Grants in other tenures), the handyperson scheme and the 'Staying Put' scheme. Harrow Council will continue to monitor and make improvements to these schemes where necessary.

Social housing tenants with additional needs whose current home is no longer suitable are given priority to move. Access to social housing continues to be facilitated for some vulnerable groups through move on quotas to support moving from care or supported housing to independent housing, including care leavers.

We continue to work with registered providers (housing associations) to develop new supported housing and to explore options for existing housing where the accommodation falls below current standards or is not being used to its optimum benefit.

Interest from private housing and support providers in coming to Harrow with targeted housing offers can help to meet the demand for supported housing but consideration needs to be given to the cost and quality of such provision. The Regulator of Social Housing has



investigated a number of Registered Providers of Social Housing (RPs) due to concerns about governance and financial viability linked to their business model which involves leasing a large number of homes from private funds and providing a financial return to real estate investment trusts (REITs). Harrow Council is monitoring this locally and taking appropriate action to mitigate any negative effects and impact on quality and value for money.

Harrow Council's Adult Social Care is developing its Market Position Statement (MPS) for Adult Social Care Services in Harrow, which sets out the current commissioning approach and market opportunities for providers. The MPS also sets out the current understanding of social care needs, forecasts and demand projections.

The development of the Adult Social Care MPS will allow Harrow Council to open a positive dialogue, in the spirit of coproduction with its Citizens, Users and Carers, Providers and partners including the community and voluntary sector. Once sufficient engagement and co-design has taken place the intention is to move to a web based online MPS that can be updated and published frequently with all subsequent commissioning intentions.

Harrow Council and its partners, including care providers, the third sector and other statutory bodies have a duty to support the development of a thriving community that is both self-resilient and self-reliant. However, Harrow Council also recognises that within any community, there are those who require support to lead full and independent lives and there are some vulnerable people who require safeguarding at certain points in their lives. Adult Social Care wishes to develop a positive, proactive and responsive relationship with those services and organisations that offer care and support to Harrow's vulnerable citizens.

Harrow Council will support the diverse range of care providers and partners, ensure that new services and delivery models focus on peoples well-being and support that enables citizens to stay as independent as possible for as long as possible, and promote diversity and the highest possible quality in the provision of all services for care and support.

The MPS will set out Adult Social Care's commissioning intentions for Housing, including Extra Care and Supported Living, as well as the following areas:

- Older People
- People with Dementia
- Learning Disabilities and Autism
- Equipment Services and Assistive Technology
- Offer to Carers.

The overarching aim of Adult Social Care's strategy for housing, including Extra Care and Supported Living, is to ensure a long term framework is in place so that the Council and delivery partners such as housing associations have the certainty to bring forward schemes which enable independent living for as long as practically possible and quality care and support when it is genuinely needed.

One example is the 'Harrow is Home' project which aims to meet the accommodation needs of people with learning disabilities or autism. The project aims to support these citizens to live independently and to have a clear move on pathway. Citizens are empowered to have the same opportunities as anyone else of being able to live in a home of their own. It aims to improve outcomes for learning and physically disabled adults, including younger adults transitioning from children's services to adulthood. This approach consists of a network or 'cluster' of homes which are linked to a 'hub' or 'core' of skilled care and support staff, enabling service users to have their own homes (supported by a tenancy). This approach

helps promote and support independent living and empowers adults under the banner of 'resilient communities'.

## **Domestic Abuse and Housing**

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexual orientation. Domestic abuse can affect anyone regardless of their age, gender, race, religion, class, sexual orientation and marital status.

Increased awareness and prevalence of domestic abuse related crimes, both nationally and regionally, has meant that the issue has risen up the political agenda.

The introduction of national and regional government policies in recent years and new legislation to tackle domestic abuse, which is expected to become law in the near future, is anticipated to place further statutory responsibilities on local authorities to provide a wider and more comprehensive domestic abuse service.

The Homelessness Reduction Act 2017 amended the Housing Act 1996 and requires local authorities to provide advice and assistance to anyone who is homeless or at risk of homelessness, irrespective of their priority need status. The legislation imposes greater responsibilities on councils to prevent homelessness and provide advice and assistance to help retain or secure accommodation. In addition the local residence criteria has been removed for applicants moving because of Domestic Abuse.

Harrow Council's three-year Violence Vulnerability and Exploitation strategy, published in July 2017, includes a number of priorities to help tackle domestic abuse.

Domestic abuse services currently available in Harrow include:

- An Independent Domestic Violence Advisor (IDVA) service, to help ensure the safety of victims and children at high risk of harm from intimate partners, ex-partners or family members
- Floating Support service, which provides information and practical support to female residents residing at the refuge and their children, or in accommodation elsewhere
- Monthly Harrow Multi-Agency Risk Assessment Conference (MARAC) where information on high-risk domestic abuse cases is shared between representatives from the statutory and voluntary sectors such as the Police, health, child protection, housing practitioners, IDVAs, probation and other specialists, in order to ensure the continued safety of the victim
- A six bed refuge which provides hostel accommodation and support to women and their children who are escaping domestic violence
- A domestic abuse intervention service for victims with complex needs, to help support them to access refuge and specialist accommodation (funded by the MHCLG until March 2020).

There is also an active Domestic and Sexual Abuse Forum in Harrow, with representatives from statutory and voluntary and community sector organisations, that reports to Safer Harrow (Harrow's Community Safety Partnership).

Harrow Council also works with partners to address housing issues faced by victims of domestic abuse. For example, in situations where the perpetrator or the victim is a social housing tenant the landlord has the option to exclude the perpetrator from the family home when this is safe, possible and appropriate, rather than always seeking alternative accommodation for the victim. Social landlords can also usually provide additional locks and

other security features through their repairs service. Harrow's Sanctuary Scheme can fund security improvements to a victim's home in any tenure.

In cases where it is unsafe for the victim to remain in their home, either temporarily or permanently, the victim may be able to access temporary accommodation provided by the local authority or they may be able to access a domestic abuse refuge through different referral routes. Refuge accommodation is provided in a reciprocal manner, so victims from Harrow are likely to access refuge accommodation in other areas for safety reasons. Refuge accommodation is available on a temporary basis and victims are supported to access additional emotional support, counselling, help with benefits, legal advice, training and employment opportunities, in order to help them lead an independent life once their time in the refuge has come to an end. Victims may be supported into move-on and second-stage accommodation, as a stepping stone to their own independent accommodation. Other housing solutions can include specialist refuge accommodation (for those that have complex needs) and dispersed accommodation (usually smaller units spread out across an area).

The Secure Tenancies (Victims of Domestic Abuse) Act 2018 requires that social housing tenants in England who currently have a life-time tenancy and are fleeing domestic violence be granted a similar life-time tenancy in their new home. This is applicable to both people rehoused in local authority and in housing association properties. The aim is to avoid situations where the individual is dis-incentivised from leaving an abusive partner for fear of losing their life-time tenancy. It also provides increased security and stability to those fleeing domestic violence when they are rehoused.

Lack of specialist refuge accommodation for men and for victims with complex needs, such as substance misuse and mental health needs, remains an issue.

Providing additional refuge accommodation requires both capital and revenue funding, to purchase or build the accommodation and to provide support services, and this is a challenge in the current financial context.

The 2019 MHCLG consultation on the future delivery of support to victims and their children in accommodation-based domestic abuse services proposes the requirement for Local Domestic Abuse Partnership Boards. We await the outcome of this consultation.

Domestic and Sexual Abuse are addressed in more detail in the Council's Community Safety, Violence, Vulnerability and Exploitation Strategy.

## **Modern Slavery**

Modern Slavery and Human Trafficking in the UK take different forms including domestic servitude and exploitation for labour, criminal activity and sex work.

Victims of trafficking are often told that they or their families will be harmed if they do not comply, their identity documents may be taken away and they may not speak English, making it more difficult to seek help.

The National Referral Mechanism (NRM) is the process by which an individual is identified as a victim of modern slavery. Referrals to the NRM can only be made by authorised agencies known as First Responders, such as local authorities, the Police, the UK Border Force, Home Office Immigration and Visas, and certain Non-Governmental Organisations (NGOs).

The Government's NRM team has a target of five working days from receipt of a referral to decide whether there are reasonable grounds to believe a person is a potential victim of

modern slavery. If it is decided that they are a potential victim they will be offered safe accommodation, if needed, and granted a period of reflection and recovery and access to specialist support. During this time further information is gathered by the NRM and a decision is then made about whether the person is a victim of modern slavery.

The Salvation Army provides specialist support for all adult victims of modern slavery in England and Wales through a government contract which was first awarded in 2011.

Harrow Council has two Single Points of Contact (SPOCs) for Modern Slavery and guidance is provided to staff, including Housing Services, on identifying signs of Modern Slavery and reporting concerns.

Modern Slavery is addressed in more detail in the Council's Community Safety, Violence, Vulnerability and Exploitation Strategy.

## **6) Improve quality and standards, especially in the private rented sector**

### **Climate change, energy and fuel poverty**

Harrow Council's work on climate change, energy and fuel poverty in all tenures can be found on page 7.

### **Harrow Council Housing**

The **Asset Management Strategy** maps stock condition, investment needs, takes account of the wider sustainability agenda and looks at how best we strategically use all of our housing assets. It explains in more detail Harrow Council's approach to investment in council housing, taking into account compliance with health and safety requirements, Decent Homes standards, financial pressures and expectations of residents.

The vision for Housing Services is to provide smarter housing services, highly valued by our communities and delivered by people inspired to achieve. Housing Services improve quality and standards in council housing through the delivery of the Smarter Housing Plan which details team priorities and action plans for each part of the service (Housing Regeneration, Asset Management, Resident Services and Housing Needs).

Housing Services carry out customer satisfaction surveys, such as the STAR survey for tenants and the leaseholders' survey, to test customer satisfaction and identify priorities for service improvement. Housing Services holds meetings for council tenants and leaseholders, such as Housing Matters, and produces the housing magazine Homing In.

Housing Services staff work closely with the volunteer Residents Board, the Harrow Federation of Tenants and Residents Associations (HFTRA), individual Tenants and Residents Associations (TRAs) and Harrow Sheltered Residents Association (HSRA). Residents are involved in council-led expert groups such as the Editorial Board and the Grange Farm Regeneration Steering Group.

### **Private Sector Housing**

The Private Sector Housing Strategy has now been incorporated into the Housing Strategy. The strategic objectives for private sector housing help to meet the Housing Strategy objective of 'improve quality and standards, especially in the private rented sector'.

### **Private Sector Housing objectives**

The strategic objectives for private sector housing are to:

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

Developing new and strengthening existing partnerships to support private sector housing is key to achieving these objectives. Successfully addressing issues of property management and standards as well as supply within the private sector relies on the abilities of a number of agencies to work together. The Council plays a key strategic role in bringing together these agencies to share knowledge and good practice and develop a firm evidence base to inform decisions and develop strategies and policies.

Housing Services, Environmental Health (Residential Licensing, Enforcement and Building Control) and Planning work together to improve quality and standards in private sector housing, particularly in the private rented sector. The Private Sector Strategy Steering Group meets on a quarterly basis to discuss strategic issues relating to private sector housing and agree necessary actions.

The Council works collaboratively with the other West London boroughs to tackle housing issues across local authority boundaries, share good practice, carry out joint service procurement exercises in order to achieve economies of scale and develop joint bids for funding.

Private sector housing is made up of owner-occupied accommodation (either owned outright or bought with a mortgage) and rented accommodation (occupied by someone other than the owner, either with rent charged or rent-free). It does not include housing rented from local authorities and housing associations. 92% of the housing in Harrow is private sector housing, 61% owner occupied and 31% private rented.

The private rented sector is an important part of the housing market providing flexibility and allowing people to move quickly, helping those who do not or do not want to own a house or who are currently saving to buy in the future.

Harrow Council recognises in particular the importance of the private rented housing sector in meeting housing needs. Private sector tenancies that provide security and stability to tenants whilst also affording flexibility for the landlord are particularly important. Achieving a satisfactory balance between these can have far-reaching social and economic benefits for both the tenant and landlord.

Affordability is a key issue in Harrow. Some households who only a few years ago were able to afford home ownership must now rely on the PRS or shared ownership to meet their immediate and longer-term housing needs.

For households renting in the PRS, there is a wide disparity between rents at the lower and upper quartiles of the private rental market in Harrow. It is the lower end of the market that will cater for the needs of households in receipt of Housing Benefit or Universal Credit, with the maximum amounts for housing costs awarded at Local Housing Allowance rates, and/or in low paid employment.

Harrow Council aims to support and encourage a strong and sustainable private housing sector where good standards are maintained. The wider associated benefits for the residents of Harrow include a greater choice for those who cannot access social or owner occupied

housing, improved access to employment and training opportunities, better educational attainment, improved health outcomes, more choice and independence for those with support needs who wish to remain in their own homes, improved energy efficiency and reduction in fuel poverty and a reduction in homelessness.

The type and quality of housing significantly impact on the local economy. Making sure that the right type of housing is available locally is essential to attracting and retaining skilled people, encouraging inward investment to the borough and contributing to a thriving local economy. Equally, high housing costs can negatively impact on the local economy by acting as a disincentive to both workers and business to locate in Harrow, including key workers such as teachers and nurses.

The majority of private sector housing in Harrow is relatively old, with much of the stock pre-dating 1945. With older properties comes the increased likelihood of poor housing conditions. This can have an impact on the mental and physical health and wellbeing of inhabitants, and research shows that there are clear links between sub-standard housing and poor health (for example, damp homes can lead to respiratory illness such as asthma and overcrowding can lead to a range of wellbeing issues).

In view of the Council's limited resources, the focus is on what can be done to encourage and facilitate the continued provision of a good quality private housing sector, including private rented housing. This will be achieved by working in partnership with other boroughs, landlords, developers and private tenants and residents, whilst using available enforcement resources to tackle the worst conditions in the sector.

#### **Private Sector Housing- National policy**

The national policy guidance on private sector housing is contained in the government's strategy 'Laying the Foundations: A Housing Strategy for England' (2011). The prime focus of the strategy is revitalising the housing market and delivering a thriving and expanding private rented sector (PRS). However, the strategy also makes clear the importance of high standards in the private rented sector and encourages local authorities to make full use of the robust powers they have to deal with unsatisfactory properties.

The Housing and Planning Act 2016 made changes to housing policy and the planning system to promote home ownership and boost housebuilding.

In April 2019 Theresa May pledged to abolish 'no-fault' eviction powers for landlords in overhaul of private rental sector in England which could lead to a change of government policy in respect of Section 21 of the 1988 Housing Act. This would represent a major reversal of a policy implemented during Margaret Thatcher's time in office. The proposed changes would effectively create open-ended tenancies.

#### **Private Sector Housing- Regional policy**

More Londoners are now living in private rented accommodation, with an increase from 11% to 26% between 1990 and 2018. Around 2 million people in London now rely on the PRS. The average private rent for a one-bed home in London is now more than the average for a three-bed anywhere else in England.

The Mayor of London and the Greater London Authority (GLA) is helping landlords to provide more choice and better standards of housing for both social and private tenants. The Mayor of London believes that renters deserve better protection from rogue landlords and agents, as well as a more secure and affordable private rented sector. A number of schemes are in operation such as the Rogue Landlord and Agent Checker, the London Rents Map

and the reporting tool. The Mayor of London has also published a blueprint report which sets out his vision for reforming London's private rented sector.

All London councils have agreed to participate in the Rogue Landlord and Agent Checker, which contains information about private landlords and letting agents who have been prosecuted or fined. Some enforcement records have been added to the Checker.

The Checker also includes information about landlord and agent offences submitted by the London Fire Brigade and the two letting agent consumer redress schemes (The Property Redress Scheme and The Property Ombudsman).

Anyone can report a rogue landlord or letting agent on the GLA website if the report relates to a rental property within London. The report is then sent to the right council for them to investigate.

The Mayor does not have any formal powers over the PRS but has called on the Government to change tenancy laws to make it harder for landlords to evict tenants without good reason.

The Mayor has developed a 'London Model' of tenure reform to improve security for these renters which proposes the introduction of open-ended tenancies and scrapping 'no-fault' evictions, so that landlords cannot evict tenants without a legitimate reason, as well as new and improved possession grounds so that landlords can continue to let their properties with confidence.

The Mayor has also asked the Government to give the GLA powers to bring rents down by allowing it to design and implement an effective system of rent control in London, drawing on proposals by the New Economics Foundation.

### **Private Sector Housing- Legislation**

Key legislation which is relevant to private sector housing includes the Welfare Reform Act 2012, Localism Act 2011, Energy Act 2011, Housing Act 2004 and Homes (Fitness for Human Habitation) Act 2018 (which amends the Landlord and Tenant Act 1985).

Many private tenants claim Housing Benefit or Universal Credit to help cover their housing costs. Many of these tenants are in employment. Local Housing Allowance (LHA) rates were introduced in 2008 and are the maximum amount that can be awarded to claimants in each area for their housing costs.

The Welfare Reform Act 2012 reduced the Local Housing Allowance (LHA) rates for private rented properties, capped the LHA rates at the 4 bedroom property size and extended the Shared Accommodation Rate age limit to 35 years.

The introduction of Universal Credit has changed how many welfare benefits are paid to working-age households and some private sector landlords are hesitant to accept tenants who claim Universal Credit because it is usually paid directly to the tenant and there is an in-built delay before the first payment.

LHA rates have been frozen for 4 years from 2016/2017. Many households face a shortfall between the maximum amount of Housing Benefit or Universal Credit that they can be awarded towards their housing costs and the market rent that they are charged and must make this difference up from the rest of their household income. Adults under the age of 35 years may find it more difficult to afford studio or 1 bed accommodation as in most cases

they will only be eligible to claim the shared room LHA rate.

The Council has recourse to Discretionary Housing Payments which can be used to assist households to cover a shortfall in their rent. These funds are not sufficient to do more than provide a temporary arrangement for certain eligible households until they are able to find more economically realistic, alternative accommodation.

The Localism Act 2011 amended the Housing Act 1996 and introduced the ability to discharge the homelessness duty through an offer of accommodation in the private rented sector and passed responsibility for the administration of Council Tax benefit to the local authorities, including decision about exemptions for empty properties.

The Housing Act 2004 and the Regulatory Reform (Housing Assistance) Order 2002 still remain the main influences on the way local authorities address private sector housing. The Reform Order, amongst other changes, gives local authorities greater freedoms to set their own framework to provide financial assistance rather than simply apply national rules.

The Housing Act 2004 introduced the Housing Health and Safety Rating System (HHSRS), which sets out a risk assessment that can be consistently applied by local authorities to identify hazards. The local authority has a duty to take appropriate action if a category 1 hazard is identified in a property. The HHSRS has 29 hazards against which properties are assessed and these are graded A-J depending on their severity. The Council's legal duty only applies to those which are the most serious and make a property non-decent (graded A-C as category one hazards).

The Housing Health and Safety Rating System (HHSRS) is a risk based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. It was introduced under the Housing Act 2004 and came into effect on 6 April 2006. It applies to residential properties in England. The HHSRS assesses 29 categories of housing hazard, each hazard has a weighting which will help determine whether the property is rated as having Category 1 (serious) or Category 2 (other)

The Homes (Fitness for Human Habitation) Act 2018 sets out the minimum property and safety standards required to let domestic property. The Act is designed to ensure that all rented accommodation is fit for human habitation and to strengthen tenants' means of redress against landlords who do not fulfil their legal obligations to keep their properties safe. Under the Act, the Landlord and Tenant Act 1985 is amended to require all landlords (both private and social) to ensure that their properties, including any common parts of the building, are fit for human habitation at the beginning of the tenancy and throughout the tenancy.

A property is deemed to be fit for human habitation by considering the matters set out in section 10 of the Landlord and Tenant Act 1985 and the 29 hazards set out in the Housing Health and Safety (England) Regulations 2005.

The government's position is that good landlords who provide decent, well-maintained homes that are fit for human habitation without serious hazards should be supported and that landlords who do not maintain safe properties prevent the operation of an effective and competitive rental market, for example by undercutting good landlords. The government expects standards to improve as tenants will be empowered to take action against their landlord and hold them to account where they fail to adequately maintain their property without having to rely on their local authority to do so.



Under the Housing Act 2004, the Council's intervention powers are limited in addressing conditions in the owner occupied sector unless significant risks to the health and safety of those living in surrounding properties are identified. However, the Council has a duty to act where poor conditions are identified in the PRS.

## **Residential Licensing**

Harrow Council operates three licensing schemes: mandatory, additional and selective.

Mandatory licensing of Houses in Multiple Occupation (HMO) is a statutory responsibility in respect of private rented properties occupied by 5 or more persons who form 2 or more separate households, and who share basic amenities. Mandatory licensing operates across Harrow.

Additional licensing of HMOs is discretionary and relates to private rented properties occupied by 3 or more people who form more than 1 household, and who share basic amenities. The use of additional licensing is based on local needs. Additional licensing operates across Harrow.

Selective licensing of all privately rented properties in specific areas is discretionary and is used to address management issues, fly tipping and anti-social behaviour. Selective licensing is currently used in the four wards in Harrow (Roxbourne, Roxeth, Wealdstone and Edgware).

Changes to HMO licensing came into force on 1<sup>st</sup> October 2018. The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018 extend mandatory licensing and introduce new mandatory conditions on minimum room sizes and refuse storage. These new regulations brought HMOs with 3 stories or fewer into scope. This resulted in around 300 additional HMOs within the new regulatory scheme in Harrow at the time. These were 'passported' through, free of charge on the same licence conditions that they are already subject to.

The mandatory conditions set out a range of requirements including a current and annual gas safety certificate, safe furniture and electrical equipment, working smoke detectors, a written tenancy agreement, references for new tenants, reasonable steps to prevent and ASB, repairs carried out within reasonable time and tenants having the landlord's contact details. The new mandatory conditions introduce requirements to comply with a local authority scheme relating to the storage and disposal of domestic waste from the HMO and to ensure that there are adequate bins for the number of households and rubbish is disposed of properly. However the tenant is still responsible for disposing of their waste.

The regulations also prescribe minimum room sizes. Licence condition requires licence holder to rectify any breach within a specified period if the room size conditions have been breached, the licence holder has not knowingly permitted the breach or the Local Authority has notified licence holder of the breach.

## **Enforcement**

The Housing and Planning Act 2016 introduced a package of new powers to help local authorities tackle rogue landlords and drive up standards in the sector. This includes civil penalties of up to £30,000 as an alternative to prosecution alongside extended rent repayment orders. On 6 April 2018, the remainder of the new powers were brought into force with the introduction of a database of rogue landlords and property agents and banning orders for the most serious and prolific offenders.

Civil Penalty Notices (CPNs) can be used as an enforcement tool. A penalty of up to £30,000 can be issued and the money reused for housing enforcement purposes. A CPN can be imposed as an alternative to prosecution for failure to comply with an Improvement Notice, committing an offence in relation to the licensing of Houses in Multiple Occupation or other types of housing, contravening an overcrowding notice or failure to comply with management regulations in respect of Houses in Multiple Occupation.

Harrow Council has statutory responsibilities for homelessness, licensing and enforcement. The main reason for homelessness in Harrow is loss of private rented accommodation and Harrow Council relies heavily on the PRS for temporary and permanent housing solutions. As affordability is a key challenge the impact of licensing and enforcement on landlord behaviour and market rent levels is monitored and there is regular liaison between Environmental Health and Housing Services.

Harrow Council is not able to provide financial assistance to owner occupiers wishing to improve the standard of their homes and it cannot enforce property standards in the sector unless they pose a threat to the health and safety of residents.

### **Private Sector Housing Objective 1: Increase the supply of privately rented accommodation, including bringing empty properties back into use**

The demand for PRS properties continues to grow and a vibrant PRS is important to meeting the immediate and longer-term housing needs of households for whom the sector will be the only choice given the high demand for and low supply of social housing. It is important to have a supply of good quality, well managed and economically realistic PRS housing in order to meet this demand. It is also important that the Council manages the expectations of applicants for social housing and, where appropriate, offers realistic advice and provides alternatives for households to meet their housing needs in the private rented sector.

The Council's local letting agency, Help2Let, works with landlords to increase the supply of affordable private sector properties for homeless households and those who are threatened with homelessness. Help2Let leases and manages properties on behalf of private landlords within the borough and the service finds tenants, manages and inspects properties and guarantees rent (with up to 2 months payment in advance). The scheme aims to bridge the gap between high demand for social housing and the lack of available homes. Harrow Council will continue to seek to increase the number of landlords using the Help2Let scheme and will develop new products and services in response to feedback from tenants and landlords and changes in the housing market.

Returning empty private sector properties to use is one way to increase supply. We will continue to develop measures to do this including the provision of financial assistance, advice, support and encouragement to owners. However as Harrow has a lower number of empty properties than the London average, increasing the supply in this way alone will not be sufficient to meet growing demand. It is therefore important that new and alternative ways of increasing the supply are explored when opportunities arise.

Properties can be empty for a variety of reasons but at a time of high demand and housing shortage they are a wasted resource. The Council offers advice, guidance and grants to encourage owners of empty properties to voluntarily bring them back into use. Empty properties can be reported to the Council who will endeavor to contact the owner.

Properties that are left empty can cause environmental issues (such as vermin and fly tipping), they can attract anti-social behaviour and squatting, and they may deteriorate and depreciate in value. The owner will be faced with the costs associated with these problems, as well as council tax and potential legal enforcement action.

Harrow Council offers various schemes and incentives to help home owners bring empty properties back into residential use and to carry out necessary repairs to bring properties to a lettable standard.

Grants are given to owners and landlords to bring their properties up to the government's Decent Homes Standard if they agree to rent the property through Help2Let for a minimum number of years (nomination period), typically between 3 and 5 years. Grants are subject to funding.

The Empty Property Grant offers up to £15,000 in exchange for a commitment to a 2 to 3 year letting agreement through Help2Let.

These grants are designed to provide financial support for the minimal works required to bring a property up to the Decent Home Standards and include renewing a defective kitchen or bathroom, renewing or repair a hot water system, rewiring, damp proofing, renewal of defective/damaged roofs, repairing or renewing rotten windows and doors and works to remedy category 1 hazards.

Legal enforcement action is a last resort and will include consultation with interested or affected parties. The 2004 Housing Act gives local authorities the power to use Empty Dwelling Management Orders (EDMOs) and Compulsory Purchase Orders (CPOs).

Returning empty private sector properties to use is one way to increase supply. We will continue to develop measures to do this including the provision of financial assistance, advice, support and encouragement to owners. However as Harrow has a lower number of empty properties than the London average, increasing the supply in this way alone will not be sufficient to meet growing demand. It is therefore vital that new and alternative ways of increasing the supply are explored.

### **Council tax**

Housing and Council Tax work together to identify empty homes. Properties that have been empty for two years or more have been charged a premium of 100% since 1 April 2019, in addition to the usual council tax charges that apply to these properties. This is intended to act as an incentive for owners of empty homes to bring them back into use.

Harrow Council will continue to review and improve how empty properties are identified and addressed. It will continue to seek funding that can be used to maximise the number of empty private sector properties brought back into use as affordable housing.

The Council will continue to offer advice and guidance to empty property owners in order to bring them back into use. Harrow's Help2Lease scheme can also provide management services for owners who are looking to rent out their properties.

This objective supports the Housing Strategy objective of 'Prevent and tackle homelessness and rough sleeping'.

## **Private Sector Housing Objective 2: Enable and enforce better housing conditions in the private sector**

Decent and well managed private sector housing is vital as it is widely recognised that poor quality housing can negatively impact on many areas of an individual's life, including their mental and physical health and wellbeing, their ability to gain and maintain employment and their educational attainment. This is especially the case for vulnerable households and those households with children.

The London Rental Standard was launched in May 2014 as a voluntary set of standards for landlords, managing and letting agents operating in London's private rented sector. It has since been discontinued. The current Mayor of London continues to support accreditation but has shifted the focus towards supporting authorities to effectively enforce against landlords and letting agents who fail to meet their obligations.

The London Landlord Accreditation Scheme (LLAS) is a partnership of London boroughs, landlord organisations and educational organisations to recognise good practice and improve conditions in the private rented sector. The scheme provides training and on-going professional development. It asks that landlords and lettings agents comply with a code of conduct and fulfil the fit and proper person requirement. Other schemes are available, such as the National Landlords Association (NLA) Accreditation Scheme.

The Council holds regular Private Sector Landlords' Forums and Conferences, aimed at making landlords aware of changes in housing policy which could impact them and their business. These will continue to be promoted to landlords with the aim of increasing attendance.

It is important to engage with landlords and tenants in the PRS in order to gain a better understanding of how the market works, identify priorities and improve the private rented sector. The Council will also seek to engage both landlords and tenants through the provision of advice and guidance.

Harrow Council will continue to encourage more landlords to become accredited and will explore options to incentivise this, where it is consistent with encouraging and developing the PRS in Harrow.

### **Promoting Tenants' Rights and Responsibilities**

The Council recognises the importance of promoting both the rights and responsibilities of tenants in the private sector. This will allow tenants to have more informed conversations with landlords and letting agents about their rights and responsibilities.

Harrow Council's social letting agency, Help2Let provides information sessions to tenants and potential PRS tenants about their rights and responsibilities. The sessions cover a variety of topics, such as what to do if there are problems in the tenancy or if difficulties with paying the rent, as well as information on utility supplies and tenancy deposit protection. The sessions aim to ensure that tenants are prepared for renting in the PRS and are able to deal with tenancy issues. The desired result is to reduce tenancy breakdowns and homelessness.

Harrow Council recognises that there is a small minority of lettings agents operating in the borough that deliver a poor service to tenants and landlords. Help2Let will continue to provide a professional and high-quality service to both tenants and

landlords, thereby offering an alternative to these agents, and will seek to expand the number of landlords involved in the scheme.

Harrow Council will provide support and guidance for private rented tenants and landlords. Guidance will be produced for both tenants and landlords on their rights and responsibilities, based on good practice examples on 'how to rent' and 'how to let'.

Harrow Council will continue to deliver training to Housing Needs customers on living in the private rented sector and will explore other ways to communicate key messages.

### **Private Rented Sector Enforcement**

The Council's preferred approach is one of enabling higher housing standards rather than enforcement. However, under the 2004 Housing Act and related legislation, local authorities have both legal powers and duties to deal with unsatisfactory housing conditions in the private sector.

The Housing Health and Safety Rating System does not differentiate between tenures and statutory notices can be served on both owner occupiers and landlords to require works to be carried out where unsatisfactory housing conditions (specific category 1 hazards) have been found. In practice the majority of action relates to privately rented properties, in which the Council's preferred approach seeks to enable and encourage landlords to undertake repairs or improvements to benefit tenants. The Council will continue to make full use of its powers to take action against those landlords who clearly and deliberately flout their responsibilities, and will review how this is done to ensure the process remains robust and effective. As part of this, the Council will review the extent of the "beds in sheds" problem in Harrow and respond appropriately.

Harrow Council can take enforcement action against landlords not responding to informal requests to improve the condition of their property. When the Council issues formal improvement notices, and this would be registered as a charge on the title of the property. It is hoped that this additional charge will deter landlords from non-compliance and result in fewer formal notices being served. The impact of this enforcement approach will be carefully monitored and reviewed by the Council.

Census data shows that the number of people is increasing far faster than the number of properties within the borough. This may cause overcrowding of some households. The Council monitors the levels of severe overcrowding and develops measures in response.

London Councils has revised its guidance on inspections of Bed & Breakfast and other emergency accommodation. This pan-London scheme called 'Setting the Standard' aims to ensure that accommodation which is being procured and accessed is of a consistent quality and meets agreed standards.

This objective supports the Housing Strategy objectives of 'Improve quality and standards, especially in the private rented sector' and 'Provide support and guidance for private rented tenants and landlords'.

### **Sustaining tenancies in the PRS**

We want to actively sustain tenancies and prevent homelessness arising in the PRS as a result of severe disrepair of tenanted properties.

For landlords who charge tenants rents at or near LHA rates we can consider helping with the cost of repairs, if the landlord cannot afford them and if it would prevent homelessness. We would normally expect the landlord to extend the tenancy period with the

existing tenant to a period of two years and take a tenant nominated by the Council if the current tenant leaves during that period.

Harrow Council will continue to explore new funding opportunities for private sector landlords in order to enable better housing conditions in the sector.

### **Private Sector Housing Objective 3: Meet the needs of vulnerable households living in the private sector**

Households Individuals with poor health or disabilities can be positively or negatively affected by accommodation and the care and support available to them. In an ageing society, it is important that the needs of vulnerable individuals in the private sector are adequately met and that households are supported to adapt their homes to meet future need.

This objective supports the Housing Strategy objective of 'meet the needs of older and vulnerable residents'.

#### **Welfare reform**

Harrow recognises that welfare reforms have had a significant impact on vulnerable households in the private rented sector. The Council will continue to monitor and respond to the impact of these changes on these vulnerable households.

Under welfare reforms, housing options for those under 35 years of age have been reduced as they may only be eligible for the shared room rate of the Local Housing Allowance on which Housing Benefit and Universal Credit are calculated. For some vulnerable households shared housing might not be appropriate and self-contained accommodation would be more appropriate for their needs. The Council will continue to assist these households where appropriate, such as through the use of Discretionary Housing Payments.

#### **Floating Support**

Floating support offers varying levels of assistance to help vulnerable households to settle into accommodation, live independently and sustain their tenancies. Floating support often assists people not eligible for statutory services and plays a role in preventing housing need.

There are currently specialist and generic floating support services available to people, usually for up to two years, but less funding is available for these services than in previous years.

Work has also been undertaken by Harrow Council and local partners to address hoarding and support residents who engage in hoarding behaviours.

#### **Home Improvement Agency**

Different schemes are available to help people who require adaptations and home improvements to stay in their own home. Harrow Council supports these residents through promoting and delivering major adaptations (through either Disabled Facilities Grants or the Housing Revenue Account), the handyman scheme and the 'Staying Put' scheme.

Examples include level access showers, through-floor lifts or the construction of extensions to provide additional bedrooms allows households to continue living independently in their own homes and reduces the need for costly residential care.

The Disabled Facilities Grant (DFG) programme provides funding for properties to be adapted to meet the needs of disabled people (non-council tenants) to live independently in their own homes, up to a maximum grant of £30,000. Adults applying for the grants are means tested to assess whether they are able to contribute to the cost of works, however children do not have to undergo the means test.

Harrow Council will continue to monitor and make improvements to these schemes where necessary.

#### **Climate change, energy and fuel poverty**

Harrow Council's work on climate change, energy and fuel poverty in all tenures can be found on page 7.

#### **4. Partnership working**

Housing and homelessness are complex issues that require partnership working with a range of organisations.

The Council will continue to work with stakeholders and partners across Harrow, West London, and London and nationally to address housing, homelessness and rough sleeping challenges, including local statutory agencies, the voluntary and community sector, the West London Alliance, West London Housing Partnership, London Councils, the Greater London Authority and MHCLG.

#### **5. Equalities**

An Equalities Impact Assessment has been completed on this Housing Strategy, taking into account the evidence base and the consultation outcomes.