



Report to Scrutiny

Item Number:

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No

Subject of Report: Housing Supply and Demand in Ealing

Meeting: Scrutiny Review Panel - Inequalities
8th September 2016

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Director Responsibility: Mark Wiltshire, Director of Community Safety & Housing

Brief: To consider the issues (e.g. demand/supply, affordability, overcrowding and tenure security) pertaining to housing in the borough and make recommendations accordingly.

Recommendations: The Panel is asked to:

- consider and comment on the issues relating to housing in the borough;
- deliberate the actions that the Council (and its partners) is taking to redress the situation;
- make recommendations for further improvements where necessary; and
- establish whether any supplementary information is required at a future meeting.

Housing Supply and Demand in Ealing

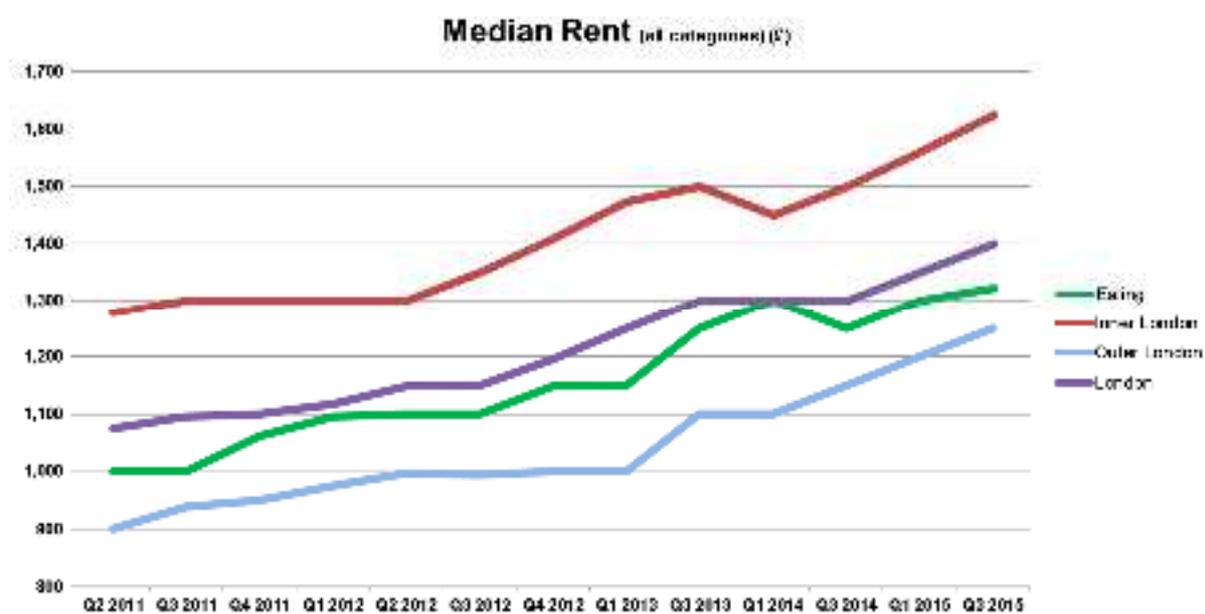
1. Housing Demand in Ealing

1.1 Central government has been implementing a programme of Welfare Reform since 2010. This programme has and will continue to make significant changes to Housing Benefit and other means and non-means tested benefits for people of working age including tax credits and disability benefits.

1.2 These changes have had the effect of squeezing the household incomes of benefit dependent households generally but have also had a direct impact on the amount of money available to households to pay their housing costs.

1.3 At the same time there has been a huge increase in property prices and rent levels in London. The ONS index of private sector rents indicates that average rents grew by 4.1% in London in the year to September 2015, compared to 1.9% in the rest of England. With consumer price inflation running at -0.1%, London's rents grew by 4.2% in real terms, only slightly down from a record rate of 4.3% in the year to August 2015. Rent increases over the last 4 years are indicated in table 1 below.

Table 1 – The increase in private sector rents since 2011.



Source: Official government statistics.

1.4 The combination of benefit cuts, particularly in relation to the amount of housing benefit payable, and an over-heated property rental market have contributed to increased homelessness through loss of private sector tenancies

1.5 The Welfare Reform and Work Act received royal assent on 16th March 2016 and makes provision for a further benefit cap. Benefits will be capped at an annual limit of £23,000 for people resident in Greater London and £20,000 outside London (£15,410 and £13,400 respectively for single-person households). In addition proposals to freeze Local Housing Allowance (LHA) rates that determine the maximum amount of housing

benefit payable were announced in the Summer budget. These measures will inevitably lead to additional homelessness from Autumn 2016 onwards,

2. Trends in Homelessness

2.1 Since 2012/13, the Housing Demand Service has seen a significant increase in the number of homeless applications year on year. Over the last year there have been fewer acceptances than in 2014/15, but this reflects a higher number of successful preventions as we work with clients to sustain their tenancy or assist them to find alternative more affordable accommodation before they lose their home. We aim to improve our prevention activity still further in future months by dealing with private rented sector breakdown at the earliest possible opportunity.

Table 2 – The increase in homelessness in Ealing since 2012.

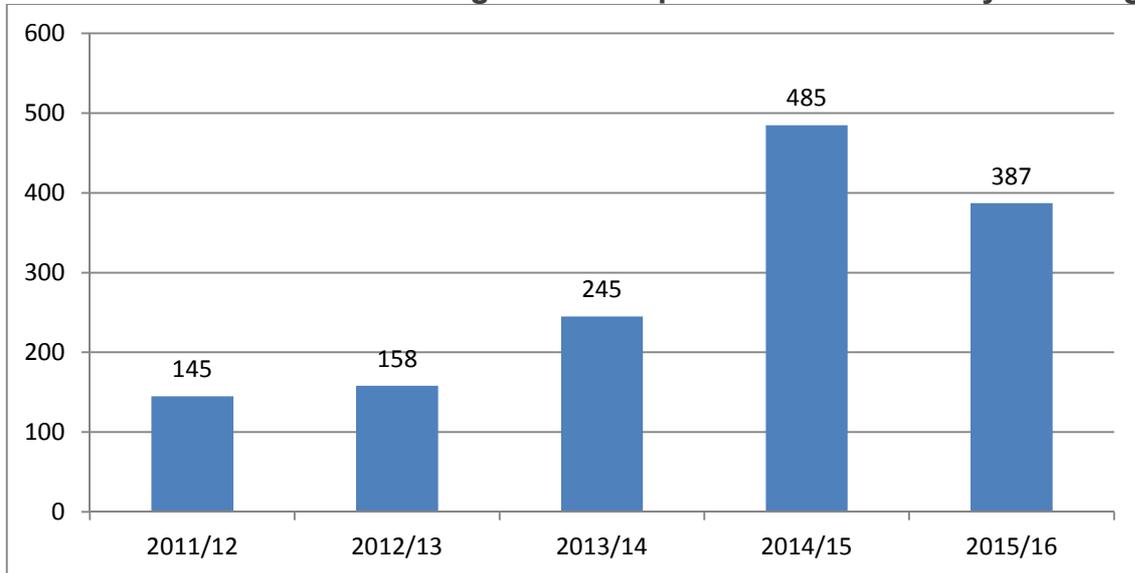
Metric	2012/13	2013/14	2014/15	2015/16	April to July 2016/7
<i>Number of Homelessness approaches</i>	2460	2931	3612	3271	963*
<i>Number of Homelessness applications</i>	1107	1893	2008	2398	727
<i>Number of Homelessness acceptances</i>	381	596	944	685	265

* This figure does not include the cases we are continuing working with at an earlier stage, through the Front-end prevention service. We offered prevention interventions to 503 families in the 3-month pilot phase of our enhanced prevention approach

2.2 Demand from homeless households has increased and this is reflected in higher numbers of placements into temporary accommodation since 2011/12 when the first changes started to impact. Around 78 households were placed in temporary accommodation each month in 2015/16 compared with an average of 25 each month in 2011/12. The average so far in 2016/17 is 91 placements per month.

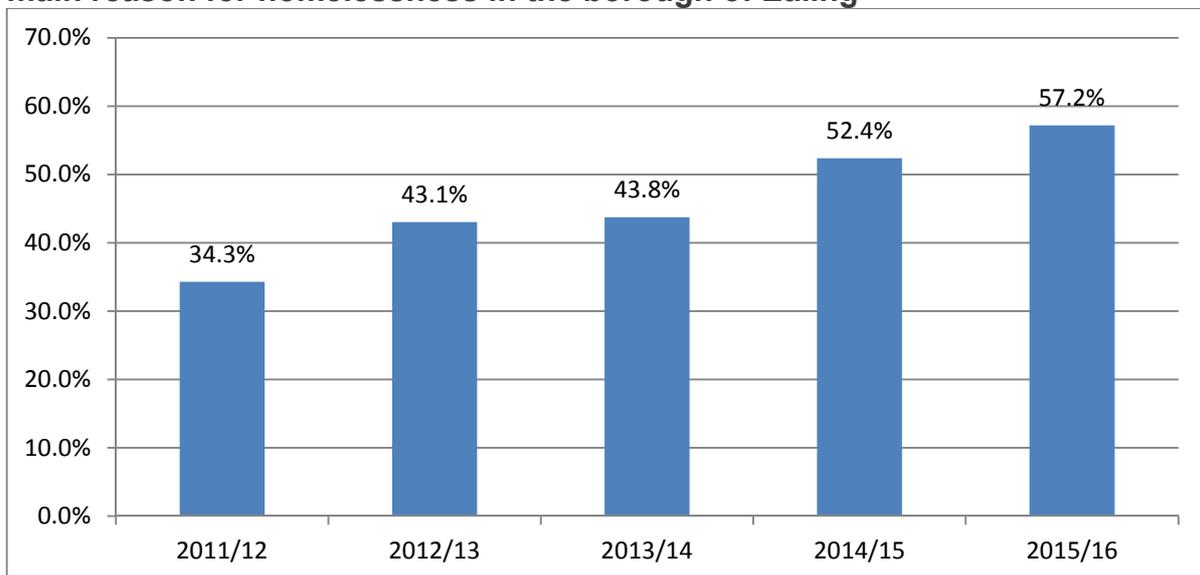
2.3 The increase in homelessness is directly attributable to an increase in the number of households becoming homeless through loss of assured short-hold tenancies in the private sector as they come to an end. Loss of an assured short-hold tenancy is the main reason for homelessness for nearly 58% of all homeless cases in Ealing.

Table 3 – Homelessness through loss of a private sector tenancy in Ealing.



Source: P1E stats

Table 4 – Percentage of accepted homeless cases giving loss of AST as their main reason for homelessness in the borough of Ealing



Reduction in LHA rates

2.4 The reduction in LHA rates has already had an impact. Between 3.9% at worst and 23.9% at best of all properties across the Borough were affordable to benefit dependent households in 2015/16. This figure is likely to fall to between 0% and 5% in 2019/20 as a result of the 4 year freeze in the amount of housing benefit payable. The pressure on larger units will be particularly acute in years to come and if London Councils predictions set out below prove to be correct very few larger properties within the borough will be affordable by 2019/20.

Table 5- Percentage of affordable properties in Ealing

LHA	2015/16	2016/17	2017/18	2018/19	2019/20
1 bed					
Inner West	23.9%	19.1%	12.5%	5%	3%
Outer West	17.6%	10.9%	5.9%	5.5%	3.5%
2 bed					
Inner West	21.7%	13.4%	8.8%	6%	5%
Outer West	11%	5.9%	2.1%	1.6%	1.1%
3 bed					
Inner West	9.3%	6.1%	3%	1.2%	0.7%
Outer West	15.9%	10%	7.1%	4.4%	2.4%
4 bed					
Inner West	3.9%	0.9%	0.2%	0 %	0 %
Outer West	13%	10.3%	5.4%	2.1%	1%

Tracking Welfare Reform –London Councils (October 2015)

Four Year Benefits Freeze

2.5 The four year rent freeze will result in

- Additional numbers of households becoming homeless from the private sector as they will no longer be able to afford market rents. For each percentage fall in LHA over 400 households could potentially (if they are benefit dependent) become homeless as their rent will no longer be covered by housing benefit
- A requirement for more generous Incentives to landlords if we are to retain tenancies to prevent homelessness or secure properties (either TA or private rented sector lets) within our own borough to accommodate people. Even when we do successfully accommodate households in borough the likelihood is that they will re-present as homeless at the end of their Assured Short-hold Tenancy.
- Less properties being affordable and therefore suitable for our clients and more households will have to relocate out of London. Where this is not possible for reasons of suitability Ealing will have to meet the rental shortfall so there will be additional costs to the Council.
- Where the Council is forced to place a household in cheaper more affordable areas out of London there will be a risk of legal challenge and associated costs

Future Homelessness Demand

2.6 It is impossible to predict levels of homelessness demand with certainty. However there are good reasons to think that homelessness pressures from the Private Rented Sector (PRS) resulting from caps and LHA freeze will continue to impact adversely on levels of homelessness, temporary accommodation bad debt and the cost of temporary accommodation.

2.7 We can assume that homelessness due to loss of an AST will continue to increase and could double over the next 4 years through the combined impacts of further caps and the four year freeze in LHA rates. According to London Council's estimates around 3% of additional properties will become unaffordable to benefit dependent households each year in Ealing over the next 3 years which equates to around 1,000 properties each year. Although many households will find their own alternative accommodation many will turn to the Council for assistance and may end up in temporary accommodation.

3. Potential Impact of welfare reform measures yet to be introduced

New benefit caps

3.1 The reduction in cap from £26k to £23k will increase the level of uncollectable debt. There will be are likely to be 139 additional capped cases already in temporary accommodation and with 963 additional capped cases in the private sector it is possible that a significant proportion of these may end up in temporary accommodation. Many will already have had their tenancies sustained under the existing cap but will once again face homelessness as the new caps impact. In addition there will be an additional £3,000 per annum of uncollectable debt on existing capped cases in temporary accommodation amounting to £0.495m each year. Housing's potential HB loss on all capped cases in temporary accommodation is £1.337m.

The introduction of Universal Credit

3.2 Where households are accommodated in temporary accommodation, the Council can apply for rent contributions to be deducted from UC payments and paid direct to the Council and there will be an increased risk of the monies not being used to make rent payments It can, however take 6 weeks to get cases into payment (payments are made in arrears) and pilot authorities have stated that their rent collection rates have been reduced severely in some cases to less than 60% as a result of administrative delays. These administrative difficulties may be resolved in the longer term but stays in temporary accommodation can be fairly short and payments may not be resolved before a family moves on.

Squeezed housing benefit income

3.3 As benefit income has been squeezed and expected tenant contributions have increased, Housing Demand has experienced an increase in the level of arrears and consequent bad debt. Bad debt provision for temporary accommodation rose by £900k in 14/15, and £1.2m last year. This year, we expect the rise to be about £1.5m after the impact of the new benefit cap is taken into account. Overall, we anticipate between 350 and 700 additional cases of homelessness between autumn 2016 and autumn 2017

4. Our approach to Homelessness Prevention

Definition of prevention

4.1 Homelessness prevention can either mean stopping foreseeable homelessness from occurring, by enabling a customer to remain in a current home; or facilitating a move to a suitable alternative before the need to accept a statutory homelessness duty occurs.

4.2 The prevention of homelessness is advantageous to most customers and offers financial savings related to the future cost of offering temporary accommodation if homelessness occurs. As a result it is the main focus of the front-end Housing Solutions service.

4.3 It is important, however, that prevention activities are lawful and do not amount to improper gatekeeping. Once a customer is within 28 days of becoming homeless, statutory duties apply and the acceptance of a prevention offer is voluntary.

How do we prevent homelessness?

4.4 The following principles apply:

- Early intervention to seek a resolution before crisis point
- Painting a clear and accurate picture of the realities of the housing opportunities available if a customer becomes homeless, so that customer choices are fact-based.
- Negotiating with landlords and other excluders to prevent or delay homelessness, with an initial focus on understanding issues, offering support and cost-free intervention
- Where applicable, offering payments from our homelessness prevention fund to induce a landlord not to end a tenancy. This can include paying off arrears or offering a sum which bridges some of the gap between the contractual rent or LHA rate and the market rent.
- Where options to preserve the current home are not possible, full information and support is offered to help customers to seek their own alternative housing, to avoid becoming homeless. This includes advise about rent levels and LHA rates in areas the customer might consider living; assisting customers to apply for a Discretionary Housing Payment to assist with a deposit or rent in advance; or providing similar assistance from our homelessness prevention fund

4.5 The Housing Demand Service is now working with clients at an earlier stage and even more intensively than in the past. A new first contact prevention service has been adopted since April 2016, from within existing staff resources. The Housing Solutions service is working with households as soon as they approach the service when they are at risk of losing private rented sector accommodation. Landlords are contacted immediately by the service with a view to sustaining the tenancy and where this is not possible clients are given advice and supporting materials about where they should look for accommodation they can afford, how to find their own accommodation and what assistance is available for rent deposits or rent in advance if necessary

Homelessness prevention for newly capped cases in the Private Sector

4.6 The Local Welfare Assistance Team and Housing Demand Solutions Service will be working together to prevent the new cohort of capped households in the private sector becoming homeless. Our aim is to identify and prioritize those households that are most likely to become homeless and work with them at an early stage.

4.7 Larger families with highest shortfalls will be prioritized and assisted into employment where-ever possible. They will also be prioritized for DHP support. If employment is not a viable option then the Housing Solutions service will support the family to find their own affordable alternative accommodation. Our aim will be to co-ordinate an approach and prevent homelessness where-ever possible.

4.8 The two services (Housing Demand and Local welfare Assistance) are jointly providing workshop intervention for the newly capped households, giving them an early understanding of their financial and housing prospects, with the aim of promoting early self-help behaviour. The two services are also jointly providing an open day for families affected by benefit caps, on 14 September 2016, where a range of statutory and voluntary services will provide information, advice and help, into employment or to avoid becoming homeless

5. Issues affecting the prevention of homelessness

Existing landlords can seek other tenants and better financial deals

5.1 Preventing homelessness has become much more difficult because of Local Housing Allowance (LHA) changes, which have reduced the amount of rent Housing Benefit will pay on a property and Welfare Benefit caps, which have limited the maximum amount of benefit (including Housing Benefit) which any household can claim.

5.2 Many private tenants have already discovered that their current home is no longer affordable and some have got into large amounts of arrears by the time they approach us. We are still prepared to offer landlords amounts to pay off arrears and cover shortfalls from our homelessness prevention fund, where appropriate- but the fund is not large enough to cover all the gaps the benefit reforms have created. Additionally, landlords are likely to be exasperated and distrustful of the ability of welfare claimants to pay rents, at this stage. We have occasionally managed to get landlords to set aside possession proceedings and occasionally to call off bailiffs but many are not willing to co-operate, by this stage.

5.3 Landlords in London are not reliant on customers who claim benefits. There is large market of tenants who are working, including younger house-sharers, who can often afford higher rents than family could. Reduced access to mortgages and rising property prices have augmented to demand from working renters.

5.4 Another factor is that all London authorities are in desperate need of landlords, to supply them with accommodation for those who have become or are about to become homeless. Councils are under a statutory duty to offer accommodation if homelessness has occurred and are also under pressure to reduce the high cost of using emergency B&B accommodation (and adhering to the requirement in law not to use B&B for longer than 6 weeks, for families). Also, all Councils are focussing on using the private sector for homelessness prevention. This means that Councils are competing to acquire properties and are forced to pay ever-higher incentives to procure the limited supply available. Although a pan-London agreement is meant to prevent other Councils exceeding the local offer, this applies only to temporary accommodation offered under homelessness legislation, not to properties sought for prevention uses. Even the agreement relating to temporary accommodation is difficult to police or enforce.

Households at risk of homelessness struggle to find alternative affordable housing.

5.5 The second impact is that, for all the same reasons, customers are unable to find affordable accommodation of their own to resolve their housing problem. Previously, a big proportion of our customers could do so, with or even without, some help from the Prevention Fund towards the deposit or rent in advance.

5.6 Currently, most rented accommodation in London and its immediate environs is unaffordable, particularly to welfare claimants. Rents have not reduced and there are enough prospective tenants who are working to allow landlords to keep them at higher levels.

5.7 Although the aim of the policy was to encourage people into work, jobs are not readily available to those without experience and skills. Finding work would assist customers by ensuring that their individual welfare benefits were not capped. However, the impact of changes to LHA rates would still severely impair their chances of finding affordable accommodation locally.

5.8 Equally, there is limited enthusiasm amongst those at risk of homelessness to seek affordable accommodation further afield. Most have a strong desire to remain in the area they know.

The correlation between prevention and the reduction of our demand for temporary accommodation is not direct

5.9 One of our key challenges is to target our resources effectively at families who, without our intervention, would have a high likelihood of going into emergency and temporary accommodation. This means making predictions about which households will not reach that point and this can be difficult.

5.10 Officers use the known facts about the family and the information they gather from a landlord, about the imminence of actual homelessness, to make a prediction about the probability that the family will not be prevented from becoming homeless. They also calculate the likely costs of a stay in emergency accommodation and, if the household seems likely to be accepted for the full housing duty, under homelessness legislation, the costs of longer-term self-contained housing. This gives us a guide to the level of expenditure which would be justified, in 'spend-to-save' terms, from our homelessness prevention fund. However, there is no accurate way of knowing whether some of these families might have resolved their own problems, while others who we believe have greater resilience to pursue self-help options sometimes still become homeless.

5.11 By intervening earlier, we are both improving our chances of influencing a landlord's decision on ending a tenancy and increasing the likelihood of using resources to support a greater number of families who might have helped themselves.

5.12 There is also a risk that the payment of incentives to induce landlords not to end tenancies will become the norm and that a percentage of landlords in the know will issue notices in order to become eligible to receive such payments. There is anecdotal evidence that some landlords we approach already have a clear expectation of receiving payment. This could inflate the numbers we see and help without impacting on true homelessness.

Statistics about preventions

5.13 The following table show the number of cases in which the outcome was a successful prevention of homelessness

Metric	2012/13	2013/14	2014/15	2015/16	2016/7 April-July
<i>Number of Homelessness Preventions achieved</i>	882	676	758	1081	287

5.14 The figure for the year to date, a third of the way through the year, projects a lower number of preventions than last year. Although there is no doubt that the increasingly difficult housing market and forthcoming additional welfare caps, coupled with the LHA freeze are making private rented sector preventions difficult, it should also be borne in mind that we are beginning our work with families earlier, when the threat of homelessness is further in the future and this means that we would envisage seeing the impact of our work later in the year.

6. Potential Future issues

Changes to homelessness legislation

6.1 Proposed changes to English homelessness legislation have been introduced as a private member's bill, following a government commissioned report by Crisis. Although the detailed changes are not yet known, the following significant changes have already been adopted in Wales and are likely at least to an extent, to provide a blueprint.

- The introduction of a statutory duty to prevent homelessness, including the ability to set out the key steps applicants are required to take to help themselves
- The duty to take statutory steps in respect of threatened homelessness to commence 56 days before homelessness is expected to happen, instead of the current 28.
- An extension of statutory responsibility to prevent homelessness for single people, currently not considered to be in priority need. A possible extension of statutory duties if those in this category do become homeless, including the duty to provide accommodation for four or eight weeks.

6.2 If duties are extended in these ways there could be a significant increase in the number of people seeking help from the Council. Many single people currently do not approach the Council because they are aware that they will not receive full statutory assistance. It is likely that increased duties would lead to a big increase in approaches from single people.

7. Temporary Accommodation Strategy

7.1 Over the last 2 years it has become more difficult to acquire long term temporary accommodation leased units within available subsidy and to assist benefit dependent households with a private sector home. We have lost many long term leased properties as leases have come to an end and landlords have withdrawn accommodation to offer to the more lucrative private rented market, as the rents being requested are significantly above Local Housing Allowance levels. Increasingly we have accommodated households outside of Ealing Borough, and more recently outside of London where there is a more affordable supply of accommodation, especially for larger sized households.

7.2 Whilst the Council is mindful of its responsibility to acquire accommodation within its own borough or as close to as possible, we recently implemented Cabinet approved Temporary Accommodation Placement and Acquisitions policies to set out clearly where applicants can expect to be placed and supporting Officers in their decision making process as to what is suitable accommodation. This will help to manage expectations of households who may have lived in Ealing for a long time but may not be placed locally.

7.2 Council Officers are taking a number of different approaches to acquiring additional temporary accommodation unit, with some of the actions set out below:

Building on the hostel portfolio to provide an alternative to B&B

7.4 The Council has reviewed all its existing owned hostel stock, ensuring that it meets decent homes standards and to consider potential site redevelopment options. We are about to begin a major refurbishment of the Poplars Hostel in Greenford, increasing the capacity from 32 rooms with shared facilities to a 59 self-contained units over the next 18 months, with the additional provision of a social hub for local residents to utilize, increasing the quantity and quality of the hostel and making better use of the available site.

7.5 We are working with colleagues in other Council departments responsible for property assets and management to ensure that possible use of existing Council resources for temporary accommodation is considered. We have transformed a former storage unit above a Council sport's pavilion into a 4 bed unit; utilised a former staff flat above a Social Club to create a 2 bed unit, and converted empty shops on existing Council estates into 6 flats being used as temporary accommodation. We have redeveloped a former Social Services offices and care accommodation into a hostel providing 22 units. Officers attend property asset management meetings across the Council and appraise all possible options when vacant units become available, and are currently considering conversion of a former children's' respite centre to a hostel.

7.6 We have in previous years leased a hostel from a Registered Provider, leased a HMO property from a provider developer and purchased a hotel in the Borough, to provide hostel type accommodation. The Council has instructed a property agent to investigate further purchases by reviewing hotel accommodation placed for sale along with contacting current providers to ascertain their interest in selling their current properties. We undertake a financial feasibility exercise for all potential purchases to consider value for money, savings to the temporary accommodation budgets and future usage options should homeless numbers reduce significantly.

Modular Homes

7.7 Modular homes will provide 100 units for households currently in B&B across 3 sites in the Borough. Although there have been delays in delivering the scheme the units are expected to be installed and occupied on two sites by December 2016 and remaining site in March 2017, provide a high quality and innovative alternative to B&B accommodation. The Council is leasing the units, so can either hand them back once the land is required for alternative use, or could be moved to another vacant site so extending the usage of modular homes.

Use of Regeneration Units

7.8 We have continued to make use of regeneration units on Council housing estates and these generate income for the HRA and provide good quality temporary accommodation. The Council manages a large number of the units and work in partnership with two Managing Agents to manage the remaining units at no cost to the Council. The use of empty units has helped to ease the cost of TA over the last few years, reduce void related costs such as security, Sitex and property damage, and has provided an income to the Housing Revenue Account paid by the Managing Agents.

7.9 The Council has approached local Registered Providers regarding any vacant units, which they may consider selling or are decanting in preparation for regeneration. The Council currently has 9 units on Friary Park estate leased to be used as temporary accommodation whilst the Registered Provider considers its regeneration programme.

Property purchase scheme

7.10 We have purchased 77 properties in the private sector. Of the 77 properties purchased, 49 of them were purchased within the Council's boundary (64%) and 15 of these properties are on regeneration projects that the Council is involved in.

7.11 The properties are managed within the existing resources of the Allocations and Accommodation Service and have provided an important source of suitable affordable temporary accommodation at a time when acquiring private sector accommodation for temporary accommodation has become increasingly difficult.

7.12 The Council has extended the existing property purchase scheme with the acquisition of up to 20 additional properties at a cost of £5m. (Cabinet report – Temporary Accommodation Placement Policy May 2016.). In addition Cabinet December 2015 approved the principle of bulk purchase to boost property supply and sites are being identified.

Engaging with private landlords.

7.13 We continue to engage with existing private landlords and are actively looking for new landlords and letting agents that we can acquire properties from. As a result of a DCLG grant, we are in the process of appointing an additional 2 Acquisitions Officers to find more accommodation in new geographical areas where accommodation supply is affordable to low income households.

7.14 Currently we are developing a marketing strategy to increase awareness of the Council's offer to private landlords, setting out clearly the options for landlords to offer their properties. We have revised our annual landlord forum based on feedback, to a model of direct engage with landlords (rather than a multiple presentations format), along with services relevant to supporting landlords in managing their properties.

Sub regional and partnership working

7.15 In more recent years, we have been working closely with local Councils to pool knowledge and expertise, and to ensure consistency in the service and financial offers made to landlords, so that we are not out bidding each other. Over the past 18 months, London Councils has led on the implementation of a London wide agreed price structure for leased and nightly rate accommodation, so that Councils do not breach the locally agreed rates.

7.16 On a West London sub regional basis, an agreed rental price framework has been in place for 3 years for agreed providers to offer temporary accommodation to the 7 West London Councils, both inside and outside London. The framework has been revised from a standard procurement scheme to a dynamic processing system, allowing new providers to be assessed to join at any time, rather than waiting for a new framework to begin in future years.

7.17 Due to restrictions that the government has placed on Local Housing Allowance, most private tenancies in London are beyond the means of people who are solely reliant on benefits for their income. Local Councils are now being priced out of the London housing market and the development of additional non-market or sub-market supply is slow and insufficient to meet demand from those priced out of the market. Increasing Councils are looking to outside of London for a supply of affordable accommodation to offer to residents.

7.18 Currently the West London Councils have employed a Project Officer to facilitate the procurement of privately owned accommodation for use by homeless households who are owed a housing duty or potentially owed a housing duty by West London authorities outside of London. The preferred method is to have a small number of providers who can acquire accommodation, and provide the transporting and resettlement services to move and settle households into their new accommodation in one service package to ensure tenancy sustainment.

7.19 The project is also looking at low demand social housing across the country where households could move to either directly or after a short period in their new area, as well as an IT portal where landlords outside of London could advertise their accommodation, and local households could apply to move in a proposed similar way as Locata advertises social housing in Ealing. The project is in its early stages and has not as yet delivered any properties, although a considerable amount of the ground work of speaking with providers, researching an IT solution and establishing a service specification to set out exactly what service is required.

8. Overcrowding

8.1 Ealing Council's Housing Allocation Policy recognises priority for households who are currently overcrowded, with either an award of Band B or Band C depending upon their circumstances. This is in accordance with Government guidance on allocation of social housing, which stipulates that priority must be awarded for reasonable preference groups such as those overcrowded, statutorily homeless or having a medical condition. Ealing's Housing Allocation Policy awards Band B only to Ealing Council tenants who are statutorily overcrowded to prioritise alongside our landlord duties whilst all other households of all tenures are awarded Band C.

8.2 Currently there are 3,112 households registered with the Council who have been assessed as living in overcrowded conditions. This equates to just over one quarter of all applications on the housing register (total of 11,681 households registered) and represents a small increase on the previous year. 62 households have been assessed as Band B, with the remaining 3,050 households awarded Band C. In terms of bedroom size need from the group, the following housing is required to meet current assessed need.

Table 6-overcrowding households registered on the housing waiting list

Bedroom Size Need	Total of current applications on Housing Register
2	1150
3	1190
4	401
5+	101

8.3 In total, 23% of social housing lets in 2015/16 were to overcrowded households (compared to 16% in the previous year), which is a fair allocation of lettings to this group in comparison to the number of applicants prioritised as overcrowded on the housing register and with the number of social housing lets available to the Council. These figures do come with a caveat that overcrowded households may sometimes fall into other priority categories, e.g. an accepted homeless applicant residing in overcrowded temporary accommodation, however the priority is likely to be recorded as homeless on the housing register.

Table 7-number of overcrowded households housed by Ealing Council

Bedsizes	0	1	2	3	4	5	Total
Band B rehoused in 2014/15	0	0	0	4	6	1	11
Band C rehoused in 2014/15	8	48	49	13	4	0	120
Total of all social lettings in 2014/15							802
Band B rehoused in 2015/16	0	0	3	7	2	1	13
Band C rehoused in 2015/16	4	85	71	14	8	0	182
Total of all social lettings in 2015/16							837

Meeting the accommodation needs of overcrowded households

8.4 The Council's Housing Demand service employs a Housing Initiative Officer to work with overcrowded Council tenants to investigate and identify housing solutions aimed at reducing the impact of overcrowding. Some of the advice can be very practical, in terms of making best use of their available housing and provision of space saving furnishings as a way of obtaining greater space, alongside assisting to find storage units and decluttering within their existing home. Working in partnership with Landlord Services, the Officer will put forward households where additional works such as a loft conversion and/or ground floor extension will alleviate the overcrowding. The Council has set aside HRA funding and since beginning this project, 11 properties have been extended allowing the existing households to remain in their current home.

8.5 Where there are no options to remain in the current property, the Council works in partnership with Shepherds Bush Housing Group to allow for a young person within in the household (usually between 18 and 25 years old) to move into a 2 year placement in social housing, and work to obtain the skills and employment to be able to reside independently. This scheme has been successful in previous years allowing young people to achieve their employment goals along with finding longer term housing solutions in the private rented sector rather than return to family home.

8.6 The Housing Initiatives Officer will advise on other housing schemes which may be able assist in finding a longer term solution. For Council tenants, the pan London GLA administered Housing Moves allows for households to bid for social housing across London. Ealing Council is a member of Homefinder, which allows for Council Tenants and accepted homeless households to bid for available social housing across the country, of which Ealing has moved 14 households to date and is the most successful London Council using this scheme. Another option is mutual exchange, and the Council works with Homeswapper to register households that would like to move via exchanging with another social housing tenant. Currently there are 727 Ealing tenants registered with Homeswapper of which 222 households are assessed as overcrowded in their current home.

8.7 A further core piece of work undertaken by the Housing Initiatives Officers is to work with Council tenants who are currently under occupying their council property. At present there are 225 households who have been assessed as under occupying, and have been awarded Band A priority. The Officer provides an enhanced service, including an incentive to downsize, removals organised and paid for and assistance with utility services cancellation and reconnection. This approach has been successful in assisting 36 households to move in 2014/15 and 58 households to move in 2015/16. With some current households releasing up to 3 bedrooms should they move, this will increase the supply of larger units of social housing to be re-let to those households in greater housing need.

9. Supporting residents to access affordable, well managed social and market rented homes

9.1 An important aspect of our homelessness prevention activity is in supporting people to find a suitable long term home in the private sector. Our support includes an income and expenditure assessment to ensure that property is affordable advice on affordable areas, useful websites and how to search, advice about approaching landlords and attending viewings. We periodically invite households facing homelessness to participate in workshops offering advice and guidance with staff on hand to provide support.

9.2 We actively acquire private sector accommodation for households in temporary accommodation to end our homelessness duty. Properties must be suitable for the household and this is defined by the Homelessness (Suitability of Accommodation) (England) Order 2012.

9.3 In some cases clients are able to remain in private sector accommodation in the borough but it is likely that as market rents increase and housing benefit payments are frozen the only sustainable option particularly for larger families is for households to move out of Ealing and probably some distance out of London.

9.4 The work of the Temporary Accommodation Cost reduction team was set out in the June Cabinet report. The team is focusing on the 385 highest cost cases each losing over £110 a week in temporary accommodation funding for this team will come to an end at the end of November. After six months of operation:

- The team has acquired private sector accommodation for 36 households in the borough of Ealing
- The team has acquired accommodation in the private sector outside Ealing for 28 households
- Although 266 households have been assisted to find their own private sector accommodation only 8 households have successfully found their own accommodation assisted with funding for deposits. The team offers on-going support to households seeking their own private sector accommodation
- 25 households have been assisted with their application for social housing and have bid successfully

9.5 We aim to acquire an additional 20 private sector lets each month to move on households on from B&B and hostel accommodation.

PRS measures in the Housing & Planning Act 2016

9.6 The Housing & Planning Act 2016 includes a package of measures to tackle rogue landlords and property agents including:

- Banning orders for most prolific offenders – offences include assault, fraud, and Category 1&2 hazards under the HHSRS
- Compilation of a database of rogue landlords/property agents Not public, accessed only by DCLG and Local Housing Authorities (LHAs).
- Civil penalties of up to £30,000
- Extension of Rent Repayment Orders to cover situations where:
 - tenant has been illegally evicted or harassed, or landlord used violence to obtain entry;
 - landlord has failed to comply with a statutory notice, eg an Improvement Notice; or
 - landlord has breached a banning order.
- Tougher fit and proper person test for landlords of licensed properties to include 'Disclosure and Barring Service' check

- Tenancy Deposits Protection data sharing: new powers to enable LHAs to receive information from tenancy deposit schemes about tenancies in their areas.

9.7 Within Ealing we have already delivered the following actions around improving the PRS:

- (a) Operated an additional licensing scheme for small HMOs. This scheme ended in 2015 and following consultation Cabinet agreed in July 2016 a new borough wide additional HMO licensing scheme and a smaller selective licensing scheme across five key wards.
- (b) Established the outhouse integrated enforcement team which developed a planning and property regulation joined up response to tackle poor housing. This led to a new multi-agency response to the challenges being introduced.
- (c) Received DCLG funding to tackle rogue landlords, delivering early morning and late evening co-ordinated multi-agency inspections of multi-occupied premises and outhouses.
- (d) The Council works across enforcement and advice services to deliver landlord accreditation schemes. Ealing has been recognised with the highest number of accredited landlords for a number of years now.

9.8 Through new ways of working with PRS landlords and agents we are also seeking to identify housing which is suitable for our supply needs and looking for collaborative ways of working.

10. Increasing housing supply: delivering new homes in Ealing

10.1 The latest housing trajectory forecasts that 7,035 new homes will be completed over the five year period between 2015/16 to 2019/20. This exceeds the GLA's target of 1297 homes per year, totalling 6485 over the 5 years.

Affordable Homes

10.2 There are three main routes to the provision of affordable homes:

- Council led (including Broadway Living and estate regeneration)
- Housing Association delivery programmes
- Private sector through s106 agreements

10.3 The table below sets out completions over the past 5 years, broken down into different programmes, as well as new homes in development or in the pipeline. The Council's estate regeneration programme makes a substantial contribution to

Table 8 – Affordable Homes to rent in Ealing

	Completed in last 5 years	On site	Pipeline
Regeneration Estates with RSL Partners	907	1009	3155
Regeneration Estates Council Led	62	33	505
Council New Build Other	171	116	90
Broadway Living	10	34	326
RSL (outside Regen estates)	1302	117	110
Totals	2452	1309	4186

Estate Regeneration:

10.4 There are 9 estates that are being regenerated, with more planned. These will deliver around 6,000 new homes by 2028. Half of these are for Affordable/Social Rent or shared ownership. Around half of these will be for private sale to help subsidise the affordable homes. The Council is well within the Housing and Homelessness Strategy targets of delivering 500 council managed new homes and 3,000 of all tenures across the estate regeneration and new build programmes by 2019.

Table 9 – Estate Regeneration Programme- new homes planned by tenure

		New Build						
Ealing Area	Estate	Proposed New Units	Affordable Soc rent + SO	Sale	Built	On site	Pipeline	Complete Date
Acton	South Acton	2,600	1,277	1,323	536	516	1,548	2028
Ealing	Green Man Lane	770	402	368	176	187	407	2023
Southall	Havelock	922	488	434	0	98	824	2026
Northolt	Rectory Park	425	327	98	150	93	182	2021
Greenford	Allen Court	89	44	45	45	44	0	2017
Greenford /Southall	Golf Links	125	115	10	57	0	68	2018
Ealing	Dean Gardens	317	121	196	0	71	246	2021
Hanwell	High Lane	320	210	110	0	0	320	2023
Hanwell	Copley Close	205	107	98	5	33	167	2019
Total		5,773	3,091	2,682	969	1,042	3,762	

Small Sites

10.5 Ealing Council has entered a Sale and Development Agreement (SDA) with property developers Hills. This agreement will transfer of a number of small sites in Ealing's ownership to Hill's in return for the delivery of approximately 214 mixed tenure homes. Overall, some 87 of the units developed will be new affordable homes, which will be built on land to remain in Ealing's ownership. The cost of delivering these homes will be covered by cross-subsidy generated from the private sale of homes, without recourse to HRA borrowing. It is anticipated that the first dwellings will complete early 2017, with the final units from the larger development in 2018. It had previously proved uneconomic for the council to directly develop these small sites for council new build affordable housing.

Housing Association delivery programmes

10.6 Recently delivered housing association schemes are as follows:

- **Manor works – Family Mosaic, W13:** 13 x Rented and 8 x shared ownership, completed Spring 2016.
- **Albert Dane, Western Road, Southall: Pocket Living:** 36 units for sale. Completed Spring 2016 <https://www.pocketliving.com/buy/development/9>

10.7 Affordable homes in the pipeline:

- **Madeley Road/Hanger Lane, Genesis HA:** Due to complete March 2017. 50 units in total. 50% affordable of which 15 are for rent and 10 for shared ownership. Of the rented, 2 will be wheelchair-accessible, which we have pre-allocated and are working with Genesis to adapt the home to the families. The OT from the Aids and Adaptation section is involved.
- **Green Man Lane, A2Dominion:** Phase 2B will contain 188 new homes (61 for social rent and 127 for private sale) due to be completed by Sept 17. All of these units are for decanted tenants. Further 2 phases are due to for completion by the end of 2019 and 2022.
- **Shakespeare road, Hanwell, Genesis Housing Association:** Just starting on site with 22 homes for shared ownership, due to complete March 2018.
- **BHS site, 104 the Broadway:** Thames Valley Housing Trust have bought the whole site that has planning permission for 98 private homes, 22 rented and 16 shared ownership, but are aiming to convert to 100% affordable.

Planning Permissions-overall housing pipeline

10.8 The table below sets out the total planning permissions by tenure that have been granted over the past three years. This is no guarantee that all permissions will be built out. In addition, to these planned homes, the Council receives some commuted sums from developers to deliver some off-site affordable homes.

Planning Permissions Granted 2013-16

Open Market	Intermediate Units				Social Units	
Private Sale	Shared ownership	Discounted Market Rent	Discounted Market Sale	Not specified	Social Rent	Affordable Rent
3639	337	8	0	256	899	249

11. Legal Implications

11.1 Part 7 of the Housing Act 1996 imposes statutory duties on the Council to provide temporary accommodation to homeless applicants in a number of situations. These include when it is assessing a homeless application of a person who it has reason to believe may be eligible for assistance, may be homeless and may be in priority need and when it has completed an assessment and concluded that an applicant is owed the full housing duty.

11.2 Section 206 Housing Act 1996 states that a local housing authority may discharge their housing functions under Part 7 of the Act only in the following ways—

- (a) by securing that suitable accommodation provided by them is available,
- (b) by securing that he obtains suitable accommodation from some other person,
- or
- (c) by giving him such advice and assistance as will secure that suitable accommodation is available from some other person.

11.3 Section 208(1) Housing Act 1996 provides that so far as reasonably practicable a local housing authority shall in discharging their housing functions under Part 7 of the Act secure that accommodation is available for the occupation of the applicant in their district.

11.4 Article 2 of Homelessness (Suitability of Accommodation) Order 1996 provides that in determining whether accommodation is suitable for a person there shall be taken into account whether or not the accommodation is affordable for that person.

Articles 3 & 4 of the Homelessness (Suitability of Accommodation) (England) Order 2003 provide that B&B accommodation is not to be regarded as suitable for an applicant with a family except where no accommodation other than B&B accommodation is available for occupation and the applicant occupies B&B accommodation for a period, or a total of periods, which does not exceed 6 weeks. The Homelessness (Suitability of Accommodation) (England) Order 2012 states that in determining whether accommodation is suitable for a person, the local housing authority must take into account the location of the accommodation, including:

- (a) where the accommodation is situated outside the district of the local housing authority, the distance of the accommodation from the district of the authority;
- (b) the significance of any disruption which would be caused by the location of the accommodation to the employment, caring responsibilities or education of the person or members of the person's household;
- (c) the proximity and accessibility of the accommodation to medical facilities and other support which—
 - (i) are currently used by or provided to the person or members of the person's household; and
 - (ii) are essential to the well-being of the person or members of the person's household; and
- (d) the proximity and accessibility of the accommodation to local services, amenities and transport.

11.5 The Homelessness Reduction Bill, referred to in Section 6 above, contains provisions which significantly extend the obligations on local authorities in respect of provision of both advice and accommodation.

12. Financial Implications

No financial implications directly arising from this report.

13. Other Implications

Links to Corporate Plan 2014-18: Priority 1: A prosperous borough, providing affordable, high quality and decent housing.

14. Background papers

Cabinet, 14 Jun 2016, Item 14: Reducing the Cost of Temporary Accommodation Project update

Cabinet, 17 May 2016, Item 15: Temporary Accommodation Placement Policy

Cabinet, 17 May 2016, Item 16: Housing Regeneration and New Build Update

Cabinet, 24th November 2015, Item 20: Proposals for reducing emergency accommodation costs

Consultation

Name of consultee	Department	Date sent to consultee	Date response received from consultee	Comments appear in report para:
Internal				
Director	Executive Director Regeneration and Housing			
Lawyer	Director of Legal Services			
Finance Officer	Director of Finance			
Councillor	Cabinet Member for Housing			
External				

Report History

Decision type: For information	No	<i>1. Urgency item?</i>	
Authorised by Cabinet member:	Date report drafted:	Report deadline:	Date report sent:
XX.XX.05	23.08.16	26.08.16	XX.XX.05

Report no.:	Lynne Duvall, Lead Officer Housing Demand