

Report for: Housing Scrutiny Committee, 17 November 2023

Title: A new Housing Strategy for Haringey

Report authorised by: Director of Placemaking and Housing

Lead Officer: Assistant Director of Housing

Ward(s) affected: All

**Report for Key/
Non Key Decision:** No

1. Describe the issue under consideration

- 1.1. A local Housing Strategy sets out the local housing authority's vision for housing in its area. It sets out objectives and targets and policies on how the authority intends to manage and deliver its strategic housing role and provides an overarching framework against which the authority considers and formulates other policies on more specific housing issues. As set out in the draft Housing Strategy, new policies and strategies on more specific housing issues - including a new Allocations Policy, Older People's Housing Strategy, and Homelessness Strategy - will be brought forward setting out in detail how the Housing Strategy's objectives will be delivered in those areas.
- 1.2. Robust strategies are widely recognised as essential to the delivery of local authorities' housing functions. Haringey's current Housing Strategy runs from 2017-2022. A new Housing Strategy is therefore required.
- 1.3. Cabinet will be asked in December 2023 to recommend a new Housing Strategy for adoption by full Council in March 2024.
- 1.4. This report gives Housing Scrutiny Committee an overview of that proposed new Housing Strategy, its context, and the processes through which it has been developed. It focuses on the content of the draft Housing Strategy agreed by Cabinet in March 2022, the consultation on that Strategy carried out between September and December 2022, and the changes made to the draft Strategy as a result both of that consultation and of new financial, regulatory, and legislative contexts. It aims to enable Housing Scrutiny Committee to consider the proposed new Housing Strategy and make appropriate recommendations in advance of December Cabinet.

2. Introduction: Developing a new strategic approach to housing in Haringey

- 2.1. Haringey's current Housing Strategy runs from 2017-2022. A new Housing Strategy is therefore required.

2.2. A new Strategic Housing Market Assessment was prepared for June 2021, assessing housing needs across Haringey, and in particular projections of unmet housing need for the period 2022-37.

2.3. Between July 2021 and March 2022, following a thorough review of evidence including the Strategic Housing Market Assessment, officers prepared a draft Housing Strategy as the basis for formal consultation.

2.4. In March 2022 Cabinet approved that draft Strategy for consultation.

2.5. The draft Housing Strategy set out the Council's ambition for everyone in Haringey, whatever their circumstances, to have a safe, stable, and genuinely affordable home.

2.6. Five fundamental principles ran through each of the Strategy's objectives and underpinned all its proposed actions:

2.6.1. Communication and co-production - communicating clearly, transparently, and respectfully with residents, and putting residents at the centre of the design of services and of homes.

2.6.2. An active council – using all levers and powers at our disposal to tackle the housing crisis.

2.6.3. Working across the council and in partnership - putting housing at the heart of what this council does, and taking a lead in bringing residents, community groups, voluntary and private sector organisations together to tackle the housing crisis.

2.6.4. Creating and maintaining sustainable and healthy communities - working with residents to deliver new, better, and healthier homes and neighbourhoods, enhancing the places and sense of community that make them proud to call Haringey home.

2.6.5. Responding to the climate emergency - delivering homes and neighbourhoods that are healthier and more resilient.

2.7. The draft Housing Strategy set out four strategic objectives, each accompanied by their own sub-objectives and details on how they will be achieved.

2.8. Strategic objective 1: Delivering the new homes Haringey needs

2.8.1. By creating the right conditions for others to build new homes, meeting the Mayor of London's target that 15,920 new homes of all kinds are built in Haringey over the next ten years.

2.8.2. Ensuring that these new homes are delivered in the right mix for our diverse community.

2.8.3. Completing more than 3,000 new high-quality Council homes by 2031.

2.9. Strategic objective 2: Improving housing quality and resident services in the social housing sector

- 2.9.1. Improving the quality of Council homes in line with our 2020-2025 Asset Management Strategy
- 2.9.2. Improving housing services to Council tenants and leaseholders, and designing these service improvements with them
- 2.9.3. As the Council brings housing management services back under direct management, embedding these functions into the Council's core business and integrating them with other Council services.
- 2.9.4. Working in partnership with housing associations in Haringey so that all social tenants, whether their landlord is the Council or a housing association, can expect the same high-quality housing services and well-maintained homes.

2.10. Strategic objective 3: Improving the quality of the private rented sector

- 2.10.1. Setting clear standards for the private rented sector and supporting landlords to meet those standards
- 2.10.2. Enforcing those standards and taking decisive action against landlords who will not provide their tenants with a home that is decent, safe, and secure
- 2.10.3. Empowering and supporting private renters to hold their landlords to these standards

2.11. Strategic objective 4: Preventing and alleviating homelessness

- 2.11.1. Preventing homelessness whenever possible
- 2.11.2. Ensuring that we have the right accommodation and support for people who are homeless or at risk of homelessness
- 2.11.3. Supporting people who are, or who are at risk of, rough sleeping
- 2.11.4. Ensuring that we are making the best and fairest use of our housing stock – and consulting on a new allocations policy to achieve this

3. Consulting on the draft Housing Strategy

3.1. Between 26 September and 16 December 2022 the Council carried out formal consultation on the draft Housing Strategy approved by Cabinet. That consultation received 706 responses. Responses were broadly representative of the tenure and housing situation of Haringey's residents. A summary of the consultation's findings is attached as Appendix 2.

3.2. The consultation showed overwhelming support for the draft strategy. At a high level, 91% agreed with its objectives. That support was consistent through most areas.

3.3. However, responses also expressed serious concern about the quality of housing and services to the Council's own tenants and leaseholders. This reflects the Council's own findings after bringing services back under direct control in June 2021 as well as concerns raised by residents in other engagement exercises and concerns raised by and to the Ombudsman and the Regulator of Social Housing. Those concerns led in April 2023 to the adoption of a Housing Improvement Plan backed by additional investment of £4.7 million, responses at the heart of changes set out below to the draft Housing Strategy.

4. Changes to the draft Housing Strategy as a result of consultation

4.1. In response to that consultation, the proposed Housing Strategy now refocuses on improving basic housing services and housing quality for Council tenants and leaseholders - and reprioritises the objectives sitting in this area:

- Transforming services to our tenants and leaseholders, and designing those services with them
- Ensuring and improving the quality of our Council housing
- Embedding these functions into the Council's core business
- Collaborating to help drive improved services in the sector across the borough

4.2. In other areas, the responses received during the formal consultation led to improvements across the proposed strategy including by:

- Clarifying our practical commitments to protecting the existing places and communities that make people proud to call Haringey, to building council homes across all of Haringey, and to doing everything possible to prevent residents being 'priced out' of a changing borough
- Strengthening links between the housing strategy and Employment and Skills strategies
- Including a focus on building stronger communities on our estates
- Prioritising a communications campaign to publicise the work that the Council can do to support private renters and address the lack of confidence and knowledge felt by renters, and to publicise the HMO licensing schemes
- Introducing more detail about sustainability and environmental commitments
- Including commitments to Supported Living including for young adults with SEND
- Including a commitment to bring forward an Older People's Housing Strategy

4.3. Many other detailed responses submitted during the consultation will inform the delivery of the strategy across a range of areas, including Neighbourhood Improvement when delivering new Council homes, co-production and consultation, and partnership with Housing Associations.

5. Changes to the draft Housing Strategy as a result of new financial, regulatory, and legislative contexts

5.1. Fundamentally, the proposed Housing Strategy responds to a housing crisis in London and beyond. It sets out key aspects of the wider context to which it

responds. These include the climate emergency, the 'cost of living crisis', Grenfell and housing safety, Covid-19, and the deep links between housing and systemic inequality.

- 5.2. The period since the draft Housing Strategy was agreed for consultation has been a period of extraordinary economic challenge: recession, inflation, rising interest rates, and falling real-terms wages have all deepened the longstanding housing crisis. This proposed Housing Strategy responds to those challenges and does everything possible to help residents respond to them – including through a renewed focus on moving homeless households from emergency to more settled accommodation. But the impact of those challenges on the Council's own finances is also profound.
- 5.3. Inflation and the relentless rise of interest rates puts extraordinary pressure on the delivery of new council homes. As a result, a number of schemes due to be delivered under the Mayor of London's 2016-2022 grant programme Building Council Homes for Londoners (BCHFL) became financially unviable. In order to ensure that the Council could still build these homes, it took the decision to charge London Affordable Rent rather than formula rent on homes still to be delivered under that grant programme. The proposed Housing Strategy reflects that decision and commits to let homes funded under the Mayor of London's 2021-2026 grant programme in accordance with the statutory rent formula for Council homes.
- 5.4. London Affordable Rent (LAR) was developed by the GLA in 2016 to balance genuine affordability for tenants with the financial viability of delivering council homes in a relatively low-grant environment. LAR is around 8% more than the formula rent cap. It is important to note that BCHFL allocated grant on the basis that council rents for homes funded under the programme would be set at LAR. In spite of that expectation, the first 187 homes Haringey Council completed under BCHFL were let at standard council rent, in accordance with the statutory rent formula.
- 5.5. In June 2022, with overwhelming support from Council tenants, the Council brought its housing management services back under direct control. The Council then actively sought external, independent views on the performance of those housing services. The results of this scrutiny and of subsequent reports by the Social Housing Regulator and the Housing Ombudsman were sobering. It is clear that the Council's tenants and leaseholders have been let down over many years.
- 5.6. The proposed Housing Strategy now commits to transforming the housing services that the Council directly provides to its tenants and leaseholders, and to bringing all their homes up to at least a decent standard.
- 5.7. In April 2023 the Council adopted a comprehensive Housing Improvement Plan as a major step in its journey to transform housing services to its tenants and leaseholders. Backed by additional investment of £4.7 million, that Housing Improvement Plan forms the basis of the area of the proposed new Housing Strategy dealing with the Council's own housing stock, and in particular informs a greater emphasis on dealing with damp and mould and ensuring building safety.
- 5.8. The proposed Housing Strategy now gives a strategic focus to achieving the Decent Homes Standard. This aligns with the changed approach of the new Asset

Management Strategy being considered by Cabinet in December 2023 and replaces the more holistic approach proposed in the consultation. The proposed Housing Strategy and Asset Management Strategy now commit to achieving Decent Homes Standard across all the Council's stock by 2028.

5.9. The collapsing availability and increasing costs of privately rented homes has led to an increased use of Bed and Breakfast accommodation for homeless households since the Council consulted on the draft Housing Strategy. The Council is committed to tackling this urgently and the proposed Housing Strategy reflects that commitment.

6. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes

6.1. The recommendation to adopt the proposed new Housing Strategy supports the delivery of all aspects of the Corporate Delivery Plan's Homes for the Future Theme.

7. Carbon and Climate Change

7.1. The recommendation to adopt the proposed new Housing Strategy supports the Council's commitments in its 2021 Climate Action Plan to the delivery of homes that are healthy, comfortable, and affordable places to heat and power.

7.2. The Climate Change Action Plan set out how the borough will become net zero carbon by 2041. The proposed new Housing Strategy supports that objective with commitments such as retrofitting Council homes, improving energy efficiency in private rented homes, supporting owner-occupiers to make their homes more energy efficient, addressing fuel poverty, and ensuring that our own and others' new housing developments meet the highest carbon and environmental standards. Responding to the climate emergency, the new Housing Strategy aims to deliver homes that are healthy, comfortable, and affordable places to live, and neighbourhoods that are resilient, greener, and healthier for everybody.

8. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

Finance

8.1. The draft Housing Strategy for consultation was approved in February 2022. This report is for the new housing strategy updated with feedback from the consultation.

8.2. This report has also been updated to include changes as a result of new financial, regulatory, and legislative contexts.

8.3. Most commitments in the strategy document have already been agreed, and in agreement with the commitments in the Council Borough Plan.

8.4. The key strategic objectives as listed in the report and related action plans does not lead to any budgetary commitments over and above those already planned for through the current HRA Business plan.

8.5. Any subsequent proposals developed, and requiring additional revenue or capital resources will need to be reviewed and approved via the appropriate approval route prior to implementation.

8.6. All the associated financial risk will be reviewed and captured as part of the current budget/MTFS setting process if recommendation is adopted.

Procurement

8.7. Strategic Procurement (SP) note the recommendations. There are no procurement implications or actions at this moment based on the recommendations.

Head of Legal & Governance

8.8. The Head of Legal and Governance has been consulted in the preparation of this report.

8.9. Under section 41 of the Greater London Authority Act 1999, as amended, ("GLAA99"), it is a general duty of the Mayor of London to prepare and publish a London housing strategy. Under section 333D of GLAA99, any local housing strategy prepared by a local housing authority in Greater London must be in general conformity with the Mayor of London's London housing strategy

8.10. Under section 8 of the Housing Act 1985, local housing authorities (including Haringey Council) shall consider and review on a periodical basis the housing conditions in their area and the housing needs of the area with respect to the provision of further housing accommodation. Section 3 of the Housing Act 2004 further imposes a duty on local housing authorities to keep housing conditions in their area under review.

8.11. Under section 87 of the Local Government Act 2003, the Secretary of State for Communities and Local Government has the power to require local housing authorities to have a housing strategy and impose requirements with respect to the ends that the strategy is to be designed to achieve, the formulation of policy for the purposes of the strategy or review of the strategy. The Secretary of State also has the power to order local housing authorities to prepare statement setting out their housing strategy and other material relating to housing. To date, the Secretary of State has not formally exercised these powers. The Explanatory Notes to this Act however describe a local housing authority's Housing Strategy as:

"... the local housing authority's vision for housing in its area. It sets out objectives and targets and policies on how the authority intends to manage and deliver its strategic housing role and provides an overarching framework against which the authority considers and formulates other policies on more specific housing issues."

8.12. The Secretary of State in the 2007 Green Paper "Homes for the future: more affordable, more sustainable" developed the reference to the local housing authority's strategic role as follows:

“The local authority strategic housing role is made up of the strategic decisions and activities associated with effective planning and delivery, in order to meet the housing needs of all residents across all tenures. Strong performance in this role will support effective place shaping and help ensure delivery of the wider sustainable community. This requires vision, leadership, planning and delivery at a strategic level to:

- *assess and plan for the current and future housing needs of the local population across all tenures;*
- *make the best use of the existing housing stock;*
- *plan and facilitate new supply;*
- *plan and commission housing support services which link homes to the support and other services that people need to live in them;*
- *work in partnership to secure effective housing and neighbourhood management on an ongoing basis”*

8.13. Section 225 of the Housing Act 2004 states that “housing” (for the purposes of carrying out the housing needs review required by section 8 of the Housing Act 1985 and for the purposes of preparing a housing strategy under section 87 of the Local Government Act 2003) includes the accommodation needs of gypsies and travellers residing in their area.

8.14. The Public Sector Equalities Duty (“PSED”) set out in section 149 of the Equalities Act 2010 obliges the Council in performing its functions “to have due regard to the need to:

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

8.15. The Housing Strategy document itself is not a formal Planning document and consequently will not form part of the statutory Development Plan. While it will be a material consideration, it will not carry significant weight in the development management process.

8.16. The following general principles of consultation apply:

- That consultation must be at a time when proposals are still at a formative stage;
- That the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response;
- That adequate time must be given for consideration and response; and
- That the product of consultation must be conscientiously taken into account in finalising any proposals.

8.17. In short, in order to achieve the necessary degree of fairness, the obligation is to let those who have a potential interest in the subject matter know in clear

terms what the proposal is and exactly why it is under positive consideration, telling them enough (which may be a good deal) to enable them to make an intelligent response. The obligation, although it may be quite onerous, goes no further than this.

- 8.18. Approval of the Housing Strategy following consultation is a function reserved to Full Council by Article 4.01(a) of the Councils Constitution.
- 8.19. Both Cabinet, in considering the recommendations in this report, and Full Council, when considering whether to adopt the Strategy, must conscientiously take into account the outcome of the consultation.
- 8.20. There is no legal reason why Cabinet should not adopt the recommendations in this report.

Equality

8.21. The council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

8.22. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

8.23. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

8.24. The decision is regarding the adoption of a new Housing Strategy to set out the Council's vision and strategic approach to housing in Haringey over the next five years.

8.25. It should be noted that the draft policy went to cabinet in March 2022 for approval for consultation so many of the comments in the previous cabinet report are still relevant these being:

8.25.1. The Housing Strategy is a major strategy which will impact many people in the borough. By seeking to improve conditions in social rented housing, in particular council housing, the strategy will have a positive impact on BAME residents, older residents, and women. By seeking to provide more social housing and in particular more family sized social housing, the strategy will also support these groups, as well as families with young children.

8.25.2. By prioritising the delivery of rented affordable housing, in particular social rented housing, and therefore not prioritising affordable home

ownership, the strategy may have a negative impact on those who aspire to homeownership but are unable to access market housing, who are more likely to be younger. Affordable home ownership will however still be delivered in Haringey and a commitment for a 2024 intermediate housing policy for shared ownership that was added after consultation should help mitigate this impact.

8.25.3. People in housing need and those living in social housing are disproportionately disadvantaged across multiple areas and have more than one protected characteristic, in particular in terms of race, socio-economic status, sex and disability. The Housing Strategy prioritises meeting the housing needs of these groups and will these for have a positive impact on those who share these protected characteristics.

8.26. However, the consultation process that took place September to December 2022 has resulted in changes to the strategy that have further equalities implications. These include:

8.26.1. An updated focus on the cost-of-living crisis which is disproportionately affecting people of a low socioeconomic status.

8.26.2. Transforming our landlord services for our 20,000 tenants who are more likely to be BAME, Women, Older and of a low socioeconomic status. This will shorten delays on repairs and ensure their complaints are properly responded to. Additionally, this comes with a stronger commitment to improve the quality of council housing including a separate housing improvement plan and a renewed focus on fire safety and tackling damp and mould.

8.26.3. Actions to improve the quality of temporary accommodation including the elimination of B&Bs. BAME people, women, young people, and those from a low socio-economic status are overrepresented in our TA stock.

8.26.4. Commitments to supported living for young people with SEND.

8.26.5. A commitment to bring forward an Older People's Housing Strategy to meet this cohorts' specific needs.

8.27. These additional actions and commitments will all support the provision of better-quality accommodation and services to residents who are disproportionately disadvantaged across multiple areas and more likely to share more than one protected characteristic. Therefore, the policy will have a positive impact on those who share protected characteristics and on equalities in general.

8.28. A full analysis is contained in the Equalities Impact Assessment found in appendix 3

9. Use of Appendices

Appendix 1 – A new Housing Strategy for Haringey

Appendix 2 – Report on the draft Housing Strategy consultation, September to December 2022

Appendix 3 - EQIA

10. Local Government (Access to Information) Act 1985

[Draft Housing Strategy 2022, !\[\]\(1d3a1175dd4902218e694b9c098adb83_img.jpg\) PDF 870 KB](#)

[2023-24 Budget and 2023-2028 Medium Term Financial Strategy Report !\[\]\(c507f772dba2b921f86777f01218e570_img.jpg\) PDF 13 MB](#)

[Housing Services Improvement Plan and Compliance Assurance Statement !\[\]\(4729e517bc6a7cd81c8025b9646574fb_img.jpg\) PDF 531 KB](#)