



**HILLINGDON**  
LONDON

**Hillingdon Housing Strategy**  
2021/22 to 2025/26  
**CONSULTATION DRAFT**

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## Abbreviations

ACM	Aluminium Composite Material
ASB	Anti-social behaviour
AST	Assured Shorthold Tenancy
BACFT	Business Assurance Counter Fraud Team
BTR	Build to Rent
CNWL	Central and Northwest London NHS Foundation Trust
CQC	Care Quality Commission
DASE	Domestic Abuse Steering Executive
EPC	Energy Performance Certificate
FRA	Fire Risk Assessments
GLA	Greater London Authority
HHSRS	Housing Health and Safety Rating System
HRAct	Homelessness Reduction Act
HRA	Housing Revenue Account
HMO	House in Multiple Occupation
LAC	Looked After Children
LAR	London Affordable Rent
LFB	London Fire Brigade
LHA	Local Housing Allowance
LLR	London Living Rent
MARAC	Multi-agency Risk Assessment Conference
MHCLG	Ministry of Housing, Communities and Local Government
NSE	Supported Housing: National Statement of Expectations
PCM	Per calendar month
PDR	Permitted Development Rights
PEEP	Personal Emergency Evacuation Plan
PIB	Premises Information Box
PRP	Private Registered Provider
PRS	Private Rented Sector
RSH	Regulator of Social Housing
SAB	Safeguarding Adults Board
SCPB	Safeguarding Children Partnership Board
SDLT	Stamp Duty Land Tax
SME	Small and Medium Sized Enterprises
STAR	Survey of Tenants and Residents
SUDS	Sustainable drainage systems
TA	Temporary Accommodation
UASC	Unaccompanied Asylum-Seeking Children

UC	Universal Credit
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## Foreword

The timing of this strategy comes as we begin to regain some normality following the Covid-19 epidemic. Some of the impacts are still to be felt and some are still unknown. As the ban on evictions is lifted, we expect the number of homelessness applications to increase. The construction industry is back at work and new homes are being completed following an extremely quiet year in 2020. The virus has changed the way that we work and has reshaped housing markets. It remains to be seen the extent to which these are permanent or temporary changes. Covid-19 has also exposed inequalities and highlighted the importance of space inside and outside our homes. Existing trends towards greater use of technology have taken a leap forward and are continuing to dramatically change how we communicate and process information. This has been evident across our housing services and is a key part of how we are reviewing our relationship with our tenants. The Charter for Social Housing Residents sets out a number of promises which will reset how the housing sector listens to and acts on the voice of their tenants and leaseholders. We will fully embrace the Charter marking a step change in how we meaningfully involve our residents from policy making to front line service delivery.

Hillingdon Council understands the importance of a good quality affordable home and the impact that it can have on many aspects of our lives including our physical and mental health, our education and our employment prospects. We want to see all residents in Hillingdon treated fairly and have the same life chances as others. That is why we are focussing on increasing investment in our existing council housing. Our primary objective is to ensure that our properties are safe, but we also want to make sure that properties are well managed, warm and comfortable to live in with good insulation, double glazed windows and efficient heating systems.

We will align our priorities to achieve maximum effect with the resources we have available. The Council has declared a climate emergency and the carbon emissions from housing in the borough will need to reduce considerably. We will prioritise those works to stock that can cut heating costs and reduce fuel poverty at the same time as helping to reduce carbon emissions.

As well as addressing the standard of homes we will turn our attention to wider neighbourhood issues. The quality of communal areas and the wider neighbourhood environment form an extension of how we view where we live and links to our sense of community and belonging as well as to our experience and perception of crime and anti-social behaviour. Hillingdon Council aspires to lead the way on housing standards to ensure a positive experience of our homes, our neighbourhoods and our management practices.

The private rented sector in Hillingdon has grown and is home to higher numbers of residents and a wider range of households than previously, including many with children. Many landlords provide good homes, managed well, but there are also private rented homes where standards are poor. We will set out our expectations of landlords and will continue to use available remedies to drive up standards in the private rented sector. Landlords rightly also have expectations of tenants to behave in a reasonable manner and the council will do more to make clear our expectations of tenants as well as those of landlords.

There has been substantial progress in tackling rough sleeping with annual rough sleeper counts between November 20 and November 21 showing a greater reduction in Hillingdon than any other area. We will continue to build on our pathway to support and house homeless people.

We know that the cost of housing to rent or buy continues to be a significant problem. As well as investing in existing homes we will make sure that additional affordable homes are available. We will do this by providing new council housing ourselves as well as continuing to work with other Registered Providers and securing affordable housing through planning contributions. Affordable homes will meet the needs of a range of households and will include low-cost home ownership as well as rented options. The primary need in the borough is for low-cost rented homes but we also want to assist the many households that aspire to home ownership. Our aims include providing more affordable homes, for more of that housing to be at low-cost rent levels and for more to be family homes of three bedrooms or more.

Increasing investment in both existing and new council housing will require significant resources. The council continues to place importance on investing wisely, maximising outcomes and getting good value for money. We will analyse intelligence to identify which types of investment are best placed to deliver our housing objectives. This will include looking at how we can use our existing housing better and identifying areas suitable for future regeneration. We are reviewing how we incentivise the release of larger family homes and how we can increase provision for overcrowded families, including extending some properties.

We have received the go ahead from residents of Avondale and Hayes Town Centre Estates to proceed with regeneration proposals in their areas and look forward to being able to welcome residents back to their brand-new homes. We see this regeneration as the beginning of a longer-term programme to bring forward proposals to improve housing in the borough.

**Councillor Eddie Lavery**

**Cabinet Member for Environment, Housing and Regeneration**

## Introduction and Context

This Hillingdon Housing Strategy sets out our priorities for housing and our key aims for the next five years. The council has responsibilities for housing both as a landlord and in relation to its strategic housing role. This includes assessing needs, identifying priorities and planning for the delivery of affordable housing; standards of housing and management across both the social sector and the private rented sector; homelessness and housing advice; housing support and aids and adaptations. The Housing Strategy identifies key challenges and sets out priorities for the coming 5 years. It takes account of and is compliant with national policy and legislation and the London Housing Strategy 2018: Homes for London.

Hillingdon is the westernmost and second largest borough in London and is a great place to live. It has lively town centres, excellent transport links, thriving businesses, good schools and vast swathes of green space. The quality of housing in Hillingdon and its environments is generally good and the mix of housing available from detached and semi-detached family homes to terraced properties and flats meets a wide range of housing needs. A majority of homes in Hillingdon are owner-occupied and the number of homes in the private rented sector has grown significantly over the last couple of decades to make up a larger proportion of the housing stock than the social rented sector. Shared ownership has increased but still forms a small part of housing provision overall. In May 2021, there were 10,101 council owned, low cost rented homes in the borough. The council also has 3,341 leaseholders and 98 shared owners. The borough is home to around 311 thousand people in about 110 thousand households.

## Housing Challenges

Housing challenges in 2020 were not surprisingly dominated by the immediate issues thrown up by Covid-19, the consequences of which are continuing to play out in 2021. This has disrupted the housing market, delayed development, postponed evictions and seen a huge response to bring rough sleepers in, off the streets. It has also seen many people falling into difficulties with employment, debt and rent arrears and has brought tensions to the surface which have resulted in, amongst other things, mental health challenges and an increase in domestic abuse. There has been a rapid acceleration in remote working with many more people working from home and there are noticeable impacts on the housing market with a premium being placed on outdoor space, a preference for houses over flats and for less crowded areas.

Activity in the housing market was initially held back by Covid-19 with a rapid fall off in transactions. The market has subsequently bounced back strongly albeit with some clear changes in buyer behaviour. Regions with the strongest growth are those that are

more rural, the Southwest and East of England. In Hillingdon, the cost of all types of houses has increased, but flats have remained fairly level. Most recently urban areas have shown stronger signs of recovery. Private renting costs have increased in other parts of the country. While renting in London remains much more expensive than elsewhere, there have been significant falls in rent levels in central London, although rental costs in Hillingdon continue to hold up.

Prior to the onset of Covid-19 there were already some significant challenges for housing strategy to address. These have not gone away and in many instances, there is an added impetus to tackle these issues as we recover from the pandemic. Building safety remains high on housing agendas in the continuing aftermath from the Grenfell Tower tragedy. The government has confirmed its determination to build back better; affordability is a continuing challenge and the need to increase the availability of affordable homes continues to grow; housing standards across sectors, social housing regulation and the ability of tenants to have their voice effectively heard remain prominent issues. Evictions have been held back during the pandemic and homelessness is expected to increase now that the eviction ban has been lifted.

Covid-19 has presented immense challenges and the government is placing clean growth and the UK's target to achieve net zero greenhouse gas emissions by 2050 at the heart of economic recovery. The falling cost of renewables, growing public pressure around climate change and the push for a green recovery is boosting decarbonisation plans. A drive towards decarbonising housing is gathering pace.

Rough sleepers have been brought in off the streets as part of the response to Covid-19. The challenges now are to continue to access the necessary support and move-on accommodation and to keep the number of rough sleepers low as we emerge and recover from the pandemic.

This Housing Strategy sets out five strategic priorities for the delivery of housing services over the next five years. Two driving issues cut across the various service areas and priorities; these are **Normalising Service Delivery following the Covid-19 Pandemic** and **Addressing Climate Change**. These are issues for the council as a whole and form the backdrop for the first priority, Place Shaping, which considers how housing contributes to the wider aims for Hillingdon as a whole and works with other services and partners within and beyond the council. Climate change and Covid-19 also provide the setting for aims and actions under the other four priorities.

How long the recovery from Covid-19 will last or what shape it will take is still unknown, but we need to adapt to a new normal post pandemic. In doing this we can't necessarily rely on what went before as a predictor of the future. Modelling based on historic precedence i.e. in relation to housing supply and demand, may no longer be relevant, however data to inform decision making will continue to be of utmost importance.

Rather than looking back, the availability of real time data to inform forward looking simulations will be key to effective decision making. Forecasts will be more reliable for the short term than the long term and will need frequent updating.

<b>Strategic Priorities</b>	
<b>Priority one</b>	<b>Place Shaping</b>
<b>Priority two</b>	<b>Increasing Access to Affordable Housing</b>
<b>Priority three</b>	<b>Leading on Improving Housing Standards</b>
<b>Priority four</b>	<b>Embracing the Charter for Social Housing Residents</b>
<b>Priority five</b>	<b>Supporting Independent Living</b>

The place shaping priority is concerned with looking at the needs of an area as a whole. A key theme is the relationship between housing and health, which has been brought into sharper focus by Covid-19 which revealed an unequal impact related to housing circumstances. Housing is recognised as a key determinant of health outcomes. Other issues relate to the climate and sustainability agenda including issues around flooding, designing out crime and using data to better understand local issues.

We aim to increase access to affordable housing in both the social and private rented sectors. There is a need for more affordable housing and in particular larger family homes for rent. A relatively small but steady supply of four-bedroom homes is needed and a much larger regular supply of three-bedroom homes. While demand for single bedroom properties is numerically the largest, supply of these homes in both the social and private sector is also more prevalent and the mismatch is therefore not as great as with larger dwellings. There is not one single initiative that will achieve the required increase in supply, but a concerted approach, looking in detail at the methods deployed and stages involved to maximise delivery by the council and partner organisations. As well as new development, this includes making best use of existing social housing and accessing properties in the private rented sector.

A central commitment of this strategy is to address housing standards. There will be more investment in existing council housing and in particular those elements that relate to safety, compliance and works to address climate change and fuel poverty. The council is ambitious and seeks to set an example in responding to climate change. A council regeneration programme is underway and further housing led regeneration is expected to follow. We are also determined to tackle poor standards in the private rented sector. We will focus efforts on higher risk properties and will consider options for introducing further licensing arrangements, where required.

The Charter for Social Housing Residents provides an opportunity to renew our relationship with tenants and leaseholders. We are undertaking a fundamental review of how we engage and what we engage about. In doing this we will be informed by our residents, aim for open communication and take full advantage of new digital methods while taking care to ensure that vulnerable residents are not excluded.

There is a particular need in the short term around housing homeless households. This is because we aim to reduce the use of temporary accommodation, at the same time that there is an increased demand for temporary accommodation for those affected by regeneration and a big risk of increased private rented sector evictions. The pathway around single homeless people and rough sleepers has developed considerably with strong local partnerships having been built up and we aim to further develop the pathway, particularly in relation to those with higher support needs. There is also a specific challenge in relation to those without recourse to public funds.

We want to support people to live independently as far as possible. In supporting vulnerable groups, housing and social care colleagues work closely and are continually developing our joint processes and procedures. Partnership arrangements continue to strengthen around safeguarding vulnerable people. We are developing joint arrangements in respect of care leavers and are working towards DAHA accreditation in relation to domestic abuse. We will also be looking at how we can better tailor housing services for those with autism, learning disabilities and disabilities more generally. Existing council provision for older people will be reviewed.

### **Delivering the Housing Strategy**

We will review and update actions annually to ensure that they take account of any relevant significant changes in the external operating environment.

## **Current Legislative and Policy Context for Housing**

Many of the recent and forthcoming policy and legislative changes affecting housing are related to:

- An ongoing need for more affordable homes and the desire to Build Back Better following the pandemic.
- The impact that the Grenfell Tower tragedy has had and continues to have in relation to safety and wider housing standards, housing regulation and the relationship between landlords and tenants.
- The increasing prominence of climate change and the wider sustainability agenda.
- A further notable change is the introduction of Domestic Abuse Act 2021.

The following table lists key changes and further detail is provided in appendix 1.

<b>Key legislative changes and policy initiatives</b>	
Government target 300,000 homes nationally per annum	Homebuilding is expected to play a significant role in helping to get the economy moving as the country moves forward from the Covid-19 pandemic
First Homes	First Homes sold at a minimum 30% discount in perpetuity to first time buyers and key workers will make up a minimum of 25% of all affordable homes secured through developer contributions.
New rules for Shared ownership	A reduced initial stake of 10 per cent. Staircasing from 1%. Landlords expected to fund most repairs and maintenance for ten years in newly built properties.
Planning changes	Permitted development rights for upward extensions. Amended local housing need methodology Changes proposed in the Planning for the Future White Paper: <ul style="list-style-type: none"> <li>- Plan for growth areas, renewal areas and protected areas</li> <li>- S106 and Community Infrastructure Levy to be replaced by nationally set flat charge</li> <li>- Additional homes through PDRs within scope of proposed levy</li> </ul> From August 2021 new broad PDR amends some existing commercial to residential uses and will allow very many properties in Class E to change to residential including retail and other town centre uses.
London Plan 2021	Strategic target of 50% affordable homes. Fast track route dispensing with viability assessments for schemes that deliver at least 35% affordable. Public sector sites and former industrial sites are required to deliver 50% affordable homes. Sets new homes annualised target for Hillingdon of 1,083.
Building Safety	Use of combustible materials banned, clearer guidance on existing regulations, mandatory sprinklers in flats over 11 metres.
Fire Safety Act 2021	Makes clear that external wall systems, balconies and flat entrance doors fall within the scope of fire safety legislation. Responsible person for the building needs to update their fire risk assessment and implement a fire safety management system.

<p>Building Safety Bill</p>	<p>Published in draft form in 2020 and included in Queen’s Speech 11 May 2021. The Bill will introduce a new regulatory regime, to enhance the fire and structural safety of new and existing residential buildings. A system of ‘gateways’ will be introduced. The new regime is not expected until 2023, however gateway one is to be introduced from 1 August 2021. The Health and Safety Executive (HSE) will become a statutory consultee on planning applications for relevant buildings (those with two or more dwellings or educational accommodation that are 18m or more in height or 7 or more storeys) and a fire statement will need to be submitted with the planning application.</p>
<p>The Charter for Social Housing Residents: Social Housing White Paper</p>	<p>The Social Housing White Paper published November 2020 sets out a new Charter for what every social housing resident should be able to expect.</p> <ol style="list-style-type: none"> <li>1. To be safe in your home</li> <li>2. To know how your landlord is performing</li> <li>3. To have your complaints dealt with promptly and fairly</li> <li>4. To be treated with respect</li> <li>5. To have your voice heard by your landlord</li> <li>6. To have a good quality home and neighbourhood to live in</li> <li>7. To be supported to take your first step to ownership</li> </ol>
<p>Climate change and decarbonising housing</p>	<p>The UK target to bring all its greenhouse gas emissions to net zero by 2050.</p> <p>The Clean Growth Strategy 2017 includes several targets to improve energy efficiency, including to upgrade all fuel poor homes to Energy Performance Certificate (EPC) C by 2030; to upgrade as many homes as possible to EPC C by 2035 (where practical, cost effective, and affordable).</p> <p>On 16 January 2020 the council declared a climate change emergency and laid out its intentions for the borough to meet ambitious targets to become carbon neutral by 2030.</p> <p>Hillingdon Council’s draft climate change action plan makes three corporate commitments:</p> <ul style="list-style-type: none"> <li>• To lead and inspire our residents, businesses and schools to reduce their own carbon emissions.</li> <li>• To become ‘Carbon-Neutral by 2030.</li> <li>• To achieve 100% clean energy across the Council’s services by 2030.</li> </ul>
<p>Future Homes Standard</p>	<p>Draft regulations propose banning fossil fuel fired boilers in new homes from 2025 with a carbon emissions reduction of 75% to 80% compared with current standards. The</p>

	<p>government have set out details of an interim step of a 31% reduction that will take effect from June 2022.</p> <p>By 2025 new homes delivered will need to be zero carbon ready.</p> <p>A further consultation proposes new energy and ventilation standards for new building as well as addressing overheating in residential buildings.</p>
<p>Sustainable Warmth: Protecting Vulnerable Households (Updated fuel poverty strategy)</p>	<p>Published Feb 2021 this includes the Low Income, Low Energy Efficiency (LILEE) measure of fuel poverty. A household is fuel poor if it:</p> <ul style="list-style-type: none"> <li>- Has a residual income below the poverty line (after fuel costs) and;</li> <li>- Lives in a home that has an energy efficiency rating below Band C.</li> </ul> <p>The statutory fuel poverty target was set in December 2014: To ensure that as many fuel poor homes as is reasonably practicable achieve a minimum energy efficiency rating of Band C by 2030. The 2015 strategy adopted two interim milestones:</p> <ul style="list-style-type: none"> <li>• As many fuel poor homes as is reasonably practicable to Band E by 2020 and;</li> <li>• As many fuel poor homes as is reasonably practicable to Band D by 2025.</li> </ul>
<p>Care leavers</p>	<p>The local authority must have regard to corporate parenting principles in carrying out their functions. Department of Education statutory guidance stresses the important of joint working in supporting care leavers to navigate their way through the transition to adulthood. Non-statutory guidance has been produced by the Ministry of Housing, Communities and Local Government (MHCLG) and the Department for Education (DfE), to support the development of joint protocols that can help local authorities to meet the accommodation needs of care leavers.</p>
<p>Domestic Abuse Act 2021</p>	<p>The Domestic Abuse Act establishes a Domestic Abuse Commissioner; to improve the effectiveness of the justice system in providing protection for victims of domestic abuse and bringing perpetrators to justice; and strengthen the support for victims of abuse by statutory agencies.</p>

	<p>The Act includes a duty on Tier 1 local authorities (the GLA for London Boroughs) to provide support for victims and their children within safe accommodation.</p> <p>The Housing Act 1996 Part 7 is amended to provide that applicants who are homeless as a result of being a victim of domestic abuse have ‘priority need’ for accommodation.</p>
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## Hillingdon - Key Facts and Figures

<p>Hillingdon population estimates<sup>1</sup></p> <p>Household estimates<sup>2</sup></p>	<p>311,126 people in 2021 316,904 people in 2026 320,537 people in 2031</p> <p>108,306 in 2018 116,013 in 2028</p>		
<p>Average house price Mar 2021 Land Registry</p>	<p>£419,408 Hillingdon £500,310 Outer London £274,615 England</p>		
<p>Current average asking house price June 2021 Uxbridge Home.co.uk</p>	<p>£272,729 One bedroom £392,716 Two bedroom £525,449 Three bedroom £742,518 Four bedroom</p>		
<p>Current asking rents pcm Uxbridge June 2021 Home.co.uk</p>	<p>£1,034 One bedroom £1,363 Two bedroom £1,689 Three bedroom £1,757 Four bedroom</p>		
<p>Monthly LAR 2021/22</p>	<p>£700.74 One bedroom £741.87 Two bedrooms £783.12 Three bedrooms £824.33 Four bedrooms</p>		
<p>Examples ward based LLR 2021/22</p>	Townfield	Brunel	Northwood
One bedroom	£691	£835	£1,036
Two bedrooms	£768	£928	£1,151
Three bedrooms	£844	£1,021	£1,266
Four bedrooms	£921	£1,114	£1,382

<sup>1</sup> 2018-based subnational population projections for local authorities

<sup>2</sup> 2018-based household projections for local authorities, Office for National Statistics

Income data <sup>3</sup> (full time) those living in Hillingdon	£35,028 median £38,221 mean		
Ratio of median house price to median gross annual residence based earnings	2019 13:15 2020 12:35		
Ratio of lower quartile house price to lower quartile gross annual residence based earnings	2019 13:51 2020 13:42		
Council owned dwellings 12.05.2021	10,101 rented 98 shared ownership 3,341 leasehold		
Private Registered Provider owned dwellings 31.03.2020	8,873 in total 6,523 general needs rented 565 supported housing 530 housing for older people 1,255 low-cost home ownership		
Long term empty dwellings (over 6 months) at October 2020	823		
Households on the Social Housing Register	2,738 at the end of March 2021		
Social Housing Lettings 01.04.2020 to 31.03.2021	555  310 (56%) 1 bed or studio 140 (25%) 2 bed 77 (14%) 3 bed 28 (5%) 4 bed		
Households requiring a full HRAct assessment: During 2019/20 Extrapolation for 2020/21	2,056 2,321		
Placements of Homeless Households into temporary accommodation	366 April 2020 to March 2021		
Rough Sleepers placed in TA under 'everyone in' initiative	224 (26/03/20 – 31/03/21) 140 accommodated in GLA hotels from Heathrow decant		

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<sup>3</sup> Annual Survey of Hours and Earnings Provisional 2020

Homeless households in Temporary Accommodation 1 April 2021: of which, emergency accommodation.	428 169	
Number of former rough sleepers in emergency accommodation at 1 April 2021	87	
Affordable homes delivered during 2019/20.	244	
Affordable homes delivery 2020/21	10	
Number of older people	2019	2035
65 and over	41,700	60,500
75 and over	19,700	29,500
85 and over	5,900	9,700
Hillingdon Care Leaver Population end of March 2021	499	
Police recorded Domestic Abuse in the rolling 12 months to September 2020; - Domestic abuse offences - Domestic abuse incidents (a combination of crime and non-crimes)	3,317 5,645	
SafeLives MARAC referrals of high-risk cases April 2020 to September 2020	314	
Cases presenting to the Housing Enforcement and Domestic Abuse Team April to August 2020	89	
Cases presenting to the Homelessness Prevention service April 2020 to January 2021	194	

## **Housing Strategy Priorities**

## Priority one: Place Shaping

***Key outcome: Housing services contribute to ensuring inclusive, greener and sustainable places***

The amount, type and quality of housing available in an area sits alongside a whole host of other elements and characteristics that go to make up what an area is like and how it works. These include other parts of the built environment, open spaces, jobs, schools, leisure activities, people, communities and organisations. Local authorities have a responsibility to look at their areas in the round and help to shape their future. This part of the strategy is concerned with how housing impacts on and contributes to the wider aims and ambitions of the council for Hillingdon as a whole.

Place shaping as a term became common parlance following Sir Michael Lyons Inquiry into Local Government back in 2007<sup>4</sup> although the general theme of looking at the needs of an area in an holistic way have much earlier roots. Place shaping is undergoing something of a revival as local authorities seek to deliver services more efficiently and to respond to change brought on at a pace following the Covid-19 pandemic. Much of this is being driven at a local level.

‘Levelling Up’ is a notable part of the national policy agenda and a White Paper has been promised for Autumn 2021 which is expected to spell out in more detail what the ‘Levelling Up’ agenda is about and how it will be rolled out. Improving living standards is part of ‘Levelling Up’ and sits alongside spreading opportunity and a host of other aims including strengthening community and local leadership, quality of life, improving education and policing and many more. Regional disparities in the UK are greater than in most comparable countries, however after adjusting for housing costs, living standards between UK regions are not particularly unequal. Different communities need to level up in different ways, for London and the South of England, affordable housing is the critical type of infrastructure requiring investment<sup>5</sup>.

Emerging themes for the council are around inclusivity, a ‘greener’ borough and sustainability. The council also wants to see all people in the borough treated fairly and with respect and to have the same life chances as others.

In defining place shaping, common themes are about bringing people and place together; about coherent and complementary approaches to physical, economic, and social development; and working with partners across service areas to address the needs and priorities in particular localities.

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<sup>4</sup> [Lyons Inquiry into Local Government, Place-shaping: a shared ambition for the future of local government, March 2007](#)

<sup>5</sup> [The Rebuilding Britain Index: Levelling Up our local communities, Legal & General, Cicero/amo strategic advisers, April 2021](#)

Planning and corporate services are central actors in place shaping, but many other services are also involved. Housing has an important role to play, both through direct service provision that impacts on local residents, their communities and the built environment and also through a wide range of connections to other services. Housing services are involved with both homes and their environments and the people living in those homes. This dual aspect means that it has connections to a large number of other service areas concerned with both people and place.

Housing services are engaged in managing homes; building and enabling the provision of new housing; preventing and responding to homelessness; and addressing private sector housing standards. In addition, housing has strong links to local planning, the physical fabric of homes and community spaces, energy use, fuel poverty and sustainability, the economy of an area, social care and the needs of vulnerable people and specific groups such as older people and care leavers, health and wellbeing, crime and anti-social behaviour (ASB), substance abuse, poverty and community cohesion.

Our homes and wider environments can have significant impacts for wellbeing. This includes our mental as well as physical health, on education and employment outcomes and on our experience of crime and anti-social behaviour. Our homes also have significant impacts on environmental sustainability.

As set out in the introduction, there are two driving issues that provide the backdrop to this strategy: 'Normalising service delivery following the Covid-19 Pandemic' and 'Addressing Climate Change'.

This strategy aims to:

- Assist in shaping the built environment at a local level and collaborate across health, social care and housing sectors to create healthy places and improve wellbeing.
- Improve living standards through investment in stock condition and access to affordable homes.
- Prioritise actions to address fuel poverty.
- Identify and understand conditions and the local context, including environmental concerns such as flood risks that housing in the borough faces.
- Design and implement affordable and socially acceptable retrofit climate change adaptation measures.
- Work in partnership to identify priorities and take part in local area action.
- Take a 'Digital by Design' approach to improving service delivery.
- Improve the security of homes and their immediate surroundings.

## **The Impact of Covid-19**

Covid-19 has had and continues to have far reaching consequences in the borough and for our services. The pandemic has, for many, prompted a rethinking of what is important to us in our homes and environments. In responding to the pandemic there

has been a dramatic shift in working patterns, many more people are working from home, and it seems likely that permanent working patterns will, in many instances, be a mixture of home and office-based working. The impact on jobs as furlough schemes end is still unknown. Lockdowns and homeworking have meant that greater value is being attributed to indoor and outdoor space. Property market activity shows that less urbanised areas are being favoured, houses are being favoured over flats, and flats that come with a balcony or other outdoor space are favoured over those that don't. Health and wellbeing are now front of mind in considerations of how and where to live.

### **Health and Housing**

There are substantial links across the housing, health and care spectrum. Healthy homes promote good physical and mental health and good health depends on homes that are safe and free from physical hazards.

Prior to Covid-19, work looking at the social determinants of health had already concluded that the real determinants of health lie outside the health care system in the conditions in which people are born, grow, live, work and age. Covid-19 has further revealed and amplified inequalities in health<sup>6</sup>. The Health and Well Being Strategy for Hillingdon is to be refreshed and work is underway to gather evidence to inform priorities.

Poor quality and inadequate housing contributes significantly to health problems such as chronic diseases and injuries and can have harmful effects on childhood development. The link between housing standards and health is well established with poor stock condition and overcrowding responsible for adverse health outcomes. The prevalence of falls in the home and the nature of treatment and care where falls occur can impact on levels of dependency and resulting demand for specific types of accommodation, care and support.

Poor housing conditions have been highlighted as a key factor in the spread of Covid-19. Deprived areas of the country experienced double the mortality rate of well-off areas and the death rate in major cities was six times higher than in rural areas. Black and Minority Ethnic (BAME) households suffered a third of all deaths.

### **Overcrowded households**

Higher Covid-19 mortality rates in areas with higher levels of deprivation are partly related to overcrowding. This includes multi-generational households, which increase the risk of transmission within households and between generations. Close proximity between people can also lead to an increased viral load and increased severity of outcomes.

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<sup>6</sup> [Build Back Fairer: The Covid-19 Marmot Review: The Pandemic, Socioeconomic and Health Inequalities in England, UCL Institute of Health Equity, December 2020](#)

Overcrowded households are more likely to be located in more deprived areas, and there is more overcrowding among low-income households. In the last 20 years, overcrowding has increased in the rented sectors. A significant degree of virus transmission happens in the home, and it is much more likely that you will pass it on to other household members if overcrowded than if you live in a generously sized property with space to self-isolate and to socially distance. Low-income, overcrowded households are also more likely to have a vulnerable person living in the house. Overcrowding is the most common reason for general housing register applications and housing transfer applications in Hillingdon. In response, we will seek to increase the proportion of social housing lettings made to overcrowded households.

Occupants of HMOs are also at high risk of infection from Covid-19 as they are unable to fully control their home environment and live in close proximity to large groups of people. HMOs house the most deprived populations in England.

### **Mental and physical health impacts of Covid-19**

The pandemic has exacerbated existing inequalities in health outcomes between people in different tenures. Those living in rental properties are more likely to have experienced ill health, depression, unemployment and other negative impacts upon their wellbeing.

The virus can also have severe and lasting physical health impacts ('long Covid') and has drastically increased the prevalence of poor mental health in the population. One in eight adults developed moderate to severe depressive symptoms during the pandemic, and disabled people were more likely to experience some form of depression.

### **Damp and mould**

As well as overcrowded housing raising the risk of infection, poor quality housing can increase the risk of having worse symptoms and dying from Covid-19, especially for those with pre-existing health conditions. Living in damp conditions raises the risks of respiratory illnesses such as asthma and COPD which in turn raises the risk of having more serious Covid-19 symptoms.

Using its newly enhanced powers the Housing Ombudsman has issued a call for evidence to support a thematic investigation into damp and mould issues in the social housing sector. An initial review had identified that damp and mould featured significantly in the ombudsman's work. Damp and mould can have a particularly significant impact on vulnerable residents and those with respiratory problems. Living in a warm, safe home of a good standard is a fundamental need and critical to our health and well-being.

## **Cold homes**

Good quality homes with sufficient heating are always important but have been particularly so during the pandemic. A report for Government set out the link to health<sup>7</sup>: 'Poorer quality housing tends to have lower temperatures due to poor insulation, inadequate heating or inappropriate use of heating. Low temperatures can reduce the body's immunity to all viruses as well as favour virus survival. There is also a greater risk of developing community acquired pneumonia and having cardiovascular events with low indoor temperatures below a minimum of 18C.'

Further specific actions that impact on health and housing are including under the other priorities in this strategy concerning access to affordable housing, housing standards, the charter for social housing residents and independent living.

## **Housing, Climate Change and Sustainability**

In March 2021, the council published its draft Strategic Climate Action Plan which set out actions to meet the vision of becoming "the greenest London borough, to protect and enhance the environment and to provide a brighter prospect for future generations."

Improving the energy efficiency of housing is a vital part of tackling the climate crisis. The Climate Change Committee (CCC) is recommending that all homes achieve an EPC rating of C or above within the next 10 to 15 years. Action to achieve this will include councils and other social landlords 'decarbonising' properties and encouraging and facilitating decarbonisation in other tenures. The council plans to take a lead role in achieving carbon reductions in residential properties. Social housing is better placed than other sectors to achieve EPC C, but there are still many homes that fall outside this rating and considerable investment is required.

The first priority in the council's approach is to reduce the amount of energy used by ensuring good insulation and efficient heating. This approach will in particular target households in fuel poverty and in doing so will be addressing some of the health issues outlined above as well as combating climate change. This is addressed more fully under priority three related to housing standards.

## **Sustainability**

The concept of sustainability is far broader than addressing climate change encompassing a range of environmental issues as well as issues concerned with the sustainability of communities. Good quality, well designed housing has a significant role in achieving environmental sustainability and contributing to social sustainability through direct health benefits, less damage to the environment and better quality of life.

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<sup>7</sup> [Preparing for a challenging winter 2020/21, The Academy of Medical Sciences, July 2020](#)

The contribution of housing services in different parts of the borough includes the provision of new affordable housing; action to reduce carbon emissions; influencing the design and layout of homes to reduce crime; renovation and repair of existing stock and the environment in which it is situated to help improve how people view their neighbourhood. The quality of social housing and estate management also make an important contribution to sustainable communities as does working to improve quality and management in the private rented sector. The operation of the social housing allocation policy can play an important role in building communities, as can reducing homelessness and households in temporary accommodation and providing support and advice.

## **Housing Design**

Design considerations for our future homes may need to consider home-office spaces with access to natural day-light and improved soundproofing. Choices on where to live may increasingly include the availability of usable amenity space and the walkability of neighbourhoods. We know that green infrastructure promotes good mental and physical health. As less time is spent in the same room as work colleagues, will we look to find connection in our immediate communities. Many of these considerations sit more firmly in the sphere of planning, however in working to enable new affordable housing and in how we maintain, manage and adapt existing housing, sustainability considerations and understanding what makes a place work is also relevant to housing strategy.

The Build to Rent sector is particularly prominent in looking not just at how buildings are constructed but at how they operate, are professionally managed and relate to wider neighbourhood and community. Promoting general well-being of community also includes understanding the issues that face specific localities, their service needs and preferences and regulating harmful and disruptive behaviours.

Inclusive design is about making places that everyone can use. Inclusivity concerns the right of all people to be respected as valuable members of their communities regardless of race, gender, disability, medical or other need. As already noted, the events of 2020 have highlighted disproportionality in society with the Covid-19 crisis having had far greater health and economic impacts on some than others.

## **Flood risk**

Flooding is one particular area of risk that is becoming more significant in Hillingdon and other parts of London. The headline impact of climate change on rainfall in London assumes less rainfall in summer but concentrated into more intense showers. In recent years surface water flooding has impacted on small groups of residents in multiple locations in Hillingdon. Heavy rain builds up on roads or saturated ground and is not

able to drain away through constrained infrastructure. These are not major incidents but are happening more frequently.

Flood awareness and preparedness is becoming increasingly important. The aged drainage network has limited capacity to deal with the type of events that are now being faced and flood risk actions need to be embedded across services to reduce risk and increase resilience. The aim is to capture water where it falls and slow the flow to drainage systems.

The Environment Agency are working to understand complex interactions in the area of the Riverside Caravan Park, West Drayton following two flooding incidents in the last year. Works at Haydon Drive have been identified and designed to slow flow water entering the Joel Street ditch and consultants are developing options to alleviate flooding risk in Victoria Road.

Council services, including housing have been developing Incident Flood Plans to ensure that their services are resilient to flooding and setting out how the service will respond to incidents. An innovative project to increase local monitoring will share data to local residents' groups. Removing impermeable surfaces from the surface water drainage system is a particular priority. Sustainable drainage systems (SuDS) are required to be implemented in every new development. Planting more trees helps to offset carbon generation and can also be a natural form of managing flood risks.

## **Local Area Action**

The council will link work on understanding how best housing can contribute to sustainability with a localised approach to engaging residents and identifying local priorities. A prerequisite for making a place work is developing knowledge of who is there, its history and likely future trends. For housing this includes an understanding of the need for different types of tenures of housing in the area, the existing quality of homes and sustainability of homes and their environment, the demographics and need profile of those living there and concerns and priorities specific to the locality. Additional information gathering and mapping work will aim to better understand the housing, geographical features and social issues impacting on different areas in the borough.

Led by the council's Community Safety Team, localised action is carried out in specific areas of the borough which is targeted and bespoke to address the presenting issues in that area. Action is informed by available data and teams with representatives from a range of services that are brought together to work with the community to identify issues specific to the area and potential interventions. Housing tenancy management services and repairs and maintenance services are an integral part of local area action groups and, depending on the area and presenting issues, there may also be input from other

housing services such as private sector housing and homelessness prevention. West Drayton is an example of an area that has recently been targeted for local area action.

Housing will continue to play an active role in area action groups. This will include both identifying policy and practical responses possible in the short to medium term, but also considering where there may be a need for more fundamental change over a longer term to address underlying causes of issues in an area. This could, for instance, feed into decisions regarding future regeneration and include issues such as developing walkable neighbourhoods and designing out crime and ASB. ASB can have a significant impact on communities, leaving people feeling vulnerable and can escalate into serious crime. The Mayor of London has made combatting ASB a mandatory priority for all London boroughs. We will work with landlords to make sure that they are aware of their responsibilities, including working with other social sector landlords aimed at delivering a robust and co-ordinated approach to ASB in the borough. A pro-active approach is also planned via high visibility programmes, e.g.in parks.

Effective place shaping requires that the knowledge across a range of partner organisations is pooled to better understand the challenges and priorities both across the borough as a whole and of its constituent parts.

## **Regeneration**

In response to concerns raised by residents about building conditions and ASB, the council has been exploring ways to improve the standard of residential accommodation on the Hayes Town Centre (Austin Road) and Avondale Drive estates in Hayes.

A proposal for estate regeneration which will also deliver additional housing supply and a high quality public realm has been put to a ballot of estate residents and they have voted overwhelmingly in favour of the proposals. The Hayes Town Centre Estate comprises 260 mostly medium rise flats and maisonettes and Skeffington Court, a 15 storey high rise block, made up of a mixture of 1, 2 and 3 bedroomed homes. The Avondale Estate consists of 144 two bedroomed flats in three 12 story tower blocks.

In drawing up the design and rehousing proposals the council has undertaken a significant amount of consultation with residents and has adapted its methods to fit covid restrictions.

The redevelopment will provide more affordable homes of a higher quality that are safer, more accessible and more fuel efficient. Residents views have been taken into account in rehousing proposals and are reflected in a specific Local Lettings Policy. Council tenants have the right to return to or remain on the new estate and the phasing means that most will only need to move once, minimising disruption. Residents can also

choose to move to other social housing in the borough if they wish to. There are, in addition, opportunities for eligible residents currently in temporary accommodation or private rented housing to move into one of the new council homes.

Voting on the landlord offer closed on 21<sup>st</sup> May 2021 and the next stages of the redevelopment will include procuring a development partner to deliver the regeneration.

### **Secured by Design**

Good planning and design have a major role to play in reducing crime and fear of crime. Design can influence the occurrence of crime both positively and negatively. Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings. The aim is to reduce the vulnerability of people and property to crime by removing opportunities that may be provided inadvertently by the built environment and to reduce fear of crime.

The Council aims to maintain and enhance the amenity of its town centres to ensure that they continue to attract investment and are attractive places to meet, shop and work. As part of development proposals in the town centres the council will encourage enhancements to the public realm that encourage regular pedestrian activity and passive surveillance.

The council requires all new development to ensure safe and attractive public and private spaces, making reference to the latest guidance on Secured by Design principles. The Borough works with Metropolitan Police Service Design Out Crime Officers and planning teams to maintain a safe and secure environment and reduce the fear of crime. Development is required to consist of good design and create inclusive environments, whilst improving safety and security. Measures to achieve this include maximising natural surveillance, providing visible, safe and accessible entrances, and ensuring adequate defensible space is provided between private and public spaces.

Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme, which is published by the Police. This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals are designed to incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

Consultation with police regarding new development layouts takes place as part of standard procedures for planning applications. Police are also a key partner in local area action targeted at specific parts of the borough.

### Digital by Design

As we emerge from the pandemic, we want to engage with our communities and understand what is important to them. During the course of the pandemic, there have been big advances in the use of digital methods to engage customers and deliver services. Trends towards more digital working approaches were already in place but have been accelerated because of the pandemic. This has come about through necessity but has also demonstrated where and how digital methods can achieve more than traditional ways of working. As we move forward services will increasingly be 'digital by design' making the most of the advantages offered by digital ways of working while making sure that those without digital skills are not left behind. Communication with tenants and residents is one of the areas where digital has much to offer. This is covered more fully under priority four related to the Charter for Social Housing Residents.

<b>We will:</b>	
Contribute from a housing perspective to the development of the Joint Health and Wellbeing Strategy and the underpinning Joint Strategic Needs Assessment (JSNA) including consideration of housing circumstances which are important social determinant of health	Review lettings arrangements to increase the proportion of lettings made to overcrowded households
Identify residential areas at risk from flooding and consider measures to reduce flood risk and increase flood resilience.	Make greater use of mapping capabilities to better understand the spatial dimension of housing issues across the borough
Contribute from a housing perspective to local area action through both taking part in neighbourhood action and in using housing intelligence to identify need for local area action	

**Key Performance Indicators**

- Number of social housing lettings to overcrowded households

## Priority two: Increasing Access to Affordable Housing

### ***Key outcome: An improved ability for Hillingdon residents to access good quality affordable housing***

The affordability of housing continues to be a major challenge for those setting up home for the first time and for those who need to move to a larger dwelling. The inability to afford housing in the local market is no longer an issue affecting a minority of households but one affecting most newly forming households attempting to access the housing market. Wide ranging consequences include overcrowding, adverse impacts on mental and physical health and employers' ability to attract staff.

The coronavirus temporarily held up new development and is generating pent up demand from delayed evictions and from rough sleepers that have been brought in off the streets. The Government has supported renters during the pandemic by banning evictions except in specific cases (such as anti-social behaviour). However, the ban was lifted at the end of May 2021, and many renters are at risk of becoming homeless. There is a risk of widespread evictions starting during summer 2021 with reports of one in twelve private renters having been served with notice since the onset of Covid-19 and one in three households in fear of losing their home.

Following an earlier temporary restriction on home moves, house prices have bounced back well, aided by a temporary suspension of Stamp Duty Land Tax (SDLT). The London rental market has seen some reduction in rental costs but mostly affecting inner London, with rents in Hillingdon remaining fairly stable and beginning to show signs of increasing. The combined impact of the Coronavirus and leaving the European Union mean that there is still much uncertainty and continuing risk to the economy, unemployment, the housing market, construction industry, evictions and homelessness.

This housing strategy aims to:

- Increase the provision of new affordable housing
- Take forward regeneration proposals to provide more, good quality, affordable housing
- Increase the proportion of affordable housing delivered as low cost rented housing to meet predominant housing need
- Include within Low Cost Home Ownership (LCHO) provision, properties aimed at those with household incomes of £30,000 to £50,000
- Maximise the availability of larger family homes of three and four bedrooms or more to rent at affordable levels.
- Prioritise the availability of housing to facilitate the progress of regeneration projects and to avoid the use of temporary accommodation for homeless households
- Release more under-occupied social rented properties for use by families

- Make best use of existing housing for instance, through transfers, conversions or extensions

## Need for Affordable Housing

There are in the region of 1,200 new households forming in Hillingdon each year. At the time of publication of the last Strategic Housing Market Assessment (SHMA) for Hillingdon in 2018,<sup>8</sup> the largest number of homes needed in Hillingdon were those with two and three bedrooms. However, there is also a need for significant numbers of larger four bedroom plus dwellings. Because four-bedroom homes are much harder to source, the greatest supply and demand mismatch is for these large family homes. Three-bedroom homes are easier to source than four beds but are not brought forward anywhere near as regularly as two beds. For this reason, increasing the delivery of large three- and four-bedroom family homes, is a specific aim of the strategy. More than three quarters of those requiring affordable housing can only afford low cost rented products such as Social Rent and London Affordable Rent.

While there are a greater number of households needing affordable housing at low-cost rent levels, the council also recognises the need to provide a mix of housing to meet the needs of different groups. Home ownership remains the tenure of choice for many households and the council will continue to support access including through low-cost home ownership products.

Subsequent to the SHMA there has been a considerable increase in need for one-bedroom homes or studios for mainly single people, but also some couples. The Homelessness Reduction Act 2017 has been in operation since April 2018 and this, alongside an increased focus on rough sleepers, especially since the start of Covid-19, has meant a significant increase in the number of single homeless people that the council has needed to support into accommodation. This has resulted in an altered housing need profile, with many more households requiring one bedroom needing to be housed.

At the end March 2021, there were 2,738 households on the housing register requiring low cost rented housing. The number has increased rapidly with 1,000 more households on the register than there were just two years ago. While the highest number of applicants on the housing register require three-bedroom homes, the number of applicants for one-bedroom homes is rising the most rapidly.

Supply of one-bedroom homes is more prevalent than larger housing, accounting for almost half of all social sector lettings in Hillingdon and almost 40 per cent of private rented sector supply. The greatest mismatch between supply and demand continues to be for larger properties. Four-bedroom homes are the most difficult to acquire and there is a need for some homes of this size to be provided each year, however there are a

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<sup>8</sup> London Borough of Hillingdon: Strategic Housing Market Assessment Update, Report of Findings, October 2018, Opinion Research Services

great many more households that require three-bedroomed homes and there is consequently a need for many more three-bedroom homes to be made available.

There are also particular affordability issues for single people under 35 and for single parents. Those under 35, with some exceptions, only qualify for the shared accommodation LHA rate. This is around 50 to 55 per cent of the 1-bedroom rate.

The coronavirus crisis has highlighted the importance of many types of key workers, including those working in the NHS and those working to provide local public services but also workers such as those staffing supermarkets and other shops. While the council does not consider that restricting the availability of housing to those in specific roles is the most effective approach, this housing strategy does aim to deliver types of affordable housing that are accessible at salary levels typical for a range of key workers.

The housing strategy has particular aims to make affordable housing available for those affected by regeneration, and to house homeless households in settled housing.

A high proportion of those on the housing register (46%) are already social housing tenants and are awaiting a transfer. Lettings to those requiring a transfer also release a tenancy and therefore enable another households housing need to be met. The strategy consequently aims to increase the number of transfer lettings, especially to those in Band A requiring a management transfer and to those releasing larger properties.

### **Housing need of households affected by regeneration**

The residents of Hayes Town Centre Estate and the four high-rise blocks at Avondale have been consulted and have voted in favour of regeneration proposals for their homes. The proposals will increase the amount of affordable housing, but the initial impact will include an increased demand on affordable housing as residents at the start of the regeneration process will need to be decanted while the works take place. For later phases of delivery moves can be accommodated within the new development, but in the initial phase, rehousing options will need to be found elsewhere, placing an additional pressure on available lettings.

Current estimates suggest that phase 1 of the regeneration will lead to a requirement for 64 households to be decanted. Properties will need to be available from late Spring 2021 and the phase 1 sites would need to be cleared by June 2022. A housing audit has highlighted an increased need for larger accommodation. In addition to the need to rehouse residents with a secure tenancy, some temporary accommodation residents will also need to be rehoused.

### **Housing needs of homeless households**

There is considerable demand for affordable housing from those who are homeless. The causes of homelessness are wide ranging and while some homeless people have vulnerabilities and support needs, there are also significant numbers of homeless

households whose homelessness is a result of being unable to access or retain affordable housing (60% in the review completed for the current homelessness strategy). Consequently, increasing the availability of affordable rented housing in both the social and private sectors is key to preventing and relieving homelessness and to a significant extent homelessness is part of the general needs affordable housing challenge. Specialist housing provision is needed for some homeless people with support needs, but for most mainstream housing is required, in either the social or the private rented sector, with floating support if needed.

Settled housing improves life chances in many ways. The council has been successful in reducing and seeks to further reduce reliance on temporary accommodation. In particular, the council seeks to reduce the use of costly emergency accommodation. At the end of March 2021, there were 428 homeless households in temporary accommodation, of which 169 are in emergency accommodation. The council has a target to reduce the number housed in emergency accommodation to 100 by the end of March 2022.

In addition to the homeless households placed in temporary accommodation, there were 87 rough sleepers also housed in temporary accommodation at the end of March 2021, who were placed as part of the 'Everyone In' initiative to bring rough sleepers in off the streets as part of the response to Covid-19.

Supply for homeless households is needed to prevent placements in temporary accommodation; to provide move on from temporary accommodation to settled housing; to reduce the overall numbers of households in temporary accommodation and to reduce the amount of bed & breakfast accommodation used as temporary accommodation.

Settled supply in the social and private sector combined is averaging 52 placements a month for homeless households, half in the social sector and half in the private rented sector. Lettings through the social housing allocation policy have totalled 555 in 2020/21. This is less than the 729 recorded in 2019/20, however the proportion made to homeless households increased resulting in similar numbers of lettings to homeless households. The council's Resettlement Team work to move residents out of and prevent their move into emergency accommodation by securing properties in the private rented sector. This includes some referrals through the 'Out of London PRS' project. The scheme is widely used for those that do not have a long association with the borough and for some households affected by the benefit cap. A flat rate incentive is required for each placement made under the scheme and families are provided with on-going support with their move such as signposting to employment, benefits, GP's, schools etc.

The overall number of households in temporary accommodation has reduced slightly throughout 2020/21, but as leased properties have been handed back, the proportion

housed in emergency accommodation has increased. The numbers are however comparatively low when compared with other London boroughs in general.

The number of leased properties will decline further in 2021/22 and there will be additional demand pressures due to both the need for decants for the regeneration programme and increased demand as a result of a backlog of private sector eviction cases that will work their way through the courts now that restrictions resulting from Covid-19 are being lifted. The increased homelessness demand resulting in a requirement for the council to assist in sourcing accommodation is estimated at 20%.

Without action to increase the supply available this additional demand will result in additional emergency accommodation placements that are both costly to the council and fail to provide a settled home.

Homelessness is covered more fully under the final priority 'Supporting Independent Living' along with other types of housing aimed at specific groups of people including those with vulnerabilities and support needs.

## **Commissioning Needs for Affordable Housing**

Although the supply of settled affordable housing across the private and social sectors has been keeping pace with homelessness demand, it has not reduced the backlog of households in temporary accommodation and demand is set to rise. Furthermore, the stock of leased accommodation for use as temporary accommodation is decreasing and is being replaced by increasing numbers in emergency accommodation. In the past year, the overall number of social lettings has reduced. There have been very few new dwelling completions, as a result of Covid-19, and this has impacted significantly on the overall number of lettings available.

As construction work has restarted, 2021/22 is expected to provide new affordable homes and this will help to increase the number of lettings available. This will not however be sufficient to meet the extra demand. Some of these pressures are temporary and the regeneration projects will begin to provide new homes resulting in less pressure in later years. There will however still be a need to increase the delivery of affordable homes above current levels.

The council will continue to access affordable homes in the private rented sector as far as possible, as well as social rented housing to house homeless individuals and families. The total annual supply requirement from relets of existing homes, new social housing lettings and private sector supply is estimated at 1,300 homes per annum.

Given the difficulty in accessing larger homes, we will aim to increase the delivery of particularly three but also some four bed roomed homes in the social sector.

## Action to increase access to affordable housing

Subject to viability, the majority of affordable housing provided will be required as Social Rent or London Affordable Rent. While there are a greater number of households needing affordable housing at low-cost rent levels, than needing intermediate housing, the council will continue to aim for an affordable housing mix to meet a range of needs in line with planning requirements.

Affordability barriers include both the lack of necessary deposits to access properties, especially in the owner-occupied sector, and insufficient income to afford monthly rent/mortgages. London Living Rent (LLR) can be more accessible than Shared Ownership for those on lower incomes, but it is a longer route to part ownership. Following a transitional period, in future 25% of affordable housing will need to be provided as 'First Homes'. These homes can provide an attractive option for those that can afford them.

For those on the lowest levels of earnings realistic housing options are social rent/LAR or private rents set below the LHA level, all of which are in short supply. Low Cost Home Ownership options will aim to address needs of households at a mix of income levels, but this will specifically include addressing the needs of those households with incomes between £30,000 and £50,000.

Hillingdon's recently adopted Local Plan Part 2 requires a minimum of 35% of all new homes on sites of 10 or more units to be delivered as affordable housing, with a tenure split of 70% Social/Affordable Rent and 30% Intermediate (Shared Ownership and London Living Rent). Under proposed changes requiring 25% of housing delivered through developer contributions to be First Homes, they would replace the majority of the Shared Ownership and London Living Rent homes provided through planning obligations.

Build-to-rent schemes will be exempt from the requirement for 25% of affordable homes to be provided as First Homes, as will proposed developments providing specialist accommodation (i.e. for older people or students), and sites exclusively for affordable housing or for self or custom build.

Delivery of affordable housing increased over the last couple of years to reach 244 affordable completions in 2019/20. In the current year, 2020/21, because of the impact of Covid-19 on the construction industry, there were just 10 affordable homes that were completed March 2021 and let in April. In future years, the increase in affordable housing supply evident before the impact of Covid-19 will need to continue to meet increased targets in the Draft London Plan. Sites delivering affordable housing have been delayed rather than stopped altogether and it is anticipated that there will be a significant upswing in 2021/22. This housing strategy aims to increase the provision of affordable homes.

The council will continue to seek affordable housing via planning contributions and through both its council house building and Registered Provider development programmes. The Hayes Town and Avondale estate regeneration are expected to deliver in the region of 720 homes. In addition to the regeneration programme, developments confirmed in the council's own building programme are scheduled to deliver 163 homes. Continuing council delivery beyond the current house building programme will rely on identifying new development opportunities and as sites suitable for development diminish, different types of opportunities will be considered. Regeneration of areas of council housing will have a more prominent role to play in future development.

The Private Registered Provider (PRP) development programme was, like the council's own programme was held up in 2020/21 due to Covid-19. Over the two years 2021/22 and 2022/23, PRPs are expected to deliver at total of 704 affordable homes of which 454 are expected as intermediate housing and 250 as low cost rent.

The council adds to the Housing Revenue Account (HRA) housing stock through a programme of buying back properties previously sold under the RTB. These purchases are part financed through RTB receipts and contribute to the required one for one replacement of properties sold under RTB. Acquisitions of affordable housing using Right to Buy receipts will also continue.

In the private sector the sharer's market has grown considerably as one of the solutions to the lack of affordable housing. This caters predominantly but not exclusively for young people. Build to Rent dwellings are often provided with bedrooms of equal size and a shower room each to cater for sharers. An increasing number of traditional family homes are let to people sharing, including larger homes let as houses in multiple occupation. The type of house sharing previously associated with students is now providing homes for a larger section of the population. It may be that the move towards sharing will be impacted by coronavirus, but with continuing affordability issues, sharing seems likely to remain a significant feature of the housing market.

Sharing opportunities have not in general appeared in the social housing sector in the same way, however sharing can provide a useful solution for some single homeless people and rough sleepers. Although shared housing in the private sector is common, it is not often affordable to those on benefits and in receipt of housing benefit at the shared accommodation rate. Shared housing is not however suitable for everyone including many with particular vulnerabilities. Opportunities to lease larger council or housing association owned properties to voluntary sector partners to manage and use as shared housing for vulnerable or homeless people will be sought as part of the housing pathway for homeless households.

## **Self-build and custom housebuilding**

The Council is required by the Self-build and Custom Housebuilding Act 2015 to keep a register of individuals and groups who are seeking to acquire serviced plots of land in the borough for their own self-build and custom housebuilding, and to give suitable development permission to enough suitable serviced plots of land to meet the demand which is established by entries added to the register.

The Council has adopted local eligibility criteria, which includes evidence of a period of residency in the borough and of sufficient resources to purchase a self-build plot of land. Given high demand and limited land availability, the Council does need to prioritise individuals with the strongest connection to the area and support their wish to bring forward self-build and custom housebuilding projects.

## **Making best use of existing social housing**

In line with council's priority of putting residents first, it is a general condition of the Social Housing Allocation Policy that the applicant has been continuously resident in the borough of Hillingdon for ten years or more. There are a number of exceptions to this including groups that the Housing Act 1996 (as amended) requires local authorities to give reasonable preference to in their allocation policies. Applicants who can show such a local connection, that would otherwise be placed in B or C are additionally entitled to a one-band uplift.

During 2020/21 there were a total of 555 social housing lettings by the Council and through nominations to housing associations. These were almost entirely re-lets of existing homes, due to the impact of Covid-19 on new build supply. For future years new developments should increase the number of lettings available. More than half of these lettings were for one-bedroom properties and less than a quarter had three bedrooms or more.

The council has nomination rights to PRP owned dwellings for social/affordable rent/LAR. This includes all nominations to new-build dwellings other than for a top slice to support pan London housing moves. The nominations entitlement for relets is 75%. For low-cost home ownership dwellings, the council will continue where possible, to work with PRPs to prioritise those living or working in the borough.

The Allocation Policy incentivises the release of under-occupied homes. A band B is awarded to those giving up one extra bedroom and band A for those giving up two extra bedrooms. This is currently being reviewed with a proposal that all under-occupiers be awarded a Band A and that they have priority over other most other Band A applicants. Those to be decanted as a result of the current regeneration programme are also prioritised and it is proposed that transfers to management transfer are similarly treated. A dedicated under occupation officer supports effective joint working across a range of

council teams including adaptations, housing benefit, homelessness prevention, social services, housing allocations and tenancy management and has resulted in an increase in the number of under-occupiers moving within the stock and releasing larger family accommodation. Downsizing incentives are available, the amount depending on the number of bedrooms released. These have also recently been revised.

At 1<sup>st</sup> April 2021, 73 per cent of the 2,738 households on the housing register were in Band A or B. Greater differentiation would provide improved clarity in identifying those households that should be prioritised for social housing in Hillingdon. It is therefore intended that a more comprehensive review of the housing register be initiated during 2022/23.

A small number of properties are released through the seaside and country homes scheme which prioritises applicants who will free up the most bedrooms.

The council introduced a flexible tenancy regime in June 2013, with most council tenants having a one year probationary tenancy followed by a five year fixed term tenancy. Towards the end of the five year period the tenancy is reviewed. The vast majority are offered another 5 year tenancy. While a number of providers have moved back to lifetime tenancies, the council has found the regime to be useful in reducing under-occupation and making best use of our housing stock. Going forward, reviews will be at a rate of around 20 per month.

As properties become available for letting, the opportunity to extend the property to provide a larger home or in exceptional circumstances to meet the specific needs of a particular household is considered. Extensions and conversions can be a cost effective way of increasing the supply of larger properties and we will continue to seek out appropriate opportunities for this.

Given the limited supply of affordable housing, it is important that available supply goes to those who need it. The council's Business Assurance Counter Fraud Team (BACFT) investigates cases of suspected housing fraud. During 2020/21 a total of 22 council rented properties have been recovered to be re-let to residents with a genuine housing need.

## **Private rented sector supply**

The private rented sector in Hillingdon expanded rapidly in the first decade of the 21<sup>st</sup> century and continued to do so in the early part of the second decade. More recently however, the number of households in the private rented sector has stabilised and may now be starting to decline.

A key barrier to accessing the private rented sector has been a freeze in recent years on LHA rates. The freeze was lifted last year as part of the response to the coronavirus, and a link to the 30th percentile of market rents was reinstated. Although this link is not being carried forward it has, in the short term meant some fairly substantial increases in the maximum benefit payable (although the gain is limited by the level of the benefit

cap) e.g. the 2019 LHA level for Outer West London for a two-bedroom property was £1,056 and is now £1,172. For a three-bed property it has increased from £1,216.28 to £1,396. The LHA can still be limited by the level of the benefit cap, which is the maximum amount that a working age household can receive in benefits. In London, this is currently £296.35 per week for single people without children and £442.31 per week for single parents and couples with or without children.

Overall access to private rented sector housing continues to be problematic with rents remaining high. Tax and regulatory changes have led to some private landlords exiting the sector, and it is predicted that 'build to rent' investors will, to some extent, step in and fill the void. Coronavirus has resulted in many tenants falling into arrears and there has been a stay on evictions with potential repercussions for landlords and tenants. The stay has been lifted from 1<sup>st</sup> June 2021 and an increase in homelessness approaches over the summer is expected as a result.

Build to Rent (BTR) are new build developments specifically designed for renting, rather than for sale and are typically owned by institutional investors and managed by specialist operators. To date BTR housing completed in Hillingdon has been let on this basis once complete rather than initially planned as BTR and consequently our usual planning requirements for affordable housing tenure mix have and will continue to be applied for developments of this nature. BTR developments in Hillingdon have been priced at the top end of the market and are unaffordable to most newly forming households.

## Empty Properties

The Council Tax Base records a total of 1,476 empty properties in Hillingdon on 5<sup>th</sup> October 2020. Of these 869 had been empty for more than six months and 139 were being charged the empty homes premium. The Council Tax Base also records 1,904 second homes in the borough on 5<sup>th</sup> October 2020.

Hillingdon Council no longer allows for a discount on council tax for properties that are left empty for a short period. Properties that are left empty for more than two years are charged council tax at a rate of 150%. Local authorities have considerable discretion regarding the level of council tax charged on empty properties.

Turnaround of empty properties within the council's own housing stock is actively managed by a cross departmental group to take collective ownership of the process, remove blockages and achieve swift and effective lettings.

In the private sector, we will work with landlords and consider options on a case by case basis to bring empty properties back into use.

<b>We will:</b>	
<p>Continue to meet housing delivery targets and promote the delivery of affordable housing through our housing and planning policies. Subject to viability, the council will seek 35% affordable housing on larger sites, rising to 50% on publicly owned land and schemes involving the net loss of industrial capacity</p>	<p>Be embarking on a review of the Local Plan and any change to affordable housing policies will be observed in the implementation of the Housing Strategy. The council adheres to the requirements of the Mayor's Affordable Housing SPG (2017) and New London Plan</p>
<p>Set out a forward plan for the commitment of Right to Buy receipts to projects. To minimise risk from delayed or abortive development projects, the plan will aim to utilise each receipt at least one year ahead of the deadline for expenditure.</p>	<p>Continue a Right to Buy buy-back programme aiming to purchase in the region of 50 properties a year. In addition to ex-council stock, the search area for properties will be expanded to include market housing in locations with existing council dwellings. Acquisitions of individual dwellings and groups of dwellings will continue to be considered on a case by case basis.</p>
<p>Continue to develop new council owned affordable housing as well as working with registered providers and the GLA to provide new affordable homes through the Homes for Londoners programmes.</p>	<p>Establish a task and finish group to consider options for future rent policy taking account of planning requirements, housing need and affordability and impact on the HRA Business Plan.</p>
<p>Complete an analysis of new development options. This will include consideration and rating of regeneration options.</p>	<p>Continue to seek a mix of affordable housing that provides as close as possible to 70% of affordable housing social rent / LAR and a minimum of 30% which has been viability tested at the Local Plan making level. There will continue to be some flexibility for Affordable Rent dwellings to be provided at a higher rent for some or all of the remaining 40% where viability is an</p>

	<p>issue. This should not exceed LHA levels.</p> <p>The council's preference for the remaining 30% of housing to be delivered as intermediate housing is that it be provided through low cost home ownership products.</p>
<p>Target in particular, those households with incomes between £30k and £50k to support owner occupation for as wide a group of residents as possible. Where shared ownership options are provided, the council will seek to ensure that low percentage shares are available within the mix.</p>	<p>Maximise the number of larger family dwellings of three bedrooms or more within affordable housing provision.</p>
<p>Work with PRP and voluntary sector partners to extend the use of shared housing to provide affordable housing for single homeless people.</p>	<p>Set targets for the proportion of social housing lettings to households on the housing register for different reasons and monitor these in line with priorities.</p>
<p>Undertake a full review of the social housing allocation policy.</p>	<p>Determine policy for and how best to register interest for types of intermediate housing other than shared ownership for sale / part sale and for rent, especially LLR. The Council already has a register for shared ownership dwellings. The impact of 'First Homes' and how will be administered also needs to be considered.</p>
<p>Continue to offer a bespoke personalised service to incentivise the release of under occupied council housing.</p>	<p>Continue to offer fixed term tenancies. The policy will however be altered so that where a tenant has been found not to have complied with the requirements of their tenancy agreement, there will be the option to grant a tenancy for a shorter period of time than the standard five years.</p> <p>A review of the policy to consider costs and benefits, including administration costs will be scheduled for when there is</p>

	sufficient experience of the implementation of tenancy reviews to draw on.
Consider the potential for extensions and conversions on a case by case basis as properties become void.	Continue close working between the BACFT and housing colleagues to investigate housing fraud.
<p>Follow policy H11 of the new London Plan with regard to build to rent housing and as part of our Local Plan Review will consider the viability of alternative approaches.</p> <p>For developments submitted to the local planning authority as 'build to rent' from the outset with the affordable element as discounted market rent, our requirement will be that where viable this is supplied at LLR levels or lower.</p>	

## Key Performance Indicators

- Number of affordable homes delivered
- Affordable housing pipeline
- Number of homes delivered at LAR and social rent levels
- Number of social housing lettings in dwellings with three bedrooms or more
- Number of households in temporary accommodation
- Number of households in emergency accommodation

## Priority three: Leading on Improving Housing Standards

### ***Key outcome: Warm, safe, good quality housing across all tenures***

The safety of resident's is the council's top priority in relation to housing standards. Prior to the Grenfell Tower tragedy on 14 June 2017, investment in safety measures in the council's housing stock had already been underway which meant that the council was in a good position to step up our response to ensuring safety in council homes. In the four years following the fire, in addition to fire safety concerns, housing standards in general have been brought into greater focus including the investment needed to maintain housing; the requirements to achieve carbon emission reductions and the impact that stock condition has on resident satisfaction. Repairs and maintenance of council and housing association housing is a key area of service delivery valued by residents and is also an area with significant demand and cost pressures.

As well as a greater focus on housing conditions in the social sector, there has been an increased policy focus on housing conditions in the private rented sector especially in relation to rogue landlords.

Climate change has increased in prominence on housing agendas. The Committee on Climate Change in their February 2019 report on UK housing stated that 'we will not meet our target for emissions reduction without the near complete decarbonisation of the housing stock'. Since 1990, the UK has reduced domestic gas emissions by 45%, but emissions from housing have not fallen.<sup>9</sup>

This strategy aims to:

- Continue to prioritise fire safety in works to and the management of the council's housing stock.
- Increase investment in the council housing stock prioritising additional safety elements, compliance and works to address climate change and fuel poverty agendas.
- Be prepared to meet the requirements of the new Building Safety regime.
- Develop plans to decarbonise housing across tenures, starting with quantifying the requirements to achieve zero carbon in the council's housing stock.
- Help low-income households to reduce energy expenditure in their home.
- Maximise the number of council owned homes with a Band C energy performance rating, or higher.
- Develop a more detailed understanding of housing conditions in the public sector and establish a road map to ensure that council housing stock meets good housing standards.

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<sup>9</sup> Housing and Net Zero, House of Commons Library Briefing Paper Number 8830, August 2020

- Develop a more detailed understanding of housing conditions in the private sector to inform future policy options including for discretionary licensing.
- Work collaboratively across services and agencies and take a robust enforcement approach to combating rogue landlords.

## **Building Safety - Cladding**

Following the Grenfell Tower fire, the most immediate focus of the Government has been cladding systems on high rise blocks and in particular, those with Aluminium Composite Material (ACM), as this was in place at Grenfell Tower. The council does not itself own any tower blocks with ACM cladding but there are two such private sector blocks in the borough. In total there are 10 council owned and 20 private sector high rise blocks of 18 metres + or higher in Hillingdon with some form of cladding. Where appropriate the council will work with the London Fire Brigade in the use of enforcement action against the owners of buildings that fail to undertake necessary remediation.

## **New Building Safety Regime**

A new safety regime being introduced by the Building Safety Bill will apply to multi-occupied residential buildings (private residential and student accommodation) of 18 metres +, or more than six storeys.

Key measures in the draft bill are described under the section on the current legislative and policy context for housing (see appendix 1). The Bill requires that both the Accountable Person and the Building Safety Manager must proactively engage with residents, provide them with key building information and develop a Resident Engagement Strategy.

The council will develop a Building Safety case for each higher-risk building, considering all risk factors, how these might be mitigated and the layers of protection that can be applied to each building. The focus will be on ensuring resident safety in each higher-risk building and taking a holistic view that integrates current compliance activities for each to report on how many are safe or unsafe. Evidence will be collected and kept up to date to establish a 'golden thread' of information for each building.

## **Standards in Council Owned Housing**

### **Fire Safety Work in Council Owned Dwellings**

The council has acted decisively in prioritising work to council housing stock that is directly concerned with fire safety. An ongoing and up-to-date programme of Fire Risk Assessments (FRAs) is in place which includes annual assessments for 11 tower blocks and for 21 sheltered housing schemes, the property types identified as having the highest level of risk; and for 489 medium and low-rise housing blocks which have the next highest risk rating.

A Fire Safety Work-Stream follows through recommendations from FRAs to ensure that necessary work is undertaken to the council's housing stock to ensure compliance with fire safety regulations. This workstream is an important and prominent part of the HRA works to stock programme, which was stepped up promptly following the Grenfell Tower tragedy and is ongoing. The council is working closely with the London Fire Brigade (LFB) and sharing relevant information.

Works have been completed in those building types considered the highest risk first, with high rise dwellings and sheltered housing prioritised. Safety compliant fire doors have been installed in 3,699 homes and additional installations are being programmed. A range of other fire safety work has been completed or is underway and this includes sprinkler systems which are being installed in all council owned residential buildings 18m and above. A specific inspection regime to cover the common areas of tower blocks is being introduced.

There is fire safety signage in all communal areas with instructions and information for residents to be fire aware and know what to do in the event of an emergency.

Caretaking services have also been prioritised around ensuring fire safety, including cleaning of communal areas, arranging removal of any waste and reporting repairs.

### **Evacuation plans**

The management of higher risk buildings has also been reviewed to ensure the protection of vulnerable tenants. Personal emergency evacuation plans (PEEPs) are in place for tenants within our sheltered housing schemes and across our higher-risk buildings and information in the Premises Information Box (PIB) is kept up to date. Management practices to improve safety including looking at how information is best communicated, changes to the Social Housing Allocation Policy for higher risk buildings, and the use of Estate Regulations are being reviewed and improved.

### **Planned works to council dwellings**

In addition to fire safety works, various other planned works programmes are underway including kitchen and bathroom replacements, window replacements, a roof renewal programme and CCTV upgrades in areas of high crime, anti-social behaviour and fly tipping. The Green Homes Grant is contributing towards planned works. These are shown under the heading of Climate Change below.

Programmes are tendered over a number of discrete phases to ensure that the council is able to support SMEs, take advantage of competitive prices and to be able take corrective action quickly, including the use of alternative suppliers should contract delivery issues arise.

Works to stock are planned based on the information held in the council's asset management information system which is updated as and when new information becomes available.

Considerations taken into account in prioritising works to stock include areas of statutory compliance; elements that are not of a good standard or shortly to become so; value for money achieved through spend to save to avoid additional costs accruing due to stock deterioration; and impacts for particular vulnerable households. The requirement for planned works in sheltered housing schemes needs to be reviewed as part of a wider approach towards future housing for older people. This is considered further under Priority Five: Supporting Independent Living.

A project will be completed to analyse costs associated with disrepairs to identify areas of planned work likely to make the largest 'spend to save' impact over the short and medium term.

While safety remains a clear priority, going forward the council will also focus greater attention on the overall quality and condition of council homes and the surrounding areas. A planned approach will be developed with intelligence use of data to inform options for planned maintenance, improvements and retrofitting for improved energy efficiency and carbon reduction, alongside redevelopment options to achieve a good standard of housing stock fit for the future.

This work will be taken forward as part of the HRA Business Plan and an HRA Asset Management Strategy.

### **Gypsies and Travellers**

Hillingdon has a council owned and managed caravan site, Colne Park in West Drayton. The site which was built in the 1960s has 20 plots with utility blocks consisting of a bathroom and small kitchen area along with a concrete hardstanding or pitch. The council is responsible for the upkeep of all communal areas, plots and utility buildings. The site is in need of some improvement works. There are plans being consulted on to create some new parking spaces. Additional works are being identified and costed to improve standards in the utility blocks and the site manager's office and the potential for additional pitches and site facilities. Funding options are being explored.

### **Private Rented Sector Housing Standards**

The private rented sector has doubled in size in Hillingdon in the last 20 years and provides around 22% of homes in the borough. It now accommodates a more diverse range of households including households with children and many remain in the sector long-term. Housing standards generally have improved across all sectors, but category 1 hazards are still more likely to be found in the private rented sector than in other tenures.

The council has a statutory duty to keep the housing conditions in their area under review. Experience suggests that there are concerns regarding standards in the private rented sector in Hillingdon and a need for the council to develop a more detailed understanding of the sector including who owns and lives in the sector, the type and

location of housing and its condition. A specification for a private sector stock condition survey and/or modelling will be developed. There is also a need to develop a clearer picture of how stable the sector is, including understanding how long people are staying in their homes, how often and how far they are moving. Specific concerns in the private rented sector include lack of fire precautions, inadequate heating, overcrowding, damp and mould growth and poor housing conditions for vulnerable households.

A risk based approach is taken to responding to complaints and enforcement action. While most landlords behave responsibly, there is a sizeable minority that do not. The council is committed to using the resources at its disposal to tackle rogue landlords and this relies on taking a holistic approach across various services within the council and with partner agencies. More formalised structures for sharing knowledge will be established and will inform the development of a more detailed Private Sector Housing Strategy. The council will take efforts to support good and responsible landlords in the sector and encourage good standards of accommodation and management.

Where appropriate links will be made with local area, community and neighbourhood work which address concerns in particular localities in the borough. See also Priority one, Place Shaping.

### **Landlord and tenant relations**

We will review the information that we make available to both landlords and tenants and the range of communication methods used. Landlords and tenants should know about their rights and obligations and about what they can do when things go wrong. We will continue to encourage landlords to join an accreditation scheme. Landlord forums will be held but for the time being will take place online. We will keep this under review.

### **Houses in Multiple Occupation**

All large HMOs where there are at least five tenants living there, forming more than one household and there is sharing of facilities require a licence. The number of multi-adult households increased between the census years of 2001 and 2011 from 1,608 to 3,074 (not all of these would be HMOs) and this trend is likely to have continued. At 1 April 2021 there were 600 Houses in Multiple Occupation (HMOs) licensed in Hillingdon, but it is thought that the number which should be licensed is considerably larger. Our estimate is in the region of 4,500 HMOs of which an estimated 1,500 would require a licence. Identifying those HMOs that should be licensed and dealing with licensing applications promptly are priorities for the Private Sector Housing Team.

### **Enforcement Action**

The council increasingly adopts a robust enforcement stance against landlords who do not comply with their statutory obligations. In response to the Covid-19 outbreak, property inspections and enforcement action has been focused on the most urgent and high risk cases. Priority has been given to ensuring that vulnerable residents are protected. The Private Sector Housing Team focuses effort on properties where the worst housing conditions are found, which is usually in HMOs. These properties tend to be at the bottom end of the private rented housing market, where the poorest and most

vulnerable tenants are housed and typically where standards of management are lowest.

The council will continue to use its enforcement powers including Civil Penalties where appropriate and will work with internal and external partners to take holistic and concerted action to deter those landlords who consistently provide poor standards of housing and management. MHCLG funding secured in partnership with the London Boroughs of Hounslow, Ealing, and Slough council is helping to identify portfolio criminal landlords operating across boundaries.

### **Discretionary Licensing Schemes**

Officers are currently undertaking a feasibility study to determine if adopting discretionary licensing will raise standards and assist in deterring rogue landlords from managing private rented accommodation. The council is giving consideration to both selective licensing for some parts of the borough and for additional licensing powers.

### **Permitted Development Rights**

There are continuing concerns regarding the impact of permitted development rights (PDR) on the quality of homes and their environment. The council made an Article 4 Direction which came in force on 22 November 2017 to remove PDR for the change of use from an employment building to residential in specific parts of the borough. In September 2020 the council agreed to make and modify non-immediate Article 4 directions (with an intended implementation date of September 2021) to remove new permitted development rights for new residential development in designated employment and industrial areas. This will mean that proposals must be submitted for planning approval in the normal way. Subsequent announcements regarding further potential changes may mean that the Article 4 directions need to be revisited.

## **Climate Change**

Work on decarbonising the housing stock will need to combine the challenges of achieving net zero with potentially revised housing standards and Health and Safety. In the short term there is a need to develop a granular understanding of the cost requirements of achieving zero carbon across the council's housing stock before setting out an approach to work towards decarbonising council owned housing stock.

Technology is continuing to develop in relation to energy efficiency and in order to take best advantage of innovation, plans will need to have built in flexibility and a number of pilots are anticipated in advance of rolling out a longer term plan.

During 2021/22 the council will set out an approach to work towards decarbonising council owned housing stock and will work with others to similarly encourage decarbonisation in other housing tenures. For the council's housing stock this will include consideration of the replacement of gas boiler systems; measures to improve energy efficiency including wall and roof insulation; expanding the use of energy

efficient fittings such as LED lighting and the installation of renewables. The council will encourage owners in other housing tenures to adopt similar measures.

Although actions to address climate change and to address fuel poverty are sometimes in alignment, it is not always the case and there is a balance to be made between meeting requirements to be warm and safe now and promoting energy efficiency and low carbon energy for the future.

## **Fuel Poverty**

Fuel poverty can leave people struggling to heat their homes affordably during the winter months. Whether an energy bill is high or low might mean the difference to whether they will be cold or run out of money. This seriously affects residents' health, wellbeing and quality of life. The impact on the NHS is severe, and cold homes lead to Excess Winter Deaths, especially among the most vulnerable in society.

Energy efficiency and affordable heating at home represent two of the most effective ways to combat fuel poverty and maintain a healthy home. In turn, energy efficiency reduces the impact of homes on the environment.

## **Green Homes Grant**

The council has successfully bid for Green Homes Grant funding for local authorities for energy efficiency works to council owned properties occupied by those on low incomes. The Green Homes Grant Local Authority Delivery Scheme is being used to upgrade 2,081 council homes with SAP ratings of E, F and G where households incomes do not exceed £30,000. Upgrades will include loft insulation, cavity wall insulation, LED lighting and replacement of single glazed windows.

In developing the Private Sector Housing Strategy options to improve energy efficiency in the private rented sector will be considered and work will take place to develop an improved understanding of how fuel poverty affects Hillingdon residents. We will continue to work with our partners and explore further funding opportunities to address fuel poverty in Hillingdon.

The council will work with HMO landlords to ensure that their properties are compliant with the Minimum Energy Efficiency Standards (MEES) when they grant a new tenancy to new or existing tenants.

## **Energy Efficiency in New Homes**

The London Plan has required that all new build homes in major developments be zero carbon since 2016. Development proposals are required to make the fullest contribution to minimising carbon emissions in accordance with the following energy hierarchy:

1. Be lean: use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy

Making a new home genuinely zero-carbon at the outset is a lot cheaper than retrofitting it later and will almost always reduce residents' energy bills too.

The major challenge for the building sector is the need to shift away from natural gas to low-carbon heat solutions.

<b>We will:</b>	
Work with the London Fire Brigade where appropriate in the use of enforcement action against the owners of buildings that fail to undertake necessary remediation	Prioritise in the council's works to stock programme, fire safety and health and safety more generally as well as compliance with standards, and heating and insulation
Carry out further work to improve the depth and breadth of customer insight across all high-risk buildings and the Social Housing Allocation Policy will be amended to restrict new tenancies to residents in higher risk buildings who can self-evacuate	Consider the use of 'estate regulations' as part of changes to management practices associated with fire safety and leaseholders in higher risk buildings
Introduce a specific inspection regime to cover the common areas of tower blocks including fire doors as part of a more intensive approach to the management of higher risk buildings	Establish a task and finish project to analyse the costs of day to day repairs and other costs associated with elements of disrepair to identify areas of planned work likely to make the largest 'spend to save' impact over the short and medium term. The analysis will seek to identify those aspects of planned maintenance that result in the highest costs if not undertaken promptly.
Develop the HRA Business Plan and Asset Management Strategy,	Develop a specification for a private sector stock condition survey/modelling which will

<p>incorporating a road map for good housing standards via future stock investment and redevelopment.</p>	<p>in addition collate information to assist in gaining a wider understanding of the nature of the private rented sector in Hillingdon and assist in targeting resources.</p>
<p>Establish more formalised structures and processes to share knowledge and intelligence regarding the private rented sector and to develop a comprehensive, co-ordinated and disciplined approach to ensuring a well-managed sector.</p>	<p>Improve knowledge and intelligence through partnering arrangements and research opportunities to inform the development of a more detailed Private Sector Housing Strategy.</p>
<p>Prioritise dealing with licence applications swiftly and efficiency and identifying additional HMOs that require to be licensed</p>	<p>Continue to tackle poor housing conditions and facilitate improved management of high-risk properties in the private rented sector</p>
<p>Continue to use enforcement powers including Civil Penalties where appropriate and work with internal and external partners to take holistic and concerted action to deter those landlords who consistently provide poor standards of housing and management.</p>	<p>Establish a multi-disciplinary task group to gather evidence regarding the prevalence of poor conditions in different parts of the private rented sector and consider the feasibility of different discretionary licensing options.</p>
<p>Develop a granular understanding of the cost requirements of achieving zero carbon across the council's housing stock and to formulate plans for those properties that are low, medium and high cost</p>	<p>Set out an approach to work towards decarbonising council owned housing stock and work with others to similarly encourage decarbonisation in other housing tenures</p>
<p>Deliver Green Homes Grant works to improve energy efficiency for low income households</p>	<p>Progress plans to attract additional funding to deliver improvements at Colne Park Traveller's Site</p>

### Key Performance Indicators

- % of council owned residential buildings 18m+ with sprinkler systems installed

- Number of improvements to council homes completed by type of work
- HRA Tenant satisfaction with landlord's repairs and maintenance service
- HRA Tenant satisfaction with the health and safety of their home
- Number of licensed HMOs
- Number of private sector housing enforcement notices served

## Priority four: Embracing the Charter for Social Housing Residents

***Key outcome: The council working together with residents delivers high quality housing services***

The Social Housing White Paper: The Charter for Social Housing Residents, was published in November 2020 and forms a central plank of the government's response to the Grenfell Tower fire. It lays out plans to move to a proactive system of regulating consumer standards in the social housing sector, with landlords subject to regular inspections and assessment against tenant satisfaction data. Councils are not, as yet, subject to proactive engagement with the Regulator of Social Housing (RSH) and will in future have much closer involvement with them. The white paper sets out a new Charter for Residents of Social Housing with seven headline promises.

### **Charter for Social Housing Residents**

#### **Headline Promises**

1. To be safe in your home
2. To know how your landlord is performing
3. To have your complaints dealt with promptly and fairly
4. To be treated with respect
5. To have your voice heard by your landlord
6. To have a good quality home and neighbourhood to live in
7. To be supported to take your first step to ownership

The Council intends to fully embrace the Charter, marking a step change in our relationship with residents. We will develop new engagement plans and processes and encourage a more open and collaborative culture to ensure that residents' voices are effectively heard and are able to have meaningful impact. We will also make full use of digital methods to reach a wider range of people and will adopt a digital by design approach to service improvement.

This strategy aims to:

- Meet consumer regulation standards
- Build up a more comprehensive profile of our tenants to inform service delivery
- Review how we make information available to residents and what information is provided
- Ensure that the residents' voice is heard at every level from policymaking to front line delivery

- Develop a comprehensive engagement strategy for greater meaningful engagement with council tenants and leaseholders.
- Implement a new structure to encourage wider resident involvement, scrutiny of our services and greater accountability and transparency
- Seek additional opportunities to improve service delivery through digitisation

## Resident Safety

The overall theme at the heart of the Charter for Social Housing Residents is the relationship that landlords have with their tenants. There is no more important aspect to this than earning residents' trust to keep them safe. While there are difficult trade-offs to be made between spending on new homes and existing homes, and on the type of investment to be made in homes, there is no question for the council that safety remains our primary concern.

Higher risk buildings are a clear area where assurance of safety, including the residents' ability to evacuate, is particularly necessary. An annual review of Fire Safety Management Plans across the housing stock will be undertaken. We aim to ensure that our residents are 'fire safe' and 'fire aware'. Hoarders can pose a particular fire safety risk to themselves and others and we will mitigate this through a dedicated panel to proactively manage risk in this area. In addition to aspects of safety relating to the buildings themselves, other aspects of safety include paying close attention to safeguarding issues such as domestic abuse and anti-social behaviour. Further developing our understanding of our tenant profile and risk factors for abuse will help in mapping where there are potential concerns. Safeguarding and domestic abuse are covered more fully under priority five on independent living.

## Performance Information

The Charter sets out that tenants should know how their landlord is performing, including on repairs, complaints, and safety, and how it spends its money, so that it can be held to account. A set of draft tenant satisfaction measures (TSMs) have been published by the RSH which include both tenant perception and quantitative measures. These are expected to be consulted on and finalised by summer 2022 and to be implemented from April 2023.

Councils and other registered providers are already required to report performance information annually to tenants, but there is little consistency on the content of the reports. A core set of measures will provide tenants with greater transparency about the council's performance and will also inform the RSH about how the council is complying with the consumer regulation standards under a proactive consumer regulation regime. An annual statement to tenants is expected as a minimum, but the intention is for a much more involved interaction between landlords and tenants and leaseholders.

We will review the way that information is made available to tenants, including via our website and in our formal annual report to tenants and will also consider how continuous performance reporting can be made available including via an app. The council is keen to embrace the culture change signalled to be more open with residents in sharing information beyond that provided through the tenant satisfaction measures and we will explore how best we can do this.

### **Benchmarking and the STAR survey**

The council is a member of HouseMark, a large membership organisation that uses data and insight to improve the operation of housing organisations and help them to achieve outstanding performance. Membership of HouseMark enables the council to participate in STAR surveys (Survey of Tenants and Residents) and benchmarking. Baseline benchmarking data for 2019/20 shows, in general that the council has comparatively low operating costs in relation to housing. Data relating to 2020/21 will be submitted by June 2021. Housemark is well placed to assist in setting a baseline for the council in relation to the proposed TSMs.

The council recognises the importance of customer feedback and has committed to using the STAR benchmarking tool as a key element in driving service improvement and shaping local offers. The survey measures satisfaction with the condition, and management of the home, the rent charged and the surrounding neighbourhood.

An initial STAR Survey was completed in January 2021. Analysis of 1,442 responses from tenants and leaseholders shows positive levels of satisfaction overall. Results detailing satisfaction with aspects of service delivery are analysed alongside service delivery and expenditure and will be used to inform future investment in works to the managed stock. A follow up survey will take place in Autumn 2021 and thereafter every 2 years as recommended by HouseMark.

### **Complaints**

To ensure that complaints handling is taken seriously, the Housing Ombudsman has published a new Complaint Handling Code. This promotes consistency across landlords' complaints procedures and learning from complaints to drive service improvements. The Code emphasises the importance of resident involvement in complaint handling through the formation of resident panels. The handling of complaints by the Housing Ombudsman is also to be speeded up and to make this work landlords will be required to provide necessary information promptly.

The council's corporate complaints procedure sets out how people can complain about any service. Regular reports on complaints and their handling are produced and learning is fed back to inform service improvement.

During 2020/21, the Council recorded 72 complaints regarding the Repairs and Maintenance Service and 23 regarding Tenancy Management Services. Of the 95 Stage 1 complaints recorded, 11 were upheld, 26 partially upheld, 54 not upheld and 4

withdrawn or cancelled with 75% of all stage 1 complaints responded to within the 10 working day target.

An initial self-assessment against the Housing Ombudsman complaint handling code has been completed and shows that the council's complaints procedure is largely compliant with the code. A need for regular publicising of the complaint procedure has been identified and this is being addressed. The complaints policy will be widely publicised through many routes. A documented approach to compliance with the code will be introduced and the self-assessment will be repeated annually. The nature of complaints will be considered on a quarterly basis to identify areas of concern and potential learning points.

## **Listening to our Residents and Treating them with Respect**

The Charter is about resetting the balance between landlords and tenants. As well as being concerned with standards, safety, and prompt repairs; it is also about residents being listened to and treated with respect, routes of redress when things go wrong and co-regulation with landlords and tenants working together.

We intend to transform the way we work with tenants and will implement a new involvement structure which supports wider involvement and promotes opportunities for tenants to challenge and scrutinise our services. Involving our 10,100 council tenants and 3,400 leaseholders in the decisions which affect their homes and local communities is a key priority for the council as a landlord and seeking ways to improve meaningful engagement with our tenants forms a key part of our housing strategy. We aim to treat all residents, with fairness and respect and to take their differing needs into account.

Work is already underway to respond to the Charter, and the council is making changes to ensure that residents are much more fully and meaningfully involved in shaping services. The Charter will however also be underpinned by a new, proactive consumer regulation regime, with updated consumer standards forming the bedrock. The new regulatory system will be outcome-focused, co-regulatory, proportionate, risk-based, and assurance-based. Primary legislation will be required, and full implementation is still some time off, however the RSH is clear that councils should not wait to respond.

To be assured of compliance with existing consumer standards and to look ahead to expected future changes, an initial self-assessment against the standards has been completed and it is planned that this exercise will be repeated on an annual basis. This has assisted in identifying priority areas to be addressed and the results of the self-assessment are feeding into future delivery plans. One of the areas identified is a need to review and further develop our current approach to engagement and develop a comprehensive engagement strategy. A failure to listen to and involve tenants meaningfully is one the key areas of concern to emerge from the work following the Grenfell Tower tragedy where tenants' safety concerns had not been acted upon.

Key elements of the strategy will include:

- Prioritising engagement in relation to health and safety
- Engagement approaches for different groups, including in relation to protected groups recognised in equalities legislation and vulnerable households and
- Use of new digital methods of engagement.

Specific groups that the engagement strategy will focus attention on include care leavers who are a priority group for avoiding tenancy failure, and the residents of the caravan site at Colne Park. Covid-19 has, as with other client groups, made communication with residents at the traveller's site more difficult, however contact has been maintained including regular visits by the council officers and a police liaison officer.

We will also develop and implement a statutory engagement strategy outlining how the council will work with residents living in high risk buildings in the context of fire safety and other areas of compliance. Localised resident engagement strategies will be developed for each higher risk building.

A key message of this housing strategy is the drive for a good housing standards. We recognise that listening to our tenants and their concerns and using their ideas is fundamental to achieving this ambition. The council is working with tenants and using customer insight from our interactions to understand what matters most to tenants across core areas of service delivery.

## **Impact of Covid-19 and Digital innovation and inclusion**

The use of IT, including robotics and social media is increasing all the time and we will be seeking to expand our methods of engagement to stay up to date with current developments as well as making use of more traditional methods. The council is exploring different ways to engage with residents through the use of non-traditional methods such as virtual meetings and links with social media. Increasing digital capabilities can also make significant differences to the effective management of housing services for both the council as a landlord and other housing services.

Covid-19 has had a significant impact on the extent to which services are delivered online. There has been a big increase in working from home, more interactions with tenants and residents happen over the phone and online and most meetings are arranged digitally. In many ways, this has been an acceleration of changes that were already underway. In line with these trends, advances are being made by the council in the use of robotics in efficient service delivery.

The move towards digital services can have both positive and negative impacts. Online services can be more cost effective and convenient, but they can also exclude

vulnerable people. The council will continue to explore the use of technology in providing efficient services while at the same time tackling digital exclusion and identifying safeguards needed for vulnerable tenants.

## Good quality homes in good quality neighbourhoods

An area where the council is aware that more work is needed to understand what matters to residents, is in relation to the shared areas of our estates. This includes internal shared areas to buildings and external communal areas surrounding our blocks and extends to the incidence of anti-social behaviour such as excessive noise or fly tipping in the neighbourhood. The council recognises the importance of the estate environment in ‘setting the scene’ for residents’ homes. This connects back to the importance of developing a localised understanding of those issues that matter most and developing responses at that local level as discussed earlier in the document in the place shaping section.

## Involving residents in the private sector

Involving our 10k council tenants and 3k leaseholders is a key priority for the council as a landlord, however the borough is home to 110k households in total, mostly living in the private sector as owner-occupiers or private renters or Housing Association tenants. It is important that residents in all housing tenures are able to be involved in housing issues in the borough. In addition to improving engagement with our own tenants, the council will be considering what further action can be taken to provide further opportunities for other Hillingdon residents to make their views known in relation to housing services. One particular aspect that will be taken forward is that post occupancy evaluation of new affordable housing developments will be introduced in respect of both rented and low cost home ownership dwellings. We will also explore how we can reach out to private rented sector tenants raising awareness of rights and responsibilities and routes for redress when things go wrong.

<b>We will:</b>	
Complete an annual review of Fire Safety Management Plans across the council housing stock	Establish a Hoarder’s panel mitigate the risk of fire and serious injury
Review our structures and processes for engagement during 2021/22	Develop a comprehensive engagement strategy for council tenants and leaseholders. Key elements will include: <ul style="list-style-type: none"> <li>• Communication regarding fire and other safety issues</li> </ul>

	<ul style="list-style-type: none"> <li>• Involving different groups including vulnerable households and</li> <li>• New methods of engagement and service design including use of digital methods</li> </ul>
Develop specific local resident engagement strategies related to higher risk buildings	Complete annual self-assessments against regulatory standards with results being reported to the Cabinet Member for Environment, Housing and Regeneration
Deploy a range of methods to capture data, including the use of housing needs surveys, encouraging self-service reporting and gathering data through interactions with tenants.	Improve customer insight and understand what our tenants and communities want, including through use of the STAR survey and through learning from complaints. A further STAR survey will be completed in Autumn 2021 and thereafter every 2 years.
Set a baseline for the Regulator of Social Housing’s proposed tenant satisfaction measures	Consider residents feedback in formulating the future approach to investment in and management of shared areas to deliver attractive, safe and secure environments
Analyse complaints and review compliance with the Housing Ombudsman’s Complaint Code on a regular basis	Identify further opportunities for improved and cost-efficient service delivery online, while identifying safeguards in relation to digital exclusion and vulnerable people.
Complete post-occupancy evaluation of new affordable housing developments	Explore how better to engage private rented sector residents

### Key Performance Indicators

- Number of ongoing anti-social behaviour cases
- Publication of an annual statement to tenants
- Number of complaints received
- Percentage of complaints resolved within agreed timescales
- Time taken to respond to information requests by the housing ombudsman

- Tenant satisfaction that the council listens to their views and takes notice of them
- Number of complaints relating to communal areas
- Tenant overall satisfaction with the service their landlord provides
- Completed localised resident engagement strategies for higher risk buildings
- Additional processes digitised

## Priority five: Supporting Independent Living

***Key outcome: Hillingdon residents are supported to live as independently as possible***

The council is committed to protecting vulnerable people and enabling people, as far as possible, to live independently. Many people require some help and support to do this either in specialist housing specifically provided for their needs or through floating support provided in general housing.

There is a wide and diverse range of supported housing and housing support available in Hillingdon. An initial mapping exercise of all supported accommodation in the borough has been carried out, including both Care Quality Commission (CQC) registered and non-registered services. The list has been shared with NHS colleagues to support a mapping exercise to provide greater clarity regarding the make-up and geography of supply across the borough.

The largest client group for supported housing is older people, followed by people with learning disabilities and there is significant provision for mental health and for single homeless people and care leavers. There is also provision in the borough for those affected by domestic abuse.

This part of the Housing Strategy considers priorities to address the housing and support needs for particular groups of people, some of which have considerable overlap.

The impacts arising from Covid-19 could not be anticipated and have been unprecedented. Lockdown has meant an increased risk of abuse and neglect and of self-neglect for adults at risk. It has also increased the risk of domestic abuse, homelessness, mental health problems and drug and alcohol use in the wider population. Housing teams seek to identify other household support needs in their interventions with residents such as homelessness reviews, tenancy reviews and property disrepair inspections to allow for early identification of safeguarding issues.

This strategy aims to:

- Reduce homelessness and rough sleeping
- Support people to sustain tenancies
- Increase awareness and action regarding adult safeguarding
- Achieve sustainable housing solutions for care leavers
- Become Domestic Abuse Housing Alliance (DAHA) accredited

- Develop housing plans to support the independence of residents with learning disabilities and/or mental health needs
- Develop autism friendly housing services
- Review existing dedicated housing provision for older people
- Plan for retrofitting of existing housing to address needs for adaptations, including for dementia
- Review the use of grants to support independent living

## Homelessness and rough sleeping

Hillingdon's Homelessness and Rough Sleeping Strategy 2019 to 2024, has six priorities:

- Priority One: Ensure that residents are able to access good quality, clear housing advice regarding their housing options
- Priority Two: Prevent earlier
- Priority Three: Eliminate the need to sleep rough in Hillingdon
- Priority Four: Increase the availability of affordable rented housing
- Priority Five: Manage the quantity, quality and cost of temporary accommodation
- Priority Six: Bring greater purpose and improved clarity and focus to local homelessness partnership arrangements

The Homelessness Strategy Action Plan is updated on an annual basis. Homelessness and rough sleeping are recognised priority areas for the Hillingdon Health and Wellbeing Board.

Homelessness approaches that required a full Homelessness Reduction Act (HRA) assessment averaged 198 a month between April 2020 and March 2021. Of these an average of 30 a month have needed to be placed in temporary accommodation. During this period, there have been 743 successful homeless preventions, an average of 62 a month. The total number of households in temporary accommodation stood 428 at the end of March 2021, of these 169 households were in emergency accommodation.

In recent years, evictions from the private rented sector have been the most common reason for homelessness however that changed during 2020/21. Action taken by the government in response to Covid-19 has included a moratorium on evictions and a longer notice period is has been required in most circumstances. A phased return to normal is now underway. A resulting backlog of cases has been building up in the system which is likely to add significantly to homelessness numbers. We are estimating a 20% rise in the number of homeless households requiring accommodation during 2021/22.

The most common reason for homelessness approaches during 2020/21 was being asked to leave by family. Other prominent reasons for approach include rough sleeping, and domestic abuse. Private sector evictions have continued to feature prominently in approaches but because of the moratorium are not yet resulting in a need for temporary accommodation. Bookings into emergency accommodation have most frequently been for rough sleepers (134)<sup>10</sup> and this is directly related to the 'Everyone In' response to Covid-19. The next most frequent is family evictions (88), followed by domestic abuse (55), prison release (41), victims of anti-social behaviour / violence (22) and care leavers (19).

The council has continued to operate a full housing advice service throughout the Covid-19 pandemic. A great deal more advice has been provided remotely, online and over the phone, however unlike many other councils, we have maintained a reduced office presence throughout with the ability for homeless people to present in person.

The council contracts with P3 to provide homelessness and related advice for young people aged 18 to 25. The HRA has put housing advice onto a stronger statutory footing requiring a robust and meaningful approach and in response to this a new two year contract with P3 includes the statutory responsibilities within the HRA, following which a full tender process for the service is intended.

The HRA has now been operational for three years and a considerable body of case level data is now available. Developments in prevention work seek to particularly target the most common reasons for homelessness. This includes working to better understand the causes of parental evictions: working to achieve DAHA accreditation in relation to domestic abuse, and engaging with landlords to, as far as possible, address the significant risk of increased private sector evictions. There is also an increased risk of unlawful evictions. The extent to which the economy is able to bounce back post Covid-19 will be a significant determinant of future levels of homelessness.

### **Rough Sleepers**

In line with government strategy the council aims to eliminate the need for rough sleeping in the borough by the end of 2024.

An important element of the pandemic response has been the government's decision, in the interests of public health, to bring all rough sleepers in, off the streets and ensure that safe accommodation is available for all regardless of homelessness priority need or immigration status. This has seen over 4,000 rough sleepers initially accommodated across London and many more over the following year. At 31 March 2021, there were 4,197 rough sleepers in emergency accommodation across London. The number of former rough sleepers in settled move-on accommodation as a result of the Covid-19

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<sup>10</sup> Data for April 2020 to March 2021

response reached 4,500 by June 2021. A large-scale exercise at Heathrow at the beginning of April 2020 resulted in a total of 170 rough sleepers from the airport being housed, including 142 into hotels across London arranged by the GLA. The remaining rough sleepers and any subsequent rough sleepers have been housed in borough unless they have been able to be reconnected to another area.

By the time of the onset of Covid-19, there had already been significant action in Hillingdon in relation to rough sleepers, especially at Heathrow airport which is recognised as a hotspot for rough sleepers. Partnership working in the borough amongst those with an interest in single homelessness and rough sleepers has strengthened to a significant degree and much clearer pathways for rough sleepers are developing. Rough Sleeping Initiative (RSI) funding from the Ministry for Housing and Local Government (MHCLG) has helped to significantly increase outreach services, floating support, and accommodation options. As part of the RSI round 3, an extra 40 HMO beds were delivered during 2020/21 through our commissioned partner, Trinity Homeless Projects. This has included 30 low support HMO spaces and 10 high support HMO spaces. All these bed spaces have now been delivered and are occupied.

At the end of May 2021, there were 68 rough sleepers in accommodation arranged by the borough and in total 125 rough sleepers had been moved on into settled accommodation since April 2020. The council acted very swiftly at the start of the crisis; RSI funding was repurposed to respond to the changing circumstances, including to secure a 33 bed building for use by rough sleepers from April 2020. These units continue to be leased and provide an excellent base for initial assessment and housing. It has allowed for improved access to a range of other support including for mental and physical health and substance abuse issues. A further 6 bed unit was secured from December 2020. The remaining rough sleepers are in other types of temporary accommodation, mostly emergency accommodation. Settled housing solutions include a mixture of shared HMOs and self-contained accommodation in the private rented sector, where it is safe and reasonable, based on the clients presenting needs. For a small number of vulnerable rough sleepers, a Housing First response has been taken to provide accommodation in social housing.

The most recent official count of rough sleepers in November 2020 found 11 rough sleepers, four at Heathrow Airport and seven in the rest of Hillingdon Borough. This was a greater reduction in the number of rough sleepers than in any other borough in England and represents a phenomenal success given that the count a year earlier recorded 106 rough sleepers, 95 at the airport and 11 in the rest of the borough. A key challenge now is to maintain the success in keeping the number of rough sleepers at the airport low.

Recovery planning from Covid-19 includes sourcing ongoing accommodation and support for these rough sleepers to prevent their return to the streets. This is likely to impact on Hillingdon, both directly through the rough sleepers that Hillingdon retains a responsibility for and potentially indirectly through placements by other boroughs in the more affordable areas of London or rough sleepers returning to the streets gravitating towards Heathrow.

Strong partnership arrangements including active engagement from the MHCLG advisor and frequent contact with a wide range of agencies has been and continues to be instrumental in ensuring that numbers of rough sleepers at the airport do not start to rise again. Airport security have worked to restrict access so that only those that intend to fly are able to remain at the airport without challenge. The airport has previously been a potential destination for rough sleepers from across London and beyond. Those arriving intending to rough sleep at the airport are redirected in an appropriate way including being advised to contact relevant services in other areas and this limits the number of referrals on to the council. Additional airport security has been engaged to work closely with outreach workers at the airport to maintain a focus on moving rough sleepers on to appropriate services. Work at the airport includes proactive reconnection with pre-rough sleepers returning to the UK. Some rough sleepers can be difficult to engage and the agencies working in Hillingdon, including those at the airport are persistent in their attempts.

### **Support for rough sleepers**

Floating support services are available to all rough sleepers in Hillingdon. There are also links to health and wellbeing services and these are being further developed. A local drug and alcohol service ARCH has been able to purchase a Fibroscan machine to detect liver damage as a result of a joint bid made with the council to Public Health England (PHE) and a further successful PHE bid is boosting the provision of support for those with drug and / or alcohol dependency, including through outreach work and detox programmes. A North West London partnership project is concerned with health provision for rough sleepers and avoiding unnecessary hospital admissions. An early focus has been on the roll out of Covid-19 vaccinations to this client group.

All moves into private rented accommodation automatically come with enhanced floating support for as long as is necessary. This support includes help with settling them into their new home and ensures that the relevant actions have been carried out to ensure that the tenancy is sustainable (such as setting up utility bills). Clients can also receive furniture vouchers which can be exchanged locally and then delivered to the property.

The experience of sourcing move on accommodation has clearly shown that there are a significant number of rough sleepers with medium to high support needs and that the accommodation currently available is not able to safely house those with these higher-level needs. Our priority for future accommodation is to explore commissioning options for this vulnerable client group.

Entrenched rough sleepers are, in general, more difficult to engage, more likely to have a range of support needs and finding appropriate move-on accommodation for them is more difficult. Target 1,000 rough sleepers comprise a list of known rough sleepers in London who have had the most contact with agencies. The list included an initial list of 23 rough sleepers in Hillingdon. For some entrenched rough sleepers, numerous offers may need to be made due to clients presenting needs and an increased likelihood of refusals.

As part of the RSI funding, three full time floating support officers have been employed through Trinity Homeless Projects to provide support to residents as they move into their settled housing solution. There are some rough sleepers that have not managed to settle in accommodation provided and placements have broken down. There is a continuing need for support to be tailored to individual needs for appropriate timescales and restarted as necessary.

Connections with GPs, substance misuse and help with immigration is available to all rough sleepers who are engaged with the council. Health support includes regular Covid-19 testing for those rough sleepers in hostel accommodation and flu immunisation. Fortnightly multi-agency case conference meetings are also held for rough sleepers. Priority cases include those that are clinically vulnerable, those with complex needs and those with a history of rough sleeping.

A key priority is an increase in accommodation for those with medium to high support needs. Floating support provision will also need to be maintained and it is important that there is movement on from HMOs where there is lower level support and rough sleepers would be expected to be able to move on to the private rented sector. Provision of additional shared accommodation is particularly important for those aged under 35 who may only be entitled to shared accommodation rate LHA.

Options to provide additional longer-term move on accommodation are being explored. This includes a large building that has been identified as suitable for providing studio flats with low level support. Options for shared accommodation that can be provided within Local Housing Allowance (LHA) rates are also being explored. Repurposed RSI funding is contributing towards the conversion of Beechwood House, owned by the council, into an HMO to be leased to Trinity Housing Projects.

Additional funding for Hillingdon through a fourth round of RSI for 2021/22 has now been confirmed. This includes many of the existing interventions being rolled forward, some additional staff, two further five bed HMOs providing a high level of support and increases in floating support, interventions at Heathrow airport and costs concerned with accessing the private rented sector and personal budgets. The HMO accommodation provided under RSI3, following set up, is now self-maintaining. The proposals are in line with Hillingdon's Rough Sleeper Delivery Plan for 2021/22. They target accommodation for those with higher support needs, additional floating support to prevent tenancy breakdown and move on to settled housing.

### **People with no recourse to public funds**

With the onset of the pandemic the government encouraged local authorities to assist those who had No Recourse to Public Funds (NRPF) and in May 2020 reminded local authorities of its position on eligibility relating to NRPF and asked local authorities to use their judgement when assessing people's needs. Subsequent case law supports the use of specific powers to provide accommodation to people with NRPF during a public health emergency. This council has continued to provide housing for those with NRPF and has been supported to do so through grant funding via RSI and other initiatives. This council along with others across London is concerned regarding the future availability of resources and consequent impact on the ability to house those with NRPF. We are working on a pan London basis to seek resolution to this issue however the issue is particularly pertinent to Hillingdon as should those with no recourse begin to be moved out of accommodation, there is a strong likelihood that some of them will gravitate towards Heathrow.

### **Tenancy Sustainment**

Housing support for those in general needs housing is provided by the council's Welfare Reform and Tenancy Support Team particularly at the beginning of a tenancy to ensure the tenant is best positioned to live independently, sustain their tenancy in the long-term and avoid the need for high cost interventions. The team provide support with re-settlement including 'setting up a home', arranging utilities, household budget management, acquiring essential fixtures and fittings and advice on basic cleaning routines and 'healthy living'. A significant proportion of casework includes debt management, welfare benefit maximisation and addressing rent debt. This support work is frequently undertaken as part of joint support planning and delivery with other key services including social services and Central and North West London NHS Foundation Trust (CNWL). Similar support is offered by Trinity Homeless Projects. Referrals have been accepted across London by Caridon Tenancy Support in connection with rough sleepers under the 'everyone in' initiative in response to coronavirus.

## Safeguarding

During 2019-20, Hillingdon Safeguarding Adult Board's (SAB) structure was aligned with the Safeguarding Children's Arrangements. The partnership arrangements work to prevent abuse, neglect and self-neglect; and to ensure that, when it does occur, our multi-agency response is timely, proportionate, coordinated, effective and in accordance with the key principles of safeguarding children, young people and adults. Of the safeguarding concerns raised during 2019/20, 46% related to people aged 65 or over<sup>11</sup>.

The SAB Board and the Safeguarding Children Partnership Board (SCPB) steer learning and development for the safeguarding environment across the London Borough of Hillingdon and are informed by subgroups and task and finish groups as required. There is housing representation on many of these groups and the level of engagement has increased significantly during 2020/21. The partnership also works collaboratively with the Domestic Abuse Steering Executive (DASE) to meet DA strategic objectives. A key initiative is a Multi-agency Safeguarding Hub (MASH) which has been developed for adults to complement that in place for children. Housing services are represented on both the adults' and children's MASH.

Safeguarding partners have faced a period of exceptionally high demand and pressure in consequence of the pandemic and the response has served to highlight the importance of effective multi-agency work. For 2021/22, self-neglect, which includes hoarding and multiple exclusion homelessness, amongst other forms of self-neglect, has been agreed as a priority for the SAB along with mental health and safeguarding.

Multiple exclusion homelessness comprises marginalisation that includes, childhood trauma physical and mental ill-health, substance misuse and experiences of institutional care. People who undergo multiple exclusion homelessness are likely to have care and support needs and may well also be experiencing abuse and neglect (including self-neglect). Adult safeguarding responsibilities are therefore engaged. Person-centred practice giving time and commitment is key.

Lockdown has increased the risk of safeguarding issues arising. Staff in various housing teams are well placed to assist in identifying when abuse is taking place and will in some instances have established connections with victims. Safeguarding issues that arise for housing staff include instances where older tenants are unable to return home and council homes may be left empty with rising rent arrears. Relevant housing staff have received training in relation to mental capacity to ensure that these matters are dealt with appropriately. There are also instances of cuckooing where criminals target the homes of adults often those with support needs, so that the property can be used for drug dealing. Where necessary arrangements may be made to move the tenant to a

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<sup>11</sup> Hillingdon Safeguarding Partnership Annual Report 2019-2020 Final Draft

different property as part of a wider package of support and to prevent the cycle of abuse from continuing. Action against perpetrators is progressed through partnership working arrangements. Safeguarding issues picked up by homelessness teams often include domestic abuse, financial abuse, sometimes of older people, suicide threats and neglect of children.

Training in relation to safeguarding issues has been rolled out across housing teams including housing enforcement, domestic abuse, welfare reform and tenancy support. We will continue ensure close working between housing and social care teams and other relevant partner organisations with regard to safeguarding.

## Care Leavers

Hillingdon was corporate parent to 337 children at the end of 2019/20, including 89 Unaccompanied Asylum Seeking Children (UASC). At 26% of the Looked After Children (LAC) population, Hillingdon has a much higher than average proportion of UASC, who are also on average older than other LAC and consequently form a higher proportion of care leavers. The care leaver population in Hillingdon stood at 454 on 01.04.2020<sup>12</sup>. All care leavers have a pathway plan in place and wherever possible this is co-produced and owned by the young people. Ideally this includes consideration of housing options at an early stage.

The council's Welfare Reform & Tenancy Support Team recognises that care leavers present a 'high-risk' group in the context of tenancy failure when transitioning to permanent accommodation in the council's managed housing stock. This group of new tenants are prioritised for support from the point of 'tenancy sign up' where support is 'front loaded' to maximise the potential for long term tenancy sustainment by ensuring that the skills and awareness necessary for independent living are in place and are developed.

On average, around 50 care leavers a year require assistance with housing. Care leavers are not automatically placed in social housing and in most instances private sector placements are sought. The Social Housing Allocation Policy does make special provision for care leavers. Care leavers are exempt from the residency requirement qualification criteria. If a care leaver has an identified housing need, they are awarded an appropriate band according to their need regardless of residency. Care leavers that are considered particularly vulnerable are considered by the Care Leavers Panel, the purpose of which is to assess whether young people are ready to live independently rather than in shared or supported accommodation and manage their own tenancy and financial affairs.

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<sup>12</sup> Hillingdon Safeguarding Partnership Annual Report 2019/20

The council's Housing and Social Care teams are working together to develop a joint protocol to help meet the accommodation needs of care leavers. Good preparation, a gradual transition and flexible ongoing support are considered key to helping care leavers achieve a successful move to independent living.<sup>13</sup> The joint housing protocol will be aligned with the care leaver's local offer and will take account of corporate parenting responsibilities. It will clearly lay out the processes to be followed that support transition to independent living and avoid homelessness. The protocol will seek to minimise unplanned moves and evictions through effective early preparation for independent living and through intervening early where care leavers are at risk of losing their placement.

## Domestic Abuse

The council has in place a strategy and strong partnership arrangements around domestic abuse. The Domestic Abuse Strategy<sup>14</sup> prioritises the following four pillars of work:

- Prevention and early intervention
- The provision of appropriate services
- Addressing perpetrator behaviour
- And effective partnership response

The Housing Enforcement & Domestic Abuse Team within Tenancy Services has been established to provide a specialist response to residents with council housing who experience any form of domestic abuse. The Team works collaboratively across key partner agencies to maximise the potential for survivors to stay safely within their own home or to be relocated where presenting risks cannot be mitigated to safe and acceptable levels. The Team also takes the lead in tenancy enforcement action where the perpetrators of domestic abuse are council tenants, reinforcing the message that domestic abuse is a breach of express tenancy obligations, will not be tolerated and has clear repercussions for those who persist with unacceptable behaviours. The Police Partnership Team have been particularly supportive of the Housing Enforcement & Domestic Abuse Team during the period of the pandemic.

The restrictions imposed to stem to spread of Covid-19 have brought additional dangers to those affected by domestic abuse. There has been a significant increase in reporting to the police, voluntary sector agencies and to the council in relation to domestic abuse. Domestic abuse is prevalent. In the 12 months to April 2021 Hillingdon Police recorded 5,622 domestic abuse incidents (a combination of crimes and non-crimes). There has

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<sup>13</sup> Applying corporate parenting principles to looked-after children and care leavers, Statutory guidance for local authorities, February 2018, Department for Education

<sup>14</sup> Hillingdon Borough Domestic Abuse Strategy 2018-2021, Preventing and eradicating violence and abuse in Hillingdon is everybody's business

been above average offending in 3 of the last 7 months. Of this figure 3,209 were identified as domestic abuse crimes.

In the first half of 2020 there were 593 high risk referrals to the multi-agency risk assessment conference (MARAC). There were 89 cases presenting to the Housing Enforcement & Domestic Abuse Team between April and August 2020 compared to 41 during the same period in 2019.

Between April 20 and March 2021 there were 259 homeless people presenting to the Homeless Prevention Service because of domestic abuse compared to 165 in the same period in 2019/20. Households fleeing domestic abuse are provided with emergency accommodation while their homelessness application is assessed. Victims may be supported with a sanctuary scheme to remain in their current property.

On a pan-London basis Emergency Response Pathways were developed focussing on emergency accommodation for those fleeing domestic violence during the Covid-19 pandemic; and early intervention for those at risk of using harmful behaviours in the home, including relocation where appropriate. At mid-June 2021, the programme has received 742 referrals, with 277 adults and 122 children successfully supported to safety and support to rebuild their lives. This includes those with no recourse to public funds, people who identify as LGBT+ and male victims.

The council's housing services are working towards achieving accreditation by the Domestic Abuse Housing Alliance (DAHA). This will further enhance the council's reputation and credibility with residents as a leader in preventing and tackling domestic abuse. Accreditation, when achieved lasts for three years.

In response to the requirements of the Domestic Abuse Act 2021, the council is working alongside the GLA to improve the evidence base related to domestic abuse.

## Older people

There are an estimated 41,700 people in Hillingdon aged 65 and over, 13.34% of the population. By 2035 the number is projected to grow to 60,500, 17.22% of the population. Over the same period the number of people aged 75 and over is projected to increase from 19,700 to 29,500 and the number 85 and over is expected to increase from 5,900 to 9,700. The oldest age group, those 85+, are the most rapidly expanding age group. Growth is not necessarily reflected in equivalent dependency, however the oldest groups are also those most susceptible to disease and disability, as Covid-19 has made us painfully aware.

The more severe impact of Covid-19 on older people has meant that the impact on their lives has been particularly hard. The problems facing older people in care homes has been well publicised, but life has also been very challenging for many cooped up in their

own homes. Research by Age UK describes fear of the virus, loss of mental and physical capacity, loneliness and isolation, and an inability to grieve as normal.

The vast majority of older people live in general needs as opposed to specialist housing and most do not plan to move and wish to stay in their current home for as long as possible. Often a housing move is precipitated by a crisis when people are ill. Good housing can reduce the demand for care and support and improve health. There are higher numbers and proportions of older people in the population in the northern wards of the borough compared to the southern wards which have a younger age profile. The majority of older people in Hillingdon are white and the proportion is greater within older age groups. In 2019 the percentage of white residents aged 65+ was estimated to be 76% and in 2024 is estimated as 70.5%.<sup>15</sup>

At the time of the 2011 census 77% of older people in Hillingdon were owner occupiers, 18% rented from the council or a housing association and 5% rented privately. People in their mid-30s to mid-40s are much more likely to rent than 20 years ago and if this trend persists into older age, in the future, older people will be much more likely to be living in the private rented sector than they are at present.

There are 21 council owned sheltered housing schemes in the borough providing 840 homes and a further 20 owned by housing associations providing an additional 644 homes. The borough has a total of four extra care housing schemes.

Council delivery during 2019/20 included an Extra Care Sheltered Housing development, Park View Court, providing 60 flats for older people: 57 one bedroom and 3 two bedroom homes. This follows on from the delivery of Grassy Meadows Extra Care scheme during 2018/19 which provided 88 flats. Movement into Park View Court was held back to some extent by Covid-19, but residents have now been moved in and it is substantially full. This scheme concludes a supported living programme that has brought on stream an additional 148 flats for older residents in premises that have been developed to Stirling University's gold standard for dementia design. There is not an immediate need for further new extra care provision, but it is expected that additional provision may be necessary by around 2025. Hillingdon's supported living programme has also seen the delivery of additional schemes for people with learning disabilities and people with mental health needs over the last three years.

Dementia is primarily a condition associated with old age and the estimated prevalence data for the 65 and over population suggests that there were 3,033 people in this age group living with dementia in 2020. Projections suggest a 20% increase in the number of people living with dementia by 2030 (3,791). This emphasises the importance of ensuring the availability of appropriately designed supported accommodation to prevent or delay the need for people living with dementia to move into more restrictive settings.

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<sup>15</sup> GLA Ethnic Group Population Projections, 2016 based

Following a review, a revised staffing and management model for the council's sheltered housing across the borough has been implemented. There is a need to look again at the council's sheltered housing stock including supply and demand data and financial performance. As part of the ongoing review of assets in its management, Housing will work with Adult Social Care to identify potential opportunities to repurpose existing general and age-restricted housing sites which could be better used to meet the needs of other specific client groups.

A high proportion of homes overall (more than half at the 2011 census) have more bedrooms than the number of occupants would suggest are needed. A high proportion of these under occupying households are older person households. There are many good reasons why people remain in their family home, however there are also some distinct advantages in planning ahead for housing needs in later life. A move to a smaller home can free up family housing and the council currently offers incentives to council tenants that move to a smaller property. These incentives are currently being reviewed and the council will continue to consider other options to incentivise downsizing.

The council will also consider purchase options to provide flexibility to older owners who wish to downsize and also to people who have access to relatively small amounts of capital.

## Learning disabilities

There are an estimated 4,714<sup>16</sup> people aged 18 to 64 with a learning disability in Hillingdon and a further 874<sup>17</sup> aged 65+. The numbers with a moderate or severe disability are 1,081 and 117 respectively. Of those with a moderate or severe disability aged 18 to 64, an estimated 417 live with a parent.

There are some specific concerns regarding existing housing provision for people with learning disabilities in Hillingdon.

- Some of the accommodation presents challenges as people age as it is not suitable for adaptation and there is a need for alternative provision.
- Some of those caring for people with learning disabilities are themselves becoming old and frail and hence there is a need to implement a sustainable housing solution for those that are currently caring for family members with learning difficulties
- Existing gaps and likely priorities for new supported housing include small schemes to cater for those with high level needs and particularly challenging behaviour.

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<sup>16</sup> [Projecting Adult Needs and Service Information System \(pansi.org.uk\)](http://pansi.org.uk)

<sup>17</sup> [Projecting Older People Population Information System \(poppi.org.uk\)](http://poppi.org.uk)

## Autism

The Council's Social Care, Housing and Public Health Policy Overview Committee has been carrying out a review to understand how the council can improve its customer service to support its local residents with autism and make reasonable adjustments to assist autistic people to access our universal services fairly. The review is considering front line services, including housing, to identify current practice, gaps in service and areas for improvement to make services more autism friendly. There are an estimated 1,953 adults aged 18 to 16 with and autism spectrum disorder in Hillingdon<sup>18</sup> and a further 396 aged 65 or over<sup>19</sup>.

Autism is a lifelong, developmental condition that affects the way a person communicates, interacts and processes information. One in 100 people in the UK are autistic. Autism is neither a learning disability nor a mental health problem, although mental health problems can be more common among people with autism and it is estimated that one in three of adults with a learning disability also have autism. While some people on the autistic spectrum may also have a learning disability, it can also affect people of average to high intellectual ability. Some very able people with ASD may never come to the attention of services as having special needs, because they have learned strategies to overcome any difficulties with communication and social interaction and found employment to suit their talents. Autism is a spectrum of needs, so it is essential to look at the individual. The features of autism can include having difficulties in social interactions, resistance to change and having distinctive behaviours. People with autism may also experience some form of hypersensitivity or lack of sensitivity, for example to sound, touch, taste, smell, light or colours. With the right sort of support, autistic people can be helped to live a more fulfilling life of their own choosing. Some people on the autistic spectrum will have subtle difficulties where others will have complex needs requiring more intensive support.

The government's first autism strategy was published in 2010 and was updated in 2014 with 'Think Autism'<sup>20</sup>. The vision of the government's autism strategy is:

"All adults with autism are able to live fulfilling and rewarding lives within a society that accepts and understands them. They can get a diagnosis and access support if they need it, and they can depend on mainstream public services to treat them fairly as individuals, helping them make the most of their talents."

Think Autism sets out that Adults with autism should be able to benefit fully from mainstream public services to live independently and healthily, including access to appropriate housing to meet individual needs. Without reasonable adjustments many

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<sup>18</sup> [Projecting Adult Needs and Service Information System \(pansi.org.uk\)](http://pansi.org.uk)

<sup>19</sup> [Projecting Older People Population Information System \(poppi.org.uk\)](http://poppi.org.uk)

<sup>20</sup> Think Autism. Fulfilling and Rewarding Lives, the strategy for adults with autism in England: and update, DOH, 2014

services can be inaccessible for adults with autism. Reasonable adjustments can include:

- Premises – taking account hypersensitivities and providing quiet or lower-light areas
- Processes – scheduling appointments at less busy times, allocating extra time to adults with autism and being flexible about communication methods, for example, less reliance on telephone-based services.
- Communications – avoiding ambiguous questions, not pressurising adults with autism in conversation and being aware of sensitivity to touch; ensuring essential documents and forms are available in accessible formats in particular, easy read versions and formats that take account of sensory issues in their choice of colours
- Planning and preparation – offering opportunities for adults with autism to visit settings in advance to familiarise themselves with what to expect, for example visiting a court prior to giving evidence or an optician's prior to an eye test.

Hillingdon's 2018 self-assessment of progress in implementing the government's Autism Strategy highlighted areas of strong performance and included within identified areas for future development, updating the housing strategy to more fully include/address the needs of autistic people.

The council does not currently have housing options aimed specifically at people with Autism. Supported Living is appropriate for some autistic people, for others the challenge is make appropriate reasonable adjustments to enable access to mainstream housing. There is a growing body of information regarding housing design in relation to autism i.e. to provide for their sensory needs. Sensory needs can be a huge issue for those with autism and sensitive placements that minimise noise in the dwelling and the neighbourhood can make a big difference, as can the provision of outside space. Those with autism may also find negotiating their way around housing services considerably more challenging than others and some dedicated housing staff with an understanding of autism would be helpful.

Making housing services more autism friendly will be an ongoing process. This will be supported by sustaining an ongoing dialogue with those with autism and relevant agencies. An early action will be to arrange autism awareness training for housing staff.

## **Mental Health**

Estimates suggest that there were 13,865 people aged 18 to 64 in the borough in 2020 living with two or more psychiatric disorders. An objective of the Council and its health and care partners is to ensure that people with mental health needs are supported in the least restrictive setting possible. This entails ensuring the availability of a range of supported accommodation to enable people to step down from hospital or NHS

provided (or funded) rehabilitation environments and also prevent crises leading to admission to these more restrictive settings.

## **Better Care Fund**

The Better Care Fund (BCF) is a key part of Hillingdon's Joint Health and Wellbeing Strategy. The delivery priorities for 2021/22 roll forward a focus on meeting the needs of older people in Hillingdon, providing support for people with learning disabilities and integrated health and care services for children and young people.

A key focus is to support the independence of residents in their own homes in a community setting. The BCF includes the funding available for Disabled Facilities Grants.

### Disabled Facilities Grants

During 2020/21 230 people were assisted with aids and adaptations to support them to live independently. Of these, 140 were for people living in council owned housing and the remaining 90 were Disabled Facilities Grants (DFGs) for those living in other sectors.

A successful pilot Hospital Discharge Grant using DFG flexibilities has become part of the council's permanent offer to support hospital discharge. The grant funds house and/or garden clearances, deep cleans and a range of other home-based activities where difficulties in arranging help can delay the return home of people no longer needing to be in hospital for treatment.

The council's telecare offer also includes access to a responder service for people who may not have any relatives or friends that can assist.

### SMART technology

There are some impressive technological innovations happening that can assist older people with living independently for longer i.e. technology that can advance the assistance provided by telecare services. The council will continue to review innovations and assess their costs and benefits to assist with both physical and cognitive decline.

## **Disability**

The council is committed to supporting independent living. To achieve this, as far as possible we want to see housing that is suitable for everyone regardless of their personal circumstances. This includes level access, homes that are adaptable to incorporate changes when they are needed and have suitable bathrooms and kitchens.

Almost 80 per cent of people become disabled during their working lives and more than half of all disabled people in the UK are working age adults<sup>21</sup>. There is a huge cost saving to designing in accessibility. On average, adapting a typical home costs up to five times more than making one adaptable at the design stage. Housing built to the lowest accessibility standard is more likely to require costly, major adaptations in the future. The baseline standards have few requirements to prepare houses to be adapted later in life. For instance, there are no requirements in M4(1) to put in a stair frame that is wide enough to allow for the future installation of a stair lift. Nor is there a requirement that the ground floor bathroom have walls that are strong enough to support grab rails or other adaptations where appropriate.

The council works to achieve accessible and wheelchair standard properties in new developments however there are instances where properties intended for disabled people are let to other households because of timing issues with bringing the right properties and people together. To guard against this happening, we will in future seek to retain adapted properties for use as temporary accommodation until such time as a disabled person or household is able to occupy the property. We will also seek to keep more comprehensive information regarding both the need for and the supply of adapted properties and will seek to retain some adaptations, such as wet rooms and stairlifts regardless of the needs of the current occupier. A working group will be set up to consider how to better meet the housing needs of disabled people.

<b>We will:</b>	
Assess current and future housing and support needs of specific client groups during 2021. The information will be substantially improved and updated as the results from the 2021 census become available	Complete further investigation into the causes and potential solutions for family and friend evictions. Map the incidence of family and friend evictions and analyse available data within the council and held by partner agencies to inform future homelessness prevention activity
Focus rough sleeper work during 2021 on: <ul style="list-style-type: none"> <li>• A supported housing solution for those with higher level needs as a key priority for development of the rough sleepers housing pathway.</li> <li>• Continuing to build our partnership working arrangements with primary</li> </ul>	Establish a move-on panel to track that there is effective movement through the single homelessness pathway and address barriers

<sup>21</sup> Now is the time: A report by the CSJ Disability Commission, March 2021

<p>healthcare, public health and social care colleagues and other organisations with roles concerning substance misuse and mental health issues</p> <ul style="list-style-type: none"> <li>Continuing to increase the provision of additional low support level HMOs for the single homeless pathway and floating support.</li> </ul>	
<p>Explore options to provide additional longer-term move on accommodation including the potential repurposing by a voluntary sector partner of a large building for studio flats and options for shared accommodation to be provided with Local Housing Allowance (LHA) rates.</p>	<p>Continue to monitor outcomes for all rough sleepers and separately identify Target 1,000 rough sleepers will in the monitoring framework to assess the extent to which rehousing is being sustained and take further action if necessary.</p>
<p>Continue to engage constructively with safeguarding partners and assist in addressing the Safeguarding Partnership's priorities</p>	<p>Arrange for safeguarding refresher training to be undertaken by housing teams including tenancy management, homelessness prevention and housing allocations staff</p>
<p>Work towards achieving accreditation by the Domestic Abuse Housing Alliance (DAHA) including identifying dedicated, trained staff within the Homelessness Prevention Team who will be responsible for assisting those affected by domestic abuse</p>	<p>Complete a joint housing and social care protocol for care leavers which will be actively monitored and reviewed annually</p>
<p>Housing services will work alongside social care to support the development of a supported accommodation plan for people with learning disabilities and/or mental health needs</p>	<p>Set up a task and finish group to develop our understanding of the housing needs of people with autism in Hillingdon, generate bespoke housing options and consider what housing services need to do to become more autism friendly</p>

<p>Complete a review of council owned sheltered housing which will include consideration of the costs of day to day repairs; future maintenance requirements including energy efficiency implications; void performance and lettings</p>	<p>Set up a task and finish group to investigate further measures that can be taken to provide attractive downsizing options. This will include consideration of new development opportunities, across housing tenures, specifically aimed at older people. In relation to council and PRP sectors this would need to include a rent policy that did not deter moves</p>
<p>Continue to utilise DFGs to support older and disabled residents to remain in their own homes</p>	<p>Continue to promote assistive technology such as telecare, which is available free of charge to people aged 75 and above</p>
<p>Set up a working group to consider options to better meet the housing needs of disabled people including</p> <ul style="list-style-type: none"> <li>• a specific LBH design code to meet the needs of the vast majority of people, that can be applied to both new housing provision and to inform refurbishments of existing homes</li> <li>• how to increase provision of evacuation lifts</li> </ul>	

### Key Performance Indicators

- Number of homelessness approaches requiring a Homelessness Reduction Act assessment
- Number of rough sleepers at the official annual count / estimate
- Total number of emergency accommodation admissions
- Number of emergency accommodation admissions with an approach reason of:
  - Family eviction
  - Private sector evictions
  - Rough sleeping
  - Domestic abuse
- Number of housing staff trained in recognising abuse and internal referral routes to raise concerns

- Number of care leaver housing placements sustained after 6 months and 12 months by social sector, private sector and supported housing
- Number of presentations to the Housing Enforcement and Domestic Abuse Team
- Number of people with learning disabilities and/or mental health needs with an unmet need for specialist supported housing
- Number of staff that have received autism awareness training
- Number of older council tenants downsizing
- Number of older people assisted by DFGs

Appendix 1

## **Current Legislative and Policy Context for Housing**

### **Levelling Up**

A landmark Levelling Up White Paper is to be published in Autumn 2021 setting out interventions to improve livelihoods and opportunity in all parts of the UK.

Levelling up is about improving living standards and growing the private sector, increasing and spreading opportunity, improving education and policing, strengthening community and local leadership, restoring pride in place and improving quality of life in ways that are not just about the economy. It will set out the next steps to enable more people to get on in life, without feeling they have to leave their local area.

### **Affordable Homes**

The government has an ambition to deliver 300,000 new homes per annum and it is clear that homebuilding is expected to play a significant role in helping to get the economy moving as the country moves forward from the Covid-19 pandemic.

The central priority of the London Mayor's Housing Strategy (2018) is to build many more homes for Londoners - particularly genuinely affordable homes. Further priorities relate to housing quality and inclusive neighbourhoods; a fair deal for private renters and leaseholders; and tackling homelessness and helping rough sleepers. This housing strategy is required to be in general compliance with the Mayor's strategy. The Greater London Authority (GLA) Affordable Housing Programme 2021-2026 (AHP) will run from 2021 to 2026. There is a two year overlap with the current programme which because of Covid-19 has been extended until March 2023. In a move away from the previous London Affordable Rent product, half of the homes provided under the programme will be for Social Rent. The programme also provides grant funding for Shared Ownership and London Living Rent homes. Social Rent homes other than those provided by councils will include a Right to Shared Ownership. A number of funding conditions are included in relation to building safety, design, sustainability, equalities and diversity, modern methods of construction and the existing requirement for a ballot to proceed

with estate regeneration. The 2021 to 2026 programme Will only fund additionality. It will not fund S106 units and will not fund demolitions or replacement homes through estate regeneration.

The Government has completed consultation on a new First Homes initiative. First Homes are a type of affordable housing sold at a minimum 30% discount off market price to first-time buyers and potentially other groups identified by the local authority. The discount is to be retained in perpetuity.

New rules for shared ownership have been confirmed. Owners will be able to buy a property in shares of as little as one per cent, while the initial stake is being reduced from 25 to 10 per cent. Landlords will be expected to fund most repairs and maintenance for ten years in newly built properties. The new model applies to homes funded through the 2021/26 Affordable Homes Programme. Longer leases on shared ownership properties of up to 990 years where the shared ownership landlord is also the freeholder are also proposed, however this requires legislation.

A new Help to Buy equity loan scheme, for First Time buyers will run from 2021 to 2023. The plan is for the scheme to end completely by 2023

On 19<sup>th</sup> April 2021 the Government launched the mortgage guarantee scheme to help increase the supply of 5% deposit mortgages for credit-worthy households by supporting lenders to offer these products through a government backed guarantee on new 95% mortgages until 31 December 2022.

MHCLG have introduced changes in how local authorities can use their Right to Buy (RTB) receipts including extending the period in which they can be used to 5 years and increasing the percentage cost of a new home that can be funded by the RTB receipts to 40%. Councils are also now allowed to use RTB receipts for homes built or acquired for shared ownership, plus the First Homes scheme for first-time buyers, as well as for affordable or social rent. From April 2022, an acquisitions cap will be phased in, limiting the extent to which RTB receipts can be used for acquiring existing homes. The cap will start at 50 per cent in 2022/23, falling to 40 per cent the following year and finally 30 per cent from 2024/25 onwards.

### **Stamp Duty**

In the March 2021 Budget, the stamp duty holiday was extended. The relief, up to a threshold of £500,000 was extended from the end of March to the end of June. The nil band rate subsequently drops to £250,000 until the end of September, returning to the standard cut-off rate of £125,000 from 1 October.

### **Planning Changes**

The Government has been signalling its intention to make radical changes to the planning system for some time. Amendments have already been made to the Use Class Order and to permitted development rights to include upward extensions in certain circumstances and for demolition and rebuilding.

The Planning for the Future white paper was published on 6 August 2020 and was consulted on during Autumn 2020. A concurrent consultation proposed some changes to the current planning system. The 4 main proposals were:

- Changes to the standard method for assessing local housing need
- Securing of First Homes through developer contributions in the short term until the transition to a new system
- Lifting the small sites threshold below which developers do not need to contribute to affordable housing
- Extending the current Permission in Principle to major development

The Government published its response in phases. On local housing need, instead of the changes proposed, the Government has amended the current standard method by adding a 35 per cent uplift to the number which it generates for Greater London and the other 19 largest urban centres.

The Government has decided not to go ahead with the proposal to lift the small sites threshold and is still considering the response to the policy proposal to extend Permission in Principle.

A new written ministerial statement outlines that a minimum of 25% of affordable homes will be required to be provided as First Homes as part of S106 developer contributions. They are to be sold at a 30% on market price for first time buyers and key workers only, with a maximum income of £90,000 in Greater London. The policy will not apply to sites with full or outline planning permissions already in place or within six months of implementation of the new proposals. To ensure the discount is secured in perpetuity, it will be passed on when the property is resold. There is a possibility of higher minimum discounts of up to 50% if a local need can be evidenced. First Homes will be exempt from the Community Infrastructure Levy. The Government has said that after securing the 25% First Homes requirement from developer contributions, local planning authorities should prioritise securing their policy requirements on social rent.

### **Planning for the Future**

The Planning for the Future white paper proposes a rules-based planning system. All Local Planning Authorities would be required to have a plan in place by December 2023 which place land into three zones:

- Growth areas - suitable for substantial development;
- Renewal areas - suitable for some development; and
- Protected areas including the Green Belt

The White Paper also proposes that the current system of S106 agreements and the Community Infrastructure Levy should be replaced by a nationally set flat charge. Additional homes created through permitted development right (PDRs) are brought within the scope of the proposed Infrastructure Levy. There are concerns that the

creation of a single levy will put affordable housing in competition with other infrastructure projects.

### **Permitted Development Rights**

From 1 August 2021 certain commercial to residential permitted development rights (PDRs) will be replaced by one new PDR, to be referred to as Class MA. This new PDR will allow all the typical town centre uses covered by the new Use Class E to be converted to residential, without any consideration for the individual or collective impact on the High Street.

Delivering housing and the reuse of redundant shopping space are the Government's priority and the Class MA permitted development right emphasises this.

However, there will be some limitation to the new PDR. It will not apply if more than 1,500sqm of cumulative floorspace is to be converted and the building must have been vacant for a continuous period of at least 3 months immediately prior to the date of the application for prior approval.

The requirement to meet space standards comes into force on 6 April 2021. The Order will not grant permission for any dwelling house that would be less than 37sqm or would not comply with the nationally described space standard. This will apply to existing permitted development that permit new dwellings and to Class MA once in force.

### **New London Plan**

The new London Plan came into force on 2 March 2021. The Plan identifies space for over 52,000 new homes per year in London – and has a strategic target for 50 per cent of all new homes to be genuinely affordable. Schemes that deliver at least 35% affordable housing go down a 'fast track' route while those under this threshold are subject to scrutiny to ensure they are providing the maximum amount of affordable housing. Public sector sites and former industrial sites are required to deliver 50% affordable housing.

The Plan sets the housing target for Hillingdon at 1,083 new homes per year for the next five years. The Government's revised methodology will be a consideration for the next iteration of the London Plan and its allocation of housing targets to London Boroughs.

New buildings need to be constructed to 'zero-carbon' standards. The Plan promotes urban greening for new development, as well as the creation of Healthy Streets.

Currently all intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000. In addition, London Living Rent benchmarks are capped at £1,400 a month for all homes (inclusive of service charges). Intermediate ownership products such as London Shared Ownership and Discounted Market Sale (where they meet the definition of affordable housing), should be affordable to households on incomes of up to £90,000. Caps will be updated where necessary in the GLA's annual monitoring report. The amount of London

Living Rent, Shared Ownership and Discount Market rent is likely to be significantly reduced as a result of the introduction of First Homes.

For dwellings to be considered affordable, annual housing costs, including mortgage (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of net household income (with net income assumed to be 70% of gross income).

### **Right to Regenerate**

A government consultation which ran from 16 January 2021 to 20 March 2021 proposed enabling public sector land or assets to be sold to members of the public if it is unused. Public bodies would need to have clear plans for land, even if only a temporary use before later development. The feedback is being considered.

### **Housing Standards**

Housing standards, especially in relation to safety and the extent to which residents are actively involved and their concerns listened to, have been high on housing agendas since the Grenfell Tower fire tragedy in June 2017.

The Independent Review of Building Regulations and Fire Safety, carried out by Dame Judith Hackitt, made recommendations to ensure that there is a sufficiently robust regulatory system and to provide assurance to residents that their buildings are safe.

### **Fire Safety Act 2021**

The Fire Safety Act 2021 clarifies where responsibility for fire safety lies in multi-occupied buildings. It amends the Regulatory Reform (Fire Safety) Order 2005 which brings together different pieces of fire legislation and designates those in control of premises as the responsible person for fire safety and managing risks. The Act clarifies that a responsible person is now required to assess the safety of a building's external wall system (including attachments such as balconies) on any building with two or more residential premises. The responsible person must also manage the fire risk for entrance doors to individual flats that open into communal areas.

This now means that building owners or managers in multi-occupied residential buildings must include an assessment of risk related to fire and take precautions to reduce the risk of fire spreading in respect of these parts of the relevant premises. As a result, Fire and Rescue Authorities have the relevant enforcement powers to hold owners or managers to account.

The extension of the risk assessment regime to cover external wall systems will have profound consequences for building owners. The standards of construction in external wall systems (and compartmentation generally) are not materially different in buildings below 18m and as external wall systems are checked in buildings of all heights, owners will more than likely find defects that will need rectifying. Risk assessments of external wall systems may require the implementation of immediate mitigation measures or remedial works to ensure that residents are safe.

A failure to carry out a suitable and sufficient risk assessment and to comply with its recommendations can constitute an offence and become the subject of enforcement action.

The Fire Safety Act is also designed to provide a foundation for secondary legislation which won't require another Act of Parliament, based upon the recommendations made from the Grenfell Tower Inquiry. Extra measures may include responsibility for lift inspections, the reviewing of evacuation plans and fire safety instructions to residents.

### **Building Safety**

The use of combustible materials on the external walls of high-rise buildings has been banned, clearer guidance has been published on existing regulations that buildings owners must follow, and it is being made mandatory for sprinklers to be fitted in all new blocks of flats over 11 metres high. Remediation work involves addressing any issues with the exterior cladding system and broader fire safety systems for each building.

### **Building Safety Bill**

The draft Building Safety Bill was published on 7 December 2020 and the bill was included in the Queen's Speech on 11 May 2021. It will take forward the recommendations of the Hackitt Review. It will ensure that those responsible for the safety of residents are accountable for any mistakes and put them right and will establish the Building Safety Regulator that will enforce the rules. The regulator will operate a new, more stringent set of rules for higher-risk buildings (not yet defined in the Bill or Explanatory notes) that will apply when buildings are designed, constructed and occupied. It will be the building control authority in respect of building work on new higher-risk buildings and be responsible for overseeing and enforcing the new regime when the building is occupied. It will oversee the performance of other building control bodies (local authorities and registered building control approvers). The Regulator will have powers to authorise remedial works, stop non-compliant projects, appoint special measures for failing projects and order the replacement of key fire safety officers. It will enable amendments to the Building Act to impose competency requirements on Dutyholders working on higher-risk buildings. It will also establish the role of Accountable Person who will be legally responsible for the safety of occupied higher-risk buildings and set out their duties. The Dutyholders will be:

- **Accountable Person** who will be legally responsible for the safety of higher-risk buildings and have ongoing obligations to assess and prevent fire safety risks, update prescribed building safety information. The Person will need to register higher-risk buildings and apply for a Building Assurance Certificate before the building can be occupied or, it is expected, for occupation to continue in existing residential buildings.
- **Building Safety Manager** (appointed by the Accountable Person) will be responsible for the day to day management of fire and structural safety in the building.

The Regulator will require all new higher-risk (residential) buildings to be registered before occupation and it is expected that existing residential buildings will need to be registered but the exact mechanisms have yet to be determined. It will ensure all higher-risk buildings, including existing ones, are managed and maintained to keep residents safe. It will have the power to inspect buildings and to require remedial work. The Accountable Person will be legally responsible for the safety of higher risk buildings. There will be a transition period before these new requirements apply to existing buildings, but no timetable has yet been set out.

A system of 'gateways' will be introduced. The new regime is not expected until 2023, however gateway one is to be introduced from 1 August 2021 by way of amendments to the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). The Health and Safety Executive (HSE) will become a statutory consultee on planning applications for relevant buildings (those with two or more dwellings or educational accommodation that are 18m or more in height or 7 or more storeys) and a fire statement will need to be submitted with and the planning application.

### **Social Housing White Paper**

A Social Housing Green Paper published in 2018 was followed by a Social Housing White Paper in November 2020. This sets out a new Charter for what every social housing resident should be able to expect.

- To be safe in your home
- To know how your landlord is performing
- To have your complaints dealt with promptly and fairly
- To be treated with respect
- To have your voice heard by your landlord
- To have a good quality home and neighbourhood to live in
- To be supported to take your first step to ownership

A tougher regulatory regime will remove the 'serious detriment test', routine inspections will be introduced, and additional inspections will take place at any time based on a risk profile. A yearly desktop review is likely to include tenant satisfaction measures, evidence of systemic issues raised by tenants and others and information from other regulators and the Housing Ombudsman.

The RSH will set out an expectation for local authorities to self-refer breaches of the consumer standards to ensure that issues of concern to tenants are dealt with as quickly as possible.

## **Decent Homes Review**

The Social Housing White Paper set out plans to review the Decent Homes Standard. The review will be conducted in two parts through to Summer 2022. Part 1 will explore criteria within the Decent Homes Standard. For each existing criteria, it will consider the strategic fit against wider Government objectives and seek to identify any contradictions or inconsistencies. It will consider whether the criterion reflects present day expectations or concerns and any unintended or undesirable consequences. Findings will inform on whether to include, amend or remove criterion from the new standard.

Part 2 will run from Autumn 2021 to Summer 2022. It will redefine decency by considering the strategic, management, economic and financial case of policy options identified during Part 1.

## **Housing Ombudsman Complaint Handling Code**

A Complaint Handling Code designed to provide more consistency among social landlords was published by the Housing Ombudsman in July 2020. The purpose is to enable quick resolution of complaints and learning from complaints to drive service improvements. Landlords are asked to self-assess against the Code.

## **Climate Change and Decarbonising Housing**

The UK has set in law an ambitious target to bring all its greenhouse gas emissions to net zero by 2050. New and existing homes account for around 20% of all emissions. The Clean Growth Strategy 2017 includes several targets to improve energy efficiency: to upgrade all fuel poor homes to EPC C by 2030; to upgrade as many homes as possible to EPC C by 2035 (where practical, cost effective, and affordable) and to improve business energy efficiency by 20% by 2030. In addition, Britain's industrial strategy includes a mission to halve energy use in all new builds by 2030.

In December 2020 the government published the Energy white paper: Powering our net zero future which addresses the transformation of our energy system.

The Government has housing policy for both new homes and to retrofit existing homes. Policy for existing homes includes:

- Every home must have an Energy Performance Certificate when built, sold or let
- The Energy Company Obligation (ECO) which supports low income, vulnerable, and fuel poor homes with energy efficiency measures and is paid through a levy on consumer electricity bills
- Minimum energy efficiency standards for private rented homes which require rented properties to be a minimum of EPC Band E (with some exemptions)

Further developments are expected in the coming year, for example the Government is expected to be published a new heat strategy (including future heat and energy in domestic homes).

Government grant funding includes a:

- Social Housing Decarbonisation Fund to help social landlords improve the least energy-efficient social rented homes
- The Green Homes Grant Local Authority Delivery Scheme to support upgrading homes for low income households

The Mayor's London Environment Strategy 2018 commits London to becoming a zero carbon city by 2050. The 2018 1.5°C Compatible Plan provides a road map and sets carbon budgets for key areas including housing. Pathways to zero carbon in 2050 rely on a high level of energy efficiency building retrofits by 2030 and on continued grid decarbonisation.

Priority areas include: Retrofit London: Retrofit all domestic and non-domestic buildings to an average level of Energy Performance Certificate (EPC) B; and Low-carbon development: Secure low carbon buildings and infrastructure via borough planning.

EPC is primarily an energy costs indicator, and not in itself a metric for energy efficiency or carbon emissions. To develop an action plan to deliver boroughs' retrofitting target, routes to achieving average EPC B ins a way that also reduces carbon emissions and energy demand, are being modelled.

The Social Housing White Paper confirms that the Decent Homes Standard is to be reviewed, including how it can better support the decarbonisation and energy efficiency of social homes, and improve communal and green spaces.

### **Hillingdon Draft Climate Change Action Plan**

Our council has a vision to become the greenest London borough, to protect and enhance the environment, and to provide a brighter prospect for future generations. We have made significant progress in reducing carbon emissions and have committed to be carbon neutral by 2030. This commitment was made at full council in January 2020 in the form of a climate emergency declaration.

Our draft climate change action plan makes three corporate commitments:

- To lead and inspire our residents, businesses and schools to reduce their own carbon emissions
- To become 'Carbon-Neutral by 2030
- To achieve 100% clean energy across the Council's services by 2030

The focus of the action plan is on the following 7 themes:

- Community leadership
- The council's own operations
- Building better places
- Using clean and green energy
- Waste management
- Climate change adaptation and mitigation
- Carbon offsetting

It also supports other objectives, including air quality, fuel poverty and preventing flooding.

Actions specifically relate to housing include supporting the access of funding for the 'greening' of residential properties and businesses, and prioritising fuel poor households for assistance with accessing grant funds to improve energy efficiency and reduce their energy costs.

The section on building better places includes a number of requirements in relation to new build housing to be addressed via planning.

### **Future Homes Standard**

In January 2021, draft regulations were released in response to the first part of a two part consultation process concerning the Future Homes Standard. It proposes banning fossil fuel fired boilers in new homes from 2025 in England with a carbon emissions reduction of 75% -80% compared with current standards. Homes will have to be 'zero carbon ready' by 2025. This means that no further retrofit work will be necessary to enable them to become zero carbon homes as the electricity grid continue to decarbonise.

The standard also sets down energy requirements for extension or building improvement / renovation works. There will also be a new overheating mitigation requirement.

The government have set out details of an interim step of a 31% reduction that will take effect from June 2022. The rules will be implemented through Part L of the Building Regulations.

The second part of the consultation has been published and proposes new energy and ventilation standards for new and existing non-domestic buildings and existing domestic buildings, as well as addressing overheating in residential buildings.

### **Fuel Poverty**

In February 2021, the government published Sustainable Warmth: Protecting Vulnerable Households in England, the updated Fuel Poverty Strategy which sets out how we will tackle fuel poverty, while at the same time decarbonising buildings, so that those in fuel poverty are not left behind on the move to net zero, and, where possible, can be some of the earliest to benefit. The Government has an updated measure for fuel poverty, Low Income Low Energy Efficiency (LILEE). It finds a household to be fuel poor if it:

- Has a residual income below the poverty line (after accounting for required fuel costs) and
- Lives in a home that has an energy efficiency rating below Band C

The statutory fuel poverty target was set in December 2014: To ensure that as many fuel poor homes as is reasonably practicable achieve a minimum energy efficiency rating of Band C by 2030. The 2015 strategy adopted two interim milestones:

- As many fuel poor homes as is reasonably practicable to Band E by 2020 and
- As many fuel poor homes as is reasonably practicable to Band D by 2025

The strategy sets out four principles to guide decisions:

- Worst first
- Cost effectiveness
- Vulnerability
- Sustainability

It sets out plans to:

- Invest further to retrofit social housing
- Expand the Energy Company Obligation (ECO), a requirement for larger domestic energy suppliers to install heating, insulation or other energy efficiency measures in the homes of people who are low income and vulnerable or fuel poor.
- Invest in energy efficiency for low income households including to install energy efficient and low-carbon heating measures in their homes.
- Extend the Warm Home Discount a requirement for energy companies to provide a £140 rebate on the energy bill of low income pensioners and other low income households with high energy bills, ensuring continuity for vulnerable or fuel poor consumers.
- Drive over £10 billion of investment in energy efficiency through regulatory obligations in the Private Rented Sector. Additionally, lead the way in improved

energy efficiency standards through the Future Homes Standard, and the Decent Homes Standard.

### **Private Sector Housing Conditions**

The Housing Health and Safety Rating System (HHSRS) is a risk based assessment and is the main system for assessing and enforcing housing standards. The council is required to take action where a Category 1 hazard under the HHSRS is identified. The MHCLG is carrying out a two-year review of the HHSRS.

The government has brought forward a range of measures designed to improve standards in the sector and crack down on rogue landlords, including:

- Banning orders, which can ban an individual from letting housing or engaging in any letting agency or property management work
- Civil penalties of up to £30,000 where a landlord or property agent has breached a banning order as an alternative to prosecution for a range of offences under the Housing Act 2004
- Extending the scope of mandatory licensing of houses in multiple occupation in England to bring smaller HMOs within the scheme
- In April 2018 the Government confirmed its intention to regulate letting and property management agents. It also proposed to legislate to require all private landlords to sign up to a redress scheme
- Regulations applying to tenancies or licenses commencing on or after 1st July 2020 to ensure that all electrical installations in rented residential properties are safe
- Under the Homes (Fitness for Human Habitation) Act 2018 the tenant, of a private or social rented dwelling, has the right to take legal action for breach of contract on the grounds that the property is unfit for human habitation.

### **Migration to Universal Credit**

The Government announced a pilot of 10,000 households transferring onto Universal Credit (UC) and that it was taking a 'test and learn' approach. It is currently expected that all households claiming legacy benefits and tax credits for working-age households will be moved to UC by September 2024.

### **Homelessness and rough sleeping**

The Homelessness Reduction Act 2017 came into force on 3 April 2018. Under the act councils have a duty to work to prevent homelessness for all eligible applicants who are

threatened with homelessness, i.e. likely to become homeless within 56 days; work to relieve homelessness for all eligible applicants who become homeless.

### **Private sector evictions**

Provisions were included in the Coronavirus Act 2020 to extend the notice periods that tenants are entitled to receive when a landlord is seeking possession of their homes. These notice periods were subsequently amended. If a landlord was not seeking to evict a tenant for anti-social behaviour, serious rent arrears, or where the tenant has no right to rent, a minimum notice period of six months applied up to May 2021. Regulations in force from June 2021 provide that until 30 September 2021 the general requirement for six months' notice is reduced to four months. Exceptions apply as set out above, but where there are rent arrears of at least four months, the required notice period is four weeks. From 1 August 2021, for rent arrears of less than four months a notice period of two months will be required. Subject to the public health advice, notice periods will return to pre-pandemic levels from 1 October.

A Practice Direction suspended all ongoing housing possession action from 27 March 2020. The suspension of housing possession actions meant that landlords could not obtain court orders for possession against tenants until 20 September at the earliest. When announcing a 4-week extension of the stay on eviction hearings on 21 August 2020, it was confirmed that courts would prioritise the most egregious cases. The requirements are in force from 20 September 2020 to 30 July 2021.

The Coronavirus Act 2020 provides protection to social and private tenants by delaying when landlords can start proceedings to evict tenants. With the exception of the most serious cases, landlords are not able to start possession proceedings unless they have given their tenants six months' notice. A stay on possession proceedings expired on 20 September 2020 and landlords will now be able to progress their possession claim through the courts. Courts will carefully prioritise the most egregious cases, such as those involving anti-social behaviour and other crimes

In the Queen's Speech in May 2021, it was announced that the government will publish a white paper in the autumn, with further protections for renters including proposals to abolish so-called 'no-fault' evictions.

### **Care leavers**

Non-statutory good practice guidance has been produced by the Ministry of Housing, Communities and Local Government (MHCLG) and the Department for Education (DfE), to support the development of joint protocols that can help local authorities to meet the accommodation needs of care leavers.

The Children and Social Work Act 2017 (CSWA) strengthened the role of local authorities as corporate parents. Corporate parenting means local authorities doing the most they can for looked after children and care leavers, to give them the same opportunities as other children and promote the best possible outcomes. In carrying out their functions the local authority must have regard to the following needs:

- To act in the best interests, and promote the physical and mental health and well-being, of those children and care leavers
- To encourage those children and care leavers to express their views, wishes and feelings
- To take into account the views, wishes and feelings of those children and care leavers
- To help those children and care leavers gain access to, and make the best use of, services provided by the local authority and its relevant partners
- To promote high aspirations, and seek to secure the best outcomes, for those children and care leavers
- For those children and care leavers to be safe, and for stability in their home lives, relationships and education or work
- To prepare those children and care leavers for adulthood and independent living

The DfE statutory guidance on applying corporate parenting principles to looked after children and care leavers stresses the importance of joint working in supporting care leavers to navigate their way through the transition to adulthood.

The CSWA also extended the provision of Personal Adviser support to care leavers up to the age of 25, whether or not they are in education or training, which the care leaver can choose to take up. Local authorities have a duty to provide care leavers with Personal Adviser support and a pathway plan up to their 21st birthday. For care leavers aged 21 or over the duty to assess needs, and develop and keep under review a pathway plan – apply only where the young person requests support. It is therefore important that joint housing protocols cover the support available from a local authority area to care leavers up to the age of 25.

### **Domestic Abuse**

The Domestic Abuse Act will establish a Domestic Abuse Commissioner; to improve the effectiveness of the justice system in providing protection for victims of domestic abuse and bringing perpetrators to justice; and strengthen the support for victims of abuse by statutory agencies.

The Act includes a duty on Tier 1 local authorities (the GLA for London Boroughs) to provide support for victims and their children within safe accommodation. The Act has

received Royal Assent but has not yet been commenced. It is MHCLG's expectation that local authorities should start to fulfil their relevant functions as if the new duty were in force and continue to fulfil these functions in line with the duty once it is commenced. The government will be developing and consulting on statutory guidance.

The Housing Act 1996 Part 7 is amended to provide that applicants who are homeless as a result of being a victim of domestic abuse have 'priority need' for accommodation; and to incorporate the definition of 'domestic abuse', as defined in the Domestic Abuse Act.

The Housing Act 1985 is amended to ensure that where, for reasons connected to domestic abuse, a local authority grants a new secure tenancy to a social housing tenant who has previously held a lifetime tenancy, the new tenancy will also be a lifetime tenancy. This will apply where a victim of domestic abuse has (or had) a secure lifetime or assured tenancy (other than an assured shorthold tenancy) and is being offered a new local authority tenancy. The new tenancy could not be introductory or a flexible tenancy.

The Social Housing White Paper has confirmed that regulatory standards will make clear that social landlords should have a policy setting out how they should tackle issues surrounding domestic abuse.

## **Supported housing**

In October 2020 the government published a Supported Housing: National Statement of Expectations (NSE) as part of a commitment to improve oversight of supported housing to ensure good quality and value for money. This is non-statutory guidance concerning the accommodation element of supported housing, not the support services provided. It provides guidance and best practice on:

- Assessing local need and planning effectively
- Ensuring safe and good quality supported housing
- Ensuring supported housing provides value for money

## **Autism**

The Autism Act 2009, required the Government to introduce an adult autism strategy, which was published in 2010 and refreshed in 2014. The accompanying statutory guidance sets our requirements for the NHS and local authorities to implement the strategy, in areas such as training for staff, identification and diagnosis, transition planning when people move from children to adult services, employment and criminal justice. A revised strategy to be extended to cover children and young people has not yet been forthcoming.

Think Autism<sup>22</sup> sets out that Adults with autism should be able to benefit fully from mainstream public services to live independently and healthily, including access to appropriate housing to meet individual needs. Without reasonable adjustments many services can be inaccessible for adults with autism.

## **Disability**

A National Strategy for Disabled People is expected during 2021/22 which aims to improve opportunities for people with a disability and is likely to include recommendations for housing and the wider environment.

### Building regulations

Approved document M provides guidance for satisfying Part M of the building regulation: Access to and use of buildings, which requires the inclusive provision of ease of access to and circulation within, building together with requirements for facilities for people with disabilities.

The 2015 edition of Approved document M introduced three different types of dwelling:

- Category 1 – Visitable dwellings
- Category 2 – Accessible and adaptable dwellings
- Category 3 – Wheelchair user dwellings

The requirements set out in M4(2) Accessible and adaptable dwellings and M4(3) Wheelchair user dwellings, are optional requirements that only apply if imposed on new development as part of the process of granting planning permission. Otherwise, only the requirements of M4(1) Visitable dwellings apply.

Very broadly, the different levels of requirement are:

- M4(1): Category 1 – Visitable dwellings. Compliance with this requirement is achieved when a new dwelling makes reasonable provision for most people, which includes wheelchair users to access and enter the dwelling, and access habitable rooms and sanitary facilities on the entrance level.
- M4(2): Category 2 – Accessible and adaptable dwellings. This requirement is met when a new dwelling provides reasonable provision for most people to access the dwelling and includes features that make it suitable for a range of potential occupants, including older people, individuals with reduced mobility and some wheelchair users.
- M4(3): Category 3 – Wheelchair use dwellings. This requirement is achieved when a new dwelling provides reasonable provisions for a wheelchair user to live in the dwelling and have the ability to use any outdoor space, parking and communal facilities.

The Building Regulations 2010 Access to and use of buildings: Approved Document Part

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<sup>22</sup> Think Autism: Fulfilling and Rewarding Lives the strategy for adults with autism in England: an update 2014

M, Volume 1: Dwellings M4 (Categories 1-3) provides the following categorisation for dwellings: