

London Borough of Hammersmith & Fulham Housing Strategy

Delivering the Change We Need in Housing

December 2014

Housing Strategy Consultation – How to Respond

The Council is seeking your views on what you think of the proposed housing strategy that forms the rest of this document.

The Council will collate responses from:

- Consultation Survey Responses (written and online)
- Interviews and discussions with individuals and group meetings
- Written submissions received from individuals and organisations
- Notes from consultation meetings

If you:

- have any questions about the housing strategy document and would like to discuss them
- have any difficulties understanding what we are proposing
- want to meet someone from the Council to discuss the proposed changes or would like someone to attend a meeting
- want to send a response

To access the Draft Housing Strategy, correspondence from the council and supporting documents go to www.lbhf.gov.uk/housingstrategy

Please contact Aaron Cahill, Interim Housing Strategy Manager on 020 8753 1649 or send your enquiry/response to housingconsultation@lbhf.gov.uk and we will respond as soon as we can.

For a paper copy of the housing strategy documents, survey (which can then be entered online by the council officers), call or email us using the contact details above.

To access the online survey go to www.lbhf.gov.uk/housingstrategyconsultation

If you want to submit a paper copy of any response you want to make, please send it to:

Housing Strategy Team
Housing & Regeneration Directorate
First Floor, 145 King St
London W6 9XY

Submissions in response to this consultation process must be submitted by **Friday 27 February 2015**

Please Note: The web addresses and contacts detailed above will be accessible / available from early January 2015.

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Executive Summary

This Housing Strategy, **Delivering the Change We Need in Housing**, sets out changes in policy and approach the Council wishes to take following the change in administration in May 2014. Our vision in simple terms is more and better, well-managed affordable housing in mixed income, mixed tenure successful places. This document is structured along three strategic themes with specific policy actions to help deliver change.

Theme One – Regenerating Places & Increasing Affordable Housing Supply

The Council intends to appoint a Residents Commission to explore how council housing can be kept affordable and protected by **securing affordable housing for the future: giving council tenants control over their homes**

We intend to **deliver mixed tenure housing in the regeneration opportunity areas** where future housing capacity and potential for jobs creation is greatest.

We outline an **affordable housing standards statement** setting out the quality and type of housing – focusing on issues such as tenure types, bedroom mixes, space standards - that the Council wants to see delivered in the future. The Council wants to **deliver affordable housing outside the regeneration areas and work with housing associations** in order to increase the amount and quality of new affordable housing in the Borough. In tandem with this, we want to be **delivering more choice for affordable ownership and rented housing**. We believe a wider range of choices could be developed through innovative working between the Council and housing associations.

The Council will **lobby the Mayor of London and national Government for more resources and choice in affordable housing** in order to maximise affordable housing delivery in the Borough in a managed and sustainable fashion.

Theme Two – Meeting Housing Need and Aspiration

The Council will revise its **Housing Allocation Scheme** which sets out the 'rules' by which social housing accommodation is allocated in the borough. The revisions are intended to make the Scheme fairer and more inclusive to applicants in housing need. We intend to adopt a new approach to **preventing homelessness** through closer joint working with homelessness agencies, third sector organisations and housing associations. We intend to revise our **Home Buy Allocation Scheme** to ensure applicants and land developers have a clear understanding of the Council's affordability requirements. For **affordable housing tenancies**, in our revised Tenancy Strategy we state our preference for secure 'lifetime' tenancies which are affordable to local people. Within that framework, we also want to explore how larger accommodation which is under-occupied can be used for families in need.

The Council wants to see a fresh approach to **meeting older people's housing needs** given that housing choices for older people is fairly limited and demographic changes indicate that demand for better more affordable housing for older people is likely to increase. We also want to adopt a fresh approach to **meeting the housing needs of disabled people, including those with learning disabilities** by working with partner organisations and interested parties to improve choice and access to the social housing system.

Theme Three – Excellent Housing Services for All

The Council wants to examine how it can improve the **housing and regeneration services** by reviewing its current approach to residents' advice and representation and adopt a new approach that helps improve the services they receive.

We also want to give **greater resident involvement in housing management decision-making**. We believe that by ensuring future services are resident-centred through better involvement, customer satisfaction will be increased.

The private rented sector has become the largest segment of the local housing market. **Improving the private rented sector** is a core element of this housing strategy, which will include reducing long term empty homes and prosecuting rogue landlords.

Finally, **personal and community safety** continue to be major issues of concern to our residents. We need to ensure that all agencies are working effectively together and that necessary infrastructure is in place to deliver safer places for people to live.

Equalities

On **equalities**, we want to ensure that this Housing Strategy is socially and economically inclusive, with a particular focus on meeting the needs of the vulnerable, elderly and disabled in the communities that make up Hammersmith & Fulham's population.

Annexes

The Housing Strategy is completed with an Action Plan and Annexes featuring the Affordable Housing Standards Statement; Tenancy Strategy; Housing Allocation Scheme Summary; and Vulnerable People's Approach. The Strategy is also accompanied by an Equalities Impact Assessment and supporting evidence base documents.

Vision Statement

What this Housing Strategy is about is identifying the change we need in housing, then developing and implementing a plan to make this happen. Our vision in simple terms is more and better, well-managed affordable housing in mixed income, mixed tenure successful places. Implementing and sustaining that vision is dependent on a range of other factors and we seek to identify those connections in this document.

In the administration's manifesto *The Change We Need*, a number of commitments were made covering the full spectrum of service provision and asset management overseen by the Council. This Strategy is focused on the housing and broader regeneration contribution to the change needed. But what is unique to the housing agenda is the manner in which it overlaps with, and on occasions is core to, delivering change in other policy areas.

The housing commitments centre on supporting homes for residents, not overseas investors. Other manifesto commitments include the following:

- backing business and supporting a strong local economy
- greening the borough
- putting children and families first
- social inclusion and improving adult social care
- creating more opportunities for young people
- tackling crime and anti-social behaviour
- renewing local democracy and giving residents new powers
- reforming planning and giving residents new powers

This means the 'read across' between housing and other agendas needs to be clear. The alternative will be a 'disconnect' which will lead to our strategic interventions across all policy areas being less than the sum of their parts. It confirms that changes that we are seeking to effect, need to be part of a coherent approach to the wider economic, environmental and social challenges that people are experiencing. The backdrop to all this is a local authority financial regime which becomes more austere year on year.

To translate that vision into reality we have identified three themes with actions for delivery:

- Regenerating places & increasing affordable housing supply
- Meeting housing need and aspiration
- Excellent housing services for all

Because of the scale of change that we are facing, some of the solutions we are proposing are radical and initially may be difficult for people to accept. But we are convinced that to achieve the radical scale of our ambition, we need to adopt radical solutions.

Theme One – Regenerating Places & Increasing Affordable Housing Supply

Evidence Base Key Points

Hammersmith & Fulham has:

- 83,390 homes accommodating 182,493 people
- Housing market segments as follows: 31.6% of households own their home/have a mortgage; 1.6% are shared owners; 15.7% are council rented homes; 15.4% are housing association homes; 33.2% are private rented (including 1-2% living rent free)
- Identified development capacity for over 10,000 additional homes during the 2015/25 period with many more to follow
- House Prices averaging £670,070
- Average household gross incomes of £44,065 per annum, with 27% of the Borough's residents dependent on less than £20,000

Source: Hammersmith & Fulham Borough Profile 2014

1.1 Securing affordable housing for the future: giving council tenants control over their homes

The backdrop

The Council is the largest single landlord in the Borough. With its other landholdings in parks, schools, leisure buildings, the Council is also the largest landowner in the Borough. This puts the Council in a central place not just as the strategic authority and service provider in areas such as planning, housing, education, setting the strategies and plans to deliver, it is by default a key agent for change on the ground too.

However, the Council recognises that at present residents have insufficient control over their homes and the future of council housing in the borough. It is the Council which decides how housing is run and by whom. It is the Council which decides the level of rents and service charges. And it is the Council which can decide to sell empty homes on the open market or to redevelop whole estates.

In addition the Council's housing stock is becoming increasingly expensive to maintain to a decent standard and very difficult to raise to modern-day standards to meet residents' expectations and their changing needs. Core to the challenge that we are seeking to address is resources. The Council must generate sufficient resources to continue repairing and improving our stock up to a minimum 'decent' standard and ideally a higher standard. The 'Decent Homes' programme ended some years ago, but wasn't envisaged to address the fundamental challenge of ageing stock which is becoming increasingly expensive to repair. The business model to date has been based on funding a capital programme from rent income and through the sales (also called 'disposals') of newly vacant stock (also called 'voids') to buyers on the open market. The new administration has called a halt to the

disposal programme, as it wants to maintain and increase the amount of affordable housing for rent. The Council now needs to assess the options for how the Council delivers its housing services, in order to provide the funding needed to ensure the council homes meet a good standard.

Previous approaches to working with the private sector

The previous administration put in place major redevelopment schemes, entering into a partnership with Capco (trading through E C Properties LP) to redevelop Earls Court and West Kensington estates, and also into a Joint Venture (JV) with Stanhope PLC. This JV was intended to last at least fifteen years with the plan to start redevelopment on two key 'opportunity sites' at Watermeadow Court in South Fulham, SW6 and Edith Summerskill House on the Clem Attlee Estate, SW6. The previous administration entered into 'conditional' arrangements which means there is relatively limited room to 'break' the agreements, but some scope to enter into discussions to modify and re-purpose them in line with the policy priorities expressed in this Housing Strategy. At the time of writing, the Council is reviewing what scope of action we have to modify the arrangements to deliver different outcomes that prioritise housing for residents rather than overseas investors.

A new approach

The new administration recognises the huge regeneration opportunity that the Council's land and property holdings present. But the difference with the new approach will be that the Council wants current and future residents to be central to the new approach with their consent sought ultimately through the ballot box.

To meet the challenge the Council is facing, it is intending to establish a Residents Commission on Council Housing to consider options for empowering residents to take local control of their homes and in order to maximise investment in existing and new council homes. In the event that the Commission recommends to the Council that resident-led models for local management and ownership should be further explored, the Commission will need to take account of a stock options appraisal process the Council is undertaking to fully work through the advantages and disadvantages of particular models.

The Council will want to explore the wider impact that council housing and its residents can make to the broader regeneration agenda, improving education; health; employment and skills; and personal and community safety outcomes.

Note: At the time of writing, the Council is in the process of recruiting an independent chair for the Commission. It will be publishing more information in early 2015 details on how residents will be represented on and involved in the Commission's work.

<p>1.1 Housing strategy action: The Council will establish a Residents Commission which will consider options for empowering residents to take local control over their homes, maximising investment in existing and new council homes and achieving wider local regeneration outcomes.</p>
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1.2 Delivering mixed tenure housing in the regeneration opportunity areas

For a geographically small borough, the scale of housing and regeneration potential in Hammersmith & Fulham is enormous. In the five regeneration areas that we have, three of which are identified by the Mayor of London as priorities for regeneration – called Opportunity Areas – are expected to yield significant numbers of jobs and housing over the next twenty years. Below are abstracts from the Draft Local Plan (consultation to take place in January/February 2015) which sets out the scale and location of the regeneration opportunities, but also the qualitative aspects of what kind of housing we want to see developed.

Strategic Regeneration Area Policy

The Council supports major regeneration and growth in the borough's five regeneration areas and will work with the local community and key stakeholders to ensure that within these areas, proposals will:

- Provide new exemplary sustainable communities, delivered to the highest standards of urban design, environmental sustainability and social inclusion;
- Deliver 25,800 new homes in the period 2015-2035 to meet local housing needs and enable local residents to access affordable homes to buy or rent;
- Deliver 49,500 new jobs in the period 2015-2035, providing a range of skills and competencies and supported by initiatives to enable local residents to access employment and training; and
- Deliver new physical, social and environmental infrastructure that meets the needs of new residents as well delivering tangible benefits for surrounding communities.

The Council has identified five Regeneration Areas (see Table below), which are anticipated to be the key focus for growth in the borough over the next 20 years. Within the plan period the indicative targets are for 25,800 homes and 49,500 jobs. Including and beyond this time frame, these regeneration areas have the capacity to deliver approximately 37,800 homes and 79,500 jobs and have the potential to tackle physical barriers and social deprivation.

Regeneration areas and indicative homes and jobs targets 2015-2035

Regeneration Area	Indicative new homes	Indicative new jobs
Old Oak Regeneration Area (OORA)	18,000 (6,000 delivered in the plan period)	50,000 (20,000 delivered in the plan period)
White City Regeneration Area (WCRA)	6,000	10,000
Hammersmith Regeneration Area (HRA)	2,800	10,000
Fulham Regeneration Area (FRA)	7,000	9,000
South Fulham Riverside Regeneration Area (SFRRRA)	4,000	500
Total in the 2015-2035 Plan period	25,800	49,500
Total in the 2015-2035 Plan period and after	37,800	79,500

Three of the Regeneration Areas are designated as Opportunity Areas in the Mayor's London Plan. The Old Oak Regeneration Area (OORA) sits within the Old Oak Common Opportunity Area, which crosses the borough boundary into the London Boroughs of Ealing and Brent and is identified in the draft Mayor's Further Alterations to the London Plan 2014 as having the capacity to deliver 24,000 homes and 55,000 jobs. The White City Regeneration Area (WCRA) covers the same area as the White City Opportunity Area, which is identified in the Mayor's Draft Further Alterations to the London Plan 2014 as having the capacity for 6,000 homes and 10,000 jobs. The Fulham Regeneration Area includes part of the Earl's Court and West Kensington Opportunity Area, which also covers part of the Royal Borough of Kensington and Chelsea. The Earl's Court and West Kensington Opportunity Area is identified as having the capacity for 7,500 homes and 9,500 jobs.

The regeneration areas represent an opportunity for significant new sustainable place-making and will provide the focus for new development in the borough. For each of the regeneration areas the council has set out the overall strategy for the area and the proposals for sites of strategic importance. In each regeneration area, development will be expected to tackle the physical nature of places, deliver sustainable communities with a range of housing tenures and affordabilities and be supported by social, physical and environmental infrastructure that meets the needs of new residents, as well as providing benefits for existing nearby residents. In taking forward these proposals, the Council will aim to involve all sections of the community in the development of policies and proposals for regeneration of the borough and in planning decisions. Development in each of the regeneration areas will need to respect and enhance the existing townscape context and heritage assets both within and around the area.

Housing Policy – HO3

Affordable Housing

Housing development should increase the supply and improve the mix of affordable housing to help achieve more sustainable communities in the borough.

On sites with the capacity for 10 or more self-contained dwellings affordable housing should be provided having regard to the following:

- a) A borough wide target that at least 40% of all additional dwellings built between 2015-25 should be affordable.
- b) 60% of additional affordable housing should be for social or affordable renting, especially for families and 40% should be a range of intermediate housing.
- c) Affordable dwellings should be located throughout a new development and not concentrated on one part of the site.
- c) The council will encourage the provision of affordable rented and social rented housing in ways that enable tenants to move into home ownership.
- d) In negotiating for affordable housing and for an appropriate mix of social and affordable rented and intermediate housing in a proposed development, the council will take into account:

- site size and site constraints; and
 - financial viability, having regard to the individual circumstances of the site and the availability of public subsidy.
- e) In exceptional circumstances, a financial contribution may be required to provide affordable housing off-site where other sites may be more appropriate or beneficial in meeting the borough's identified affordable housing needs.

In addition, there should be no net loss of social/affordable rented housing on development sites.

1.2 Housing strategy action: The Council will in its planning, housing and regeneration roles deliver the Local Plan Strategic Regeneration and Affordable Housing policy objectives. This will include the development of an affordable housing delivery programme which will maximise delivery over the next 10 years. Where the Council provides 'leverage' through land and/or funding, affordable housing requirements with the aim of exceeding the overall 40% affordable housing target set out in this section with an emphasis on increased provision of social rented housing.

Please note: The Council will shortly be consulting on an 'issues and options' version of its Draft Local Plan. The Local Plan will eventually be the local development plan document for Hammersmith & Fulham, replacing the current Core Strategy and associated documents and is expected to be adopted in 2016. Housing and regeneration policies adopted in the final Local Plan may necessitate future changes to the Housing Strategy.

1.3 Delivering affordable housing outside the regeneration areas and working with housing associations

The backdrop

In section 1.2, we highlight the important role the five regeneration areas will play in delivering significantly more market and affordable housing over the next 20 years or so. However, focusing on the large numbers in the regeneration areas obscures the important role that small and medium sites play in contributing to our housing targets.

The Council believes there is scope for a 'mixed economy' approach to housing delivery whereby the private sector (with affordable housing delivered through the S106 process) and housing associations, who provide new affordable housing as their core business, and the Council in its 'direct delivery' role.

The Borough wants Hammersmith & Fulham to be a place that housing developers – particularly housing associations – want to do business in. Collectively, housing associations have 12,450 rented affordable homes (15.4% of the total borough stock) compared to 12,683 affordable rented homes (15.7%) from the Council. This is a position of strength which housing associations should be building from.

Re-engaging with housing associations

An important element of this strategy is about re-engaging with housing associations to the point that they initiate the delivery of more affordable homes but also generate more value through other initiatives that facilitate social and economic inclusion. Housing associations have a wide range and rich history of initiatives that originated from 'Housing Plus' policies, some originating from many decades before. So we want to see more innovation in affordable housing delivery and a more holistic offer to existing and new tenants from housing associations, ensuring security of their tenancies throughout. We want associations to help boost affordable housing delivery over the short, medium and long terms, becoming the active development partners they once were, reflecting the stock presence they currently have in the Borough.

The Council recognises that high land values are a disincentive to develop, but with the stock presence housing associations have and asset value that they hold, a good proportion of which has been generated from increasing land values in the Borough, we want to see some renewed development interest. In return we will review how our housing, planning and regeneration processes can be changed to deliver schemes more quickly, giving priority to schemes that deliver our objectives.

The Council will consider using identified or future commuted sums or other sources of investment (such as public sector land) to assist with achieving the outcomes that we set out in this housing strategy document. The Council would want to see a sufficient quantum of affordable housing for families as part of this package.

Housing association developers' panel

We are proposing to establish an affordable housing association developers' panel which may be used for specific areas of the Borough to bring more certainty to both housing associations and the Greater London Authority in their investment approach and also make clear to private developers who the Borough's preferred partners are. They may wish to propose their own partners (or even their own affordable housing products), but we would base our approach on supporting those housing associations who have a significant presence in the Borough; who are actively investing in the Borough; and those who are not disinvesting in the Borough (i.e., selling on the open market a disproportionate amount of affordable housing to reinvest receipts elsewhere); have tenant representation on their boards; manage their housing stock in the borough to high standards; and, more broadly, satisfactorily meet the regulatory standards of the Homes and Communities Agency. In the event that this proposal is adopted, details will be published on how this panel will be assembled in Spring 2015.

Affordable housing direct delivery

In addition, the Council is undertaking a 'direct delivery' role on sites in its ownership and is seeking to maximise affordable housing – particularly social rented accommodation - through new homes on 'infill' sites. In such instances, the Council

will consult with local residents which should help ensure there is community support for these kinds of affordable housing schemes.

Nominations to housing association stock

Housing Associations' total stock is on par with the Council's own stock and we want to make sure the nominations process to new homes and also re-let homes is working efficiently and effectively. Working through the Housing Association Forum, we want to review how the current process works and how it can be made to work better.

1.3 Housing strategy action: The Council will encourage housing associations to bring forward innovative housing solutions on small to medium sites; review how it can facilitate the work of housing associations more effectively and efficiently; proposes to create an approved panel of housing associations ; and review how the nomination process for new accommodation and re-lets can be made to work more effectively and efficiently.

1.4 Affordable housing standards statement

The scale of the opportunities presented to the borough is significant. This next section focuses on the perennial challenges for local authorities and the communities they represent to 'capture' some of the value that is generated from this growth. This is primarily intended for the advantage of current and future communities, particularly those who are on low to medium incomes. The value of individual homes can range from £500,000 up to many millions of pounds. There is some degree of choice in the Borough with homes generally less expensive in the north and more expensive in the south, but the average price is £670,070, which is way beyond the means of a household on the Borough's average income of £44,065 p.a.

As house prices continue to rise the incentives for developers to minimise affordable housing provision (and on occasions propose no affordable housing at all) are huge and the Council will use all powers at our disposal to challenge such proposals. The Council's position is that we should work harder and more effectively and ensure we maximise affordable housing choices for people who need affordable rented homes and those who aspire to affordable low cost home ownership homes.

The objective of more affordable housing needs to be accompanied by a more refined set of requirements which address issues such as affordability itself – providing guidance on issues such as the price of affordable housing; space standards; tenure – what the split should be between affordable/social rented or low cost home ownership; accessibility. Annex A to this Housing Strategy sets out in more detail what affordable housing standards the Borough is seeking. The statement seeks to assemble existing housing and planning policy – local and regional (i.e., Mayor of London) - in one document, housing developers can review before making proposals to the Council. It may not be possible to deliver all the standards all of the time. We do expect the Mayor of London's Housing Design Guide Standards, set out in the Housing Supplementary Planning Guidance, to be met. Some, but not all of the standards are set out below and highlight the key

issues of importance to the Council. The headings in the Affordable Housing Standards document are as follows:

- **Market and Affordable Housing Tenure Mix** – the Borough’s Core Strategy (i.e., the Local Plan) target for affordable housing is 40% of additional housing to be affordable. Of that 40% affordable housing, 60% should be affordable housing for affordable rent and 40% affordable housing for low cost home ownership
- **Market and Affordable Housing Bedroom Mix** – the Borough’s Development Management Local Plan requires the following bedroom mixes:
 - where social rented housing is replacing existing social rented housing the new housing should meet the needs of the relocating tenants
 - for affordable rented approximately: 1 bedroom: 10% of units; 2 bedrooms: 40% of units; 3 bedrooms: 35% of units; 4+ bedrooms 15% of units
 - for intermediate housing approximately: 1 bedroom: 50%; 2 bedroom: 35%; 3 or more bedrooms : 15% of units; and,
 - for market housing, a mix of unit sizes including larger family accommodation
- **Affordable Rent Definitions** – The National Government’s *Fairer Future for Social Housing* created a new affordable housing product called ‘Affordable Rent’ which should be charged at no more than 80% market rent (including service charges). But for many people, this product can be misleading because market rents are so high in the Borough: 80% of a local market rent is too high a price to pay for most people seeking affordable housing. The Council seeks to ensure that ‘Affordable Rent’ products are lower than the Local Housing Allowance (below average private rents for the area), but these rents will still be high for many prospective tenants. In the Standards document we set out our preference for lower priced rented housing, but in some instances it is possible we will not be able to enforce this requirement.

The Council is working within the context of a Mayor of London’s regional housing strategy. This provides the statutory framework for the Council’s approach through the London Housing Strategy; associated policy guidance; and funding initiatives. Where possible, housing association and (where applicable) their private sector partners should seek to deliver affordable homes that align with the ‘Target Rents’ for the housing association concerned. Ideally these rents should be similar to those charged by the Council for its own housing.

- **Intermediate Housing Definitions** – Intermediate housing is for people who are not eligible for social housing as defined in the Housing Allocation Scheme but not earning enough and/or have sufficient wealth to buy on the open market. There is a range of intermediate housing products that are available, but the Council’s primary focus is on ensuring that intermediate homes are affordable for people on low to medium incomes. The income ranges are drawn from the Mayor of London’s planning documents which are from £21,100 to £66,000 for one bedroom and two bedroom homes, with the

limit increased to £80,000 for three bedrooms or more. The Council is keen to ensure that applicants at the lower end of the income ranges are able to access affordable housing, so the Council splits the income ranges into three bands – the ‘thirds model’ – which is intended to lead to developers providing housing that is affordable to low, medium and high incomes within the above range.

- **Accessible Housing** – Requirements for accessible housing are set out in this section, which requires 10% of all housing to be accessible for people who use wheelchairs or at least easily converted to being made accessible. The key issues to be addressed here are width of doorways; kitchen and bathroom fixtures and fittings; level thresholds; and lift access. Associated with this is a requirement to deliver the sixteen lifetime homes standards.
- **Space Standards** – The space standards are based on the Mayor of London’s Housing Design Guide Standards set out in his Housing Supplementary Planning Guidance (SPG) document. There are a number of other design guide standards that the Council seeks in new developments, but adequate space for people to live in is considered one of the most important.
- **Sustainability** – All homes should satisfy London Plan policy on sustainable design and construction and make the fullest contribution to the mitigation of and adaptation to climate change.
- **Secure Housing in Safe Environments** – The reduction of crime and anti-social behaviour (ASB) is a key priority for Hammersmith & Fulham and its tenants, particular those who might be considered more vulnerable and building homes which are ‘Secured by Design’ is part of the solution. Secured by Design focuses on the principals of crime prevention and use of British security standards in the planning and construction of newly built homes. The principles have been proven to achieve a reduction of crime risk by up to 75%, by combining minimum standards of physical security and well-tested principles of natural surveillance and defensible space. By ensuring that homes built in Hammersmith & Fulham are designed in accordance with Secured by Design principals, as well as implementing both proactive and reactive local management services, the Council aims to significantly reduce the potential for crime and ASB occurring. Management services are referenced in Theme 3 of this Draft Strategy.
- **Supported Housing** – There are a number of people from the community that require more than a roof over their head. Such residents may have dependency issues (e.g., drugs, alcohol); be in danger of homelessness; or be victims of domestic violence. Supported housing seeks to provide additional services (sometimes provided onsite) to help ensure that these people are catered for and ideally ‘moved on’ to general needs housing when they are able to. Any proposed Supported Housing scheme will need to be evidence based and accompanied by a robust business plan, with appropriate advice and approval from the Council’s Adult Social Care Directorate.

1.4 Housing Strategy Action: The Affordable Housing Standards described above and detailed in Annex A sets out the standards and pricing of affordable housing the Council wishes to see developed in the Borough.

1.5 Delivering more choice for affordable ownership and rented housing

The backdrop

Increasing the delivery of affordable housing in Hammersmith & Fulham is challenging for a range of reasons: land is in short supply; available public investment is low; housing associations are being increasingly cautious about how they intervene in the market; higher 'affordable rents' mean 'bad debts' are likely to rise, complicated by downward pressures on the benefits regime. There is some evidence that housing associations who historically have been active in the Borough are investing elsewhere, where land prices are lower and the economic conditions for affordable housing development greater. We wish to change this situation for the better as set out in the preceding section.

Changing our approach

The operating environment for developing new affordable housing continues to be challenging. However, the Council should still be able to express concerns and take action where proposed new affordable housing is considered not to be affordable to applicants from the Housing Register and Home Buy Register. The Council is mindful of the affordable rent guidelines set out in the Mayor's Housing Strategy which our local housing strategy should be in broad conformity with. Any local affordable rent policy will be difficult to enforce. Where GLA investment is applied, the price of Affordable Rents are likely to be between 50% (Capped Rent) and 80% (Discount Rent) of local market rents (all inclusive of services charges). These rents can be twice what the Council charges their own tenants. Where the Council uses its own resources and/or influence, it will expect the price of the housing – rent (including service charge) – to be affordable to the Council's applicants. As a minimum, we would expect any proposed 'Affordable Rents' (inclusive of service charges) to be lower than the Local Housing Allowance for the area and closer to 'target rents'.

On Intermediate Housing costs, because of high house price inflation, products such as Shared Ownership (part rent, part buy) must be based on open market values. So 25% of a new one bedroom home would require a mortgage of c £125,000 but additional costs will come in the form of rent on the un-owned equity and service charges. For a one bedroom home, occupants can just about afford the housing costs based on 40% of disposable income. For a two bedroom home, the costs can become prohibitive for the applicant, particularly when other cost of living factors are taken into account.

New partnerships with housing associations

This presents an opportunity for housing associations in partnership with the Borough to look at new ways for younger adult households – 'generation rent'

households, often younger people in their 20s and 30s - who cannot afford to climb the first rung of the home ownership ladder.

The guiding principle for our approach will be affordability to the applicant. Our approach to affordability is set out in the Affordable Housing Standards Statement.

More choice for council tenants wanting to access home ownership

As part of overall objective of making the most efficient use of the housing stock, the Council also wishes to assist those tenants who have aspirations to move into home-ownership. This would have the additional benefit of freeing-up more accommodation for those in housing need. The Council will therefore explore a scheme in which tenants can use their rent payment to build up a notional 'share' in their home which they can cash in and 'sell' back to their landlord when they move out into home-ownership. The Council also intends to develop its own 'H&F Shared Equity Home' model to allow local people on low to medium incomes to access home ownership. The Council is aware that some council housing tenants who wish to own their home are unable to because of the high purchase price, despite the discounts available.

1.5 Housing strategy action: The Borough will invite housing associations to come forward with proposals to maximise the opportunities for new affordable housing in the Borough; the Council in its role as the strategic authority for the Borough and landlord will review what opportunities it can create through its own strategic review of its land and buildings to increase affordable housing choices and opportunities for local people

1.6 Lobbying the Mayor of London and Government for more resources and choice in affordable housing

The Backdrop

In creating new opportunities for affordable housing development, this in turn creates fresh demand for additional investment resources. There is much in the way that innovation and the introduction of small amount of money or land can bring to the table, but often there are funding gaps which are either met through planning obligations from developers, or funding from the Greater London Authority's Affordable Housing Programme. However, available funding on a grant per unit basis is relatively limited compared to the open market value of homes being developed and sold in the Borough. Where GLA funding is secured, there is a requirement a small percentage of new lettings should be available for the Mayor's Pan London Mobility Scheme, called *Housing Moves*, which arguably creates a disincentive to receive the investment that is available. Nonetheless, working on the basis that the GLA in its strategic planning role advising the Mayor of London seeks to maximise affordable housing on major sites, then the 'loss' of affordable homes to the London Moves scheme should be relatively marginal. Indeed some applicants from Hammersmith & Fulham may wish to move out of the borough which should 'even up' any possible loss of nominations.

More housing investment

The Borough in its bid for Housing Zone resources for the White City Opportunity Area in September 2014 made clear it wished to start a dialogue about maximising affordable housing delivery in Hammersmith & Fulham. We will follow up that letter and bid through a process of regular engagement with the Mayor of London and senior staff to ensure that the shared priority and opportunity of increasing affordable housing delivery over the next 10-20 years is realised. Where the Council is able to secure additional housing investment through the GLA, there will be conditions attached such as on nomination arrangements and rents which may mean the proposed schemes look less attractive than at first sight. Each scheme will be treated on its merits to ensure that the Borough's residents gain maximum advantage from future housing investment.

An important part of the agenda is also concerned with how new and existing housing is being bought by 'buy to leave' investors and also those who purchase homes that have previously been bought under the right to buy. The Council will work with other local authorities facing the same challenges. We want to understand and act on what opportunities there are to arrest and reverse situations like these arising now and in the future.

National agenda

The national Government's approach to housing is set out in its national strategy, *Laying the Foundations: a Housing Strategy for England* published in 2011. The Council will lobby Government Ministers, for example, on the next Comprehensive Spending Review to ensure the case for affordable housing is made and investment is increased in the regeneration areas identified in this document.

The Lyons Housing Review *Mobilising Across the Nation to Build the Homes Our Children Need* (Oct 2014) provided some in depth analysis of why the country has not built enough homes for people to live in and set out a 'roadmap' as to how the housing crisis could be addressed. The Report makes reference to identifying Housing Growth Areas and creating New Homes Corporations to help deliver more housing to meet housing need, together with the opportunity to channel more institutional investment into housing development. Given the Council's ambition for its own housing stock and more broadly realising the housing capacity in the Borough, there is an opportunity for the Council to review how the development and regeneration process may need to change to deliver the Housing Strategy objectives identified in this document and speed up delivery.

<p>1.6 Housing strategy action: Strategically engage and lobby the Mayor of London and the national Government to maximise investment in affordable housing and ensure housing built is prioritised for the domestic market.</p>

Theme Two – Meeting Housing Need and Aspiration

Evidence Base Key Points

Hammersmith & Fulham has:

- c 850 applicants on its Housing Register (people needing accommodation)
- c 1,200 households in temporary accommodation, which includes households in bed and breakfast
- c 80 applicants who use wheelchairs or have mobility issues awaiting accommodation

Source: H&F Data (Oct 2014)

2.1 Housing Allocation Scheme

The Housing Allocation Scheme is a document that sets out the eligibility and qualifying criteria for people who are in housing need. Some but not all of these applicants will be applying as homeless, but there are other needs such as medical, overcrowding needs which also give people priority. In other words, they are not homeless but living in unsatisfactory housing conditions or are armed forces personnel returning from overseas.

In summary, the Housing Allocation Scheme sets out:

- How the council will decide which applications qualify to join the register
- How the council will decide relative priority for qualifying applicants
- How the council will allocate accommodation

Main features of the current scheme

At present, to qualify to join the housing register applicants must be a current resident of the borough and have been resident for a continuous period of five years and (outside of exceptional circumstances) must satisfy at least one of the following conditions:

- Overcrowded by at least two bedrooms against their defined housing need
- Suffering from a medical condition that is severely affected by existing living conditions (or worse)
- The council has accepted a duty to accommodate under homelessness legislation and the applicant is residing in a Bed and Breakfast (B&B) hostel or accommodation that is otherwise unsuitable (this is subject to amendment following a recent Court of Appeal judgement)

Qualifying applicants are placed in one of four priority bands. Band 1 applicants have the highest priority and band 4 applicants the lowest. Within bands priority is determined by date order. Extra priority is awarded for households making a community contribution (e.g. working households, fosterers/adopters, volunteers and registered carers).

The Council will undertake a consultation on changes to the Housing Allocation Scheme in light of the change in administration and is setting out where those changes might be made. Changes that could be made include:

- Amendments to the residence criteria
- Requalification of households owed the homelessness duty who are in suitable long term temporary accommodation (subject to amendment following a Court of Appeal judgment)
- Relaxation of the needs thresholds on overcrowding
- Relaxation of the needs thresholds for medical conditions
- Removing the Community Contribution criteria

The Council also wants to hear how it can work more closely with veterans' charities to identify and prioritise ex-armed services personnel that are struggling to locate housing in the borough.

More detail on possible changes can be found in Annex C of this Housing Strategy.

<p>2.1 Housing strategy action: The Council will consult with interested parties on changes to the Housing Allocation Scheme.</p>
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2.2 Preventing homelessness

The Council's Housing Allocation Scheme (see Section 2.1 and consultation document) sets out in detail the priority which homeless people receive under the Scheme and a quota for such need is detailed in the Annual Lettings Plan. But a core element of the Council's homelessness obligations involves working with other organisations to help prevent homelessness. There are a range of scenarios in which people can become homeless or be threatened with it. Cases arise across a broad spectrum of society, beyond the obvious cases of rough sleepers.

Much of our work associated with preventing homelessness involves working with third sector agencies such as housing associations and agencies that specialise in providing support for specific need groups. Some of these services are funded through the Supporting People programme which is one of the links between the services provided by the Council's Housing & Regeneration Directorate and that provided by Adult Social Care. Ensuring officers from different parts of the Council work in concert, together with specialist providers is core to continuing the work undertaken to prevent and reduce homelessness.

The Homelessness Strategy adopted in October 2012 focused on four future work priorities which were:

- Preventative Action – Identifying and Helping Need Groups
- Housing Allocation Scheme and Flexible Tenancies
- New Housing Supply
- Future Service Delivery

With the change in administration, a different approach with different emphases is expected. The manifesto commitments on homelessness are as follows:

- Work with homeless charities, faith communities and homelessness prevention professionals to provide safe, warm accommodation for homeless individuals and homeless families
- Act to help people in danger of homelessness
- Take action to support homeless children are provided with suitable homes and support
- Make sure that young homeless people have safe accommodation and access to Disclosure and Barring Service (DBS) checked mentors who will support their wellbeing and help them back into education or employment

Further commitments on the related issues of the bedroom tax, housing benefits and Local Housing Allowance:

- Mitigate the National Government's bedroom tax and support for those unfairly targeted
- Negotiate with private sector leaseholders to limit residents being forced out of the Borough
- Support those unfairly targeted by housing benefit and Local Housing Allowance cuts

Following the change in administration, the Council intends to take the opportunity to review, change and improve the way it works with other organisations to prevent homelessness. There also needs to be a clear 'read across' to any changes to the Housing Allocation Scheme. Rather than produce a new Council-drafted Homelessness Strategy, the Council is intending to facilitate a more inclusive process. We will review how the council delivers its services at present in light of the manifesto commitments described above. This will involve the development of a strategy with other officers of the Council; our third sector partners; and clients themselves which we will seek to be a fair, inclusive and value for money approach to homelessness prevention. The Council is reviewing how it works with the third sector, with a focus on engagement, liaison and homelessness referral arrangements. A working group made up of representatives from the Council and the third sector (including housing association representatives) will be established to develop the new approach. The final document will be a Homelessness Prevention Strategy Action Plan, part of the Housing Strategy. This will avoid the outcome of homelessness being treated separately from our wider housing strategy approach.

2.2 Housing strategy action: The Council will work with third sector agencies and clients to develop and adopt a revised Homelessness Prevention Strategy Action Plan.

2.3 Home Buy Allocation Scheme

Just as we have a Housing Allocation Scheme for applicants in housing need, (usually meaning rented accommodation), we also have an Allocation Scheme for people who have housing aspirations which can't be met from the local housing

market. Such applicants are generally not eligible for accommodation under the Housing Allocation Scheme criteria because their income and/or wealth is too high, but not sufficient to buy on the open market. Such applicants are often described as being from the 'squeezed middle' and more recently 'Generation Rent'. Such people – often working adults from the younger age groups - are often unable to afford to access home ownership through lack of a substantial deposit, and end up paying high rental costs to landlords rather than paying (and eventually reducing) their own mortgages. The Council in its strategic housing, planning and regeneration roles, secures affordable housing from developers as part of what is called 'planning obligations'. Much of what is in the development 'pipeline' – schemes with planning consent, but yet to be implemented - will be for low cost home ownership (LCHO) purposes.

It should be noted that not all homes available through the Home Buy Allocation Scheme are for LCHO purposes, with some being rented accommodation charged at a sub-market, intermediate rent. But the majority of intermediate accommodation that becomes available is LCHO, as that has historically been applicants' preference. In tandem with the consultation on the Housing Allocation Scheme, we are also consulting on changes to the Home Buy Allocation Scheme. The changes we are proposing are relatively minor which involve aligning the Council's affordability criteria with those of the Mayor of London, as set out in the Annual Monitoring Report. In this document the Mayor for London reports on progress on delivery on the London Plan, but it also provides guidance on what the income ranges should be defined as meeting an affordable criteria. Currently the minimum gross income is £21,100 per annum (p.a.) up to £66,000 p.a. For three bedrooms, the maximum is £80,000 p.a.

The Council is proposing to 'track' the income ranges identified in the Mayor's Annual Monitoring Report on an annual basis so that applicants and developers have a clear idea of what the affordability criteria is. In line with current practice, the Council will continue to apply three lower, middle and upper affordability bands within the Mayor's ranges, so that a wide spectrum of households can access the intermediate housing ladder. The Council will consider applicants on incomes lower than £21,100 p.a.

At the moment, the priority order for applicants seeking homes available under the Homebuy Allocation Scheme is as follows:

1. Social tenants (council or housing association who are vacating a home for nomination to the Council)
2. Armed Services/Ex Armed Services Personnel
3. Police officers living or working in the Borough
4. Homeless working households in temporary accommodation
5. Disabled applicants
6. Households living for twelve consecutive months in the borough
7. Households working in the Borough for twelve consecutive months
8. Households living or working in the Borough with an income within the relevant limit
9. Households with an income above the levels (see above)

The Council is seeking views on whether people agree with this priority order and also whether other groups, such as specific 'key workers' should be given enhanced priority.

In Section 1.5, we are seeking alternative models of home ownership that make gaining access to the home ownership a reality for people on low to medium incomes. The Home Buy Allocation Scheme sets out definitions of products that are currently available: the Council would like to see alternative proposals from not just development partners, but also residents and people who work in the borough and finance institutions that can help increase affordable housing choice. This should include reducing onerous deposit requirements.

Reviewing the Home Buy Allocation Scheme is an opportunity to review the Discount Market Sale product the Council currently uses and reshape it to a 'H&F Shared Equity Home' product that has better terms for the applicant.

2.3 Housing Strategy Action: The Council will consult with interested parties on changes to the Home Buy Allocation Scheme.
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2.4 Affordable housing tenancies

The 2011 Localism Act gave powers to social landlords – Council landlords and housing associations - to issue what are called 'fixed term tenancies' to replace what most people call 'lifetime tenancies'. These fixed term tenancies were expected to last five years (but shorter in exceptional circumstances). Each local authority is required to produce a Tenancy Strategy which sets out its position on the kinds of affordable housing tenancies it wishes to support in its respective area. It may wish to promote fixed term tenancies or support the continuance of lifetime tenancies, sometimes a mix of the two.

The Council's general position is to support 'lifetime tenancies' as they give the best security that tenants should have. However, the Council wants to explore how tenancy agreements can ensure that council housing meets needs on an ongoing basis. The Council is particularly concerned about council homes that are under-occupied which can happen when a household's children leave home, leaving older tenants who do not need the bedrooms that they have. The Council wishes to adopt an approach that better incentivises under-occupying tenants to move – 'down size' – to smaller accommodation. We also want to explore what other mechanisms can be used to ensure that the small amount of large family accommodation that we have available is used to maximum effect.

Housing associations will need to demonstrate that they have had regard to the Council's policies set out in its Tenancy Strategy. However, they are not required to change their own tenancy policies to reflect those set out in the Tenancy Strategy.

2.4 Housing strategy action: The Council will seek views on the Tenancy Strategy approach set out Annex B and consult with council tenants on revisions to the Tenancy Agreement (i.e., returning from fixed term tenancies to 'lifetime' tenancies) to improve security of tenure and help reduce under-occupation to meet housing need. We will also seek residents' views as to whether certain categories of applicant (e.g., those with a record of anti-social behaviour) should have fixed term tenancies granted in the first instance.

2.5 Meeting older people's housing needs

Current estimates indicate that over the next 20 years there could be a 40% increase in the over 65 year old population in the Hammersmith & Fulham with the sharpest increase in the over 85 year old population. Whilst estimates on demand for services for older people is complex there is an indication that an upward trend is likely to continue and this would lead to an increase in demand for older people's care and accommodation.

Our overall strategic approach is to support people within their own homes and to ensure that there are adequate housing options to help facilitate this. This includes provision of aids and adaptations and disabled facilities grants for private sector households. The effective delivery of this approach relies on good joint working practices between Housing, Health and Social Care exploring preventative options including options for pooling budgets. Older people's housing need cannot be looked at from a housing perspective alone. In line with duties under the 2014 Care Act, future housing needs assessments will be undertaken through a joint approach between housing, health and adult social care taking into account relevant tri-borough evidence. We will build on the existing and emerging evidence base and work with stakeholders to determine what housing options are required to deliver on future demand and changing needs to support older people in their own homes and prevent unnecessary admissions to hospital or residential care.

The Greater London Authority (GLA) Strategic Market Housing Assessment indicates that at a London level there is insufficient supply of older people's housing, particularly in the market sector and the Mayor for London is seeking to encourage more specialist and mainstream developers to build more housing suitable for older people. We are currently undertaking a Joint Strategic Needs Assessment (JSNA) with Westminster City Council and the Royal Borough of Kensington & Chelsea to better understand the future housing needs for older people and the findings of this will feed into future planning process.

The overall demand for sheltered housing in Hammersmith & Fulham is relatively low and some schemes are not suitable for those with higher care needs and existing general needs stock is unlikely to be able to meet future needs. The council is committed to improving sheltered housing and working with residents to explore options to deliver this, working with the NHS and others to deliver new types of private and social sheltered housing which will include on-site home and medical care. We will continue to focus on improving the management of existing adapted and accessible stock and working with adult social care to support independence. The Council will also need to be more innovative and proactive in its approach to identifying housing options for older people from existing social housing. Any such

options will need to be accompanied with appropriate levels of management support for individual client groups.

2.5 Housing strategy action: The council will:

- Build on the Older People and Housing Joint Strategic Needs Assessment (JSNA) and undertake further detailed work with key partners and stakeholders to examine what housing options are required across tenure to deliver future demand and changing needs.
- Improve the recording of and matching of adapted properties to ensure the best use of stock
- Seek to deliver new mixed use extra care beds in borough including private for sale units for older people within 2015/18

2.6 Meeting the housing needs of disabled people, including those with learning disabilities

The council is committed to improving housing options for vulnerable groups including those with learning disabilities, mental health needs and physical disabilities and we are focusing support and resources on those with the highest and most complex needs.

There are a range of housing options available for vulnerable groups in the borough and these include residential and nursing care, supported housing and private sector accommodation. We work closely with Adult Social Care to deliver a structured pathway which aims to support people towards independence addressing both care and housing needs. The majority of the Borough's general needs housing is not well suited for those with severe physical disability and placements in some areas can risk exposing some vulnerable groups to harassment and/or victimisation. Three quarters of existing housing stock is flats with nearly half having no ground floor entrance and many having no lift access and there is a lower proportion of two and three bed flats when compared to greater London. The limitations of existing stock highlights the challenges to meeting the needs of those with physical disabilities and vulnerable groups and the importance of good matching processes for all accessible and adapted properties that become available to let.

We recognise the benefit to individual wellbeing in maintaining existing family links and social networks and to this end we have set targets in reducing the number of out of borough placements and will work with stakeholders towards increasing local housing options and models available. We are currently working closely across Health, Housing and Adult Social Care to deliver our responsibilities to meet the housing and care needs of adults with care and support needs in line with the 2014 Care Act.

2.6 Housing strategy action: The Council will:

- Continue to implement the Learning Disability accommodation and support strategy and work with key stakeholders to deliver this
- Undertake a review and reconfigure learning disabled supported housing provision
- Map the system for updating and maintaining the accessible housing register and make recommendations for improvements
- Review and improve the system for void notification and allocation of adapted properties
- Review affordability of social housing and options for those on disability benefits and who are unlikely to be able to work
- Work with stakeholders to improve access for vulnerable groups and ensure that council staff have appropriate training to enable them to identify and respond to needs
- Explore with Adult Social Care and Health initiatives to provide innovative preventative services
- Improve access to the social housing system, e.g., staff training and changes to registration approach

Theme Three – Excellent Housing Services for All

Evidence Base Key Points

Hammersmith & Fulham has:

- 83,390 homes accommodating 182,493 people
- Housing market segments as follows: 31.6% of households own their home/have a mortgage; 1.6% are shared owners; 15.7% are council rented homes; 15.4% are housing association homes; 33.2% are private rented (of which c 2% live rent free)
- A Private Rented Sector that has grown from 23.4% of the housing market in 2001 to 33.2% in 2011

Source: Hammersmith & Fulham Borough Profile 2014

3.1 Council housing and regeneration services

This section focuses on housing management and repairs services and how satisfied residents feel about the work that is done on their behalf. Residents, whilst expressing satisfaction at some levels of improvement in the service are dissatisfied about other aspects and expect significant improvements. The council, as landlord, needs to find the right balance ensuring that residents receive an excellent, value for money service and ensure that mechanisms are in place to allow them to help shape and improve the services delivered.

Increased residents advice and representation and powers to terminate housing management contracts feature in the manifesto commitments. Section 1.1 of this Housing Strategy focuses on the establishment of the Residents Commission and Stock Options Appraisal process. This provides an opportunity for a radically different way of engaging with residents and giving them a pivotal role in the future management and ownership of their stock. In tandem with that process, we need to review how we improve the service to ensure residents get what they are entitled to.

3.1 Housing Strategy Action: The Council will review in consultation with residents the current approach to residents' advice and representation and adopt a new approach that helps improve the services they receive.

3.2 Greater resident involvement in housing management decision-making

The Council involves tenants and leaseholders in a number of ways with decision-making relating to way their homes are managed and maintained. There are periodic meetings of the respective Tenants and Residents Associations (TRAs) and Borough –level Tenant and Resident Forum meetings where officers of the respective TRAs have the opportunity to receive reports from senior officers and scrutinise reports on 'key performance indicators' in relation to the Council's own service and those who are contracted to deliver services on their behalf. Other initiatives include involving tenants helping with 'mystery shopping' and inputting into the design of the repairs service for tenants, i.e., how the service can be designed to ensure it works most effectively for tenants.

The Residents Commission and Strategic Housing Stock Options Appraisal process identified in Section 1.1 of this document will place some pressures on time available particularly to TRA representatives and staff from the Council to fully work through the appraisal process. In addition to this, the Council will need to ensure that the service to residents continues to improve to meet key performance requirements.

In that light, we need to review the mechanisms for engagement on an ongoing basis with TRAs and residents generally to ensure their views are taken into account in a meaningful and effective fashion.

3.2 Housing Strategy Action: The Council will work with residents and other interested parties to develop and implement new and better approaches to engage with residents to improve the delivery of housing management services

3.3 Improving the Private Rented Sector

The backdrop

The Private Rented Sector (PRS) comprises a large section of the housing market – 33.3% in 2011 - in the Borough, a rise from 23.4% in 2001. The stock is provided from a range of sources such as ex-right to buy council housing which has been sold to investors; private landlords with a small to medium portfolio of stock; small-scale landlords who have one or more homes owned for investment or family reasons; buy to let landlords (sometimes from overseas) who have homes in new ‘luxury’ developments. Taken together, they provide an increasingly large proportion of housing which meets a very important need for people who are either unable to enter the home ownership market or just simply want somewhere to live for work purposes and expect to move on. Some PRS housing is used to accommodate homeless households. Some of those who are unable to enter the home ownership market are paying housing costs equal to mortgage costs, but because they don’t have a significant deposit, they are paying market rents. Consequently, they are unable to save for the deposit needed to buy a home, meaning home ownership is not an option for people in their 20s and 30s.

Rogue landlords and empty homes

There are instances of ‘rogue’ landlords who charge the market rent they can, but do not fulfil their landlord obligations to keep the property in a safe and decent condition. And there are instances where homes are overcrowded with individual households, called ‘Homes in Multiple Occupation’ (HMOs), which can create health and safety problems – sometimes ‘hazards’ - which require action by the Council.

Separately, there are also some instances where homes are deliberately kept empty for a wide range of reasons: sometimes the owner doesn’t have the resources to repair and improve the home, sometimes he/she has bought it for investment reasons and is expecting the price to increase and are content for it to remain vacant on that basis. Any home empty for longer than six months is wasteful and the Council wants to consider options to reduce its occurrence. An initial response would be to substantially increase council tax on homes empty for long periods.

Improving the private rented sector

On the broader challenge of improving the private rented sector, there are a number of responses that the Council is considering to address issues in what historically has been a difficult market to intervene in. The Council wants to achieve better outcomes for our residents in private rented housing.

The council has a statutory obligation to take action against unsatisfactory landlords in certain circumstances, e.g., where they are deliberately letting homes which are unfit to live in and not undertaking remedial action. We will meet our obligations and publicise actions to dissuade others from doing the same.

Some homes being rented privately are reported to be council or housing association homes being illegally sub-let by their tenants. This is both an abuse of limited social housing stock, but also often results in very poor quality of service to those who are sub-letting the accommodation. The Council will work to identify and curtail illegal sub-letting.

Accreditation and licensing

A broader issue lies in whether the council should introduce a 'voluntary' accreditation/licensing scheme for landlords; a selective one (e.g., for particular places/areas or particular types of housing); or a compulsory scheme across the Borough. Resourcing each of these approaches will cost money. In addition to this, the council wish to explore whether rent can and should be controlled in some way and that tenants should have the right to more than a minimum one year (sometimes six months) tenancy with rental increases restricted in some way.

The current position is that the Council promotes landlord accreditation through the *London Landlord Accreditation Scheme* administered by the London Borough of Camden. This scheme provides training and support for private landlords. However, the Council recognises that private sector tenants and other interested parties want more to be done.

3.3 Housing strategy action: The Council will:

- Meet its statutory obligation to take enforcement action against unsatisfactory landlords and those who are deliberately and illegally letting unfit homes
- Continue to promote landlord accreditation
- Investigate the advantages and disadvantages of a licensing scheme for the Borough
- Seek all means to prevent homes being empty for longer than 6 months
- Investigate the advantages/disadvantages of rent controls through a London Living Rent
- Formulate the Council's 'H&F Private Landlords' Charter which will include reference to conditions and standards in the private rented sector.

3.4 Personal and community safety

In Section 1.3 of this Strategy, we highlighted the importance of well-designed new environments that reduce and ideally remove the potential for crime and anti-social behaviour. However, the reality for most residents is that they will already be living in environments designed many years ago, where the potential for such behaviour already exists. Subsequently, in order to best manage these 'problem areas', local Environmental Visual Audits shall be undertaken with a view to 'target-hardening' these locations, and consideration to altering the local environment to reduce crime/ASB given. This target-hardening shall be a combination of local crime-reduction initiatives (in conjunction with both the Council and Metropolitan Police Service); and where possible, implementation of visual deterrents (i.e. CCTV, better lighting, street signage); and alteration the local landscape to make these 'problem areas' less appealing to those wanting to commit crime. By undertaking local target-hardening in these areas, it is our aim to reduce the likeliness of crime being committed whilst at the same time increasing resident's confidence and perception of the local area.

<p>3.4 Housing strategy action: The Council will review with its partners how it can continue to improve its approach to personal and community safety in the Borough.</p>

Equalities Statement

The 2010 Equalities Act places an equality duty on local authorities (and other public bodies) to protect people from discrimination in the workplace and in wider society. To meet this duty, the Council needs to consider all individuals when carrying out their day-to-day work when shaping policy, in delivering services and in relation to their own employees. It also requires that public bodies to:

- have due regard to the need to eliminate discrimination
- advance equality of opportunity
- foster good relations between different people when carrying out their activities

The adoption of a new Housing Strategy (and associated documents) requires the Council to undertake an Equalities Impact Assessment (EqIA) to fully assess what the positive and negative impacts of adopting the Housing Strategy will be on defined 'equality groups'. These are:

- women
- black, Asian and ethnic-minority people
- young people and children
- older people
- disabled people
- Lesbian people, gay people, bisexual people and transsexual people
- people from different faith groups

Reviewing population data set out in the Hammersmith & Fulham Borough Profile (2014) it is clear that the large majority of the population is drawn from the groups identified above. Overall, the Council is confident that the equality impacts of the proposed interventions will be positive on the groups identified above. For example:

- More wheelchair accessible homes and those that meet the sixteen lifetime standards will have positive impacts on disabled people
- More family-sized accommodation for social/affordable rent will alleviate overcrowding and will have positive impacts on children
- Better designed housing and their environments should reduce anti-social behaviour and crime which will have positive impacts on those who suffer from hate crime and racial harassment

More broadly, if the number of jobs that are created through our regeneration interventions, then there is a significant opportunity to deliver training, skills and work opportunities for young people.

Our over-arching requirement for the EqIA process is to fully consider what positive and negative impacts might occur through the changes we are proposing. It is not the case that we avoid interventions if they may lead to negative impacts on some groups as they may lead to positive impacts for others. But we are required to understand them and have due regard and monitor them accordingly. This will be set out in the Draft Equalities Impact Assessment which will form part of the Housing Strategy Consultation process.

Action Plan

Theme 1 - Regenerating Places & Increasing Affordable Housing Supply

1.1. Housing strategy action: The Council will establish a Residents' Commission which will consider options for empowering residents to take local control over their homes, maximising investment in existing and new council homes and achieving wider local regeneration outcomes.

1.2 Housing strategy action: The Council will in its planning, housing and regeneration roles deliver the Local Plan Strategic Regeneration and Affordable Housing policy objectives. This will include the development of an affordable housing delivery programme which will maximise delivery over the next 10 years. Where the Council provides 'leverage' through land and/or funding, affordable housing requirements with the aim of exceeding the overall 40% affordable housing target set out in this section with an emphasis on increased provision of social rented housing.

1.3 Housing strategy action: The Council will encourage housing associations to bring forward innovative housing solutions on small to medium sites; review how it can facilitate the work of housing associations more effectively and efficiently; proposes to create an approved panel of housing associations; and review how the nomination process for new accommodation and re-lets can be made to work more effectively and efficiently.

1.4 Housing strategy action: The Affordable Housing Standards described above and detailed in Annex A sets out the standards and pricing of affordable housing the Council wishes to see developed in the Borough.

1.5 Housing strategy action: The Borough will invite Registered Providers to come forward with proposals to maximise the opportunities for new affordable housing in the Borough; the Council in its role as the strategic authority for the Borough and landlord will review what opportunities it can create through its own strategic review of its land and buildings to increase affordable housing choices and opportunities for local people.

1.6 Housing strategy action: Strategically engage and lobby the Mayor of London and national Government to maximise investment in affordable housing and ensure housing built is prioritised for the domestic market

Theme Two – Meeting Housing Need and Aspiration

2.1 Housing strategy action: The Council will consult with interested parties on changes to the Housing Allocation Scheme.

2.2 Housing strategy action: The Council will work with third sector agencies and clients to develop and adopt a revised Homelessness Prevention Strategy Action Plan.

2.3 Housing strategy action: The Council will consult with interested parties on changes to the Home Buy Allocation Scheme.

2.4 Housing strategy action: The Council will seek views on the Tenancy Strategy approach set out Annex B and consult with council tenants on revisions to the Tenancy Agreement (i.e., returning from fixed term tenancies to 'lifetime' tenancies) to improve security of tenure and help reduce under-occupation to meet housing need. We will also seek views residents as to whether certain categories of applicant (e.g., those with a record of anti-social behaviour) should have fixed term tenancies granted in the first instance.

2.5 Housing strategy action: The council will:

- Build on the Older People and Housing Joint Strategic Housing Needs Assessment (JSNA) and undertake further detailed work with key partners and stakeholders to examine what housing options are required across tenure to deliver future demand and changing needs.
- Improve the recording of and matching of adapted properties to ensure the best use of stock
- Seek to deliver new mixed use extra care beds in borough including private for sale units for older people within 2015/18

2.6 Housing strategy action: The Council will:

- Continue to implement the Learning Disability accommodation and support strategy and work with key stakeholders to deliver this
- Undertake a review and reconfigure learning disabled supported housing provision
- Map the system for updating and maintaining the accessible housing register and make recommendations for improvements
- Review and improve the system for void notification and allocation of adapted properties
- Review affordability of social housing and options for those on disability benefits and who are unlikely to be able to work
- Work with stakeholders to improve access for vulnerable groups and ensure that council staff have appropriate training to enable them to identify and respond to needs
- Explore with Adult Social Care and Health initiatives to provide innovative preventative services
- Improve access to the social housing system, e.g., staff training and changes to registration approach

Theme Three – Excellent Housing Services for All

3.1 Housing strategy action: The Council will review in consultation with residents the current approach to residents' advice and representation and adopt a new approach that helps improve the services they receive.

3.2 Housing strategy action: The Council will work with residents and other interested parties to develop and implement new and better approaches to engage with residents to improve the delivery of housing management services

3.3 Housing strategy action: The Council will:

- Meet its statutory obligation to take enforcement action against unsatisfactory landlords and those who are deliberately and illegally letting unfit homes
- Continue to promote landlord accreditation
- Investigate the advantages and disadvantages of a licensing scheme for the Borough
- Seek all means to prevent homes being empty for longer than 6 months
- Investigate the advantages/disadvantages of rent controls through a London Living Rent
- Formulate the Council's 'H&F Private Landlords' Charter which will include reference to conditions and standards in the private rented sector.

3.4 Housing strategy action: The Council will review with its partners how it can continue to improve its approach to personal and community safety in the Borough.

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Annex A – Affordable Housing Standards

Note: The boxed text below is drawn from the Housing Strategy document. The additional italicised text is intended to complement where necessary that set out in the main document.

Market and Affordable Housing Tenure Mix – the Borough’s Core Strategy (i.e., the Local Plan) target for affordable housing is 40% of additional housing to be affordable. Of that 40% affordable housing, 60% affordable housing for rent and 40% affordable housing for low cost home ownership

Intermediate housing is generally for working households with a regular income and some savings. Applicants are in need of affordable housing, but not eligible for affordable rented housing (through the criteria set by the Housing Allocation Scheme) and unable to access market housing on the open market. Intermediate housing is often, but not exclusively, low cost home ownership housing. It can include sub market priced homes for rent. The eligibility and qualifying criteria is set out in the Council’s Home Buy Allocation Scheme (April 2013).

Affordable Rented housing is generally for those who are eligible and qualify for affordable housing (through the criteria set out in the Housing Allocation Scheme) and are in need due to their personal circumstances (e.g., single parent families; disability; age; homeless; supported housing needs, etc). The eligibility and qualifying criteria is set out in the Council’s Housing Allocation Scheme (December 2012).

The position of the administration will be to maintain the 40% affordable housing requirement, with the additional qualification that of the 40% affordable housing, 60% should be for affordable rented purposes, and 40% for intermediate purposes. By way of example, for a scheme of 100 homes, 60 homes should be for market purposes, 24 homes can be affordable rented purposes and 16 for intermediate purposes.

The Council will actively encourage schemes that deliver over the 40% affordable housing target and be flexible in its approach on how developers wish to calibrate the affordable housing mix to achieve scheme viability. The Council will work with other interested parties such as the Greater London Authority, to achieve acceptable outcomes.

Market and Affordable Housing Bedroom Mix – the Borough’s Development Management Local Plan requires the following bedroom mixes:
where social rented housing is replacing existing social rented housing the new housing should meet the needs of the relocating tenants
for affordable rented approximately: 1 bedroom: 10% of units; 2 bedrooms: 40% of units; 3 bedrooms: 35% of units; 4+ bedrooms 15% of units
for intermediate housing approximately: 1 bedroom: 50%; 2 bedroom: 35%; 3 or more bedrooms : 15% of units; and,
for market housing, a mix of unit sizes including larger family accommodation

For affordable homes larger than one bedroom, the Council wishes to see 50% of each property type to be able to accommodate an additional person. For example, with the 40% requirement for 2 bedroom affordable rented homes, half of these should be for 3 persons, the remaining half for 4 persons. The same approach should be applied to 3 bedroom properties (5 persons and 6 persons).

Affordable Rent Definitions – The National Government’s *Fairer Future for Social Housing* created a new affordable housing product called ‘Affordable Rent’ which should be charged at no more than 80% market rent (including service charges). But for many people, this product can be misleading because market rents are so high in the Borough: 80% of a local market rent is too high a price to pay for most people seeking affordable housing. The Council seeks to ensure that ‘Affordable Rent’ products are lower than the Local Housing Allowance (below average private rents for the area), but these rents will still be high for many prospective tenants. In the Standards document we set out our preference for lower priced rented housing, but in some instances it is possible we will not be able to enforce this requirement.

The Council is working within the context of a Mayor of London’s regional housing strategy. This provides the statutory framework for the Council’s approach through the London Housing Strategy; associated policy guidance; and funding initiatives. Where possible, housing association and (where applicable) their private sector partners should seek to deliver affordable homes that align with the ‘Target Rents’ for the housing association concerned. Ideally these rents should be similar to those charged by the Council for its own housing.

*The Council recognises that the Mayor’s priority and associated funding where available centres on the **Affordable Rent** regime, which is more aligned with local market prices and the Local Housing Allowance. In that vein, the following **Affordable Rent** products (where funded by the Greater London Authority) are acknowledged by the Council:*

- *The rent level for **Capped Rent** homes is agreed to be no more than 50% of market rent (inclusive of service charge), noting that where this is below the target rent level (exclusive of service charge) for a given property the target rent level, plus service charge, shall apply.*
- *The rent level for **Discounted Rent** homes is agreed to be no more than 80% of market rent for that property (inclusive of service charge), noting that where this is above the Local Housing Allowance (inclusive of service charge) for a given property, the Local Housing Allowance level, shall apply.*

Where possible, the Council would like Assured Tenancies (i.e., ‘lifetime’ tenancies) granted to tenants of new homes but recognise that grant requirements and/or policies of the Registered Provider may require a fixed term tenancy – an Assured Shorthold Tenancy – for 5 years be granted (plus one year starter/probationary tenancy). The Council will consider proposals on a scheme by scheme basis and will be flexible in its approach to tenancies proposed by Registered Providers.

Intermediate Housing Definitions – Intermediate housing is for people who are not eligible for social housing as defined in the Housing Allocation Scheme but not earning enough and/or have sufficient wealth to buy on the open market. There is a range of intermediate housing products that are available, but the Council's primary focus is on ensuring that intermediate homes are affordable for people on low to medium incomes. The income ranges are drawn from the Mayor of London's planning documents which are from £21,100 to £66,000 for one bedroom and two bedroom homes, with the limit increased to £80,000 for three bedrooms or more. The Council is keen to ensure that applicants at the lower end of the income ranges are able to access affordable housing, so the Council splits the income ranges into three bands – the 'thirds model' – which is intended to lead to developers providing housing that is affordable to low, medium and high incomes within the above range.

The guiding principle to affordability that governs the intermediate housing regime is that housing costs (rental costs/mortgage payments and any associated services charges) and should not be greater than 40% of an applicant's (or applicants') disposable income, which should be considered 70% of gross income. The affordability of the intermediate home to the applicant is based on a mortgage multiplier of 3.5 x gross annual household income, which is drawn from the Mayor of London's Annual Monitoring Report.

To ensure that a sufficiently wide range of applicants have access to intermediate housing opportunities, the Council adopts a 'thirds' approach whereby applicants from the following income bands can afford one and two bedroom intermediate products on offer:

- 1. 1/3 affordable to households on gross incomes of up to £29,000*
- 2. 1/3 affordable to households on gross incomes of up to £43,550*
- 3. 1/3 affordable to households on gross incomes of up to £50,550*

In addition, the Council will seek the mid-point of these income bands when negotiating with developers and Private Registered Providers. In line with the Mayor of London's approach to large family sized accommodation, the maximum gross annual income a household can earn to be eligible for a Home Buy product will be £80,000. Intermediate Products include the following:

- Shared ownership*
- Shared Equity/Loan*
- Discount and other non-funded low cost home ownership schemes*
- Intermediate Rent*
- Discount Market Sale / H&F Shared Equity Home*

The Council will be flexible in its approach to affordability, taking account of scheme viability. However, it is highly unlikely to depart from the core principle of housing costs being no greater than 40% of disposable income. The Council will also welcome developers' alternative approaches to intermediate housing which delivers more and better choices for applicants living and working in the borough.

Accessible Housing – Requirements for accessible housing are set out in this section, which requires 10% of all housing to be accessible for people in wheelchairs or at least easily converted to being made accessible. The key issues to be addressed here are width of doorways; kitchen and bathroom fixtures and fittings; level thresholds; and lift access. Associated with this is a requirement to deliver the sixteen lifetime homes standards.

Current policy set out in the Development Management Local Plan requires that all developments providing ten or more residential units 10% of all new housing should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. In addition, the council requires that all new homes should be built to accessibility requirements set out in the Lifetime Homes Standards.

Space Standards – The space standards are based on the Mayor of London’s Housing Design Guide Standards set out in his Housing Supplementary Planning Guidance (SPG) document. There are a number of other design guide standards that the Council seeks in new development, but adequate space for people to live in is considered one of the most important.

All developments should meet the minimum space standards for new homes set out in the Mayor of London’s Housing Supplementary Guidance (Nov 2012). Examples of the Mayor’s space standards (for flats) are set out below:

Dwelling type (bedroom/persons)	Essential GIA (sq.m)
1 bedroom (2 person)	50 sqm
2 bedroom (3 person)	61 sqm
2 bedroom (4 person)	70 sqm
3 bedroom (4 person)	74 sqm
3 bedroom (5 person)	86 sqm
3 bedroom (6 person)	95 sqm
4 bedroom (5 person)	90 sqm
4 bedroom (6 person)	99 sqm

Sustainability – All homes should satisfy London Plan policy on sustainability design and construction and make the fullest contribution to the mitigation and adaptation to climate change.

The above text is drawn from London Plan Policy 5.3. The Government announced earlier in 2014 its intention to abolish the Code for Sustainable Homes and replace it with energy efficiency standards set out in Building Regulation standards. The Council will seek to ensure that new housing meets London Plan policies.

Secure Housing in Safe Environments – The reduction of crime and anti-social behaviour (ASB) is a key priority for Hammersmith & Fulham and its tenants, particular those who might be considered more vulnerable (the elderly and those with children), and building homes which are ‘Secured by Design’ is part of the solution. Secured by Design focuses on the principals of crime prevention and use of British security standards in the planning and construction of newly built homes. The principles have been proven to achieve a reduction of crime risk by up to 75%, by combining minimum standards of physical security and well-tested principles of natural surveillance and defensible space. By ensuring that homes built in Hammersmith & Fulham are designed in accordance with Secured by Design principals, as well as implementing both proactive and reactive local management services, will help significantly reduce the potential for crime and ASB occurring. Management services are referenced in Theme 3 of this Draft Strategy.

Further reference on secure homes in safe environments is set out in the housing Design Guide, part of the Mayor of London’s Housing Supplementary Guidance.

Supported Housing – There are a number of people from the community that require more than a roof over their head. Such community members may have dependency issues (e.g., drugs, alcohol); be in danger of homelessness; or be victims of domestic violence. Supported housing seeks to provide additional services (sometimes provided onsite) to help ensure that these needs are catered for and ideally ‘moved on’ to general needs housing when they are able to. Any proposed Supported Housing scheme will need to be evidence based and accompanied by a robust business plan, with appropriate advice and approval from the Council’s Adult Social Care Directorate.

There will be specific need groups (e.g., those with one or more dependency issues) where affordable housing provision requires additional management services. Such management services will normally require funding from the ‘Supporting People’ programme or other source. Registered Providers will need to consult with the Council’s Housing Options and Adult Social Care teams before submitting proposals for affordable housing development. As ‘rule of thumb’, the Council will expect at least 10% of new affordable housing to be for supported housing purposes which may be higher or lower in any given year.

Annex B – Tenancy Strategy

1. Summary

1.1 The 2011 Localism Act places a statutory duty on local authorities to produce a Tenancy Strategy which should set out the local authority's approach to tenure reform in the social housing sector. Section 150 (1) and (2) states the following:

(1) A local housing authority in England must prepare and publish a strategy (a "tenancy strategy") setting out the matters to which the registered providers of social housing for its district are to have regard in formulating policies relating to:

- (a) the kinds of tenancies they grant
- (b) the circumstances in which they will grant a tenancy of a certain kind
- (c) where they grant tenancies for a term certain, the lengths of the terms, and
- (d) the circumstances in which they will grant a further tenancy on the coming to an end of an existing tenancy

(2) The tenancy strategy must summarise those policies or explain where they may be found

1.2 In this document, we describe the current 'state of play' in respect to the Council's own stock as Registered Provider for its own stock and that owned and managed by our Private Registered Providers partners, for the purposes of this document described as Housing Associations.

1.3 Following consultation and any necessary revisions, this Tenancy Strategy will replace the Tenancy Strategy adopted in October 2012.

2. Hammersmith & Fulham's Tenancy Strategy Approach

2.1 A key theme of the administration's manifesto commitments was to improve security of tenants and also help ensure housing costs could remain affordable.

2.2 Historically, tenancies issued by local authority registered providers and housing association registered providers are broadly similar, inasmuch they are 'lifetime' tenancies. This means if tenants pay their rent and service charges and meet all the other conditions of the tenancy, then tenants can stay in their homes for the rest of their lives. This must be their principal home (i.e., they must not have another home that they could live in) and not be subletting to other households, although allowing lodgers to stay can be permitted.

2.3 There are opportunities for succeeding the tenancy if the tenant dies, principally spouses/partners/civil partners and/or household members (any of whom will need to be registered as household members on the original

tenancy agreement). Details of succession rights will be set out in the individual tenancy agreement. Succession rules changed for tenancies granted after 1 April 2013 and individual tenants should check their tenancies as to what rules apply to them. The policy position on succession will also be set out in the latest Council Housing Allocation Scheme document which sets out the 'rules' by which affordable rented accommodation is allocated.

- 2.4 On security of tenure, the Council intends to return to issuing 'lifetime' secure tenancies for its council tenancies. But the Council is seeking views on whether certain categories of applicant (e.g., those with a record of anti-social behaviour) should have fixed term tenancies granted in the first instance. We also recommend to our housing association partners that their equivalent tenancy, the Assured Tenancy, should be adopted rather than adopting Assured Shorthold Tenancies. However, we recognise under the funding regime adopted by the Mayor of London and that policies adopted by both the Council and housing associations must be in 'general conformity' with his Housing Strategy, housing associations have changed their approach to both tenancies and rents. Some housing associations are now issuing five year fixed term Assured Shorthold Tenancies and are charging affordable rents that can be twice what they are charging their existing tenants. The Council recognises that the affordable rent regime and the more commonplace adoption of Assured Shorthold Tenancies is a result of a change in national policy, but nonetheless consider that some local discretion can be applied to improve affordability and security of tenure.
- 2.5 The Council has relatively limited powers to exert change on our housing association partners' work, but where the Council provides funding or land for development or other tangible support, in the absence of any GLA funding, it will seek additional value – through lower rents and lifetime tenancies - where appropriate.
- 2.6 For housing associations, the Council expects them to have regard to this Tenancy Strategy and issue tenancies according to their own policy regime. These are likely to be affected by the GLA grant conditions for new affordable housing broader changes applied following the 2011 Localism Act. Where the Council directly or indirectly facilitates the delivery of new housing through use of public land; commuted sums; or other intervention, then we would seek to ensure that the Registered Provider concerned, decisions on tenancy arrangements will be made on a scheme by scheme basis.

3. Affordable Rents

- 3.1 One of the objectives of the National Government through its *Future for Social Housing* consultation paper and the 2011 Localism Act that followed it was to generate additional revenue from the rental stream of new affordable housing, with the intention of alleviating the capital cost of housing development. This meant rather than adopting rents which were generated from individual housing associations' policies – mostly 'target rents' - the intention was to link affordable rents to those of the local housing market.

- 3.2 The Council is not seeking to set a local affordable rent policy which all Registered Providers should adhere to. The Council's preference is that rents should be aligned as close as possible to 'target rents' set by individual Registered Providers and be affordable to people on low incomes in the Borough. The Council recognises that where schemes are funded by the Greater London Authority, rents charged may be either Discounted Rent (up to 80% of local market rents) or Capped Rent (up to 50% of local market rents).
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Annex C – Housing Allocation Scheme Summary

Main features of the current scheme

The Hammersmith & Fulham Housing Allocation Scheme was introduced in April 2013. The Scheme sets out:

- How the council will decide which applications qualify to join the register
- How the council will decide relative priority for qualifying applicants
- How the council will allocate accommodation

To qualify to join the housing register applicants must be a current resident of the borough and have been resident for a continuous period of five years and (outside of exceptional circumstances) must satisfy at least one of the following conditions:

- Overcrowded by at least two bedrooms against their defined housing need
- Suffering from a medical condition that is severely affected by existing living conditions (or worse)
- The council has accepted a duty to accommodate under homelessness legislation and the applicant is residing in a B&B, hostel or accommodation that is otherwise unsuitable

Qualifying applicants are placed in one of four priority bands. Band 1 applicants have the highest priority and band 4 applicants the lowest. Within bands priority is determined by date order. The table below highlights the main categories of applicant in each band

Band	Main types of applicant
Band 1	Applicants with life threatening medical conditions (exacerbated by existing housing conditions) Applicants who are overcrowded by 3 bedrooms
Band 2	Applicants who meet the needs thresholds for qualification at band 3 and who also satisfy community contribution criteria
Band 3	Applicants who are overcrowded by at least two bedrooms Applicants with severe medical conditions (exacerbated by existing housing conditions) Homeless duty households who are currently residing in a B&B, a hostel or accommodation that is otherwise unsuitable
Band 4	Homeless duty households who are currently residing in a B&B, a hostel or accommodation that is otherwise unsuitable but who do not satisfy the five year residence condition (will usually be offered some form of private sector accommodation)

Where applicants have sufficient priority to be considered for an offer the allocations team contacts them to discuss area preferences and to clarify how the process

works. The usual approach is to draw up a list of the top five applicants who are then invited to a multiple viewing. The property will usually be offered to the applicant with the highest priority but if for any reason it is refused it will then be offered to the applicant with the next highest priority (and so on). By discussing potential offers in advance we seek to minimise refusals but where applicants refuse two reasonable offers their priority will be reduced or in the case of a homeless household and where the offer is made in final discharge of the council's housing duty then only one reasonable offer of accommodation is usually made.

Options for Change

The scheme has been drafted in such a way that it could be relatively easily adapted and amended should a change of approach be required. This can be done by extending the range of qualifying conditions or conversely reducing the range of disqualifying conditions. Possible options include:

Amendments to the residence criteria

The current condition is that applicants must have lived in the borough for more than five years. This has proved quite difficult to implement in practice. We were already considering making it more flexible e.g. currently resident + 5 out of last 7 years but other options are possible. The amount of households who would requalify would depend on the amendments adopted. The introduction of the current rule resulted in the disqualification of 3701 households from the register (although considerable numbers of those would not have had sufficiently high needs to qualify in any event)

Requalification of households owed the homelessness duty who are in suitable long term temporary accommodation

Current position is that households accommodated in the longer term forms of temporary accommodation (typically private houses/flats leased by the council or a housing association and then sub-let to a homeless) do not qualify for the housing register so long as the accommodation remains available and suitable. As and when this accommodation ceases to be available applicants are re-instated on the register and their priority date backdated to the date of their homelessness application. The main advantage of this approach is that it has allowed us to focus resources on applicants whose housing needs are the most severe and urgent e.g. households who are severely overcrowded or those in bed and Breakfast accommodation. Nevertheless it has proved contentious. Requalification of this group would be relatively straightforward administratively. It would mean an increase of approximately 700 on the housing register. (NB. Subject to revision following Court of Appeal judgement of 6 November)

Relaxation of the needs thresholds on overcrowding

Households who are only overcrowded by one bedroom do not currently qualify for the register. As above this has enabled a concentration of resources on those with the highest housing needs. The impact of allowing all households who were overcrowded by one bedroom or more back onto the register would be significant especially in relation to single households as this would have an especially marked

impact on our ability to focus resources on those who need it most. The impact would be less marked in relation to families. A variation of this option therefore would be to allow families who are overcrowded by one bedroom back onto the register but not single applicants. In total 892 household were disqualified from the housing register because they were overcrowded by only one bedroom. Of these 346 also failed the residency test.

Relaxation of the needs thresholds for medical conditions

The same considerations apply as above. Applicants with a medical condition that is only moderately impacted by current housing circumstances could be re-qualified. In total 99 households were disqualified from the housing register for this reason of whom 38 also failed the residence test

Removing the Community Contribution Criteria

At present, where housing applicants have met the eligibility and qualifying criteria of the Housing Allocation Scheme, enhanced priority is given to applicants who meet at least one category of community contribution. These include applicants who are working; volunteering; in training and education; registered foster carers and adopters; carers; with disabilities and older residents; and certain categories of young people.

Priority is also given to individuals who served in the armed forces, though there has to date been a low level of take-up of this priority. Therefore, closer working with armed forces charities to identify former armed forces personnel with links to the Borough in need of accommodation could be pursued.

A key question of this consultation process is whether the Council should retain the Community Contribution criteria.

Costs and consequences

The re-qualification of particular groups of applicant for the register would of necessity increase the administrative costs of running the service and the greater the number applicants who are re-qualified the greater that cost would be. Decisions would also be required on whether to make any amendments to the scheme retrospective. Whilst this would be fairly straightforward in the case of homeless duty applicants in long term temporary accommodation as we know who and critically where they are and in any event their disqualification is only for so long as the accommodation remains available, in other areas the challenge would be far greater.

The other main negative impact would be on waiting times. For those applicants who do qualify (i.e. those with the most severe and urgent housing needs) waiting times have dropped significantly. The average wait time for all classes of applicant who received an offer (measured on the basis of their priority date) was 3.9 years in 2012/13 (the final year of operation of the previous scheme). This dropped to 2.2 years in 2013/14. For those applicants who have joined the register since its introduction and who have been re-housed the average wait time is 3 months.

Increasing Affordable Housing Supply and Access to Private Rented Housing

Core to the Housing Strategy is achieving a significant and sustained uplift in affordable housing delivery, particularly social rented accommodation. The Council will expect any short term increase in waiting times to reduce in the medium to long term as affordable housing delivery increases. In addition, increasing access through direct lettings to suitable private rented accommodation will help ensure any short term rise in waiting times are reduced.

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Annex D - Vulnerable People's Approach

This document will form part of the revised housing strategy 2014 and sets out the Council's approach to meeting the housing needs of older and vulnerable people living in the borough.

Older People

National and London context

The overall strategic approach at a national and regional level is to support people within their own homes and to ensure that adequate housing options are available to help facilitate this. This includes provision of aids and adaptations and disabled facilities grants for private sector households.

The GLA Strategic Market Housing Assessment indicates that at a London level there is insufficient supply of older people's housing, particularly in the private sector and the Mayor is seeking to encourage specialist and mainstream developers to build more housing suitable for older people. In response to this the Draft Further Alterations to the London Plan 2014 sets out for the first time specific requirements for purpose built homes for older people in the capital as: 2,600 market, 1000 shared ownership and 300 affordable per annum alongside 400 to 500 new bedspaces per annum in care homes

Local context

There is a tri borough Joint Strategic Needs Assessment (JSNA) on older people and housing currently underway (2014) and this follows a recent older people's housing strategy needs/gaps assessment (2014) both these include population estimates that indicate a 40% increase in the over 65 population over the next 20 years with the sharpest increase in the over 85 population. Estimation on demand for services for older people is complex but the current indication is that the upward trend is set to continue and it is therefore reasonable to assume that this is likely to translate into an increase in demand for older people's care and accommodation. Improved life expectancy and a gradual shift towards longer periods of time spent with chronic and disabling conditions means that services are shifting from hospital into a more co-ordinated community based support which focuses on maintaining people within their own homes.

Hammersmith & Fulham are committed to supporting people within their homes and reducing the number of unnecessary admissions to hospital and residential care. This is done through offering a range of housing options, care packages and support to promote independence and choice for older people these include:

- 975 units of local authority run sheltered housing
- 464 units of Housing Association sheltered housing in the Borough
- Extra care/residential and nursing care beds
- Floating support service - a free, short time visiting service available across tenures to support residents aged 16 and over who are having difficulties managing their home and remaining independent in the community

- Aids and adaptations and Disabled Facilities Grant which aim to support people across all tenures to remain independent for as long as possible.
- Tailored care packages for eligible older people

There will be challenges in meeting changing needs and promoting independence within the bulk of existing stock. Whilst the provision of older peoples housing is relatively high much of the sheltered housing stock is not well suited to those with higher level care needs as a number do not have lift access and cannot accommodate wheelchair access or parking of motility scooters and demand levels for sheltered housing are relatively low. The majority of older people in social housing live in general needs housing however three quarters of the council's general needs housing stock is flats with nearly half having no ground floor entrance and some having no lifts. Options for those in the private rented sector and owner occupiers are limited with very few downsizing specialist options available.

There are a number of strategies and policies at a local level in Hammersmith & Fulham that shape the provision and development of housing and support for older people. All of these focus on a preventative agenda working across housing, health and social care to promote independence and reduce unnecessary admissions into hospital. These include:

- Housing Policy 4 in the 2011 Hammersmith & Fulham Core Strategy – this policy states that housing for people with care and support needs must be protected, and, subject to continuing need, applications for new developments where there is an established local need will be supported.
- The Council's JSNA (2013 – 14) and Health and Wellbeing strategy (2013 – 15) 'Better access for vulnerable people to sheltered housing' - supporting people to live in suitable accommodation as they age which will allow them to manage their health at home rather than having to be admitted to hospital or needing to be placed in short or long term nursing care.
- The 2012 Housing Strategy includes an action to develop a strategic health and housing approach to meet the needs of older residents.
- The Care Act 2014 – Health, Adult Social Care and Housing will be working in an integrated way to deliver their duties under the new Care Act 2014.

Moving forward:

Older peoples housing need cannot be looked at from a housing perspective alone. In line with duties under the Care Act 2014 - future housing needs assessments will be undertaken through a joint approach between housing, health and adult social care taking into account relevant tri-borough evidence. We will build on the existing and emerging evidence base and work with stakeholders to determine what housing options are required to deliver on future demand and changing needs and to support older people in their own homes preventing unnecessary admissions to hospital or residential care.

The council is committed to improving sheltered housing and working with residents to explore options to deliver these improvements as well as working with the NHS and others to deliver new types of private and social sheltered housing which will include on-site home and medical care. Plans are in place to deliver new mixed use extra care beds in borough including private for sale units for older people

Hammersmith & Fulham are currently on target to deliver all new homes to the lifetime home standard with 10% wheelchair accessible which means that new housing stock going forward will be better suited to meet the needs of an ageing population. This target will remain and we expect to continue to deliver at this level. An important aspect of meeting current needs will be an ongoing focus on improving the management of existing adapted and accessible stock to help meet current and future demand. This will include maintaining the Accessible Housing Register to assist the housing allocation process by matching property to need.

The council will continue to support older people in their own home and promote independence and prevention through the ongoing delivery of floating support and working closely with adult social care and health to ensure mechanisms are in place to support this objective.

Vulnerable groups

National and strategic context

The overall strategic direction is to promote independence, adopt a preventative approach and provide a range of housing options and support models to help deliver this with an emphasis, where possible, on maintaining family and local links. The Care Act 2014 emphasises the need for statutory agencies of Health, Housing and Adult Social Care to work together to meet the housing and care needs of adults with care and support needs and places new statutory duties on landlords of social housing to work with partner agencies to protect adults in their care. In Hammersmith and Fulham this will also mean working effectively across the tri-borough.

In London the GLA Mental Health report (January 2014) highlights the prevalence of long term physical health problems in the population with mental health. One of the main national policy drivers for people with mental health needs is, where possible, to support in primary care settings with an emphasis on linking housing and health needs assessments and improving the evidence to inform future planning and prevention.

Local context

The council is committed to improving housing options for vulnerable groups including those with learning disabilities, mental health needs and physical disabilities and we are focusing on targeting support and resources on those with the highest and most complex need. The Council's emphasis is supporting people to maintain their health and wellbeing, promote independence, and engaging with training and employment opportunities. Alongside our partners in Health and Adult Social Care we have put in place a structured care pathway which aims to support people towards independence addressing both care and housing needs. For those with the highest and most complex needs who may not be able to live independently we work with families and carers to put in place, where possible, appropriate local

housing and support packages. Support needs often do not fit neatly into one category and experience shows that many vulnerable people will often have complex overlapping needs sometimes known as 'dual diagnosis' and there is an increasing prevalence of people with complex needs being supported in the community. We recognise the benefit to individual wellbeing in maintaining existing family links and social networks and to this end we have set targets in reducing the number of out of borough placements and will work towards increasing local housing options and models available.

There are good examples of joint working and successes across the tri-borough in working with all vulnerable people with reductions in delayed discharge and better consideration of housing needs across the care pathway. These need to be built on and there a number of local strategies and plans in place that shape the provision of local services. These include:

- Accommodation and support strategy for people with learning disabilities which outlines the Council's vision and plan to improve the quality and choice of housing and support options for people with LD and includes an action plan for the first year of implementation.
- Housing Policy 4 in the 2011 Hammersmith & Fulham Core Strategy – this policy states that housing for people with care and support needs must be protected, and, subject to continuing need, applications for new developments where there is an established local need will be supported.
- The 2012 Housing Strategy includes an action to develop a strategic health and housing approach to meet the needs of vulnerable residents
- Health and Wellbeing Strategy – priorities include better access for vulnerable people to Sheltered Housing and improving mental health services for service users and carers to promote independence and effective preventative service
- LBHF JSNA includes reference to supporting vulnerable people and supporting good health into older age.

The current range of housing options available for vulnerable groups include residential and nursing care, supported housing, general needs housing and private sector accommodation. However the majority of the boroughs general needs housing is not well suited for those with severe physical disability and placements on large estates can risk exposing some vulnerable groups to harassment and/or victimisation. Three quarters of existing housing stock is flats with nearly half having no ground floor entrance and many having no lift access and there is a lower proportion of two and three bed flats when compared to greater London. The Council has an accessible housing register and data from this register shows very few local authority properties that are wheelchair accessible and a small number of adapted properties suitable. This highlights the importance of ensuring that the council makes the best use of existing accessible and adapted properties by matching people's needs against available stock. Housing is working closely with Adult Social Care to better understand current need and demand across vulnerable groups and a priority

for the future will be to ensure that adequate provision is made in new housing developments for people with disabilities.

Physical Disability

The rate of physical disability registration is 37.3 registrations per 1000 household and the number of residents claiming Disability Living Allowance and/or Severe Disablement Allowance is 4.3% which is broadly similar to other London Boroughs. However the percentage on higher rate DLA components and therefore with a more severe disability and number of working age claimants is higher than the rest of London.

Given the nature of existing stock those on the housing register with mobility issues will face a longer wait for a suitable offer of accommodation. Recent needs assessments indicate that the majority of people with physical disabilities that come into contact with the local authority will either already be in social or private rented housing with only small number in owner occupied properties and of those people very few will be in full time employment or earning to a level that would make intermediate home ownership a realistic option. This also highlights the needs for the availability of affordable rents for these groups.

Mental Health

Nationally around 40% of years life lost from a disability are from mental health, evidence shows that people with mental health needs suffer more physical health problems than other people and are likely to die younger. Hammersmith & Fulham has the 8th highest population with severe and enduring mental illness known to GP's in the country (2012/13) with high levels of referrals from the Borough's prison population around 50 to 70 referrals a month and several of the borough's wards fall into the 20% highest in London for incapacity benefit/ESA for mental health reasons. In line with national policy, responsibility for mental health patients has moved from secondary to primary mental services with people being supported in community based settings such as supported housing. There are an increasing number of people with complex high level needs being supported in community settings and this level is likely to continue. Over the next 3 years the council plans to bring 30% of people with mental health needs back into in-borough placements recognising the importance that family and existing networks can play in maintaining health and wellbeing. A recent review of supported housing completed by Adult Social Care led to a reconfiguring of mental health supported housing to increase the focus on those with high support needs. However a mental health housing needs assessment carried out by housing options indicates that it is currently hard to place people with dual diagnosis of serious physical and mental health needs in borough and more options are needed to support in borough those with complex and very high support needs.

Learning disabilities

In 2012 Adult Social Care carried out an extensive needs assessment for the learning disabled population in Hammersmith & Fulham. From this an accommodation and support strategy and action plan was drafted, the implementation of which is being led by Adult Social Care. The Council's aim is to move away from an over reliance on residential (registered) care models and out of

borough placements and offer a wider housing and support options and models of service to offer real choice to meet the needs of learning disabled, including those with challenging needs. National data from the Learning Disability Observatory for 2011- 20130 show a 3.2% growth in terms of need for social care services for adults with learning disabilities which comes from increased life expectancy and as a result an increased population meeting the threshold for eligibility for adult social care services. Of these people over 55% will have severe learning disabilities and around 20% profound and multiple disabilities. It is also worth noting that by 2030 there is an estimated 14% increase in those aged 50+ using social care services and the number aged 70+ will more than double.

At 2013 there were 715 people listed as having a learning disability on the adult social care database and around 20 people per year transition from children's into adult services. There is of course a much wider community of people with a learning disability who may need access to mainstream housing or low level supported housing to support independence.

Preventing Homelessness and Single Homeless

The Council works with a range of agencies that provides support across needs groups to reduce and prevent homelessness and Hammersmith & Fulham's Housing Strategy (2012) focused on four priorities which were 1) preventative action identifying and helping needs groups, 2) housing allocation scheme and flexible tenancies 3) new housing supply 4) future service delivery.

The Placement and Assessment Team for Homeless singles (PATHS) team was established in 2007 and has two main functions, firstly to provide a centralised access 'gateway' into Hammersmith & Fulham, supported accommodation and floating support services. Secondly to support and enable people to move through and on from supported accommodation to more independent living.

Current provision:

Alongside general needs housing, sheltered housing provision, specialist residential and nursing provision there is also:

Specialist provision for residents with learning difficulties current provision which includes:

- 65 residential care home bedspaces in borough,
- 6 beds in residential respite,
- 3 nursing beds
- 28 beds in general needs with additional support.
- access to 55 supporting people quota of general needs

Supported Housing provision for vulnerable single homeless (currently excluding learning disability provision):

- over 350 beds of a range of high level and medium supported housing and step down provision across client groups including substance misuse, young people, mental health, offenders, domestic violence and refugees.

- access to 55 bed supporting people quota of general needs housing.
- access to part time Learning Disabled support officer based in the PATHS team this role has now been expanded to include supporting families.
- full time mental health support/liaison officer based in PATH's team.

Moving forward

The council is committed to working in partnership with providers, the NHS and other agencies to deliver our responsibilities under the Care Act 2014 and ensure that the most vulnerable in our community have access to suitable housing options and where necessary can live in a supported housing environment. We will continue to focus on those with the highest level of need and work with providers particularly the third sector, to deliver a supported housing pathway towards independent living offering increased choice and delivery models. We need to improve our evidence base and will work with other agencies and departments to improve data collection and recording to inform future planning processes

The Council will work with homeless charities, faith communities and homeless prevention professionals to provide suitable accommodation for homeless individuals and families. We have recently reviewed and committed to the continued delivery of our PATH's service providing a centralised access gateway for single homeless with complex needs including dedicated posts for mental health, learning disability and young people within the team.

The council plans to review and re-model supported housing provision for people with learning disabilities to better meet existing and future needs as address problems in the existing provision and we will continue to work with stakeholders to understand how we can improve access to the system. A priority for the future will be to ensure that provision is made available in new housing developments for people with disabilities including learning disabilities a key challenge will be affordability of new housing.

There are a number of new developments in the current pipeline which will deliver additional extra care and specialist provision for those with disabilities and we will continue to deliver on our wheelchair accessible and lifetime home targets for new build which will increase the stock of accessible housing in the borough for future generations.

Reference Documents

H&F Housing Strategy Evidence Base 1 of 3 - Hammersmith & Fulham Borough Profile 2014

H&F Housing Strategy Evidence Base 2 of 3 - H&F Housing Demand and Homelessness Data (October 2014)

H&F Housing Strategy Evidence Base 3 of 3 - H&F Joint Strategic Needs Assessment 2013-15

Mayor of London - Homes for London – The London Housing Strategy (June 2014)

Lyons Housing Review - Mobilising Across the Nation to Build the Homes Our Children Need (Oct 2014)

H&F Equalities Impact Assessment – Housing Strategy (2014)

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