

Housing and Homeless Strategy Consultation Response (February 2018)

Introduction

Citizens Advice Richmond is an independent local charity providing information and advice to anyone who lives, works or studies in Richmond borough. Our service is free, confidential and impartial. We empower people to resolve their problems and change their lives for the better. Housing is consistently the third largest of the issues that people seek our advice about – in the nine months April – December 2017, we dealt with 1,443 housing issues on behalf of 731 individual clients.

Theme One: Delivering Affordable Homes; new supply and redevelopment of existing social housing stock

As an advice giving charity we are not involved in the provision of housing in the borough; but a major problem for our clients on low incomes is the lack of affordable accommodation for private renting and insufficient social housing.

We strongly support the priority and objectives of Theme One and applaud many of the initiatives described to increase affordable housing. However we would like to see a much clearer statement of the Council's numerical targets for the provision of more affordable housing and an increase in social housing stock in the next five years to the end of 2022/23.

The Council's Strategic Housing Market Assessment (SHMA) for the borough estimates that 895-915 new homes will be required each year up to 2033 with 50% being affordable homes, that is, between 448 and 458 affordable homes each year. The £18 million of GLA funding for 2016-21 is expected to deliver 364 affordable homes, or 91 a year, and the completions for the three years 2018-21 are put at 159. These figures suggest that there needs to be a substantial increase in the provision of affordable homes in the next five years to get anywhere near to the SHMA's needs assessment. However there is no indication that the Council has set any numerical targets for any of the initiatives described for Theme One for the supply of affordable homes over the next five years. Consequently this theme of the strategy does not yet provide a clear picture of the overall increase in affordable housing or in social housing stock that it is hoped to achieve in the next five years.

In addition we would welcome a more detailed analysis of the gap between the borough's existing social housing stock of 10,000 units and the unsatisfied demand. In our view the 3,670 applicants on the housing register on 1 October 2017 understate the number of all those in need of social housing as a result of the restrictions on eligibility for the register imposed by recent changes in the Council's Housing Allocation Policy. Nevertheless if these 3,670 applicants are accepted as the measure of unsatisfied demand, with no movement within the current 10,000 units, an additional 734 units would need to be created each year for the next five years to accommodate all those already on the housing register.

It would be helpful therefore to have:

- (a) an estimate of the number of social housing units likely to become available over the next five years due to the departure or death of current social housing tenants and
- (b) a breakdown of the characteristics of those currently on the housing register to indicate the main types of social housing required and the urgency of the need.

This information will help to clarify the scale of increase required in social housing in the borough over the next five years and the types of accommodation most urgently required.

It will be helpful to know for example how many of those on the housing register are families in urgent need of three or four bedroom properties and how many have significant disabilities that required accommodation with modifications. The results of our analysis of private tenancies on offer in the borough last autumn and the views of letting agents who responded to our survey in December both confirm that most of the rents for three and four bedroom properties are beyond the reach of families on low incomes. Secondly our clients with severe mobility problems often have to wait a long time to be considered for social housing. Consequently we would like to see a clear commitment in Theme One to provide more three and four bedroom properties for overcrowded families and to give higher priority to accommodation suitable for disabled applicants.

Finally in view of recent evidence that 444 private properties in the borough have remained empty for more than six months we would like to know what plans the Council has to investigate the possibility of converting some of these properties into affordable housing. We note that currently the Council may have discussions with private landlords of empty properties, particularly if local residents make complaints, but is reluctant to commit resource to compulsory purchase. We wonder if the cost benefit of compulsory purchase has been assessed, especially where it would provide large properties for social housing for families.

Theme Two: Addressing housing market pressures, preventing homelessness and increasing housing options

Monitoring the extent and reasons for homelessness in the Borough

It is noted in the introduction to this theme that the number of homelessness acceptances in the borough has fallen in the last five years to 2.26 acceptances per 1,000 households compared with an average for London boroughs of 5.03 acceptances per 1,000 households. It is suggested that one reason for this low total may be the Council's focus on preventing homelessness and finding alternative accommodation options for households facing homelessness. Another reason however may be that the Council has adopted a more rigorous approach to accepting homelessness applications. To meet HRA requirements it will be important in future:

- to record the ratio of applications to acceptances and what alternatives are proposed when applications are not accepted;
- to follow up whether these proposals are adopted; and
- to check with SPEAR how many of its clients become street homeless following the rejection of a homelessness application.

Providing adequate resources to implement the Council's HRA responsibilities

We welcome the Council's commitment to flexible use of its budgets and recruitment and training of an additional 25-30 staff to meet its responsibilities under the HRA to prevent and relieve

homelessness. We particularly welcome the commitment that as more people are prevented from becoming homeless the Council will draw on the substantial budget previously earmarked for temporary accommodation. If however the budget for the local assistance scheme is merged with the budget for the rent deposit scheme we hope that sufficient funds will be retained to help tenants who are not at immediate risk of homelessness to meet urgent needs such as the acquisition or replacement of essential furniture or white goods.

In addition we strongly support closer integration of the Council's services in providing Housing Benefit and Discretionary Housing Payments with its services to prevent homelessness. In the experience of our clients, including particularly those who are private tenants, backlogs in dealing with the calculation of Housing Benefit following change of circumstances and with applications for Discretionary Housing Payments can lead directly to rent arrears and the risk of eviction. In our view the staffing needed to provide these services needs to be increased to eliminate the backlogs and speed up decisions on Housing Benefit and Discretionary Housing Payments.

So while we welcome the increase in staffing proposed to meet the Council's new HRA responsibilities we are not sure whether it will be sufficient to meet all the tasks required, including the additional staff needed to reinforce the Council's Housing Benefit service. We hope that if necessary additional funding will be allocated from the Council's General Fund.

Working with partner agencies to improve homelessness prevention

We welcome the Council's commitment to strengthen its links with partner agencies in order to identify those at risk of homelessness as early as possible and provide a wide range of support to help vulnerable tenants avoid becoming homeless. We suggest that it will be important to agree a protocol with Jobcentre Plus and DWP to identify as early as possible benefit problems that have stopped tenants being able to pay their rent. For our part as Citizens Advice Richmond we are keen to work closely with staff who are delivering the Council's services to prevent homelessness. We will aim to identify clients at risk of homelessness and, with their consent, refer them for appropriate Council services. We will also be ready to contribute advice and support [within our available resources] to implement personalised plans for individuals referred by the Council's Regeneration Team.

Improving links with landlords in the private rented sector

We see this as a very important, but also a very challenging, element of the Council's strategy. There is obvious advantage in persuading private landlords who are providing tenancies at affordable rents to retain tenants whom they might otherwise evict or accept tenants facing eviction from another tenancy. To achieve this Council staff will need to strengthen their contacts with local letting agents as well as landlords since landlords often rely on their letting agents to deal with the Council. Our survey of local letting agents completed in December 2017 revealed some letting agents' and landlords' reluctance to deal with the Council because of bad experiences in the past. These experiences included:

- problems with the Rent Deposit scheme
- delays in calculating the Housing Benefit payable at the start of a tenancy or when the tenant's income changes during the tenancy
- difficulties due to Housing Benefit being paid in arrears

- the costs incurred by landlords due to the Council's advice to tenants served with Section 21 notices that they will be regarded as making themselves intentionally homeless unless they stay in the property until served with a court order to leave.

It follows that to make progress with these letting agents and landlords will require a fresh approach. We hope that the recommendations that we have made in our report on Supporting Private Renting to avoid Homelessness have been taken into account in developing the package of measures to be considered at Cabinet on 22 February and that there will be time for consultation with the Council's partners before the package is finalised. Our experiences in meeting letting agents during our survey suggest that the best chance of selling the package successfully will be through a team with the time to make, and maintain, direct contact with individual letting agents and landlords.

Providing accommodation and services appropriate for those already homeless

We strongly support the Council's plans to continue to provide temporary accommodation where necessary but at reduced cost; to work with SPEAR to provide appropriate accommodation and services for rough sleepers; and to continue to fund hostels and Refuges with linked services for other vulnerable groups. We would stress the importance of ensuring that all this accommodation meets health and safety standards.

Theme Three: Ensuring Good Quality Homes-Providing Choice, Standards and Quality for Renters

Overview

We agree that this theme deserves priority and support the objectives described. However we doubt if the objectives can be achieved without an increase in the resource devoted to this area of the Council's work to support the proactive approach required. We note that by contrast with Theme Two there is no reference to the budget or staff resource that will be devoted to Theme Three. It would also have been useful to have seen statistics on the average number of interventions of Environmental Health Officers in other London boroughs for comparison with the work of the team in this borough. If the Fitness for Habitation Bill becomes law the Council may need to provide even greater priority to this theme over the five year period.

Improving conditions in the private sector

The annual performance targets for the work of the Private Sector Housing team (PSH) need to be clarified to provide an accurate comparison with the actual results for 2016/17. At first sight it appears that the annual targets for the next five years are less ambitious than was achieved a year ago. This is probably not correct because it may require a larger number of formal interventions to remove 75 hazards and have the basis for serving 75 enforcement notices; but as the figures for 2016/17 and the future annual targets are not on the same basis it is impossible to know. This needs to be sorted out to confirm that the team will be carrying out more interventions than in the past to safeguard the conditions of private tenancies.

In addition we hope that efforts will be made to encourage private tenants to bring serious problems with their landlords over the conditions of their properties to PSH team's attention. There is a step by step explanation on the Council's website of the Council's role in investigating these problems, but it would be helpful to have a leaflet with the same information available for

tenants who are not computer literate. Before the team will conduct an investigation tenants must provide a substantial amount of information on a tenant's referral form. While the need for this information to justify an investigation is clear it would be helpful if the form could include an offer for the team to help tenants who have difficulty assembling all the information required. There is also a case for mounting a specific campaign to bring to tenants' attention the recent changes in the law affecting the standards required for privately rented property due to come into force in April.

Implementing changes to HMO licensing

There is insufficient information in this section to show that the PSH team will be able to safeguard standards of accommodation in HMOs in the borough in the next five years. There is no indication of the number of HMOs expected to apply for a licence in the next five years or the number of unlicensed HMOs that may be brought to the team's attention. It would also be helpful to know what action the team will take to follow up allegations of unsafe multi occupation without a licence where the residents are too afraid to complain. In addition there is no information about the action that the team will take each year to monitor the standards of the 40 HMOs already licensed. Consequently the target for the team to inspect 15 HMOs a year for licensing purposes does not seem adequate and may suggest the need to enlarge the team.

Implementing the regulations arising from the Housing and Planning Act (HPA) and publicising the new requirements to landlords

We strongly support the Council's commitment to implement the HPA regulations and publicise them to landlords. We hope that more resource can be devoted to pursuing rogue landlords who are slow to respond to enforcement notices. We note that only one successful prosecution of a rogue landlord is included in the Council's list of achievements. We hope that the Council will ensure that it has sufficient staffing to use the powers conferred by the HPA regulations effectively.

Prioritising fire safety

We obviously welcome the action that RHP is taking to improve fire safety in the wake of the tragedy at Grenfell Tower; but it would be helpful to have information about how soon RHP will have been installed sprinklers in some of its retirement homes and how soon it will have completed its plan for remedial action in all its high rise blocks. It would also be helpful to know why it will not be installing sprinklers in all its retirement homes and whether it will be taking any other remedial action to strengthen fire safety in those homes.

Supporting the Ham Close uplift Programme

We strongly support this programme.

Maximising opportunities for social housing tenants to move, downsize and to reduce overcrowding

We strongly support all the initiatives described in this section except in relation to empty properties. In particular we support the Sponsored Moves programme by ensuring that our clients who become subject to Bedroom Tax are informed about the financial support available for moving to a smaller property. However with 1157 households with overcrowding points on the

housing register we think that the Council's Housing Strategy should include a target for rehousing these households over the next five years, and should be ready to provide further funding for the RHP's extension programme and for new build to achieve this target. We have already explained under Theme One why we consider that the Council should consider a more proactive approach to bringing empty properties into use for social housing.

Ensuring that the needs of Gypsies and Travellers are met

We support the Council's approach to this.

Improving housing management standards through the Tenant Champion's service

We believe that there is some way to go before vulnerable social tenants can get a prompt response to deal with complaints that involve complex issues. To make a complaint to RHP it is necessary to go online. There is no explanation on RHP's website about whether there are any further stages in its complaints procedure if a tenant is not satisfied with RHP's first response. The description of the Tenant Champion's service makes it clear that complex issues may take time to consider and there can be delays if the Tenant Champion is away (e.g. on holiday). We consider that the complaints procedure for RHP tenants needs to be reviewed to provide a much clearer statement of how complaints will be dealt with (which is available to tenants' advisers without signing into the RHP website as tenants) and that Ward Councillors should be trained to the same level as the Tenants' Champion so that they can deal with complaints promptly in her absence.

Theme Four: Supporting the needs of vulnerable residents, working with care and support services to provide quality housing options

Overview

We strongly support the priority of this theme and the objectives to achieve it. We comment on those objectives that are particularly relevant to our clients.

Preparing for full service Universal Credit (UC)

We are pleased that it has now been decided to hold monthly meetings of the Welfare Reform Stakeholders' Group specifically to prepare for the introduction of full service UC in June this year. In addition we have agreed to draft a proposal to set up a Partnership Group to facilitate early identification of vulnerable UC applicants who will need special support to secure UC. In the housing context we think that it will be important for the Council's staff to establish a close connection with Jobcentre Plus and DWP staff responsible for the housing element of UC to facilitate early consideration of DHPs where appropriate, and secure the payment of housing costs for temporary accommodation.

Reducing fuel poverty for low income and vulnerable households

We welcome the wide range of grants available for residents on low incomes in the borough; but if the Council wishes to continue to make a contribution with grants from the Local Assistance scheme the deadline for applying for these grants needs to be brought forward to the early autumn of each year so that successful applicants receive their grants by December when they will face their highest fuel costs.

Delivering a programme of home adaptations to people with disabilities so that they can remain living independently

We welcome the Council's decision to recruit more staff to deal with applications for Disability Facilities Grants. Although the experience of our disabled clients may be unrepresentative we have been concerned that some of them have had to wait several months to get a response to their applications and to have them considered and decided. This is clearly not acceptable when adaptations are needed urgently to allow applicants to continue living in their own homes independently.

Support for Mental Health and Learning Disability

We strongly support the Council's plans to provide suitable housing and support for residents with mental health problems or learning disabilities. We would like to see a similar commitment to train all Council staff involved in providing Council services to take account of people's mental health problems or learning disabilities and to recognise that procedures for recovering debts such as Housing Benefit overpayments and Council Tax arrears need may need to be modified when advisers are supporting clients with mental health problems or learning disabilities.

Playing an active role with partners to safeguard vulnerable adults and children

We welcome the Council's plans to secure this objective. Our financial capabilities team continue to be available to provide training in budgeting for young adults moving from care homes to live independently.

Citizens Advice Richmond
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