# **Housing Strategy**

2011/12 to 2015/16





# Forward by Councillor Dudley Mead, Deputy leader (statutory) and cabinet member for housing, finance & asset management



This is an exciting time in housing and a good time to launch a new housing strategy. The coalition government has completely shaken up the way we have been doing things in housing over the past thirty years, and I am looking forward to doing things differently.

Increasing housing supply is the key to the success of this strategy. We welcome the introduction of affordable rent. We will introduce it to new homes built in the next phase of our new build programme.

We will also welcome development proposals from housing associations and developers that include affordable rent. We will take a flexible approach to rent setting and will look at each proposed scheme on its merits.

We are keen to see all sectors of the housing market in Croydon playing their part in meeting housing need. Private landlords have an important role to play in providing badly needed homes for single people and families faced with homelessness. We have been listening to landlords' views through our consultative forum and understand how the rental market has changed and the pressures on them. While it is not in our power to change everything, we have come up with a range of actions we believe will improve our offer to private landlords and increase the supply of housing for households in need.

We have also taken a long, hard look at our housing waiting list and are currently consulting on the changes we propose to make. Firstly, we want to make sure our social housing is available to Croydon residents and that those who can afford to buy or rent privately are encouraged to do so and do not go on the waiting list. We want to disqualify applicants who have a

poor tenancy record or who have been evicted for anti-social behaviour. We also want to give more priority to people who are working, volunteering, and fostering children or who have served their country in the armed forces.

We also welcome the introduction of flexible, fixed term tenancies and will set out how we will use them in our tenancy strategy which will be published later this year. We will make sure that everyone one that needs affordable housing can access it, for as long as they need it. We will look at ways to help people move out of affordable housing into market housing either to rent or buy.

From April the government will have done away with the old housing finance system and for the first time in decades local authorities will be allowed to keep the rents they collect from tenants and use them to maintain council homes and to build new council homes. We will publish an asset management plan showing how we will invest in council homes in the future. We have an excellent track record in managing our council homes and estates, and we will continue to improve on this performance and crack down on tenancy fraud and anti-social behaviour. Our housing management staff will play a central role in supporting families in Croydon with multiple needs. We are well on the way to establishing our residents scrutiny panel and will look to work with local housing associations to improve scrutiny.

Finally, good quality housing and neighbourhoods make a significant contribution to improving health and well-being. We will work with our colleagues in the health service to ensure we co-ordinate and prioritise our activity to reduce demand for acute health services.

We are committed to improving the lives of Croydon residents through this clear and comprehensive housing strategy and action plan.

# Introduction

# We are Croydon - This is our vision

One of the main aims of the housing strategy is to contribute to achieving our vision for Croydon. The vision was developed and agreed two years ago following a consultation exercise in which 20,000 residents and businesses played an active part. It paints a picture of the kind of place we want Croydon to be by 2040.



"In 2040 Croydon will be London's most enterprising borough a city that fosters ideas, innovation and learning, and provides skills, opportunity and a sense of belonging to all."

By 2040 we want Croydon to be a city renowned for its enterprise and skills, punching above its weight in contributing to the London, UK and global economy. The housing strategy is one of a number of plans and strategies that explain how we will bring this about.

# Our strategies and plans

The vision and community strategy set out the overarching aims and priorities for our other strategies and plans. These include our planning policies, transport strategy, cohesion strategy, the work and skills plan and the housing strategy.

Our key strategic planning policy, the core strategy, sets out how we plan to bring about new development in Croydon. It brings together how our different places, buildings, spaces and services can be developed to achieve the best combination of building, regeneration, and conservation in the borough. It includes plans for the types and locations of new homes. The core strategy is published on the council's web site, please use the link below to access the document:

http://www.croydon.gov.uk/planningandregeneration/croydons-planning-policy-framework/core-strategy/

Well-planned infrastructure is essential to sustainable regeneration, providing not just homes and jobs but all of the other elements that make great places in which to live, work and spend time. Our Infrastructure Delivery Plan (IDP) identifies the utilities, transport, parks, open spaces, schools, health facilities and other public services we will need to support this development. Our capital strategy supports these plans by making sure we make the correct investment decisions to achieve our vision for the borough. The IDP is also published on the council's web site, please use the link below to access the document:

 $\frac{http://www.croydon.gov.uk/contents/departments/planningandregenerati}{on/pdf/868213/1114530/idpaug11.pdf}$ 

The housing strategy also supports the core strategy and IDP by showing how different housing services, investment, and enforcement will combine to ensure the successful delivery of our plans for growth and regeneration.

# **About Croydon**

Croydon is an outer London borough; its northern tip borders Lambeth six miles from central London and its southern boundary joins Reigate and Banstead 40 miles from the south coast. It covers an area of 34 square miles (86 km²) and is estimated to have the largest borough population in London of 345,000 people. There are nearly 150,000 homes in the borough, seven out of ten of which are owner occupied, the rest are rented from either social or private landlords.



North End Road, Croydon

Much of the south of Croydon is affluent green belt; the metropolitan centre is a strategic business, retail and transport hub; and the north of the borough is inner city in character with some prosperous neighbourhoods. Areas with marked deprivation and lack of opportunity are concentrated in the north of the borough and in small pockets in the east and south. Health in Croydon overall is similar to the England average. Life expectancy is above average, but there is a large gap in life expectancy between the most and least deprived areas.

Local employment is concentrated in the retail, public administration and public health sectors, and average incomes tend to be lower than the London average. Since 2005 Croydon has seen an increase in the number of jobs, including in key sectors such as business services and construction. There is also significant investment underway in Croydon estimated at more than £3bn and construction currently dominates the centre of the borough.

# National and regional policy

The coalition government has made clear its commitment to redistributing power and opportunity from the centre to local councils, communities and people through localism and decentralisation.

Localism and the Big Society: Localism is designed to shift power away from central government to local people. It aims to give people more opportunities to exercise choice and control over local decisions. The Localism Act 2011 gives local communities the opportunity to run services, shape development and take ownership of community assets. Social housing reforms also provide significant opportunities for tenants to engage in decision making and scrutiny.

**Social housing reforms:** The Coalition Government has embarked upon a radical overhaul of social housing policy, also focusing on deregulation and flexibility, as well as introducing a new model for financing social housing investment. The main reforms include:

- National housing strategy: the government published its new national housing strategy, Laying the foundations: A Housing Strategy for England, in November 2011. The strategy includes ways to increase housing supply, support quality and choice for tenants, and to bring empty homes back into use. It includes proposals for a new 95% mortgage, a new £400m "Get Britain Building" investment fund, to allow reconsideration of section 106 agreements and to reinvigorate the right to buy through increasing discounts.
- Affordable rent: The government plans to maintain the supply of affordable housing by investing £4.5bn between 2011 and 2015 (the affordable homes programme 2011-15). To make this investment go further it will introduce a new social housing tenure, affordable rent which enables housing associations to charge up to 80% of market rents. Housing associations are then able to "lever in" higher levels of private investment on the back of the increased rental income into housing development. They will also be able to convert a proportion of their housing stock to affordable rent as it falls vacant. The affordable homes programme in London will produce 55,000 new affordable homes in London by 2015.
- New homes bonus: introduces a 6 year council tax bonus for new housing and empty homes brought back into use to incentivise local authorities and local communities to accept and encourage residential development.
- Self-financing: ends the local authority subsidy system and allows
  councils to keep their rents and spend them according to local priorities.
  In return councils must make a one-off repayment of their historic debts
  from previous council building programmes and other agreed housing
  expenditure. This will require most local authorities to take out a large
  loan to cover the repayment, and to manage its repayment over the
  next thirty or so years.

- Flexible tenancies: introduces fixed term, flexible tenancies for social landlords aimed at increasing the supply of affordable housing by providing social housing only for as long as tenants need it, not for life. Local authorities must agree and publish a tenancy strategy for their area setting out how social landlords should use flexible tenancies and the circumstances in which they should be reissued.
- Welfare reform: has already brought in major changes to the
  calculation and entitlement to housing benefit, including capping
  payments according to the size of property rented, increasing
  deductions for adult household members and, with the introduction of
  Universal Credit, capping a household's overall benefit to no more than
  the national average salary.

Housing strategy and investment in London: In London, the Mayor is responsible for spatial planning, housing strategy and investment. The first statutory London Housing Strategy was published in February 2010 and new transport and economic development strategies for London followed shortly afterwards in May 2010. The Mayor has recently published proposals for a revised London Housing Strategy which are subject to a 12 week public consultation period which closes on 6 March 2012. The revised strategy looks further at enhancing mobility and choice, tackling housing need and rough sleeping, and improving options for home ownership. Our housing strategy must be "in general conformity" with the London Housing Strategy and contribute towards the housing targets set out in the London Plan. The latest London Plan, setting out the capital's spatial development priorities, was adopted in July 2011.

# Objectives and priorities

The next twenty years will see an exciting programme of regeneration in Croydon. Major growth in the number of homes will be coupled with new infrastructure to transform buildings into highly functioning, successful neighbourhoods. We have made sure our housing strategy and our plans for wider development and investment (set out in the core strategy and infrastructure delivery plan) are completely consistent.

# Challenge, opportunities and approach

**Challenges:** The scale and extent of the housing and welfare reform programme means we will have to respond to significant challenges over the next four years. We will need to change traditional ways of doing things and to confront some settled expectations about rights and responsibilities. We are already seeing increasing homelessness, and there is the potential for increased overcrowding and rent arrears arising from housing benefit and welfare reforms.

**Opportunities:** The government's housing reforms also offer significant opportunities to develop a more flexible, targeted and effective housing service in the coming years. One which responds to the needs and aspirations of the modern age, provides assistance and support for as long as necessary and a platform for success and development.

**Approach:** In response to the challenges set out above we have identified six objectives we think make most sense for Croydon to pursue. Our approach to achieving these objectives will be to provide leadership where it's needed, to be flexible where it helps achieve our aims and to be innovative where we can see this will improve outcomes for Croydon's residents.

# Our long-term aims

The long-term aims we are working towards through the housing strategy are:

- To provide a choice of housing for people at all stages of life, and to meet housing need by providing good quality, affordable housing to those that need it, for as long as they need it.
- To ensure social housing is used to benefit society, to encourage independence and positive behaviour rather than entrench dependency and despondence.
- To ensure we contribute to giving children and young people a good start in life.
- To create and maintain strong, active, thriving communities; and to

- reduce concentrations of social, economic and environmental deprivation.
- To make the best use of our existing housing and reduce carbon dioxide emissions through effective maintenance, improvements and adaptations.
- To enable older and vulnerable people to achieve and maintain independence for as long as possible.
- To contribute towards improving the health and well-being of Croydon's residents and enabling them to achieve their potential, rather than holding them back.
- To play our part in reducing crime, developing the economy and increasing labour market mobility, and reducing social exclusion.

#### Our strategic housing objectives to 2015/16

We have identified six strategic housing objectives that will enable us to achieve the long-terms aims set out above. Our strategic housing objectives for the next four years are as follows:

- 1. Optimising the supply of new housing
- 2. Protecting and improving existing housing
- 3. Customer-focussed housing advice and options
- 4. Sustaining strong, successful and thriving communities
- 5. Achieving and sustaining independence through housing support
- 6. Improving health and well-being through decent homes and neighbourhoods

The following sections each deal with these objectives in turn, setting out:

- an outline of the demand for the housing services covered by the objective,
- the national and regional policy framework we are working within,
- the challenges we face locally, and
- the actions we will take to respond to these challenges over the next four years.

**The Housing Strategy Evidence Base**: explains in detail the statistical background and key issues relating to each objective.

**Equality Impact Assessment**: looks in detail at the equality impact of the strategy and how we have responded to mitigate any adverse impact

Consultation documents: We consulted on the housing strategy between 28 November 2011 and 23 January 2012. We held a housing strategy conference on 28 November 2011, with a series of presentations setting out the main themes, and workshops looking at new housing supply, revising our housing allocations scheme, ideas for developing the Big Society in Croydon and housing support. We published five consultation documents on the council's web site and invited over 500 individuals and organisations to comment on our proposals. While it has not been possible to incorporate every point of view, the challenge and discussion generated by the consultation process has been invaluable and resulted in a stronger housing strategy.

Please see the following link for a short conference report including videos of the presentations and presentation slides, consultation documents on the first five objectives and information about the feedback received.

A number of other documents accompany this strategy.

# Part one: Building and places

# OBJECTIVE 1 - OPTIMISING THE SUPPLY OF NEW HOUSING



We chose the word **optimise** deliberately for this objective to emphasise our aim not just to maximise numbers, but to create great places to live places that contribute to delivering our vision for Croydon. This includes bringing unused and under-used housing back into use by tackling empty homes, and by converting smaller dwellings into familysized homes which are in short supply in Croydon. We have a good track record in delivering new housing and this section of

the strategy sets out how we will achieve our objective through ambitious plans for growth and regeneration, through flexible affordable housing policies, infrastructure delivery and through the next phase of our council new-build programme.

### Housing need and demand – the facts and figures

Our planning and housing policies are based on robust and reliable evidence which includes an assessment of Croydon's housing market, how much land is available for development, a borough wide study looking at Croydon's residential character and a number of other supporting strategies and appraisals.

**Population growth:** Population growth is the main driver of housing demand. Between 2010 and 2031 the UK population is expected to increase by 9.5 million, an annual growth rate of 0.63%, and Croydon's population to increase to 394,500 people. The Office for National Statistics (ONS) expects the number of households in Croydon to increase to 157,000 by 2016, and to 183,000 by 2031. The age profile of our population is also changing and so is its diversity.

**Housing stock:** There are nearly 150,000 homes in Croydon, the largest borough housing stock in London. In the past 30 years housing tenure has changed in line with the national trend. However, we have a smaller social housing stock than many other London boroughs, limiting our ability to meet housing need. Our social housing is mainly concentrated in the north and the eastern edge of the borough. Fieldway and New Addington wards have the highest proportions of social housing, with 57% and 40% respectively.

**Housing market:** Croydon's average house prices are significantly cheaper than many parts of London and the borough's private rents are also significantly cheaper than the London average. However, Croydon residents still find house prices and rents difficult to afford. The bottom 25% of house prices is seen as a good indicator of the "entry level" price for market housing. In Croydon the bottom 25% of house prices is more than eight times the lowest 25% of earnings. This affordability ratio has nearly doubled over the past ten years.

Household incomes in Croydon are lower than London overall and do not allow many households to buy or rent market housing. Many households are barely holding on to market housing and are vulnerable to fluctuations in the economy and reductions in household income. Someone looking to buy a one bedroom flat in Croydon would need an income of at least £43,000 per year, and more than £74,000 for a 3 bed family home. To rent privately requires an income of at least £26,000 for a 1 bed flat, and £38,000 for a three bedroom family home. The average

income of someone working full-time and resident in Croydon was just over £30,000 in 2010.

Local Housing Market Assessment: Our local housing market assessment (LHMA) supported by our housing strategy evidence base, sets out the need for new affordable and market housing in Croydon to 2031. The LHMA estimates that 22% of households in Croydon are unsuitably housed, mostly living in the north of the borough. However, only 2.9% (4,000) are in housing need and unable to afford to move to a new home or to repair, extend or adapt their current home to make it suitable for them. Table 1 below shows the estimated number of future households that will require affordable, intermediate and market housing in Croydon between 2010 and 2031.

| Table 1: Housing requirement – Croydon 2010 to 2031 |         |              |            |        |  |  |  |
|---|---------|--------------|------------|--------|--|--|--|
|   | Market  | Intermediate | Affordable | TOTAL  |  |  |  |
|   | housing | Housing      | Housing    |        |  |  |  |
| TOTAL   | 18,000  | 1,700        | 7,300      | 27,000 |  |  |  |

The LHMA can be downloaded from the council's web site from croydon.gov.uk/contents/departments/planningandregeneration/pdf/9 12686/917223/localhousingmarketassessment

**New housing supply:** House building in England in recent years has failed to keep pace with population growth. It has averaged just over 145,000 per year in the first decade of the 21st century, when national targets estimated a need for between 200,000 and 260,000. Croydon's performance in house building in recent years, however, has been reasonably good. The housing stock has increased by an average 1,120 additional dwellings per year, over the past seven years. In total more than 7,800 new homes have been added.

**Unused and under-used housing:** Council tax records indicate there are around 1,600 private sector homes In Croydon that have been

vacant for more than 6 months, which is 1.3% of the private housing stock. There is also a significant number of council homes in Croydon that could be extended or converted into family sized homes, which are in short supply.

## National and regional policy

The main changes to housing policy relevant to optimising the supply of new housing are described in more detail below. In short, the right to buy will be reinvigorated by increasing the discounts available, affordable rent will allow housing subsidy to go further by increasing rental income for housing associations, and housing revenue account self-financing opens up the possibility of significant investment in council housing, including building new homes.

**Reinvigorated right to buy**: The government published a consultation document detailing proposals to reinvigorate the right to buy in December 2012, originally announced in the National Housing Strategy *Laying the Foundations*. It includes details of protections for people purchasing, exclusions from the policy and how the money raised from the sales (the "capital receipt") will be used to repay existing housing debt and contribute towards producing a replacement home.

Affordable rent: Affordable rent, introduced from April 2011, is designed to make government housing investment go further by increasing housing associations' capacity to raise development finance. Affordable rent allows them to charge up to 80% of market rents on new affordable homes and on a proportion of their existing stock when it becomes vacant. Local authorities and housing associations are expected to agree programmes that meet local housing priorities as part of the affordable rent framework. Affordable rent also includes funding to bring empty homes back into use, and in London this funding will be distributed by the Mayor (see action 1.7 below).

**Housing revenue account (HRA) self-financing:** Self-financing replaces the housing finance subsidy system from April 2012. This will allow local authorities to take longer-term decisions and will provide a more transparent system through which tenants can hold their landlords to account. In return for a one-off settlement payment to central government in respect of their historic housing debt, local authorities will be able to keep the council rents they collect and use them to manage and maintain their council housing stock. Croydon currently makes payments into the system; in 2011/12 the payment was £16.2m. When self-financing begins the council will take on an additional debt of £223.12m to finance the settlement payment. The loan(s) taken out to make the settlement payment will be financed and repaid from the HRA. Long term financial planning based on a 30 year business plan will be updated annually to reflect actual expenditure, allowances and financial projections. The implications and opportunities presented by HRA self-financing will be examined and digested over the coming year; however, it is important recognise the fundamentally different business model that will emerge as a result of its implementation. It will profoundly change the council's approach to housing investment going forward and potentially provide the opportunity for further investment in the housing stock, regeneration and continued funding for the council new build programme.

The council's cabinet receives a report every year detailing plans for the annual rent increase and details of the investment programme for the following year, and in future this will include an update on the developing issue of self-financing and a "health report" on the 30 year HRA business plan.

# What are the big challenges?

**Reduced housing investment:** The affordable homes programme 2011-15 represents a 60% reduction in investment compared to 2008/11. Framework delivery agreements were agreed between housing associations and the Homes and Communities Agency in late

2011. They set out the total programme of new homes each provider will deliver over the next four years. For most associations this will entail a reduction in the overall size of their affordable housing programme and a greater focus on working in boroughs where schemes can most easily be delivered. The challenge for this strategy is how to best work with developing housing associations in order to attract sufficient investment into Croydon to meet our housing need. We will continue to make the case to the Mayor and the government for additional resources to enable us to increase housing supply and meet the borough's housing needs.

Rent policy and the "affordability" of affordable rents: Croydon like other boroughs faces high levels of housing need from single people and families who are either in receipt of benefits or earn low incomes. Recent housing benefit and welfare reforms have capped local housing allowance and propose absolute caps to out of work benefits through the introduction of universal credit. One of the uncertainties around the introduction of affordable rent is how local authorities will approach rent setting as part of their role in agreeing development proposals. The dilemma for housing associations and London boroughs is how to strike the right balance between affordability and viability.

**Viability:** Over the three years since the credit crunch land and sales values have inhibited regeneration and speculative development in Croydon. However, since the decline in 2009 and 2010 residential markets have stabilised during 2011 and are predicted to grow between 2013 and 2015 with further growth anticipated in the wider Croydon market following the implementation of the Metropolitan centre masterplans. This puts Croydon in a more positive position going forward increasing its attractiveness to investors and the viability of schemes. The challenge for this housing strategy and the council's wider planning policy is to provide sufficient flexibility to allow developments to progress and to deliver levels of affordable housing that respond to both housing and construction market conditions.

The right to buy's impact on HRA self-financing: The announcement of proposals to reinvigorate the right to buy and replace properties bought on a one-for-one basis in the *Laying the Foundations* appeared to cut directly across plans to implement self-financing. However, the detailed proposals set out in the consultation document published on 22 December 2011 should not have a significant impact on the viability of the council's 30 year HRA business plan. The final details will be closely examined when they are published later in the year and worked into the housing strategy action plan.

# Priority actions: Optimising the supply of new housing

# New housing and regeneration

Our Core Strategy shows where and how we plan for new development and change to occur in Croydon up to 2031. This change will not take place in the same way in every area of the borough; some places will grow and change while others will not, and there are a number of reasons why we have taken this approach. Croydon is a borough of contrasting places and our core strategy, supported by a detailed borough character appraisal, identifies areas with the potential for growth, as well those where it's important to celebrate and protect what we have. More than a third of the borough is open space; however, it is unevenly distributed with the majority in the South of the borough. This is an asset and something we want to preserve, however, and it is also a constraint, limiting the land available for new housing to certain areas. We also need to ensure we provide sufficient land for employment, education, health and other community facilities so that people moving into our new housing have the opportunity of a good quality of life. There are also environmental constraints, with some areas of the borough susceptible to flood risk<sup>1</sup>. Developments in these areas must carefully

consider how to reduce flood risk, utilise sustainable drainage systems (SUDs) and minimise any possible groundwater contamination.

**Regeneration:** The area with the greatest potential for regeneration and growth is the centre of Croydon. It has been identified as an "opportunity area" in the 2011 London Plan. We have well developed plans to regenerate the "opportunity area", to create a new residential community of more than 7,000 households and to encourage the creation of new jobs and businesses. These plans include improving our streets and public spaces to attract the shoppers, employers, workers and new residents who will play a vital part the renaissance and future vitality of Croydon. They also include improving our transport networks, including capacity at East Croydon Station and on the tram network, in order to reduce traffic impact and encourage a shift to more sustainable modes of transport.

Key sites: Work on Saffron Square on Wellesley Road is already underway which will provide more than 700 new homes in the centre of Croydon. The council has given the go ahead to three other major developments in the opportunity area in recent months: in July 2011 the strategic planning committee approved the Menta development on Cherry Orchard Road which will produce more than 400 new homes on the doorstep of East Croydon Station; It also approved the development of Ruskin Square which will deliver at least another 550 new homes beside East Croydon station. In January 2012 the committee approved No. 1 Lansdowne Road which will provide another 390 new homes on Wellesley Road, and work is planned to commence on this development in 2013.

**Masterplans:** Three masterplans for Mid-Croydon, East Croydon and West Croydon will guide planning decisions in central Croydon over the next 20 years. The Opportunity Area Planning Framework, which will

<sup>&</sup>lt;sup>1</sup> The main risks of fluvial flooding are in the vicinity of the Norbury Brook through Thornton Heath and Norbury and through Kenley, Purley and Waddon along the Brighton Road and Godstone Road valleys and around the culverted River Wandle.

Surface water flood risk concerns a number of the valleys in the south of the borough

run alongside these masterplans, is in preparation with a consultation draft planned to be approved by the council's cabinet in June 2012. The outer edges of the centre will also play a substantial role in delivering residential growth including Waddon, Purley, Coulsdon, Broad Green and Selhurst.

Coulsdon and Cane Hill: The site of the former Cane Hill Hospital to the south of Coulsdon town centre is identified in the core strategy as a major opportunity to deliver a substantial residential-led mixed use development. The masterplan for Coulsdon town centre and Cane Hill is currently in development and will include plans to develop around 650 much-needed new eco-friendly homes, new retail and business units, enhanced open spaces and new leisure uses, all integrated with the surrounding area and with strong links to the town centre. The HCA has very recently chosen Barratt Homes as their preferred partner for the regeneration of Cane Hill.

**Key diagram:** the diagram on page 16 shows the areas of Croydon that will see significant regeneration and growth.

London Plan housing targets: By adopting the approach of concentrating development in the places with the most capacity to accommodate new homes, while at the same time respecting and conserving local distinctiveness, we will be able to produce more than 20,000 new homes in Croydon by 2031. This will meet our London Plan target of 1330 new homes a year. As mentioned previously, 7,300 of these new homes will be built in the opportunity area in the centre of Croydon. A further 11,600 will be built outside the opportunity area. We also plan to bring more than 900 empty homes back into use, and provide 200 more non-self contained bed spaces in hostels and student halls of residence.

Land capacity for housing development: The London Plan, however, increased our annual housing target from 903 net additional homes per

year to 1,221. Unfortunately, this means we no longer have a supply of housing land to sustain five years worth of new building, which is a government requirement. To overcome this we will issue a "Call for Sites" from developers and other interested parties in the spring of 2012. Work will also continue on bringing forward sites identified in the Greater London Authorities Strategic Land Availability Assessment (which forms part of the evidence base for the Proposed Submission Core Strategy) and the Mayor's Opportunity Area Planning Framework for Croydon.

Core strategy timeline: Updated evidence on the viability of affordable housing development led us to carry out further consultation on our affordable housing policy (CS2: Homes) between 16 January and 27 February 2012. In March 2012 the council will submit representations made on the proposed submission drafts of the core strategy to the Secretary of State for examination. An examination will take place in the summer of 2012, and following this the final document will be adopted as part of our development plan in early 2013.

### Affordable housing policy

Policy CS2: Homes in the core strategy sets out how we will provide a choice of housing for people in Croydon, including affordable housing for those who cannot access suitable market housing.

Minimum affordable housing requirement: Over the course of the planning period (the twenty years from 2011 to 2031) we aim to ensure that 35 per cent of new homes are provided as affordable housing for residents on low incomes. We will negotiate to achieve up to 50 per cent affordable housing on sites that can provide more than ten homes.

However, we are realistic about the viability of developing affordable housing in the current housing market and have therefore reduced the minimum affordable housing requirement to 15 per cent in the early part of the plan. We will review this requirement, through our dynamic

viability model<sup>2</sup>, annually for sites outside the opportunity area, and every three years for sites inside the opportunity area. Changes to our affordable housing requirements will be reported in our annual authorities monitoring report.

Opportunity area - commuted sums and off-site provision: Our plans to stimulate growth and development, and to build and sustain a new residential community will mean developments in the opportunity area will take much longer to design and initiate. A minimum affordable housing requirement of 10% on site will, therefore, be applied, with developers able to offer additional contributions to affordable housing through provision on "donor sites" or by paying a commuted sum towards the provision of affordable housing in Croydon. If a developer is not able to guarantee either of these options then a variable commuted sum linked to development value at a later stage of the development may be agreed.

Affordable tenure mix: Our preferred overall mix of affordable housing tenures in the borough is 60:40 between affordable or social rent and intermediate low cost home ownership. However, in certain circumstances, for example some developments in the opportunity area, we may consider a different tenure split if it is agreed with a housing association that it is justified.

**Size mix:** 60% of the overall need for housing in Croydon is for homes with three or more bedrooms. We will set a preferred unit size mix on individual sites through our Joint Development Management and Site Allocations Development Plan Document (DPD). In the opportunity area we aspire to have 20% of homes with three or more bedrooms, and 35% of all two bedroom homes to provide four bed spaces, which should provide sufficient space for a small family.

<sup>2</sup> Table 4.2 of the core strategy includes the dynamic viability model which adjusts our minimum on site affordable housing requirement according to changes in construction costs and house prices.

Other housing requirements: We will require new homes to achieve London Housing Design Guide minimum standards and that new family homes meet minimum design and amenity standards in the forthcoming Joint Development Management and Site Allocations DPD. We will require all new homes to achieve the equivalent of level four of the Code for Sustainable Homes to comply with core strategy policy CS6. The London Plan requires 10 per cent of homes to be wheelchair accessible or easily adaptable for residents who use wheelchairs; all new homes to meet lifetime homes standards; and for all new housing to make provision for play and informal recreation based on the child population generated by the development. We will also seek to deliver ten additional Gypsy and Travellers pitches in the borough by 2021.

# Infrastructure - making great places

The Infrastructure Delivery Plan (IDP) identifies the infrastructure we need to support Croydon's regeneration and growth through to 2031. It also forms part of the evidence base for our Local Development Framework (LDF). Infrastructure includes physical or hard infrastructure such as utilities and transport; green infrastructure such as parks, open spaces and the natural environment; and social infrastructure such as schools, health facilities and other public services. The IDP ensures Croydon develops in a sustainable way, providing not just homes and jobs but all the other elements that will make it a great place in which to live, work and spend time. A summary of our plans for infrastructure delivery relevant to the housing strategy are provided below.

**Schools and education:** Critical to the success of our plans for growth are our proposals for expanding our education provision. We plan to provide ten more forms of entry in our primary schools by September 2012. We also need to accommodate this "bulge" in the number of primary school pupils as it works its way through to secondary school. So we also plan to provide an extra 10 forms of entry in our secondary schools by 2016 to achieve this. The Education Estates Strategy will set out in detail how this expansion will be funded and implemented.

**Transport:** A key part of our plans to regenerate the centre of Croydon is to encourage smarter travel. We want to foster a change in behaviour by encouraging people to shift away from car use and towards more active travel. We have developed a borough wide Transport Strategy, and we will also study in more detail the transport and accessibility needs of the centre of Croydon. One of our priorities is to increase the capacity of East and West Croydon stations, and to reduce overcrowding on the Tramlink network. In the longer term the capacity of the track in the central area will need to be increased, and we will consider extending the network to Mitcham, Sutton and Bromley, and towards London, Purley and Coulsdon.

Parks and open spaces: Green infrastructure includes parks, open spaces, playing fields, woodlands, allotments and private gardens. The north of the borough has less access to parks and open space, and as our population grows it will be increasingly important to protect existing local parks, and to look for opportunities for new open space wherever practicable. Our plans to achieve this involve creating a network of greenways that will connect green spaces across the borough.

Health and community facilities: The NHS is working towards a clinically-led, more joined-up and integrated approach to delivering health services. More services will be delivered in the community such as hospital-based, and GP-led, health centres. Three networks for these services are planned across the Borough, in the northern, central and southern areas. Growth in Croydon will also create pressure for more public service outlets in the community and we will support developments that incorporate more and improved community facilities. We will also seek to retain existing community facilities that meet the needs of the community, are well-located and viable, and are accessible to everyone. We will also look to ensure community services are co-located so as to enable multi purpose trips for residents.

The infrastructure delivery plan can be downloaded from the council's web site

http://www.croydon.gov.uk/contents/departments/planningandregeneration/pdf/868213/1114530/idpaug11.pdf

# Funding Infrastructure through the Community Infrastructure Levy (CIL)

CIL allows a local authority to raise funds from new local developments to pay for the infrastructure needed to support it. We have recently concluded consultation on how we intend to charge CIL in Croydon. The consultation identifies Croydon's infrastructure needs over the next five years that are eligible for CIL, together with the funding required and current funding gap (rounded to closest £m).

| Priority infrastructure requirements           | Funding required | Funding<br>Gap |
|--|------------------|----------------|
| Education: Primary Schools, Secondary          | £166m            | £122m          |
| Schools & Special Education Needs              |                  |                |
| Provision                                      |                  |                |
| Transport: Improvements to the roads,          | £12m             | £3m            |
| tram, bus and rail networks as well as         |                  |                |
| regeneration of Croydon's public realm         |                  |                |
| Environmental: District Heating system,        | £43m             | £17m           |
| cycle lanes and improvements to specific       |                  |                |
| parks, flood prevention & protections          |                  |                |
| Culture: Fairfield Halls regeneration, library | £72m             | £72m           |
| improvements and sport & leisure centres       |                  |                |
| Health: Health, Emergency & Essential          | Not yet          | Not yet        |
| Services                                       | determined       | determined     |

Our capital programme, which is funded through prudential borrowing, will help to reduce this funding gap by around £100m over the five year period. This leaves a £114m gap in the funding available for infrastructure in Croydon which justifies the need to start charging CIL from 2013. There will be an independent examination of our draft charging schedule in the summer of 2012, and following this we will be

able to start charging CIL on developments in Croydon from the spring of 2013 onwards.

# Recovery and regeneration following the August riots

The interim report of the Riots Communities and Victims Panel into the riots in August 2011 identified an association between environmental factors, such as deprivation, community engagement and housing needs, and the rioting. In Croydon some areas that are already relatively poor have got more deprived over the last few years. This is particularly the case for a number of wards to the north of the town centre, one of which, Broad Green, was particularly badly affected by the riots. While the causes of the riots were complex and multi-faceted, and nothing will ever excuse criminal activity, there are some underlying characteristics of parts of north Croydon that we will need to address over the longer term, including those related to housing need or housing conditions. We will await the conclusions and recommendations of the national and local reviews before bringing forward a set of proposals on how we might work with the relevant communities to address some of these deep-rooted issues.

# Rent policy

We welcome the introduction of affordable rent and will adopt a flexible approach to its implementation in the borough. We will work flexibly and creatively with housing associations seeking to build new affordable housing in Croydon. Our housing development team have already issued interim guidance to housing associations for the delivery of affordable homes. With regard to rent setting, we will determine rent levels on a scheme by scheme basis by considering both scheme viability and affordability.

# Planning and enabling

Recently we have modernised our planning framework for the metropolitan centre and improved our planning pre- application process. We understand the issues and risks that registered providers and developers grapple with in trying to meet affordable housing

requirements in the current market. We want Croydon to become the preferred place to "do business" for developers and housing associations. We believe we can achieve this by bringing developers and registered providers together earlier in the development process. Our enabling service is introducing a number of improvements including providing dedicated development officers. They will proactively assemble sites for development, work with land owners and help iron out planning issues to make deliverability more certain, and engage with housing associations at the earliest stage of the process.

# Council new build - phase three

We have a very successful new council new-build programme which has provided 102 new council homes to date. Our development in Sumner Gardens produced 13 high quality, energy efficient homes, and in New Addington we have built a further 14 new family sized homes. These new homes are extremely popular, are built to high design and sustainability standards and have been included as a case study in the Revised London Housing Strategy. The programme increases overall housing supply, and contributes to reducing overcrowding by providing alternative accommodation for under-occupying tenants. It benefits residents by using blighted land often susceptible to fly-tipping, vandalism and anti-social behaviour.

The land for phase three spans 18 different sites designated as appropriate for our new build programme due to significant abnormal costs (including boundary works, utility diversions and rights of ways compensation) and the relatively high design and quality standards of the dwellings proposed. Phase three will produce more than 30 new homes, 60 per cent of which will be family sized homes with at least three bedrooms. The programme will be funded from the HRA with £3.75m made available in 2012/13 and £6m in 2013/14. Phase three will commence in November 2012 and will complete in December 2013 at a total cost of £10.8m. Work on identifying further sites for phase four is already underway. We will make provision for building 25 new council homes per year in the HRA business plan going forward to 2015.

# Bringing empty homes back into use

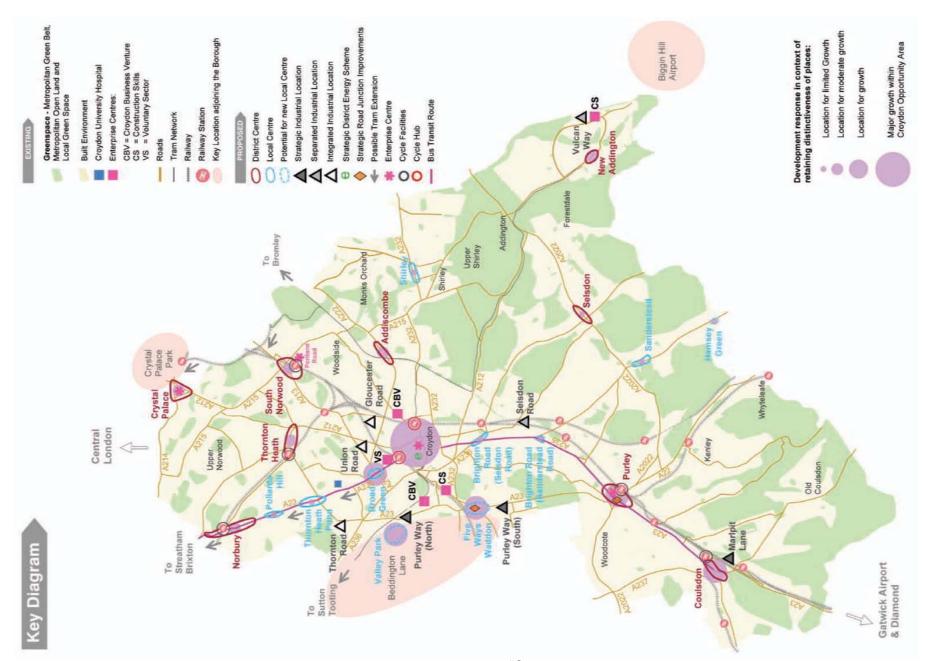
Empty homes blight neighbourhoods and can be vulnerable to break-ins and vandalism. Investment in bringing them back into use is a high priority that provides excellent value for money, and helps to increase our housing supply. There are currently around 1,600 empty homes in Croydon that have been empty for more than 6 months. We plan to return 400 empty properties in Croydon to use per year by providing advice, information and financial assistance in the form of empty property loans to the owners of empty homes. Loans are available for properties that have been empty for longer than six months and require essential repairs or improvements. The loans are also available to owners of commercial properties for the conversion of non-residential space above shops. They are repayable after a period of two years. We will also expect owners to agree to allow the council to use their property as accommodation for people in housing need in return for proving the loan. As a last resort we will take action to compulsorily purchase an empty property where attempts at persuading the owner to bring it back into use have failed. We submitted a bid to the Mayor for empty homes funding in January 2012 as part of the South West London Housing Partnership. We are also working with housing associations to secure empty homes funding for Croydon, and will be supporting a community bid. Our empty homes programme will contribute to meeting the Mayor's target of ensuring no more than 1% of London's homes remain empty and unused for more than six months. We are also interested in provisions in the Local Government Finance Bill 2010-12, currently before Parliament, which will introduce a

discretionary 'empty homes levy' where local authorities could charge up to 150% of the council tax bill for properties that remain empty for more than two years.

## Larger homes programme

Tackling overcrowding and providing more family sized accommodation are significant issues for the housing strategy. Extending homes or deconverting homes to single family dwellings makes a quick and cost effective contribution to meeting these objectives. This work has used resources from the Mayor of London's targeted funding stream but this funding has now ended. There is a clear business case: the cost per bedroom of conversion is £46,000 compared with the current affordable new-build cost of £50,000. We have therefore made provision for £100,000 a year for a rolling programme of two extensions per year.

Assisted private purchase and special transfer payments We have increased our Assisted Private Purchase Scheme (APPS) in 2012, to assist council tenants to purchase a home on the open market to £500,000 in 2012/13 and have increased investment in special transfer payments to assist under-occupying tenants move to smaller housing thereby free up much needed family sized homes. As part of our developing the tenancy strategy we will explore different ways of using cash incentives to enable tenants to move out of social housing and rent of buy market housing.



# Action plan 1: optimising the supply of new housing

| Ref  | Key activity   | Milestones                                | Director lead                              | Key Performance measure  |
|------|--|---|--|--|
| 1.1  | Meet our London Plan housing targets by delivering 1330 new homes per year   | On-going                                  | Director of Planning & Building<br>Control | No. new homes delivered  |
| 1.2  | Deliver housing to meet a range of needs in accordance with our core strategy, as follows:  • Min. of 35% new homes to be affordable homes  • 100% new affordable homes to be level 4 of CSH  • 10% new homes to be wheelchair accessible  | On-going                                  | Director of Planning & Building<br>Control | <ul> <li>% New homes affordable</li> <li>% New homes level 4 CSH</li> <li>% new homes wheelchair accessible</li> </ul>         |
| 1.3  | <ul> <li>Progress the Council new build programme by:</li> <li>Completing phase three of the programme by delivering more than 30 new council homes</li> <li>Identifying approximately 10 suitable sites and undertake initial feasibility studies for new build Phase 4 pipeline programme</li> </ul> | Phase 3<br>completion<br>December<br>2013 | Director of Planning & Building<br>Control | <ul> <li>No, new council homes delivered</li> <li>No. sites identified for phase 4</li> </ul>                                  |
| 1.4. | Larger homes programme: establish a small programme of extensions and conversions to suitable council homes  | On-going                                  | Director of Housing Needs and<br>Strategy  | No. council homes converted  |
| 1.5  | Increase the supply of housing by bringing 400 empty properties a year back into use (including empty spaces over shops)   | On-going                                  | Director of Housing Needs and<br>Strategy  | <ul> <li>No. empty homes brought back to use</li> <li>% private sector housing empty for<br/>longer than six months</li> </ul> |
| 1.6  | Promoting home ownership through in vesting in the Assisted Private Purchase Scheme (APPS) and by promoting home ownership opportunities including First Steps and the reinvigorated right to buy (RTB).   | On-going                                  | Director of Housing Needs and<br>Strategy  | <ul><li>No. APPS grants made</li><li>No. First Steps applicants</li><li>No. RTB sales</li></ul>                                |

# OBJECTIVE 2 – PROTECTING AND IMPROVING EXISTING HOUSING

It sounds obvious to say that our existing housing is a valuable resource; however, it can be easily overlooked in the drive to increase housing supply. Three out of four of the homes we will live in 2050 have already been built. It is vital, therefore, that we invest in them now to ensure that they are fit for purpose in 40 years time. Great strides have been made in improving social housing in recent years; however, it is a different story for private homes in Croydon where one in three fails the decent home standard. This section looks at how we will establish an asset management strategy setting out how we will invest in maintaining and improving council housing over the long-term. It also shows how we will tackle private housing in poor condition and help home owners and tenants to increase the energy efficiency of their homes.

# Housing conditions – the facts and figures

**Decent homes:** Council and housing association homes in Croydon are generally in good condition. In April 2011 100% of council and housing association homes in Croydon met the decent home standard. In contrast a significant proportion of private housing in Croydon there are significant housing problems in private housing is in poor condition. Research by the Building Research Establishment in 2008 found:

- 37% of private housing fails the decent home standard
- 10% of private housing is in disrepair
- 17% of private housing has category 1 hazards under the HHSRS
- 24% of private housing provides inadequate thermal comfort
- 6% of private housing lacks modern facilities

The estimated cost of removing all private sector category 1 hazards is £227m3. Despite activity targeted towards vulnerable households living in private housing, half of them still live in non-decent homes.

**Energy efficiency:** Private housing tends to be less energy efficient than social housing generally due its age and type of construction. Council homes have an average energy efficiency SAP rating <sup>4</sup> of 80 on the 2001 scale. The estimated average SAP rating of a private home in Croydon in 2008 was 56; however, 11% had a SAP rating of less than 35. Private housing energy efficiency is relatively good in Croydon compared to the London average, but Croydon has a greater proportion of the least energy efficient homes.

**Fuel poverty:** There are three main causes of fuel poverty: poor energy efficiency performance of housing, low income levels and high energy costs. Anyone that spends more than 10 per cent of their income on fuel bills is deemed to be living in fuel poverty. Fuel poverty is increasing nationally and it is estimated that in 2009, 4 million households were experiencing fuel poverty in the UK, 18% of all households. It is estimated that there are more than 9,000 households in fuel poverty in Croydon.

# National and regional policy

Government policy towards the standard of maintenance of council homes has changed very little in recent years. Social housing providers are still required to ensure tenant's homes meet the decent homes standard by the social housing regulator. The main change in policy has been the introduction of self-financing which provides the possibility of significant investment in council housing in the longer term. Government funding has been cut back from private sector housing and

<sup>&</sup>lt;sup>3</sup> HSSA 2011 CLG.

HSSA 2011 CLG.

the main policy focus has been on improving energy efficiency. Details of the main changes to housing policy relevant to this objective are provided below.

**Green deal:** The Green Deal, introduced in the Energy Act 2011, enables the installation of energy efficiency measures without the need for public funding or upfront investment by householders. The investment costs will be repaid through a monthly charge based on fuel bill savings. The Green Deal also introduces an obligation, which replaces CERT<sup>5</sup>, for energy companies to focus help towards low income, vulnerable households and domestic properties where energy efficiency works are more expensive. Households will be able to receive up to £6,500 of energy efficiency improvements, via a Green Deal provider, with the money repaid through fuel bill savings.

Energy performance in private rented housing: The Energy Act 2011 includes a responsibility for local authorities to issue notice to a private landlord if the rental property has a low performing Energy Performance Certificate. By 2016, private landlords will be unable to refuse a tenant's reasonable request for consent to energy efficiency improvements where a finance package, such as the Green Deal and/or the Energy Company Obligation (ECO), is available. By 2018, it will be unlawful for a private landlord to rent out a home which does not reach a minimum energy efficiency standard. Local Authorities will enforce the domestic minimum standard regulations, with the ability to impose a civil fine of up to £5000.

Feed-in tariffs (FITs): Introduced April 2010, FITs provide direct payments to installers of small-scale renewable energy equipment. Councils have received positive pressure from the government to take advantage of the income generating opportunities of the FITs. Every council was written to by the Secretary of State for Energy and Climate Change and encouraged to become a 'power generators of the future'.

**London Housing, Climate change and energy strategies:** The Mayor's Draft Climate Change Mitigation and Energy Strategy sets a target to reduce London's  $CO_2$  emissions from all sources by 60% by 2025 compared to 1990 levels. By 2030 all existing homes should be fitted with energy efficiency measures and have the potential to generate electricity. The Croydon Climate Change Mitigation Action Plan has set  $CO_2$  reduction targets for domestic housing of 5% by 2015 and 34% by 2025 from the 2005 baseline.

**Fuel poverty:** The Warm Homes and Energy Conservation Act 2000 required the Secretary of State to publish a strategy setting out policies to ensure that no one, so far as reasonably practicable, lives in fuel poverty. The main objective of the UK fuel poverty strategy published in 2001 was to end the blight of fuel poverty by 2010. Unfortunately that target was not achieved and in October 2010 the Government announced it would commission an independent review to take a fresh look at the fuel poverty target and definition. The Hills Fuel Poverty Review published an interim report for consultation and is now considering the responses as it works towards publishing a final report early next year.

**Rugg review of private rented housing:** Following the Rugg review the government has no plans to introduce further regulation of the private rented sector. Instead it will encourage responsible letting through the use of voluntary accreditation schemes for landlords and letting agents, and will rely on existing enforcement powers in the Housing Act 2004.

### What are the big challenges?

Maintaining council homes: A great deal of investment and work has gone into achieving the decent homes standard for council homes in Croydon. However, there is still a need for on-going investment to maintain the standard, and the estimated cost over the next four years is approaching £100m. The council will need to finance this investment

<sup>&</sup>lt;sup>5</sup> Carbon Emissions Reduction Target (CERT).

without additional funding from central government (e.g. decent homes backlog funding) or the Mayor of London. HRA self-financing will provide sufficient resources to achieve this.

The scale of poor private sector housing conditions: The government withdrew funding for private sector renewal in 2010 as part of the comprehensive spending review and this presented a challenge for our investment strategy to tackle poor housing conditions. Although we have been able to fund a significant programme for 2012/13 the scale of the investment required remains a significant challenge.

**Reduction in FITs:** Concern over the take up of FITs and the sustainability of the level of investment led to the government launching a review of the funding arrangements for solar installations in February 2011. Consultation on the proposals for phase one of the review closed on December 2011. In December Friends of the Earth and solar companies Solarcentury and HomeSun launched a High Court challenge against a government decision to cut feed-in-tariff payments. This has caused considerable disruption to the renewables market, and the recent cut to the FIT for multiple, or 'aggregated', installations of solar photovoltaic panels to 16.8p has added to the pressure on solar providers and landlords seeking to develop viable schemes.

**Fuel poverty:** The physical and medical conditions exacerbated by excess cold are a major pressure on health resources (see Objective 6: improving health and well-being through decent homes and neighbourhoods).

# Priority actions: Protecting and improving existing housing

# Maintaining council homes

### Asset management strategy

Our approach to maintaining and improving council homes will be set out in our asset management strategy to be published in 2013. It will be based on a variety of sources of information, including surveys and feedback from our residents. It will include a comprehensive assessment of investment needs in our residential stock, as well as future opportunities for estate regeneration and considering the future best use of existing retirement housing. The strategy will be reviewed annually and will inform our rolling 30 year HRA business plan.

# Maintaining council homes

HRA self-financing allows us to change the focus of our investment. We will continue to invest in kitchens and bathrooms as well as investing in other areas that our residents have indentified as their priorities such as improving security, reducing fuel poverty and improving energy efficiency. We will also focus on improving the appearance of our homes and estates through a major programme of external decorations. Our current estimate of the cost of these works over the next four years is £100m. This programme will be financed without additional funding from central government or the Mayor of London. HRA self-financing will provide sufficient resources to allow us to consider potential estate regeneration projects in the future.

# Improving energy efficiency

We will improve energy efficiency of council homes to an average SAP rating of 81 (71 SAP 2005) through a programme of central heating installation, double glazing and insulation including the following GLA funded initiatives:

- o Installing new condensing boilers and better heating controls
- Helping older or vulnerable tenants with the installation of central heating in our central heating plus programme
- Installing external wall cladding, loft insulation, thermostatic radiator valves and draft proofing

#### **Procurement**

Our responsive repairs contract and kitchens and bathrooms contract will be up for tender again in 2014. We will require companies interested in providing these services to ensure a proportion of their workforce is made up of local labour. We will also require the successful contractor to provide apprenticeships for Croydon residents. We will ensure our tenants and leaseholders are engaged in the arrangements to select a new contractor.

# Installing photovoltaic (PV) panels to up to 1,000 council homes

We will continue to progress our plans to install photovoltaic panels on council homes. In response to the reduction on FIT tariffs we are liaising with interested contactors to assess their impact on our original plans. We will continue to explore opportunities for the use of solar PV on council homes, but we recognise the limitations to our original plans likely to result from the current state of the market.

#### Improving fire safety in council blocks

We will improve fire safety in council flats by providing council staff with accredited training on carrying out fire risk assessments. We will carry out fire safety remedial and improvement works to 850 blocks in the borough. Over the next three years we will complete a fire safety risk assessment for each of our high and medium risk blocks.

# Private sector housing renewal & energy efficiency Private sector renewal

We plan to bring 400 private sector homes per year up to the decent home standard through our private sector renewal activity, as follows: **Discretionary home investment loans:** We will provide financial assistance to eligible home owners to remove serious hazards or disrepair and to bring the property up to the decent homes standard. The discretionary home improvement loan is subject to a means test and is recoverable when the property is sold. The maximum loan is £15.000.

**Home repair loan:** we will also assist older or disabled people who need to carry out small-scale works to remove hazards, tackle disrepair or make minor adaptations. The loans are subject to a means test and the maximum loan is £3,000.

## Housing regulation and enforcement

We will use our statutory powers to enforce the standard of private housing in Croydon. We have already instituted additional licensing of houses in multiple occupation (HMO) to extend the statutory scheme to include dwellings with three or more occupants, and buildings with two storeys. Our HMO team takes a proactive approach to licensing, and provides guidance and support to landlords via our website and dedicated email address. We will also refer landlords to our Private Licensing Agreement providers where they wish to offer properties to the council to use as temporary or emergency accommodation. Where necessary, we will take enforcement action to tackle the most serious housing condition problems, particularly where there are issues around public safety, nuisance and crime. We plan to bring fifty HMOs up to standard per year. We are currently exploring opportunities for shared services with our neighbouring boroughs of Bromley and Bexley. We are also currently considering a licensing scheme for all

# Introducing the Green Deal to Croydon

We have made good progress in delivering the RE:NEW scheme in Croydon. Our RE:NEW contactor is on target to improve the energy efficiency of 1,600 private sector homes by the end of March 2012. We are currently working with the Mayor to explore opportunities for accessing any remaining grant funding for energy efficiency works, and then for opportunities arising from the Green Deal from Autumn 2012 onwards.

Offer energy loans to tackle excess cold and fuel poverty
Energy loans are designed to improve the energy efficiency of cold
homes and help vulnerable people who may be in fuel poverty. The loan
covers the cost of things like improving insulation and draft proofing and
installing an energy efficient boiler. We will provide 30 householders per
year with assistance to improve the energy efficiency of their homes
through this scheme. The loans are subject to a means test and are
repayable when the property is sold.

# Action plan 2: Protecting and improving existing housing

# Insulating homes with solid walls – pilot scheme

We will set up a pilot scheme offering homeowners assistance with insulating their properties if they have solid walls. The pilot scheme will be run in partnership with Houseproud and will offer home owners home investment loans to assist with carrying out the works.

Audit private landlord's energy performance certificates We will carry out an audit private landlords in Croydon to make sure they are complying with their legal duty to obtain energy performance certificates before letting their dwellings.

| Ref | Key activity  | Milestones                                | Director lead  | Key Performance<br>measure                                 |
|-----|---|---|--|--|
| 2.1 | <ul> <li>Develop and Publish a council dwelling asset management strategy</li> <li>Develop council homes asset management strategy</li> <li>Update strategy annually</li> </ul> | Strategy to<br>be published<br>March 2014 | MD Croydon Landlord Services, Director of Housing Needs & Strategy | Date strategy published                                    |
| 2.2 | Maintain 100% of council homes to the decent homes standard over time   | On-going                                  | MD Croydon Landlord Services, Director of Housing Needs & Strategy | % decent homes   |
| 2.3 | Increase energy efficiency of council homes through a programme of central heating installation double glazing  | On-going                                  | MD Croydon Landlord Services, Director of Housing Needs & Strategy | <ul><li>Average SAP rating</li><li>Target SAP 81</li></ul> |
| 2.4 | Procure contractor to install photovoltaic panels to 1,000 council homes funded by the feed in tariff   | November<br>2012                          | MD Croydon Landlord Services, Director of Housing Needs & Strategy | Date new contract let                                      |
| 2.5 | <b>Improve fire safety in council stock</b> through programme of inspections and improvements works (2011/14)   | On-going                                  | MD Croydon Landlord Services, Director of Housing Needs & Strategy | No. inspections     carried out                            |
| 2.6 | Private sector renewal programme - Improve 400 properties to the decent homes standard through combination of information, advice and loans                                     | On-going                                  | Director of Housing Needs and Strategy                             | Target 400 private sector homes improved                   |

|      | Improve energy efficiency of private sector housing by completing RE:NEW programme and exploring opportunities through the Green Deal, and through our Energy loans programme – provide assistance to 30 vulnerable homeowners through energy loans | On-going | Director of Housing Needs and Strategy | • | Annual target 30 energy loans |
|------|---|----------|--|---|-------------------------------|
| 2.10 | Pilot solid wall insulation programme   | On-going | Director of Housing Needs and Strategy | • | No. homes insulated           |

# Part two: People and communities

# OBJECTIVE 3 - CUSTOMER-FOCUSSED HOUSING ADVICE AND OPTIONS

## Housing advice and options

The government's housing reforms have encouraged to us to think again about how social housing can be used to benefit society, to encourage independence and positive behaviour rather than entrench dependency and despondence. These reforms have also challenged established expectations of everyone having the right to register on the council waiting list and, if their turn came, to receive a life-long tenancy. We currently face significant increases in homelessness and housing need, as well as uncertainties over welfare reform and increasing competition for private sector accommodation from households currently unable to buy. This section looks at how we plan to implement the reforms and respond to the current challenges, including how we will change our housing waiting list rules, procure sufficient private rented accommodation to meet housing need, and how we will mitigate the impact of the housing benefit and welfare reforms on Croydon.

Homeless and housing applications – the facts and figures Housing need: The supply of social housing available each year is only sufficient to help one in ten applicants on our housing waiting list. As a result, social housing is only allocated to people in the most urgent housing need. Urgent housing need<sup>6</sup> fell gradually between 2004 and 2011 from 3,320 to 1917 households (a 42% decrease), but rose to 2815 in 2011/12 (a 14% rise in one year and is continuing to rise).

**Overcrowding:** In 2010 there were 1,924 households on the housing register who were overcrowded according to the government's bedroom standard. There are also around 800 potential under-occupiers of council housing who could move to smaller homes and "unlock" this underused housing stock.

**Homelessness:** the number of households the council accepted as homeless fell between 2004/05 and 2009/10, but rose for the first time in 2010/11 to 575. The most common reason for homelessness is parental evictions, followed by exclusions by relatives and friends. Croydon was the first London borough to achieve the government target of halving the use of temporary accommodation. The total number of households in temporary accommodation fell by two thirds between December 2004 and March 2010, to 1,267. However, since then it has increased to 1,478 in March 2011 and to 1555 in September 2011.

**Rough sleeping:** In October 2011 we estimated that there were 18 rough sleepers on a typical night in Croydon. There was only one person sleeping rough who had done so for more than a year, and three others who sleep in Croydon intermittently.

# National and regional policy

Housing benefit reform has had the biggest impact on housing need and homeless, compounding the effects of the credit crunch and economic downturn. Government policy towards social housing has been to provide greater discretion for local authorities over housing waiting list rules, and to social landlords over the type of tenancy they can grant, rather than continuing with life long security of tenure. Details of the main changes to housing policy relevant to this objective are provided below.

**Housing benefit reform:** reforms to housing benefit have capped local housing allowance (LHA) rates based on the size of property being

<sup>&</sup>lt;sup>6</sup> Urgent housing need includes homeless households, high priority cases on the housing and transfer registers and urgent supported housing move-on cases

rented. They have also changed the way LHA is calculated, using the 30<sup>th</sup> percentile of market rents rather than the median, thereby reducing the amount payable. From January 2012, housing benefit will only pay for a room in a shared house for under 35 year olds, rather than self-contained accommodation. From April 2013 housing benefit paid to social housing tenants of working age who are under-occupying their property by two rooms or more will be reduced. Housing benefit will be paid direct to the claimant and not to the landlord, unless certain conditions are satisfied.

**Universal credit:** The welfare reform bill proposes to introduce a new out-of-work benefit, universal credit, to cover living expenses and housing costs from 2013. It will be capped at £350 per week for single people and £500 per week for family households.

**Rough sleeping:** The government's *Vision to end rough sleeping: No Second Night Out* (2011) sets out a commitment to end rough sleeping and ensure people receive help as soon as they come onto the streets. The Mayor has been given £20m to help end rough sleeping in London by 2012.

**Homelessness:** The Localism Act 2011 also enables local authorities to fulfil their legal duties to homeless households by providing accommodation with a private landlord, without the applicant's agreement, which could not be done previously. The private sector housing offered must be suitable and the tenancy offered must be for a minimum of 12 months. If the applicant becomes homeless again, through no fault of their own, within two years the council's legal responsibilities towards the household recurs.

**Flexible tenancies:** The Localism Act 2011 introduces a new fixed term flexible tenancy for new social housing tenants, with a minimum term in most cases of five years. It is the Government's intention that tenants

whose circumstances improve will move into private housing on expiry of the fixed tenancy term, thereby releasing more homes for households in housing need.

**Tenancy strategy:** The Localism Act 2011 requires local authorities to develop a tenancy strategy in consultation with housing associations, set out the criteria for the allocation of new flexible tenancies, the duration of the fixed term and the circumstances under which they would be renewed. Sections 150-153 of the Localism Act 2011 commenced on 15 January 2012, and the tenancy strategy for Croydon must be agreed and published by 15 January 2013.

**Housing allocations schemes:** The Localism Act gives local authorities greater freedom to set their own rules about who should qualify to go on the housing waiting list. The waiting list rules must still make sure that social housing goes to the most vulnerable in society and those who need it most. But, councils can now stop people who have no need of social housing from joining the waiting list. The government published new guidance for local authorities on housing allocations, in January 2012 for consultation. The new guidance clearly shows that social homes are expected to go to people who genuinely need them, such as hard working families and ex-servicemen and women. People who do not genuinely need social homes (such as those who already own a home suitable for their use) will not be allowed to join the waiting list. The new guidance expects schemes to give additional priority for housing for members of the armed forces and to ensure residency requirements (i.e. to have lived for 12 months in Croydon) do not apply to them.

### What are the big challenges?

The effects of LHA cap and universal credit – migration to cheaper areas: Changes to the way LHA is calculated will affect around 3,000 existing private tenants in Croydon over the course of 2012. Our main

concern is that tenants in more expensive areas of London will be forced to move to places with cheaper rents like Croydon. We estimate around 550 households will move to Croydon as a direct result of LHA changes in 2012/13 from other London boroughs.

Shared accommodation for people aged under 35: The extension of the single room rate to under 35 year olds will affect around 1,000 existing private tenants in Croydon. Those affected will have to move from self-contained flats into shared houses, unless they are exempt through having stayed in homeless accommodation in the past. We expect this will increase the risk of single homelessness; block people moving out of hostels; and increase the number of homeless 16 and 17 year olds in B&B hotels.

**Increased homelessness:** The anticipated impact of LHA reforms on homelessness in Croydon includes:

- a legal responsibility to arrange housing for 580 extra homeless households in 2011/2013
- an increase in single homelessness by 300 in 2012/13
- increased costs to the council's housing needs service of £1.3m in 2011/2013
- additional costs of £170,000 per year due to increased homelessness acceptances because of greater difficulty in procuring private rented accommodation to alleviate housing need
- Increasing number of people not moving out of supported housing schemes, who are ready to do so.

**Rough sleeping:** There are a number of challenges in preventing rough sleepers from returning to the street which include providing specialist services for rough sleepers with complex needs, how best to engage with entrenched rough sleepers and how to establish and maintain

effective referral arrangements to health services, including mental health services.

Procuring private sector housing: One of the biggest challenges facing the housing strategy is to procure sufficient private rented accommodation for people in housing need. Although we have been successful in the past, it has recently become more difficult. There are a number of reasons for this which include increasing house prices, restricted mortgage lending and more people looking to rent rather than buy. As competition for private rented accommodation increases landlords are becoming less interested in working with the council. Reforms to housing benefit including direct payment to tenants have also had an effect. The challenge for the housing strategy is to provide a better deal for private sector landlords in order to procure sufficient supply to meet growing housing need.

**Housing targets:** There are several national and regional housing targets to which Croydon is expected to contribute. These include:

- Only using B&B hotels as temporary accommodation for homeless families with dependent children in an emergency and never for longer than six weeks
- Halving overcrowding in the social rented sector by 2012 (London)
- Ending rough sleeping by December 2012 (London).

# Priority actions: Customer focused housing advice and options

### Mitigate the impact of HB reform

We will implement our plan to mitigate the impact of HB reform including:

- Providing information for tenants on changes to their benefit and sources of advice, and for landlords receiving direct payments regarding the changes for their tenants
- Dedicated landlord liaison officer: the liaison officer will provide
  advice and support to tenants in larger properties affected by LHA
  caps, help them to remain in their homes if possible, or move if they
  can no longer afford it. This includes mediating with landlords,
  negotiating rent reductions, providing housing and money advice to
  tenants to help make up benefit shortfalls, and making applications
  for direct payment of housing benefit where this will assist.
- **Sustain Project**: Sustain will assist single people affected by the extension of the single room rate to age 35. It will provide advice and support, mediate with landlords, negotiate rent reductions where possible and help people affected to move to shared accommodation where necessary.
- Supporting bids for funding services to assist people affected by the benefit reforms and providing other innovative solutions such as use of empty properties, lodging schemes etc.

# Increase the supply of private sector housing to meet housing need

We aim to secure private accommodation for 1,000 households facing homelessness between April 2012 and March 2015. We have already engaged a range of providers to supply accommodation through our new private licensing agreement (PLA). We are also using our existing deposit bond and placement scheme, housing association leasing scheme and Croylease to achieve this target. We are also making progress with a number of new schemes including:

- Developing a local lettings agency to supply private accommodation for homeless and potentially homeless households in Croydon.
- Exploring new methods to procure or develop additional supplies of accommodation including building temporary housing, purchasing

- existing residential accommodation and converting existing buildings used for other purposes to residential accommodation.
- Establishing a voluntary out of borough options scheme to enable housing applicants who want to live in other parts of the country to access suitable accommodation.
- Increasing our supply of emergency accommodation in the form of Houses in Multiple Occupation (HMO) for homeless people through our PLA providers.
- Exploring options for shared procurement with five boroughs in the South West London Housing Partnership.

## Tackling youth homelessness

Croydon is a regional champion for youth homelessness and has developed a range of innovative services to support young people in danger of becoming homeless. We will continue this work through the following projects:

- Short Time Out Project (STOP): This project has been developed in partnership with CAYSH<sup>7</sup> a local voluntary organisation. It provides short term accommodation for up to 12 weeks for 13 young people normally aged 16 or 17. This project provides a safe and secure environment for young people to assess their options. Family intervention and other support is provided during this period to help them to move-on in a planned way.
- **First Base Supported Lodgings:** This project provides 16 and 17 year olds with a room in a family home. It provides a safe and secure environment to enable the young person to continue to participate in educational and life skill development. This project can also be used to help 18 year old care leavers to remain within their existing home with foster carers. This enables continuity of care and support and

<sup>&</sup>lt;sup>7</sup> CAYSH is a charity that works with disadvantaged young people, for more information about their work go to www.caysh.org

- helps the young person to achieve their full potential. The project assists up to ten young people at any one time.
- **Drop in Zone Advice Service:** The drop-in service brings together youth offending, housing advice and family intervention in a holistic approach to address young peoples' needs. It does not require the young people to make an appointment and this immediate accessibility is the key factor to its success. It assisted 9000 young people in 2011.
- Roving concierge service: this is an out of hours monitoring, assistance and support service that helps to keep young people safe and secure. It also minimises any disturbance or nuisance caused to other residents in the local area from young people's accommodation.
- CRIAS Light: This is a preventative service aimed at young people
  heading towards homelessness. It provides rent in advance and a
  deposit for private rented sector accommodation and is funded by
  Crisis.
- New supported housing: A new 43 unit accommodation based supported housing scheme is being built by South London YMCA at Sumner Road, due to open in June 2012. It will provide a STOP service as well as short term move on units for those young people assessed as needing short term support.

#### Develop a tenancy strategy for Croydon

We will develop a strategic tenancy policy in partnership with registered providers, residents, social housing tenants and housing applicants, setting out criteria for allocation of new fixed term 'flexible tenancies' of social housing, the duration of the fixed term, and the circumstances under which they would be renewed. We will explore a range of options to enable tenants to move out into market housing either to rent or buy. The strategy will also set out criteria for allocating properties at affordable rents and our policy on rent setting for new affordable housing developments. Our housing development team have already

issued interim guidance to housing associations for the delivery of affordable homes. We will start our consultation in 2012 at our annual residents' conference in March 2012, followed by consultation on a draft strategy with housing associations and other stakeholders in the summer of 2012. The final draft strategy will be presented to the council's Cabinet in November 2012.

#### Revise our housing allocations scheme

We will revise our housing allocation scheme in the light of changes in government policy and legislation. Our aim in doing so is to meet significant housing need and to achieve a better balance between housing supply and need. We also want to ensure we maintain strong, active, thriving, cohesive communities; and to reduce concentrations of social, economic and environmental deprivation. Following the publication of the Armed Forces Covenant in May 2011, Croydon became the first London borough to launch a community covenant with the armed services. As part of this covenant we want to ensure our housing policies provide help to members of the armed services including access to housing. We also want to use our housing policies to benefit working people, and those that make a positive community contribution such as volunteering. The scheme will continue to be based on reasonable preference, will assess applicants and place them in the appropriate priority band, and applicants (except homeless households) can state a preference for a particular area of the borough and landlord. The main proposed changes are summarised below:

#### Qualifying for the housing waiting list

We propose to change the rules for qualifying to go on the housing waiting list as follows:

 Setting a 12 month residency requirement for registration on the housing waiting list

- Disqualifying applicants who are registered on other councils' waiting lists
- Disqualifying applicants who have sufficient income or assets to afford market housing to purchase or rent
- Disqualifying applicants who refuse all reasonable offers of accommodation.
- Disqualifying applicants with a poor tenancy record, e.g. rent arrears, recent poor tenancy conduct, anti-social behaviour or criminal behaviour

#### Greater recognition on the housing waiting list

We propose to give extra priority for housing to the following applicants:

- Applicants in training or in work.
- Applicants who are members of the armed forces.
- Applicants who contribute to the community through volunteering.
- Applicants who are foster carers or adoptive parents needing to move.
- Applicants who are vulnerable care leavers with a need for medium to long term tenancy support.

#### Changes to our assessment of housing need

- We will assess overcrowding by using the accommodation standard adopted in the welfare bill
- We will encourage underoccupying social tenants to move to high quality smaller homes thereby increasing the supply of family sized homes
- Applicants living with relatives or friends, or in shared accommodation, or with relatively low medical or welfare needs will no longer qualify for reasonable preference for housing as a matter of course.

- We expect to be able to provide private rented housing for most homeless households.
- Homeless households in temporary accommodation will get a relatively low priority for housing.
- Most housing applicants will be directed to assess their own need for housing and to access information on their housing options on-line.
- We want applicants to be able to make fully informed choices. Those
  who receive offers of accommodation will be given clear information
  explaining the differences between periodic and flexible, fixed term
  tenancies, the assistance available for paying an affordable rent, and
  other relevant information.

The final revised housing allocation scheme will be presented to cabinet in 2012.

# Overcrowding reduction strategy

We will implement the key actions set out in our overcrowding reduction strategy 2010-2014, which includes actions already set out in objective one to deliver the council's new build programme, ensure the affordable homes programme produces the appropriate proportion of family sized homes and deliver the larger homes programme. We will also encourage underoccupiers to move to smaller homes though a range of schemes, working towards a target of 90 moves per year. We will enable overcrowded families to move into suitable private rented accommodation, and we will rehouse more than 100 overcrowded families on the housing waiting list and more than 250 on the transfer list each year.

### Reviewing homelessness in Croydon

We will carry out a review of homelessness in Croydon, in 2012 in preparation for refreshing our homelessness strategy which comes to an end in 2013. The findings of the review and our new proposals for

tackling and preventing homelessness will be included in our housing strategy update to be presented to Cabinet in 2014.

# Implement our rough sleeping action plan

We will implement our action plan for ending rough sleeping by 2012; the three priorities are to reduce the flow of new rough sleepers onto the streets, to support existing rough sleepers into accommodation and to prevent a return to the streets. Actions include:

- creating a director of local services,
- launching a training programme for local volunteers
- developing a befriending and peer mentoring project funded through the South West London Housing Partnership.

We will also explore the development of "wet" (where alcohol is allowed) provision for rough sleepers with high and continuing alcohol abuse.

# Housingmoves, the pan-London mobility scheme

We will participate in the pan-London mobility scheme, allocating 5% of available council homes through it (approximately 25 per year).

# Establish an accessible housing register

We will implement the accessible housing register to make best use of wheelchair accessible and adapted properties. We will also work with housing applicants with disabilities carers and others to improve our arrangements for allocating accessible and adapted housing.

### Promote home ownership

We will promote home ownership among moderate income households by helping council tenants gain a stake in their existing homes through the Social HomeBuy scheme; paying grants to council tenants to help them buy their own homes in the private sector (see the APPS scheme in 1.9 below) and holding two conferences a year on opportunities for low cost home ownership. We will also promote the Mayor of London's First Steps initiative.

# Action plan 3: Customer focussed housing advice and options

| Ref | Key activity  | Milestones | Director lead                          | Key Performance measure  |
|-----|---|------------|--|--|
| 3.1 | <b>Implement a strategy to reduce homelessness</b> arising from changes in housing benefit including; | On-going   | Director of Housing Needs and Strategy | <ul> <li>No. of households<br/>accepted as homeless</li> </ul> |
|     | Communication for tenants and landlords   |            |  |  |
|     | Landlord-tenant liaison   |            |  |  |
|     | <ul> <li>Support for vulnerable tenants to remain, or move if accommodation unaffordable</li> </ul>   |            |  |  |
|     | Increased access to move-on accommodation for   |            |  |  |

|     | supported housing residents  |                               |  |   |
|-----|--|-------------------------------|--|---|
| 3.2 | Access 1000 units of private accommodation for homeless  | On-going                      | Director of Housing Needs and Strategy | No. households living in                                      |
|     | and potentially homeless households through:   |                               |  | temporary   |
|     | a deposit bond and placement scheme  |                               |  | accommodation   |
|     | <ul> <li>private licensing agreement (PLA)</li> </ul>  |                               |  |   |
|     | <ul> <li>a property management service (HALS)</li> </ul>   |                               |  |   |
|     | <ul><li>a leasing scheme (Croylease)</li></ul>   |                               |  |   |
|     | <ul> <li>development of a local lettings agency (subject to options appraisal)</li> </ul>                                      |                               |  |   |
|     | <ul> <li>Explore a range of innovative methods of procuring or<br/>developing an additional supply of accommodation</li> </ul> |                               |  |   |
|     | <ul> <li>Establishing a voluntary out of borough options scheme.</li> </ul>  |                               |  |   |
|     | <ul> <li>Increasing our supply of emergency accommodation in</li> </ul>  |                               |  |   |
|     | the form of Houses in Multiple Occupation (HMO)  |                               |  |   |
| 3.3 | Revise and implement housing allocation scheme   | Revised scheme to be          | Director of Housing Needs and Strategy | No. households on   |
|     | Consult on draft scheme early 2012   | published                     |  | housing waiting list  |
|     | <ul> <li>Publish final strategy summer 2012</li> </ul>   | July 2012                     |  |   |
| 3.4 | Develop and publish a tenancy strategy for Croydon   | New strategy to               | Director of Housing Needs and Strategy | Date tenancy strategy   |
|     | <ul> <li>Consult on draft strategy summer 2012</li> </ul>  | be published<br>November 2012 |  | published   |
|     | <ul> <li>Publish final strategy before 15 Jan 2013</li> </ul>  |                               |  |   |
| 3.5 | Tackle youth homelessness through a range of provision   | On-going                      | Director of Housing Needs and Strategy | No. of 16-17 year olds  |
|     | including:   |                               |  | households accepted as  |
|     | Stop project   |                               |  | homeless  |
|     | <ul> <li>First Base Supported Lodgings</li> </ul>  |                               |  | <ul> <li>No. care leavers accepted<br/>as homeless</li> </ul> |
|     | Drop in Zone Advice Service  |                               |  | as nomeiess   |
|     | CRIAS Light  |                               |  |   |
|     | New supported housing – Sumner Road  |                               |  |   |
| 3.6 | <b>Implement rough sleeping action plan</b> , including developing the befriending and peer mentoring project                  | March 2013                    | Director of Housing Needs and Strategy | No. rough sleepers in     Croydon                             |
|     | - O : 1 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -  |                               |  | Croydon   |

| 3.7 | Participate in the pan London mobility scheme  | On-going                               | Director of Housing Needs and Strategy | • | Housingmoves figures  |
|-----|--|--|--|---|---|
| 3.8 | Establish an accessible housing register and improve arrangements for allocating accessible and adapted housing. | Register to be developed by July 2012. | Director of Housing Needs and Strategy | • | No. accessible homes on register % accessible homes allocated to people with disabilities |

# OBJECTIVE 4 – MANAGING AND SUSTAINING STRONG, SUCCESSFUL AND THRIVING COMMUNITIES

The effective management of social housing is an essential element of developing and sustaining strong, successful and thriving communities. Housing management provides the support and, when required, the enforcement necessary to ensure that existing social housing estates and new developments successfully knit into the surrounding community. It contributes to how places develop and succeed and, when done well, helps residents derive a sense of security, satisfaction and comfort from a place, as well as a sense of belonging and commitment to it. Croydon has a good track record in this area; housing was assessed as a 4 star service in the final Comprehensive Performance Assessment in 2008. We are also a beacon authority for resident participation and community engagement - Croydon is one of the few stock retained London boroughs to have achieved the decent home standard.

# Housing management – the facts and figures

**Deprivation:** Deprivation is concentrated in two main areas of Croydon: the north-west and south-east; Fieldway is the most deprived ward in the borough and is among the poorest 20% of wards in the country. Smaller pockets of deprivation are dispersed throughout the borough, mostly related to social housing estates. According to the Index of Multiple Deprivation, Croydon is ranked the 16th most affluent of the 33

London boroughs authorities, and 213th most affluent of the 354 English local authorities. There are pockets of deprivation in the borough, with nine areas ranked in the 10% most deprived areas in the UK. There are also 21 areas in the south of the borough ranked in the 20% most wealthy areas in the country. 8

**Crime:** Fear of crime is high, particularly on social housing estates. This is despite a 10% reduction in recorded crime over the past 3 years and a crime rate that is below the London average. The main hot spots for crime are in and around Croydon's town centre.

**Anti-social behaviour:** The council takes action on more than 2,000 complaints a year from tenants and leaseholders about anti-social behaviour. Complaints generally concerning litter, noise and abandoned cars. Residents list their top priorities as safer, cleaner estates and neighbourhoods, and more youth provision.

Housing management performance: local authority business plan statistics provide a wide range data which gives a good picture of a council landlord's overall performance. Croydon is one of the few stock retained London boroughs to have achieved the decent homes target and has consistently been in the top 25% of performers in London since 2004-05. Our performance in completing urgent repairs on target has

<sup>&</sup>lt;sup>8</sup> For more information on how these areas are indentified and ranked see Index of Multiple Deprivation 2010 at www.imd.communities.gov.uk

steadily improved over the past nine years from 94% to over 99%. The 2010/11 performance is the 2nd highest in London, up from joint 11th in 2009/10. The time we take to relet empty council homes has been very consistent over the past four years at around ten days on average, and has improved by 4.4 days since 2002-03. The average energy efficiency of our council homes has been consistently in or very close to the top 25% of London boroughs over the past nine years. Overall tenant satisfaction in Croydon has been consistently over 70% since 2000 and has been in the top 25% of London Boroughs over the past ten years. This data demonstrates the council has made consistent improvements in most areas of its housing management service over the past eight years, and has been a front runner in making council homes decent, delivering tenant satisfaction and improving the energy efficiency of its dwellings.

# National and regional policy

The focus of government policy concerning the management of social housing has been towards ensuring landlords crackdown on fraud and anti-social behaviour. At the same time residents are being given stronger tools to hold their landlord to account. The introduction of housing self-financing also makes effective housing management crucial to the success of council HRA business plans. Details of the main changes to housing policy relevant to this objective are provided below.

**Tenant scrutiny:** In 1 April 2010 the housing regulator, (then) the Tenant Services Authority introduced a common set of housing service standards for all social housing providers. In October 2010, however the government set out introducing significant changes to social housing regulation. The Tenant Services Authority (TSA) will be abolished, and from April 2012 the Homes and Communities Agency (HCA) was to take over its role. In addition social housing tenants will take a lead role in monitoring their landlord's compliance with the standards (hence the term "co-regulation").

**Tenant cashback:** In April 2011 the government, announced plans to give tenants more control over the budget for repairs and maintenance of their homes, and to share in any saving this produces, hence tenants cashback. Tenants will be able to come to an agreement with their landlord to carry out simple repairs themselves, and groups of residents can also take responsibility for repairs to a particular block or estate. There are currently three registered providers piloting tenant cashback.

Tenancy fraud: It is estimated that up to 50,000 homes may be unlawfully sublet in England, costing the public purse nearly £1 billion per year. The Audit Commission recently reported social housing tenancy fraud as the most significant area of fraud facing Local Government. The National Fraud Authority launched a project in September to encourage local authorities and housing associations to tackle tenancy fraud much more aggressively. The housing regulator has also included tackling unlawful occupancy in its proposed Tenancy Standard. The government is currently consulting on proposals to strengthen action against tenants committing tenancy fraud including introducing a maximum penalty of two years imprisonment and/or a fine of £50,000.

Anti-social behaviour: Enabling social landlords to take firm action to tackle anti-social behaviour is a priority for the government and there are plans to make it easier to evict tenants from social housing guilty of anti-social behaviour. Following the civil unrest in August 2011 there are also plans for tenants or members of their family found guilty of serious anti social behaviour or criminality beyond the immediate neighbourhood of their home, to also face eviction.

Tenants' complaints and the single Housing Ombudsman: Provisions in the Localism Act 2011 mean all housing complaints will go to a single Housing Ombudsman from April 2013. Under these arrangements tenants' complaints also must be referred to a local designated representative, such as a recognised tenant's panel, MP, or local

Councillor before it can be considered by the single Housing ombudsman

# What are the big challenges?

Families with multiple problems: providing children and young people with a good start in life is an overarching strategic priority for Croydon. We have around 800 families with five or more disadvantages, and we are committed to work intensively with them to provide the support they need, and to reduce the duplicated and wasted costs of different public agencies working in isolation from each other. Croydon participated in the community budget pilot and has recently established the family resilience service, a multi-professional team including health, social care, community safety, education and job centre plus staff, which provides targeted support to families with complex needs and multiple problems aiming to reduce domestic violence and developing parental competence. Many of these families live in social housing and Croydon Landlord Services has a significant role to play in ensuring ongoing engagement and delivering high quality support focusing on tenancy sustainment.

**Transparency:** Tenant scrutiny takes resident involvement to the next level, which presents a fresh set of challenges for social landlords. They must ensure monitoring information is not only accurate but clear and understandable in order to meet the challenge of transparency. Performance indicators are often effective "can openers", however, resident scrutineers will need the necessary skills, training and information to carry out this responsibility effectively.

Meaningful involvement in maintenance: On the face of it tenant cashback could be the ultimate in tenant empowerment and potentially increase tenant satisfaction in the process. However, it also provokes concerns about quality, liability, conflicts of interest and inevitable clashes between cyclical maintenance and individual demands. There are a range of challenges in working up a safe effective scheme including minimising one off set up costs and indirect costs produced by

less standardisation, limiting health and safety risks and protecting the value and standard of our housing assets. The obvious safeguards around health and safety, gas and electricity, and concerning the quality and appropriateness of work being carried out will need to be a part of tenant cashback arrangements to protect both landlord and tenant.

Effective business processes in housing management: From 1 April 2012, the HRA subsidy system will cease, a new system of self-financing for council housing will begin. Future plans for investment assume 100% rent collection and a 2% void rate. These assumptions make effective rent collection, managing debt, tackling tenancy fraud and achieving quick turnaround of empty properties of vital importance to social landlords and to the success of their self-financing plans going forward.

# Priority actions: Managing and sustaining strong, successful and thriving communities

#### **Croydon Landlord services**

We have recently set up an internal arrangement similar to that of a housing arms-length management organisation (ALMO). Our provider division, Croydon Landlord Services (CLS), has operational responsibility for day-to-day property, estate and tenancy services. Our client division is responsible for developing housing strategies and plans, developing the annual budget, monitoring the provider's performance, ensuring compliance with governance arrangements, supporting resident scrutiny and identifying best practice. We have drawn up a service level agreement between CLS and DASHH and this agreement will form the basis of our performance management arrangements going forward. It will also provide a framework around which we can ensure our "client" and tenant scrutiny roles are effectively aligned.

### **Tenant scrutiny**

We already have a number of tenant audit, performance monitoring, service review and inspection mechanisms in place, including resident inspectors (auditors), mystery shoppers, neighbourhood voices, estate

inspections, surveys and service review groups. We have already started the process of developing an independent tenant scrutiny panel. We have recruited tenant scrutiny members to the panel through an independent selection process. We have developed the panel's terms of reference, identified training needs and procured a training provider. The tenant scrutiny panel's main role will be to hold the CLS to account in the provision of housing management services. The next stage will be induction training, followed by a detailed programme of training and development. Our established arrangements for resident inspection and mystery shopping which will help to inform and shape the panel's work programme. We will also explore opportunities to work with other social landlords in Croydon to enable residents to scrutinise services in respect of a specific geographic area or a particular service or issue; for example repairs, quality of life issues or anti-social behaviour. We will also establish arrangements to work with the Health, Social Care and Housing Scrutiny Sub-Committee on housing issues of mutual interest. Croydon is also a regional resident involvement champion and we will be organising workshops and events to enable social landlords to share experiences and developing good practice.

Contribute to the work of the family resilience service

We have recruited specialist tenancy support officers to work closely with vulnerable families who may also be at risk of losing their home. We will continue to adopt a holistic approach through working with other agencies that will lead to improved outcomes for our families and also lead to a reduction in the costs associated with later intervention.

# Roll-out the tenancy fraud initiative (TAT)

We set up the tenancy audit team (TAT) in October 2011, with four dedicated officers and a team manager. The team has started work on the Waddon Estate and has completed over 400 visits to date. The team's aim is to visit every tenanted property on the estate and verify the tenant is still in occupation, working closely with colleagues in internal audit. Good links have been made with the UK Border Agency to deal with immigration issues and any suspected trafficking. The team

have also dealt with a range quality of life issues including untaxed vehicles, obstructive parking and untidy gardens. An application for possession of one abandoned homes has been made to the county court and several cases of suspected benefit fraud are also under investigation. We will "roll out" this approach to tackling tenancy fraud across the borough over the course of the strategy.

Review arrangements for dealing with housing complaints We will review our current arrangements for dealing with housing complaints in the light of the changes to be brought in by the localism act.

### Implement tenants cashback

We will explore opportunities for tenants to carry out simple repairs themselves, or to contract with local traders. We will learn from the pilot initiatives, consult with tenants and develop an initiative that will give tenants the choice and opportunity to participate in a tenant cashback scheme if they wish.

# Tackling anti-social behaviour

Anti social behaviour (ASB) remains a key issue for our residents and communities, and we will undertake a range of actions to improve our response to anti-social behaviour over the course of this strategy. We will update our policies and procedures to ensure they make effective use of any new powers being made available. We have signed up the *Respect – ASB Charter* and this will form the basis a new "local offer" to residents. We are committed to supporting local communities to solve problems and we will develop local community safety action groups to enable this process. The council will work with partner agencies providing training and advice to increase consistency in approach and improve joint working. Keeping our estates clean and safe is a priority for us as it is for our residents. We will develop and implement a new volunteer neighbourhood warden service that will provide tenants and leaseholders the opportunity to gain new skills and experience to assist them into employment. Recruitment to the scheme will commence in

March 2012. We will also give neighbourhood wardens the appropriate enforcement powers including being able to issue fixed penalties to those responsible for dog fouling, fly tipping and litter. We will continue to provide a community mediation service and look at how best to secure best value for money going forward.

everyone living on our estates. An all ages steering group has been established. The group will lead the development of an all ages action plan and strategy to help engagement across all ages and improve community cohesion across our estates.

# All ages initiative

A further initiative we have been working on is bringing people of all ages together to share ideas and discuss common issues affecting

# Action plan 4: Managing and sustaining strong, successful and thriving communities

| Ref | Key activity  | Milestones   | Director lead   | Key Performance<br>measure  |
|-----|---|--|---|---|
| 4.1 | Agree and implement service level agreement (SLA) for Croydon Landlord services and establish effective performance management arrangements aligned to and supportive of the remit of the residents' scrutiny panel   | Establish SLA performance management arrangements June 2012          | Director of Housing Needs and Strategy                                | SLA Performance<br>report   |
| 4.2 | Establish effective arrangements for resident scrutiny, including working in partnership working with housing associations on recruitment and training, on issues of joint interest, and with the Health, Housing and Social Care Scrutiny Sub-Committee.                               | Establish work panel programme March 2012.  Annual report March 2013 | Director of Housing Needs and Strategy                                | <ul> <li>% tenants very or<br/>fairly satisfied with<br/>the overall<br/>performance of their<br/>landlord</li> </ul> |
| 4.3 | Contribute to the work of the family resilience service through the appointment of three designated tenancy support officers in CLS, providing support to families of council tenants with complex needs and multiple problems – focusing in tenancy sustainment and arrears management | On-going   | MD Croydon Landlord Services, Director of<br>Housing Needs & Strategy | <ul> <li>No. families<br/>supported</li> <li>% tenancies<br/>successfully sustained</li> </ul>                        |
| 4.4 | <b>Introduce a scheme to prevent tenancy fraud</b> in social housing through audit, photographic ID cards for new tenants, training of  | On-going   | MD Croydon Landlord Services, Director of Housing Needs & Strategy    | No. unauthorised occupiers evicted.   |

|     | social housing providers, publicity and investigations   |            |  |  |
|-----|--|------------|--|--|
| 4.5 | Review arrangements for dealing with housing complaints  | March 2013 | MD Croydon Landlord Services, Director of Housing Needs & Strategy | % of housing<br>complaints resolved<br>to satisfaction of<br>complainant   |
| 4.6 | Introduce a tenant cashback scheme to enable tenants to become involved in the maintenance of their homes and share in any savings.  |            | MD Croydon Landlord Services, Director of Housing Needs & Strategy | No. tenants taking up<br>tenants cashback<br>offer   |
| 4.7 | <ul> <li>Improve approach to tackling anti-social behaviour (ASB) through:         <ul> <li>Run a pilot programme of voluntary tenant neighbourhood wardens</li> <li>Update policies and procedures to include new ASB powers</li> <li>Develop new local offer based on Respect – ASB charter</li> <li>Develop local community safety action groups</li> </ul> </li> <li>Review provision of community mediation service with a view to securing best value for money</li> </ul> |            | MD Croydon Landlord Services, Director of Housing Needs & Strategy | <ul> <li>No. ASB complaints<br/>successfully resolved</li> <li>% residents very fairly<br/>satisfied with<br/>arrangements for<br/>tackling ASB</li> </ul> |

## Part three: Health and well-being

## OBJECTIVE 5 – ACHIEVING INDEPENDENCE THROUGH HOUSING SUPPORT



Housing support helps people leaving an institution such as hospital or prison or recovering from addiction or a traumatic experience to regain independence and resilience. It helps older people and people with learning

disabilities or mental health problems to achieve and sustain independent living. It helps prevent people from experiencing crises and the need for more intensive intervention, avoiding additional costs to health, social care, probation and homelessness services. It is a positive, cost effective and person-centred service that saves more than £3 for every £1 invested. Housing support can be provided in purpose built accommodation with support staff or by providing services to people in their own homes (known as "floating support") or through providing adaptations, handypersons repairs and other similar support measures that help people live independently in their own homes for longer.

The need for housing support – the facts and figures
In total nearly 7,000 people benefit from housing support services in
Croydon, which includes 4,000 people living in supported housing or
receiving floating support.

**Ageing population:** Nationally, between 1983 and 2008 the proportion of people aged 65 and over increased slightly to 16%. However, the

number in the oldest age categories (aged 85 and over) doubled from 0.6 million to 1.3 million. By 2033 the proportion of people aged 65 and over will increase to 23%, and the proportion of people aged over 85 will double again to 3.3 million representing 5% of the population. The proportion of the population aged between 16 and 64, however, is expected to fall from 65 per cent to 59 per cent.

Young people and unaccompanied minors: As the London borough with the largest population and a high proportion of children and young people Croydon has a high demand for supported housing services for young people at risk of homelessness, young people leaving local authority care and teenage parents. Croydon is also home to the only place in the UK where a claim for asylum can be made, the UK Border Agency's asylum screening unit. As a result of this the council is the 'corporate parent' for the highest number of looked-after unaccompanied asylum seekers in the UK. These are young people who arrive in the UK with no adult to assume responsibility for them. The eligibility for housing of asylum care leavers aged 18 and over depends on immigration status.

**Disability:** There is no single statistic that captures the extent of our disabled population. There are 51,300 people in Croydon with a limiting long term illness or disability, which is just below the national and London average. There are also around 6,800 people aged 65 or over who need support with mobility tasks. Almost 3,900 in Croydon are blind or partially sighted. Nearly one in four people aged 65 and over have one or more chronic health condition, representing 10,900 people.

**Estimated supported housing need:** In 2006 the Greater London Authority, Housing Corporation and National Housing Federation collaborated to produce an estimate of the supported housing need in London, Building for All. The estimate for Croydon found that there was no need for additional supported housing up to 2016 and that changes in the demand from different client groups could be met by making

changes to existing services. Building for All provides a useful method for estimating overall housing support needs; however, it does not capture local trends that fall outside the data used in its projections. In Croydon there are a number of client groups whose need for housing support has begun to change quite significantly in recent years:

- The number of young people aged 18 to 25 years old with learning disabilities that have reached adulthood and require continuing care has been steadily increasing; 139 people were in this group in 2008/09. This increased to 154 in 2009/10 and is projected to reach 188 in 2010/11 (need actual).
- There are around ten chaotic drinkers, who are likely to have longterm physical health conditions and many will require care, who need medium to long-term "wet" (where alcohol is allowed) supported accommodation.
- There are around ten vulnerable people with complex needs including mental health and substance use problems that need supported housing for the medium to long-term.
- The number of people presenting as homeless because of domestic violence.

#### National and regional policy

**Transformation of adult social care:** One of the government's priorities in recent years has been to transform adult social care. The policy was initially set out in the 2005 green paper <u>Independence, Wellbeing and Choice</u>, and further developed in the 2006 white paper <u>Our Health, Our Care, Our Say</u> and the 2007 concordat between government, local government, independent sector providers and the NHS, <u>Putting People First</u>. The coalition government has reinforced this approach by emphasising the need for a cultural shift in health and adult social care, moving power down through the system and, where possible, putting people "at the heart of what we do, not as beneficiaries but as participants, in shared decision-making".

**Personalisation:** One of the key parts of the transformation is the "personalisation" of social care by enabling service users to decide on the care and services they receive through self-directed support and personal budgets.

**Reablement and hospital discharge:** In October 2010 the department of health announced an extra £70 million would be allocated to primary care trusts for hospital discharge support. Local authorities, NHS trusts and community health services have been given the responsibility for drawing up plans to facilitate seamless care for patients on discharge from hospital and to prevent avoidable hospital readmissions.

**Supporting People:** The Supporting People programme was introduced in 2003 to bring together seven different supported housing funding streams into a single programme. Since 2003 central government has gradually relaxed its control over how Supporting People funding is administered and services commissioned. Local authorities now have complete discretion over how to spend Supporting People funds to best meet local needs. From 2011/12 onwards Supporting People funding is included as part of the main government grant to local authorities, the formula grant.

Housing benefit and welfare reform: As mentioned before the government has introduced plans to radically reform welfare and housing benefits and they will have a significant impact on people requiring housing support, most of whom are dependent upon welfare benefits. Particularly significant is the proposal to extend the housing benefit shared accommodation rate from people aged under 25 to people under 35. The key concern is the impact on vulnerable people moving-on from short term supported housing and being able to access a private sector tenancy. The government has recently consulted specifically on proposed changes to housing benefit in supported housing services and we await the outcome of that consultation. Whilst

there are risks for the council these proposals could potentially enhance the council's role in commissioning supported housing.

**Rough sleeping:** The elimination of rough sleeping in London by 2012 remains a high priority for the Mayor of London, and Supporting People funded outreach and resettlement services will continue to play a key role in achieving this target. A recent multi-agency estimate indicates that rough sleeping in Croydon has increased from 11 in 2010 to 18 in 2011. Croydon's rough sleeper agencies are signed up to the Mayor for London's No Second Night Out initiative

#### What are the big challenges?

**Demographic change – ageing and disability:** The proportion of people in our population likely to need housing support to live independently is increasing. This will increase demand for support services. It will also increase demand for equipment and home adaptations, handypersons services, telecare and telehealth and other services associated with ageing such as memory loss

Housing for older people: Only one in twenty older people in Croydon live in housing specifically provided for older people, and despite an ageing population we have not seen an increase in demand for traditional "sheltered" housing in recent years. Instead older people now prefer to stay in their own homes and have services delivered to them, for example through handypersons services, home improvements and telecare. As a result some of our sheltered housing has become increasingly difficult to let.

Welfare and housing benefit reform: We estimate that the extension of the housing benefit shared accommodation rate will affect around 1,000 people in Croydon and will have a substantial affect on our ability to provide move-on accommodation for young people ready to leave supported accommodation. Our research estimates there will be an

increase of up to 300 single homeless people in 2012/13 and 80 in 2013/14 as a result of this reform.

**Institutional shared accommodation:** We provide housing support services to more than 500 adults in Croydon with long-terms support needs helping them to live independently in their own home. However, a proportion of our supported housing for adults with support needs is in hostels and large group homes. This institutional style provision is no longer considered appropriate for person centred or for enabling people to achieve independence.

Achieving efficient, focused services: The government's deficit reduction strategy has required local authorities to reduce their expenditure over the four years to 2015. Funding for housing support has been reduced by 12%. In Croydon we have had to reduce expenditure on housing support in 2011/12 by £340,000, and have achieved this by renegotiating with service providers, tendering and redesigning services. We have a good track record in this area and in the past have been able to respond to cuts in funding through focusing on efficiency with providers and reducing hourly and unit costs to make council resources go further. A significant issue for the council is how much further the drive for efficiency can go in driving down costs.

# Action plan 5: Achieving independence through housing support

#### Reviewing our housing for older people

Our older peoples housing strategy sets out our need for housing for older people and extra care housing, and our plans to improve our overall housing offer to older people in Croydon. We have already made major changes to the way we deliver housing support to older people, moving from resident wardens in all schemes to providing visiting support and more technology such as community alarms and telecare through our Careline service. We will commence a review of

our housing for older people in April 2012. Part of the review will be to assess whether certain schemes are suitable for refurbishment to a higher physical standard, converted to general needs housing, or to be sold and the receipt re-invested into improving other schemes. We will work with housing associations providing housing for older people in Croydon to ensure a co-ordinated strategic approach to improving service provision borough wide.

#### Major adaptations scheme

We will enable 100 older or disabled council tenants and 220 private sector occupants to get major aids and adaptations to their homes in 2012/13.

**Disabled facilities grant:** We will provide financial assistance to eligible home owners or private tenants to enable a disabled person to gain access to their dwelling, to move around it and access kitchen and bathroom facilities. The assistance is in the form of a grant to meet the costs of undertaking the works required. The grant is subject to a means test, with the exception of families with a disabled child or young person. The maximum award is £30,000. We have made £1.9m available for disabled facilities grants for 2012/13, which should finance a programme of 190 grants.

Minor repairs and improvements scheme - Staying Put
Our Staying Put Home Improvement Agency will enable 1300 older
people per year to stay in their homes through providing advice, repairs
and improvements, handyperson service and hospital discharge service.

#### Redeveloping supported housing assets

With our support South London YMCA was awarded capital funding from the Homes & Communities Agency to redevelop the site of the Cornerstone Hostel which will enable the closure of the seriously outdated Lansdowne Hostel in 2012. In addition we have well established plans with SLYMCA to redevelop:

• Sumner Road Hostel which will be completed in 2012

#### • Alexandra Hostel site which will be completed in 2012

The extent of any unmet supported housing demand for adults at risk of social exclusion after the provision of new services (e.g. Alexandra Hostel, Sumner Road) will be reviewed. The Millennium Foyer remains in need of redevelopment and we will explore with South London YMCA the best way of taking this forward.

• Providing self-contained and small- scale sharing accommodation
As part of our implementation of personalisation we will identify and
decommission hostels and shared housing schemes for people with
disabilities and mental health problems where bathrooms are shared by
4 or more people and/or where people have inadequate kitchen
facilities. This will be part of our on-going service review programme
and each service will be looked at individually with a view to how the
accommodation can be improved to support the aims of the service.

#### Improving supported housing services

Young people and care leavers: We will establish a programme to replace the small shared houses we use for young people services. We will also implement the findings of the review of young people and care leaver supported housing services conducted in 2011. In particular we will address young peoples' concerns relating to safety and the quality of support on offer, as well as ensuring that young people are equipped for and are realistic about the move on choices open to them.

**Domestic violence:** We will help victims of domestic violence by providing twenty bed spaces in women's refuges and supporting ten people through floating support in their own home each year. From April to September 2010, 65 women from out of borough benefitted from these services. During the same period the national domestic violence helpline received 891 calls from Croydon residents and 160 women were accommodated in out of the borough refugee provision, therefore the net exports were far greater than the net imports.

**Offenders:** We will help 100 offenders each year returning to Croydon following completion of sentence to resettle by providing supported

housing or floating support. We will also review services for exoffenders to ensure satisfactory quality and performance and to identify any opportunities for further efficiencies.

**Substance misuse services:** In partnership with the Drug and Alcohol Action Team (DAAT) we will review the need for "wet" hostel facilities for alcohol dependent single homeless people. We will also recommission outreach services for drug users who have successfully completed a rehabilitation programme.

**Rough sleepers:** In light of the impact recent severely cold winters have had on our resources and of predictions that future winters are could be as severe, we will review our cold weather provision.

#### Procurement – new framework agreement

We will complete the renewal of the Supporting People Framework Agreement to ensure that all Supporting People services are contracted for on a sound legal basis and that best value is achieved through an open competitive process. We will continue to achieve value for money with emphases on costs, outcomes, throughput rates and shared services, and we will explore the opportunities for some services to be contracted through "payment by result". The new framework will be approved for use in March 2012. We will then embark on exploring new shared commissioning arrangements with neighbouring boroughs either through a shared framework agreement or commissioning shared services, and this work will be carried out over the next twelve to eighteen months.

### Action plan 5: Achieving independence through housing support

| Ref | Key activity  | Milestones | Director lead                             | Key Performance measure   |
|-----|---|------------|---|---|
| 5.1 | Review our housing provision of housing for older people in partnership with housing associations   | March 2013 | Director of Adult Care Commissioning      | Date review completed   |
| 5.2 | Major adaptations programme - Enable 320 older or disabled people to get major aids and adaptions to their homes                            | On-going   | Director of Housing Needs and<br>Strategy | <ul> <li>Target – assist 320         people needed         adaptations</li> </ul> |
| 5.3 | Assist 200 people disabilities to adapt their homes with through the provision of disabled facilities grants                                | On-going   | Director of Housing Needs and<br>Strategy | Target 200 grants   |
| 5.4 | Staying Put Home Improvement Agency – enable 1300 people stay in their own homes, including supporting work to reduce hospital readmissions | On-going   | Director of Housing Needs and<br>Strategy | Target assist 1300 people needing minor adaptations                               |
| 5.5 | Redevelop supported housing assets, including  • Sumner Road Hostel  • Alexandra Hostel  • Increasing level of self-contained accommodation | March 2013 | Director of Adult Care Commissioning      | No. new self contained services provided  |

| 5.6 | Improving supported housing services, including services | March 2013 | Director of Adult Care Commissioning | <ul><li>% people assisted to</li></ul> |
|-----|--|------------|--------------------------------------|--|
|     | for  |            |                                      | achieve independent                    |
|     | Young people and care leavers                            |            |                                      | living through planned                 |
|     | Domestic violence  |            |                                      | departures                             |
|     | Offenders  |            |                                      |  |
|     | Substance misuse   |            |                                      |  |
|     | Rough sleepers   |            |                                      |  |
| 5.7 | Renewing the Supporting People Framework Agreement       | March 2013 | Director of Adult Care Commissioning | Date framework                         |
|     | and explore opportunities for shared commissioning       |            |                                      | commences.                             |
|     | arrangements   |            |                                      |  |

## OBJECTIVE 6 – IMPROVING HEALTH AND WELL-BEING THROUGH DECENT HOMES AND NEIGHBOURHOODS

Good quality housing provides more than our basic need for shelter and warmth. It allows young people to grow and develop in healthy surroundings; it provides a safe, secure place for people to rest and recharge; and with sufficient space it allows people of all ages to study, think and learn. At the right price or rent it is a platform for economic self sufficiency and an opportunity to plan and provide for the future. It is an essential part of health and well-being. On the other hand insecure housing and homelessness create stress and anxiety. Neighbourhoods plagued by vandalism, anti-social behaviour and harassment destabilise feelings of safety and security leaving residents helpless, distressed and nervous. Poor quality homes that are cold, damp and badly maintained contribute to accidents and injuries, and to a range of medical and physical conditions.

This section of the strategy looks at how good quality housing and housing services contribute to improving health and well-being. It looks directly at the improvements that can be made to people's health and

to the saving that can be made on acute services as a result. It examines how we can learn from and adapt existing good practice, direct our activity and resources towards Croydon's health priorities and encourage closer joint working between housing and health professionals. It concludes by setting out the priorities we should focus on in Croydon and a plan detailing the practical actions we can take to contribute to the improvement of health outcomes over the next four years.

#### What is health and wellbeing?

What do we mean by health and well-being, and how widely or narrowly should we draw the definition? The World Health Organisation defines health as:

[Health is] a state of complete physical, mental and social well-being `and not merely the absence of disease or infirmity" 9

 $<sup>^9</sup>$  World Health Organisation (1978) *Declaration of Alma-Ata*. International conference on primary health care, 6–12 September, Alma-Ata.

In Croydon we have also drawn a deliberately wide definition. The following definition was set out by Croydon's Joint Director of Public Health, Dr Peter Brambleby, in his annual public health report published in December 2010<sup>10</sup>:

"Health and wellbeing is more than the absence of disease; it is the ability for everyone in Croydon to fulfil their potential, make a contribution and be resilient to life's challenges"

#### Housing and health

Housing has always been identified as one of the most important requirements for good health. The origins of government intervention to improve housing go back to the 19th century and concerns about public health from overcrowding and from unsanitary housing conditions<sup>11</sup>. The latter part of the 20<sup>th</sup> century saw dwindling political interest in the issue of poor housing, despite evidence of widening inequalities in society and recognition of the health consequences of poor housing. The Black Report<sup>12</sup> into health inequalities published by the Department of Health and Social Security in 1980 identified housing as one of the "prime prerequisites for health". It set out a wealth of evidence on the association between housing conditions and health, including infant mortality and overcrowding, and housing insecurity and depression. It went on to recommend increased spending on housing improvements, better co-ordination of policies and joint funding for health and local authorities to tackle certain aspects of housing. The Health Education Council followed up the Black Report in 1987 with The

Health Divide: Inequalities in health in the 1980s. The report references a number of research studies that examine the association between poor housing and poor health.

The British Medical Association published a report in 2003, *Housing and Health: building for the future*, examining the evidence in relation to health and housing, suggesting ways of ensuring all people benefit from good quality housing and looking at future direction of policy. The report recognises:

"Multiple housing deprivation appears to pose a health risk that is of the same magnitude as smoking and, on average, greater than that posed by excessive alcohol consumption<sup>13</sup>"

The Marmot Review, also looking at health inequalities and published in February 2010, identified housing as one of the wider determinants of health:

"...the distribution of health and well-being needs to be understood in relation to a range of factors that interact in complex ways. These factors include whether you live in a decent house."

The Chartered Institute of Housing published a report, *Housing, health and care*<sup>14</sup>, in December 2009, looking at how public sector agencies could work together to improve health and well-being. Although some of the detail has now moved on, for example the performance framework around Local Area Agreements (LAA), the examples of good practice are very interesting and informative. The National Housing Federation has also recently published a report, *Housing for Health*:

 $<sup>^{10}</sup>$  Annual Report of the Joint Director of Public health for NHS Croydon and Croydon Council, December 2010.

<sup>&</sup>lt;sup>11</sup> Chadwick E (1842) Report on the sanitary conditions of the labouring population of Great Britain. London: HMSO

<sup>&</sup>lt;sup>12</sup> Inequalities in Health [report of the working group on inequalities in health under the Chairmanship of Sir Douglas Black], DHSS (1980) http://www.sochealth.co.uk/Black/black9.htm

<sup>&</sup>lt;sup>13</sup> Marsh A, Gordon D & Pantazis C et al (1999) *Home sweet home? The impact of poor housing on health*. Bristol:The Policy Press

<sup>&</sup>lt;sup>14</sup> Housing, Health and Care, Chartered Institute of Housing (December 2009)

worlds aligned- a tool for local influencing<sup>15</sup>, explaining how housing associations can influence public health, clinical commissioning groups and contribute to health improvement.

Health and housing – the facts and figures on health costs

There is considerable evidence demonstrating how poor quality housing impacts on health spending. The following examples provide a compelling case for investing in housing improvements to save on expenditure on treating ill-health.

**Cold housing:** It is estimated that the treatment of cold-related illnesses and conditions is a substantial cost to the NHS of approximately £1billion per year<sup>16</sup>.

**Fuel poverty:** Age UK estimates that every 1 degree drop in average winter temperature below 18°C results in 8,000 additional winder deaths in the UK. And for every additional winter death there are 8 admissions to hospital, 32 visits to outpatient care and 30 social services calls. The extra pressure this places on health and social care services every winter is considerable <sup>17</sup>.

**Housing hazards:** 17 times as many people are injured in the home or garden than at work; nine times as many as on the roads<sup>18</sup>.

**Unhealthy housing – national costs:** The Building Research Establishment estimates health outcomes from unhealthy housing are costing the NHS around £660m per year<sup>19</sup>.

**Trips and falls:** Peter Ambrose's East London study estimates that hip fractures caused by falls cost the NHS £726 million per year

#### National and regional policy

The government's overarching policy objective is to reduce the current budget deficit and health and social care services have been required to make substantial efficiency savings as part of the 2010 spending review. Demographic pressures, public expectations and medical advances have also increased demand for services which further increases the need to find ways of making resources go further. Details of some of the main changes to government health and housing policy relevant to this objective are provided below:

**Health and social care bill:** introduces a fundamental shake up of the National Health Service. Particularly relevant to this objective is the introduction of clinical commissioning groups and the requirement to establish health and well-being boards. A lot of work has already been done in Croydon to progress these proposals, including the establishment of a shadow health and well-being board in April 2011.

**Public Health Outcomes Framework:** In January 2012, the government announced the public health outcomes framework against which councils and the government will be measured. Alongside this a ringfenced public health budget was also announced with £2.2 billion going to local authorities, £2.2 billion to the NHS Commissioning Board for national measures such as breast and cervical cancer screening, £210 million to the new Public Health England body and £620 million to the department of health for campaigns such as flu vaccination.

**Localism Act 2011**: The Localism Act 2011 focuses on decentralisation, local decision making and local communities having more power to become involved, to take on services and to hold providers to account. Housing reforms included in the act provide for social landlords to be

<sup>&</sup>lt;sup>15</sup> Housing for health:worlds aligned, National Housing Federation (November 2010)

<sup>&</sup>lt;sup>16</sup> Office of the Deputy Prime Minister (2003b)

<sup>&</sup>lt;sup>17</sup> Age UK <a href="http://www.ageuk.org.uk/get-involved/campaign/preventing-winter-deaths/">http://www.ageuk.org.uk/get-involved/campaign/preventing-winter-deaths/</a>.

<sup>&</sup>lt;sup>18</sup> Data combined from information from RoSPA and HSE

<sup>&</sup>lt;sup>19</sup> Nichol et al 2010

able to offer flexible, fixed term tenancies to housing applicants, and to discharging the homelessness duty with an offer of private sector housing without the applicants consent. The act also allows greater freedom for local authorities to set their own rules about who should qualify to go on the housing waiting list.

Housing benefit and welfare reform: The recent reforms to housing benefit in the form of caps to benefit rates and extending the single room rate to people aged under 35(previously 25) will have an impact on housing insecurity, financial debt, migration of households to cheaper areas, households rationing spend on food and energy consumption all of which could contributing to deteriorating health and well-being. These reforms combine with recent increases in homelessness as a result of the credit crunch and economic downturn.

Hospital discharge, reablement and "winter pressures": In October 2010 the department of health wrote to chief executives of strategic health authorities in England advising that an extra £70 million would be allocated to PCTs for post discharge support. PCTs were expected to devise "local plans in conjunction with the Local Authority and FT/NHS Trusts and community health services on the best way of using this money to facilitate seamless care for patients on discharge from hospital and to prevent avoidable hospital readmissions." In December an extra £162 million was also to be provided for local authorities to help with reablement during the winter period. The "winter pressures" funding would be allocated to PCTs, for them to transfer to councils to spend on social care support. Primary care trusts and local authorities would then decide how best to use the additional funding to make the greatest impact on relieving additional pressures on hospitals over the winter period.

#### The impact of housing on health

The table below reproduces the evidenced-based framework developed by the United Kingdom Public Health Association which summarises the complex relationship between health and housing<sup>20</sup>.

| Housing Impact                  | Health Impact  |  |  |
|---------------------------------|--|--|--|
| Housing need                    |  |  |  |
| Homelessness and rough sleeping | (see 2011 Crisis briefing on life expectancy of rough sleepers) Mental health, anxiety, depression Stress Injury Infection |  |  |
| Housing affordability           | Mental health, anxiety,<br>depression<br>Stress  |  |  |
| Security of tenure              | Mental health, anxiety,<br>depression<br>Stress  |  |  |
| Decent homes                    |  |  |  |
| Overcrowding and space          | Infectious diseases TB, influenza. meningitis  |  |  |

<sup>&</sup>lt;sup>20</sup> Social Determinants of Health – Housing: A UK Perspective, Hacker, Ormandy and Ambrose (2010)

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|   | Mental health, anxiety, depression Sleep deprivation Stress Lack of educational achievement (CIEH, 2008) Infant mortality Developmental delay |
|---|---|
| Excess cold (SAP < 35)  | Bronchitis, Influenza, Pneumonia, Heart attack, Stroke, Hypothermia Worsens rheumatoid arthritis, leg skin ulcer healing                      |
| Domestic hazards (home and garden)  | Trips and falls injury/trauma, accidental death   |
| Decent neighbourhoods   |   |
| Anti-social behaviour Fear of crime Nuisance Harassment Resident participation Resident empowerment | Mental health, anxiety,<br>depression<br>Stress<br>Social exclusion   |
| Vulnerable groups   |   |
| Housing support Adaptations Equipment   | Mental health, anxiety, depression Social exclusion   |

| Mobility |
|----------|
| ,        |

Local priorities – health needs and housing conditions
It is important that we direct our activity and resources towards those areas that are a priority for Croydon. We can start to identify these areas using information from our Joint Strategic Needs Assessment (JSNA) and from our Joint Director of public health's annual report.

**Health needs:** Overall health in Croydon is similar to the England average. Average life expectancy is above average for men and women; the death rate from all causes has fallen and is lower than the national average for men and has fallen for women and is similar to the national average; early death rates from heart disease, stroke and cancer have also fallen in the last ten years.

In 2009/10 Croydon's Joint Strategic Needs Assessment examined geographical health inequalities in Croydon, including differences in life expectancy and mortality rates between Croydon's most deprived and least deprived areas<sup>21</sup>. The key findings were:

- Life expectancy in Croydon is increasing at the same rate for all, but there is gap between the most deprived 10% of areas and the least deprived 10% of 10.6 years for men and 5.7 years for women<sup>22</sup>.
- All cause all age mortality rates are also falling across the borough at roughly the same rates in the most deprived and least deprived areas. However, the mortality rate was 760.3 per 100,000 for the most deprived 20% of areas and 410.5 per 100,000 for the least

This is as measured by the 2003-07 slope index of inequality indicator used in the NHS World Class Commissioning assurance framework. Males = 10.6 years (95% confidence interval: 8.9 to 12.33); Females = 5.7 years (95% confidence interval: 3.4 to 8). Source: Association of Public Health Observatories www.apho.org.uk/resource/view.aspx?RID=75050

 $<sup>^{21}</sup>$  Tackling health inequalities – a programme for action, DH (2003). Introduced PSA target

deprived 20% of areas. Figure 24 below shows the distribution of all cause, all age mortality rates across Croydon's LSOAs.

The 2011/12 JSNA core dataset indentifies statutory homelessness and households in temporary accommodation as being significantly worse than the national average. Fuel poverty, however is identified as being significantly better than the national average.

Programme budgeting: Programme budgeting is a technique for assessing investments in health programmes rather than health services. By dividing the expenditure by programme budgeting areas it is possible to analyse how Croydon performs relative to other areas. Differences in spending may be the result of different needs and demands, or different configurations of services. However, they might highlight areas where there is room for review and innovation. The Department of Health published a programme budgeting benchmarking tool in December 2011, which includes data comparative data on the following programmes:

- Mental health disorders (programme 05): Croydon is ranked 66
  nationally and spends £20.6m per 100,000 people in the borough.
  Mental health is the biggest single budget category in Croydon. The
  Joint Director of Public Health's 2010/11 annual report suggested the
  Health and Well-being Board consider a strong focus on promoting
  mental well-being, building resilience and maximising protective
  factors, which would include tackling homelessness, as well as
  tackling anti-social behaviour and harassment.
- Problems of circulation (programme 10): Croydon is ranked 57
  nationally and spends £13.71m per 100,000 people in the borough.
  The association between excess cold and circulation problems would
  suggest tackling poor housing conditions, particularly poor thermal
  comfort and improving energy efficiency should be a priority in
  Croydon.

- Problems of the respiratory system (programme 11): Croydon is ranked 109 nationally and spends £7.78m per 100,000 people in the borough. The link between indoor air quality and respiratory problems would suggest tackling overcrowding and poor housing conditions, particularly dampness as a priority for Croydon.
- Problems due to injuries and trauma: Croydon is ranked 66
  nationally and spends, £7.08m per people in the borough. The Joint
  Director of Public Health's 2010/11 annual report suggested focusing
  on prevention of accidents which would include tackling hazards in
  the home.

**Housing conditions (BRS data 2008):** Croydon has the largest private housing sector in London with 122,011 homes. 83% are owner-occupied and 17% private rented. Most of the borough's private housing is in good condition; however, a significant proportion is in poor condition. The worst housing conditions in the borough are found in the private sector.

In 2005, BRE (formerly the Building Research Establishment) carried out a study of stock condition in Croydon, using modelled data from the English House Condition Survey and the 2001 census, and updated it in 2007 and 2008. The key findings of the 2008 update are as follows:

- 10% (11,397) of private housing is in disrepair
- 17% (20,086) of private housing has category 1 hazards under the HHSRS
- 24% (28,370) of private housing provides inadequate thermal comfort
- 6% (6,695) of private housing lack modern facilities
- 37% (42,973) of private housing fails the decent home standard
- The estimated cost of removing all private sector category 1 hazards

is £227m<sup>23</sup>.

Unhealthy housing – the costs to Croydon NHS: Using the Chartered Institute of Environmental Health (CIEH) Housing Health and Safety Rating System cost estimator tool we can estimate the costs to the NHS of housing (HHSRS) hazards in Croydon (based on private sector housing stock of 120,000 owner occupied and private rented dwellings).

| HHSRS hazard       | Cost to NHS per annum |  |  |
|--------------------|-----------------------|--|--|
| Crowding and space | £251,400              |  |  |
| Entry by intruders | £1,658,600            |  |  |
| Damp               | £90,600               |  |  |
| Excess cold        | £6,427,400            |  |  |
| Level falls        | £1,745,400            |  |  |
| Stair falls        | £888,400              |  |  |
| Total              | £11,061,800           |  |  |

#### **Good practice**

There are a number of examples of good practice we can learn, draw inspiration from and incorporate aspects of into our strategy action plan, for example:

- Walsall Health through warmth scheme tackles fuel poverty, cold related illness and excess winter deaths.
- **Liverpool** Healthy homes initiative tackles unhealthy unsafe housing reducing accidents.
- **Blackpool** Integrated streamlined working which enables direct referrals from GPs to the Home Improvement Agency
- Sandwell Repairs on prescription provides free service to people
  on low incomes ineligible for benefits who have respiratory illness
  or mental health conditions exacerbated by non-decent housing.

## Priority actions to improve health and well-being through decent homes and neighbourhoods

The housing strategy includes a range of programmes aimed at achieving five other housing objectives:

- 1. Optimising the supply of new housing
- 2. Protecting and improving existing housing
- 3. Customer-focussed housing advice and options
- 4. Sustaining strong, successful and thriving communities
- 5. Achieving and sustaining independence through housing support

These action plans set out the activity we will undertake to meet housing need through increasing affordable housing supply, improve existing housing, tackle and prevent homelessness, provide housing support and provide effective management for social housing.

Focusing activity, resources and effort towards our priorities To work in partnership to focus and co-ordinate activity, resources and effort, including exploring opportunities to "spend to save", towards the following housing programmes:

- Implementing plans to meet housing need, tackle homelessness, increase the supply of private sector housing and mitigate the local impact of housing benefit and welfare reforms.
- Private sector housing renewal and improving the energy efficiency of private sector housing occupied by vulnerable households.
- Tackling housing hazards to prevent falls and accidents through licensing and enforcement powers.
- Providing adaptations, handypersons and other related services to enable people to achieve and sustain independence.

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<sup>&</sup>lt;sup>23</sup> HSSA 2011 CLG.

 To support local hospital discharge arrangements and support the implementation of the reablement plan

#### Joint training and development

To establish a programme of joint training, raising awareness and sharing guidance, information and practice for public agencies interested and involved in improving health and housing in Croydon.

#### Improved referral procedures

To develop improved, streamlined referral procedures to ensure those affected by insecure housing, homelessness, or unhealthy housing conditions, anti-social behaviour or harassment can be effectively directed to the appropriate services and receive the appropriate assistance and support.

#### Housing strategy evidence base – health and housing To develop a health and housing section in the housing strategy

evidence base to be published in 2012 and to assist and contribute to the production of Croydon's Joint Strategic Needs Assessment.

#### Follow up and provide evidence of improved outcomes

To explore the development of mechanisms for gathering evidence of improved outcomes, including surveys of self-assessed well-being and looking for opportunities to work with academic institutions interested in carrying our research into the impact of housing on health.

#### Community support initiatives

Explore opportunities for collaboration on community support initiatives that aim to improve health and well-being in Croydon with housing associations, voluntary and community organisations and other interested agencies.

### **Health champions**

To contribute to the development of the health champion community leadership programme with a view to engaging the participation of social housing residents.

### Action plan 6: Improving health and well-being through decent homes and neighbourhoods

| Ref | Key activity   | Milestones    | Director lead   | Key performance measure  |
|-----|--|---------------|---|--|
| 6.1 | Work in partnership to focus and co-ordinate activity, resources and effort, including exploring opportunities to "spend to save", towards the following housing programmes:  Implementing plans to meet housing need, tackle homelessness  Private sector housing renewal  Tackling housing hazards, particularly excess cold.  Providing adaptations, handypersons and hospital discharge services | On-going      | Director of Housing Needs and<br>Strategy                           | <ul> <li>No. households assisted via various housing programmes</li> <li>Estimate of savings to health services using established methodology (ICIEH)</li> </ul> |
| 6.2 | To establish a programme of joint training for housing and health professionals  | March<br>2013 | Director of Housing Needs and<br>Strategy and Joint Director Public | No. training sessions held   |

|     |   |                  | Health  |   |  |
|-----|---|------------------|---|---|--|
| 6.3 | To develop improved, streamlined referral procedures  | March<br>2013    | Director of Housing Needs and<br>Strategy and Joint Director Public<br>Health | • | No. referrals from health services to housing programmes     |
| 6.4 | To develop a health and housing section in the housing strategy evidence base   | December<br>2012 | Director of Housing Needs and Strategy  | • | Date health and housing section completed and published      |
| 6.5 | To explore the development of mechanisms for gathering evidence of improved outcomes  | March<br>2014    | Director of Housing Needs and<br>Strategy and Joint Director Public<br>Health | • | % of residents self reporting improved health and well-being |
| 6.6 | Explore opportunities for collaboration on community support initiatives  | March<br>2014    | Director of Housing Needs and<br>Strategy                                     | • | No. of residents assisted through community initiatives      |
| 6.7 | contribute to the development of the health champion community leadership programme with a view to engaging the participation of social housing residents | March<br>2013    | Joint Director Public Health  | • | No. resident health champions                                |

### Implementing the strategy

The housing strategy has been developed in consultation with our residents and partner organisations. We have presented and discussed our proposals and approach with a range of different groups, including:

- Health, Social Care and Housing Scrutiny Sub-Committee
- Carers Partnership Group
- EQUA
- Assets and Places Board
- Council Management Team
- Annual residents conference, March 2011
- Tenant and Leaseholders Panel
- Housing strategy conference, November 2011
- Shadow Health & Well-being Board
- CROHAG (Croydon Housing Association Group)

#### An active responsive document

The final draft of the housing strategy will be presented to the council's cabinet on 19 March 2012. We want this strategy to be an active and responsive document that keeps up with national and local changes in policy and demand for services. We will continue to engage with stakeholders and partners on the implementation of our strategy action plan.

#### **Annual updates**

We will present a report to the council's cabinet and to the shadow health and well-being board setting out the progress made in implementing the action plan. The strategy comes to an end in 2015 and we will conduct a through review of the policy landscape, the extent of housing need and the demand for services, and consult with our residents, partners and stakeholders on our proposals for a new strategy during that year.

#### On-going research into housing need and key housing issues

Throughout the year we work on gathering national and local data, monitoring our services, conducting surveys, benchmarking our housing services with other social landlords to ensure we keep up to date with changes in housing policy and demand. The housing strategy evidence base that supports our housing strategy will be updated every year and published annually alongside the annual housing strategy update reports.

#### Resources

An important part of implementing this strategy is to make sure we continue to focus on being efficient, and on the need to drive down costs. To achieve this we will maximise our revenue collection and combat tenancy fraud. We will work closely with other departments and agencies, to identify joint aims and goals, adopt a "total place" approach where it's appropriate. We will look for opportunities to achieve efficiencies through working smarter, together. We will also explore different ways of working, or of configuring services where this helps to achieve the same outcomes for less expenditure.

#### Contact details for comments and suggestions

We hope you have found the housing strategy informative, thought provoking and that it clearly sets out our plans to deliver new housing, meet housing need and provide excellent housing services going forward to 2015. However, if you have any queries concerning the strategy, or wish to discuss any of the issues it raises please contact the housing strategy manager in the department of adult services, health and housing; the contact details are provided below:

Write to: David Morris, housing strategy manager, DASHH, Croydon council, Taberner House, Park Lane, Croydon CR9 3JS

Telephone: 020 8726 6000 ext 60539

Email: <a href="mailto:david.2.morris@croydon.gov.uk">david.2.morris@croydon.gov.uk</a>;