

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	6th December 2023	
REPORT TITLE:	Housing Strategy 2023- 2028	
CORPORATE DIRECTOR / DIRECTOR:	Susmita Sen, Corporate Director for Housing	
LEAD OFFICER:	Simon James, Change Manager (Housing) Email: simon.james@croydon.gov.uk	
LEAD MEMBER:	Councillor Lynne Hale, Cabinet Member for Homes and Deputy Mayor	
KEY DECISION? [Insert Ref. Number if a Key Decision] <i>Guidance: A Key Decision reference number will be allocated upon submission of a forward plan entry to Democratic Services.</i>	Yes 8323EM	REASON Key Decision – Decision significantly impacts on communities living or working in an area comprising two or more Wards
WARDS AFFECTED:	All	

1 SUMMARY OF REPORT

- 1.1 The current report presents a refreshed Housing Strategy 2023- 2028 to Cabinet for approval. The report details the factors driving the need for a Housing Strategy and the methodology of its development, including feedback on the draft Housing Strategy from our residents and partners.

2 RECOMMENDATIONS

For the reasons set out in the report and appendices, the Executive Mayor in Cabinet is recommended to:

- 2.1 Consider:
- 2.1.1 the feedback received from the Homes Scrutiny Committee held on 23rd October,

- 2.1.2 the feedback received on the draft Housing Strategy 2023-2028 from residents and partners via the engagement and consultation process as detailed in Appendix B, and
- 2.1.3 the Equalities Impact Assessment detailed in Appendix C
- 2.1.4 The Housing Delivery Plan detailed in Appendix D
- 2.2 Delegate authority to Corporate Director to make minor amendments in conjunction with Executive Mayor and Cabinet Member prior to publication.
- 2.3 Agree the Housing Strategy 2023- 2028 as detailed in Appendix A; and
- 2.4 **RECOMMEND** the Housing Strategy 2023- 2028 to Full Council for adoption.

3 REASONS FOR RECOMMENDATION

- 3.1 The Housing strategy sets out the long-term objectives of Croydon Council in relation to how we aim to improve all housing related services including the management of our stock, homelessness and rough sleeping and the supply of affordable accommodation.
- 3.2 Together with the Housing Transformation programme agreed at Cabinet in December 2022, it sets out a pathway as to how the Council will comply with the Regulator of Social Housing Consumer Standards and improve services provided to Croydon residents.
- 3.3 The Housing Strategy 'sits above' and presents an overview of the following associated strategies, Homelessness and Rough Sleeping, Asset Management and Resident Engagement.
- 3.4 Following the contraventions of the Regulator of Social Housing Standards and the importance of improving services to residents that this has identified, the production of a Housing Strategy setting out how the Council will improve all housing related services, is of paramount concern to all Members.
- 3.5 Equally, the role of the Improvement and Assurance Panel in identifying housing as a key concern, makes it appropriate that this matter is referred to full Council for consideration.

4 BACKGROUND AND DETAIL

Drivers for developing the Housing Strategy 2023- 2028

- 4.1 The Council does not have a statutory duty to produce a housing strategy for the borough, nonetheless, the adoption of the Housing Strategy 2023- 2028 will enable the Council to address the increasingly complex and challenging context within which we deliver housing services. The Housing Strategy 2023- 2028 provides the strategic foundation for the development of forthcoming strategies including the Asset Management Strategy, Resident Engagement Strategy and Homelessness Prevention & Rough Sleeping Strategy. The strategies demonstrate a forward-thinking and

proactive approach to shaping the future of our housing services which will provide much needed direction in these areas.

- 4.2 Following the 2017 Grenfell Fire tragedy and wider concerns regarding the conditions of social housing, the Council must adhere to a series of legislation which will improve both living conditions and building and fire safety standards for social tenants and homes. The legislation increases the accountability of social landlords, including the Council, to the Government in ensuring their social homes are safe and residents are treated with respect. The social housing legislation will also be joined by revised standards for social landlords enforced by the Regulator of Social Housing and revised Decent Homes Standards.
- 4.3 The Government has also recognised that housing conditions must also be improved for private rented sector tenants. The Council will soon be required to adhere to the Renters (Reform) Bill which will extend the Decent Homes Standard to the private rented sector. The socio-economic context in which we deliver housing services, such as the national cost-of-living crisis, increased interest rates and the subsequent unaffordability of the private rented sector, has increased demand for our services as more residents are unable to afford their rent. The pressures on our housing services have led to an increase in the number of residents in emergency and temporary accommodation where many residents remain for several years owing to the lack of availability of affordable homes in the private rented sector.
- 4.4 In 2021, the Regulator of Social Housing found the Council to be in breach of the Regulator's two consumer standards: the Home Standard and the Tenant Involvement & Empowerment Standard. From May 2022, the Council subsequently developed the [Residents' Charter](#) and the [Housing Transformation Programme](#). The Housing Transformation Programme is a programme of individual projects which aim to improve and transform our housing services for which the Housing Strategy 2023-2028 provides the strategic framework. The Housing Transformation Programme has identified specific areas of our services which require immediate improvement whilst the Housing Strategy 2023- 2028 sets out our longer-term ambitions.
- 4.5 The Improvement and Assurance Panel (IAP) was commissioned by the Secretary of State for Levelling up, Housing and Communities to advise and assist on the Council's financial recovery strategy and report on the progress of the Croydon renewal plan. In the remit given to the Panel, housing was identified as one of the priority areas for improvement.
- 4.5.1 The Exit Strategy (October 2023) devised by the IAP and produced in conjunction with the Council sets out the progress required by 2025. Within the document, it sets out the necessity to produce a Housing Strategy to provide necessary direction for the service.

Methodology for developing the Housing Strategy 2023- 2028

- 4.6 The Housing Strategy 2023- 2028 has been developed in response to the resident and partner feedback and insight the Council has received following the Council's breach of the Home Standard and the Tenant Involvement & Empowerment Standard. In the summer of last year, the Council held 20 vision and mission sessions with residents, tenants, leaseholders, staff, and partners to identify the long-term vision of our housing services, and what 'good' housing services looked like. The feedback from these sessions underpinned the development of the draft priorities and objectives of the Housing Strategy 2023- 2028.
- 4.7 The draft priorities and objectives also reflect feedback from tenants and leaseholders received through the consultation on rent increases that were held in December 2022. The consultation identified the following key priorities of tenants and leaseholders: keeping neighbourhoods clean and tidy, improving the repairs service, tackling anti-social behaviour, and improving neighbourhood safety.
- 4.8 The Council recognises that housing services are not the only Council services that contribute to ensuring residents have access to safe, warm, and dry homes. The Housing Strategy 2023- 2028 has involved subject-matter-experts across the Council including colleagues from adult's social care, children's social care, and spatial planning. Co-production across the Council has identified key issues for our housing services including the provision of appropriate accommodation for care-experienced young people, older people, and the development of the Local Plan 2019- 2039.
- 4.9 Delivering good housing services that residents deserve requires the Council to become more outward-looking in identifying best-practice and learning from our peers. The Housing Directorate has worked closely with key colleagues from other London borough and London Councils to identify best-practice methods for co-producing the Housing Strategy 2023- 2028 and meaningfully consulting with our residents and partners.
- 4.10 Staff, Members, residents, and partners have shaped the Housing Strategy 2023-2028 through targeted focus group sessions and the survey consultation. The feedback received on the draft priorities and objectives of the Housing Strategy 2023-2028 through consultation and engagement with our residents and partners is detailed in Section 5.

Delivering the Housing Strategy 2023- 2028

- 4.11 The Housing Strategy 2023- 2028 will be underpinned by a Delivery Plan (see Appendix D) which will detail the key actions and milestones to be achieved by 2028 to ensure our strategic priorities and objectives are delivered.
- 4.12 The key milestones will be SMART (specific, measurable, achievable, relevant, and time-bound) and reviewed as part of our Housing Transformation Programme. The key milestones will align with the Council's existing key performance indicators, including the Tenant Satisfaction Measures and our performance against the Regulator of Social Housing's Consumer Standards.

- 4.13 The strategic priorities and objectives of our Housing Strategy 2023- 2028 will be reviewed against imminent changes to legislation including the introduction of revised Consumer Standards by the Regulator of Social Housing and the revised Decent Homes Standard.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1 The following alternative options were considered ahead of developing the Housing Strategy 2023- 2028:

- Do not produce a new housing strategy
- Delay the development of a new housing strategy

- 5.2 The alternative option of not producing a new housing strategy was rejected for the reasons listed in 3.1- 3.5. The Council rejected the option of delaying the development of a new housing strategy on the basis that the Housing Strategy 2023- 2028 is key to setting the foundation for subsequent strategies which will enable the urgently required improvement and transformation of housing services.

6 CONSULTATION

- 6.1 The draft priorities and objectives of the Housing Strategy 2023- 2028 went out to consultation through an online survey questionnaire. The survey asked respondents whether they agreed or disagreed with the draft priorities. The online survey was live for seven weeks from 14th June to 2nd August 2023. The online survey consultation received 450 responses and showed broad support for all five draft priorities and underlying objectives.

- 6.2 Survey responses regarding the draft priorities and objectives are listed below; further detail is provided in Appendix Two:

- Priority One-*Listen to our residents and provide good services*- strongly agree or agree: 77.2%.
- Priority Two- *Work with our partners and residents and landlords to ensure that homes in the Borough are safe, secure and energy efficient*- strongly agree or agree: 73.6%.
- Priority Three-*Enable people to live healthy and independent lives in their homes and communities*-strongly agree or agree: 75.9%.
- Priority Four-*Maintain the supply of affordable homes that meet the diverse needs of residents in Croydon*- strongly agree or agree: 65.3%.
- Priority Five-*Work with our partners and the local communities to make the best use of resources and manage the demand for housing related services*- strongly agree or agree: 69.9%.

- 6.3 Council staff, Members, residents, and partners were notified of the survey questionnaire via the following channels:
- Staff intranet
 - Weekly Our Croydon staff bulletin
 - Fortnightly Housing Directorate staff newsletter
 - Open House newsletter circulated to tenants and leaseholders
 - Croydon Landlord Forum Newsletter
 - Executive Mayor Perry's Your Croydon newsletter circulated to residents and partners
 - Voluntary, community, and faith sector mailing list
 - Council social media channels
 - Emails directly from the Corporate Director for Housing to Members
 - Emails directly from the Corporate Director for Housing to Croydon MPs
- 6.4 Physical copies of the survey were also made available to our residents and partners in Croydon libraries to enable responses from those without digital access. Targeted sessions were held with the following groups to ascertain more detailed feedback on our draft priorities and objectives, and suggestions as to what these should mean for our residents:
- Residents
 - Tenant and Leaseholder Panel
 - Members through an All-Member briefing on the Housing Strategy 2023- 2028
 - Voluntary, community, and faith sector partners
 - Private rented sector landlords
 - Housing associations
- 6.5 Feedback from the targeted sessions, and changes to the draft priorities and objectives following this feedback is detailed in Appendix B.
- 6.6 The Strategy has also been reviewed by the Tenant and Leaseholder Panel and the Homes Scrutiny Committee.

7 CONTRIBUTION TO EXECUTIVE MAYOR BUSINESS PLAN

- 7.1 The development and implementation of the Housing Strategy 2023- 2028 is key to ensuring the Council delivers against the following priorities within the Mayor's Business Plan 2022- 2026:
- Get a grip on the finances and make the Council financially sustainable.
 - Become a council which listens to, respects, and works in partnership with Croydon's diverse communities.
 - Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors.
 - Develop our workforce to deliver in a manner that respects the diversity of our communities.

- Ensure children and young people have opportunities to learn, develop and fulfil their potential.
- Invest in council homes to drive up standards and develop a more responsive and effective housing service.
- Work with partners and the VCFS to promote independence, health and wellbeing and keep vulnerable adults safe.

8 IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1 There are no direct quantifiable financial implications arising from adopting the Housing Strategy as detailed in Appendix A.
- 8.1.2 Financial implications will be considered alongside non-financial considerations as the Housing Strategy priorities are being planned and implemented to contribute to making the Council financially sustainable.
- 8.1.3 Comments approved by Sarah Attwood on behalf of the Director of Finance. 17/10/2023.

9 LEGAL IMPLICATIONS

- 9.1 Under section 41 of the Greater London Authority Act 1999, as amended, (“GLAA99”), it is a general duty of the Mayor of London to prepare and publish a London Housing Strategy. Under section 333D of GLAA99, any local housing strategy prepared by a local housing authority in Greater London must be in general conformity with the Mayor of London’s London Housing Strategy.
- 9.1.1 Under section 8 of the Housing Act 1985, local housing authorities shall consider and review on a periodical basis the housing conditions in their area and the housing needs of the area with respect to the provision of further housing accommodation.
- 9.1.2 Section 3 of the Housing Act 2004 further imposes a duty on local housing authorities to keep housing conditions in their area under review.
- 9.1.3 Under section 87 of the Local Government Act 2003 (as amended), the Secretary of State for Communities and Local Government has the power to require local housing authorities to have a housing strategy and impose requirements with respect to the ends that the strategy is to be designed to achieve, the formulation of policy for the purposes of the strategy or review of the strategy. The Secretary of State also has the power to order local housing authorities to prepare statement setting out their housing strategy and other material relating to housing. To date, the Secretary of State has not formally exercised these powers. The Explanatory Notes to this Act however describe a local housing authority’s Housing Strategy as: “... the local housing authority’s vision for housing in its area. It sets out objectives and targets and policies on how the authority intends to manage and deliver its strategic housing role and provides an overarching framework against which the authority considers and formulates other policies on more specific housing issues.”

- 9.1.4 The Secretary of State in the 2007 Green Paper “Homes for the future: more affordable, more sustainable” developed the reference to the local housing authority’s strategic role as follows: “The local authority strategic housing role is made up of the strategic decisions and activities associated with effective planning and delivery, to meet the housing needs of all residents across all tenures. Strong performance in this role will support effective place shaping and help ensure delivery of the wider sustainable community. This requires vision, leadership, planning and delivery at a strategic level to: - assess and plan for the current and future housing needs of the local population across all tenures; - make the best use of the existing housing stock; - plan and facilitate new supply; - plan and commission housing support services which link homes to the support and other services that people need to live in them; - work in partnership to secure effective housing and neighbourhood management on an ongoing basis”.
- 9.1.5 Section 225 of the Housing Act 2004 states that “housing” (for the purposes of carrying out the housing needs review required by section 8 of the Housing Act 1985 and for the purposes of preparing a housing strategy under section 87 of the Local Government Act 2003) includes the accommodation needs of gypsies and travellers residing in their area. The Housing Strategy is an overarching document, it sits above the council’s Homelessness strategy and the Housing allocation policy. More recently, the Fire Safety Act 2021, the Building Safety Act 2022 and the Social Housing (Regulation) Act 2023 places obligations and conditions to improve living conditions and building safety for social landlords and the private rented sector.
- 9.1.6 The Public Sector Equalities Duty (“PSED”) set out in section 149 of the Equalities Act 2010 obliges the Council in performing its functions “to have due regard to the need to: a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it”
- 9.1.7 The Housing Strategy document itself is not a formal Planning document and consequently will not form part of the statutory Development Plan. While it will be a material consideration, it will not carry significant weight in the planning development management process.
- 9.1.8 The following general principles of consultation apply: - That consultation must be at a time when proposals are still at a formative stage; - That the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response; - That adequate time must be given for consideration and response; and - That the product of consultation must be conscientiously considered in finalising any statutory proposals.
- 9.1.9 In short, to achieve the necessary degree of fairness, the obligation is to let those who have a potential interest in the subject matter know in clear terms what the proposal is and exactly why it is under positive consideration, telling them enough (which may be a good deal) to enable them to make an intelligent response. The obligation, although it may be quite onerous, goes no further than this.

9.1.10 Approval of the Housing Strategy following consultation is a function reserved to Full Council by Article 4.2. of the Council's Constitution.

9.1.11 There is no legal reason why Cabinet should not adopt the recommendations in this report.

9.1.12 Comments approved by Sandra Herbert Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (Date 03 November 2023.)

10 EQUALITIES IMPLICATIONS

10.1 Under the Public Sector Equality Duty of the Equality Act 2010, decision makers must evidence consideration of any potential impacts of proposals on groups who share the protected characteristics, before decisions are taken. This includes any decisions relating to how authorities act as employers; how they develop, evaluate and review policies; how they design, deliver and evaluate services, and also how they commission and procure services from others.

10.1.2 Section 149 of the Act requires public bodies to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- Foster good relations between people who share a protected characteristic and people who do not share it.

10.1.3 An EQIA has been carried out and shows predominantly positive impact on all protected characteristics. Extensive consultation with residents has been conducted which demonstrates strong support for the key priorities set out in the strategy. This support is coming from all the protected groups. At the implementation stage, individual delivery plans should have a more detailed impact analysis due to likelihood of having direct impact.

10.1.4 Comments approved by Naseer Ahmad, Interim Senior Equalities Officer. (Date 28/09/2023)

OTHER IMPLICATIONS

11 CRIME AND DISORDER IMPLICATIONS

11.1 The Strategy alludes to the low levels of satisfaction amongst residents surveyed in relation to the Council's approach to anti-social behaviour.

11.2 The Council recognises the impact that anti-social behaviour can have on people's ability to lead healthy and independent lives and will ensure that its services are joined

up in working to prevent nuisance both in its management of Council homes but also through the support services it provides to residents who live in the private rental sector.

12 ENVIRONMENTAL IMPLICATIONS

12.1 The Executive Mayor's business plan sets out the Council's commitments to reducing carbon emissions in Croydon.

12.2 These objectives are integrated into the delivery of housing services;

- Our services contracts commit our contractors to the Executive Mayor's objectives when delivering front-line housing services.
- New build housing in the Borough is subject to planning requirements around environmental sustainability.
- The Council's Asset Management Strategy will commit Croydon Council to achieving the Executive Mayor's objectives in the maintenance of its own stock.

13 RISK MANAGEMENT IMPLICATIONS

13.1 Housing has been identified as an area of key concern by the Government and the progress of the Transformation Programme is monitored by the Improvement and Assurance Panel appointed by the Secretary of State. Failure to progress the Housing Strategy would therefore impact on the ability for the Borough to achieve an exit from intervention in July 2025.

13.2 The Regulator of Social Housing has put the Council in contravention of the Homes Standard and the Tenant Involvement and Empowerment Standard. To achieve recognition requires delivering the improvements for Council residents and Leaseholders outlined in the Transformation programme and in the Housing Strategy.

14 APPENDICES

A Housing Strategy

B Housing Strategy Consultation Report

C Equality Information Analysis Form

D Delivery Plan

