

# HOUSING & REGENERATION SCRUTINY SUB COMMITTEE

Wednesday, 10 February 2021 at 6.30 p.m.

Online 'Virtual' Meeting - <https://towerhamlets.public-i.tv/core/portal/home>

This meeting is open to the public to attend.

**Members:**

Chair: Councillor Ehtasham Haque

Vice-Chair:

Councillor Amina Ali, Councillor Dipa Das, Councillor Marc Francis, Councillor Helal Uddin and Councillor Andrew Wood

**Substitutes:**

Councillor Shad Chowdhury, Councillor Mohammed Pappu and Councillor Leema Qureshi

**Co-opted Members:**

Anne Ambrose

Tenant Representative

Moshin Hamim

Leaseholder Representative

[The quorum for this body is 3 voting Members]

**Contact for further enquiries:**

The Committee Services Officer

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Web: <http://www.towerhamlets.gov.uk>

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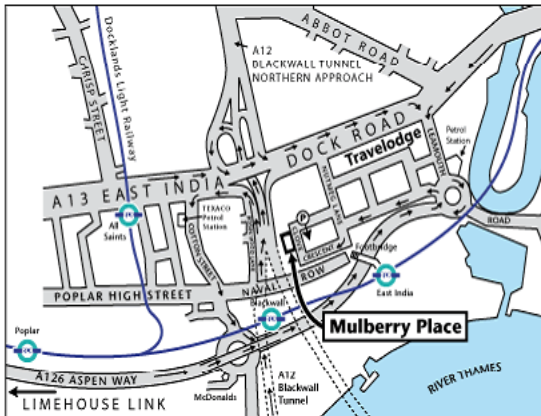
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## **APOLOGIES FOR ABSENCE**

### **1. DECLARATIONS OF INTERESTS 5 - 6**

Members are reminded to consider the categories of interest in the Code of Conduct for Members to determine whether they have an interest in any agenda item and any action they should take. For further details, please see the attached note from the Monitoring Officer.

Members are reminded to declare the nature of the interest and the agenda item it relates to. Please note that ultimately it's the Members' responsibility to declare any interests and to update their register of interest form as required by the Code.

If in doubt as to the nature of your interest, you are advised to seek advice prior to the meeting by contacting the Monitoring Officer or Democratic Services

### **2. MINUTES OF THE PREVIOUS MEETING(S) 7 - 12**

### **3. REPORTS FOR CONSIDERATION**

#### **3 .1 Social Landlord Performance Report 13 - 22**

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### **4. PRESENTATIONS**

#### **4 .1 Comprehensive Regeneration Update 41 - 80**

#### **4 .2 Leaseholder Service Improvement Plan (THH) 81 - 90**

#### **4 .3 Housing Companies Update 91 - 98**

### **5. ANY OTHER BUSINESS**

#### **Next Meeting of the Sub- Committee**

The next meeting of the Housing & Regeneration Scrutiny Sub Committee will be held on Thursday, 15 April 2021 at 6.30 p.m. in Online 'Virtual' Meeting - <https://towerhamlets.public-i.tv/core/portal/home>

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# Agenda Item 1

## **DECLARATIONS OF INTERESTS AT MEETINGS– NOTE FROM THE MONITORING OFFICER**

This note is for guidance only. For further details please consult the Code of Conduct for Members at Part C, Section 31 of the Council's Constitution

### **(i) Disclosable Pecuniary Interests (DPI)**

You have a DPI in any item of business on the agenda where it relates to the categories listed in **Appendix A** to this guidance. Please note that a DPI includes: (i) Your own relevant interests; (ii) Those of your spouse or civil partner; (iii) A person with whom the Member is living as husband/wife/civil partners. Other individuals, e.g. Children, siblings and flatmates do not need to be considered. Failure to disclose or register a DPI (within 28 days) is a criminal offence.

Members with a DPI, (unless granted a dispensation) must not seek to improperly influence the decision, must declare the nature of the interest and leave the meeting room (including the public gallery) during the consideration and decision on the item – unless exercising their right to address the Committee.

**DPI Dispensations and Sensitive Interests.** In certain circumstances, Members may make a request to the Monitoring Officer for a dispensation or for an interest to be treated as sensitive.

### **(ii) Non - DPI Interests that the Council has decided should be registered – (Non - DPIs)**

You will have 'Non DPI Interest' in any item on the agenda, where it relates to (i) the offer of gifts or hospitality, (with an estimated value of at least £25) (ii) Council Appointments or nominations to bodies (iii) Membership of any body exercising a function of a public nature, a charitable purpose or aimed at influencing public opinion.

Members must declare the nature of the interest, but may stay in the meeting room and participate in the consideration of the matter and vote on it **unless:**

- A reasonable person would think that your interest is so significant that it would be likely to impair your judgement of the public interest. **If so, you must withdraw and take no part in the consideration or discussion of the matter.**

### **(iii) Declarations of Interests not included in the Register of Members' Interest.**

Occasions may arise where a matter under consideration would, or would be likely to, **affect the wellbeing of you, your family, or close associate(s) more than it would anyone else living in the local area** but which is not required to be included in the Register of Members' Interests. In such matters, Members must consider the information set out in paragraph (ii) above regarding Non DPI - interests and apply the test, set out in this paragraph.

### **Guidance on Predetermination and Bias**

Member's attention is drawn to the guidance on predetermination and bias, particularly the need to consider the merits of the case with an open mind, as set out in the Planning and Licensing Codes of Conduct, (Part C, Section 34 and 35 of the Constitution). For further advice on the possibility of bias or predetermination, you are advised to seek advice prior to the meeting.

### **Section 106 of the Local Government Finance Act, 1992 - Declarations which restrict Members in Council Tax arrears, for at least a two months from voting**

In such circumstances the member may not vote on any reports and motions with respect to the matter.

**Further Advice** contact: Janet Fasan, Acting Monitoring Officer, Tel: 0207 364 4800.

## **APPENDIX A: Definition of a Disclosable Pecuniary Interest**

(Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, Reg 2 and Schedule)

| Subject   | Prescribed description   |
|---|--|
| Employment, office, trade, profession or vacation | Any employment, office, trade, profession or vocation carried on for profit or gain.   |
| Sponsorship                                       | Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by the Member in carrying out duties as a member, or towards the election expenses of the Member. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.  |
| Contracts   | Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority—<br>(a) under which goods or services are to be provided or works are to be executed; and<br>(b) which has not been fully discharged.   |
| Land  | Any beneficial interest in land which is within the area of the relevant authority.  |
| Licences  | Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.   |
| Corporate tenancies                               | Any tenancy where (to the Member's knowledge)—<br>(a) the landlord is the relevant authority; and<br>(b) the tenant is a body in which the relevant person has a beneficial interest.  |
| Securities  | Any beneficial interest in securities of a body where—<br>(a) that body (to the Member's knowledge) has a place of business or land in the area of the relevant authority; and<br>(b) either—<br><br>(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or<br><br>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class. |

**LONDON BOROUGH OF TOWER HAMLETS**

**MINUTES OF THE HOUSING & REGENERATION SCRUTINY SUB COMMITTEE**

**HELD AT 6.30 P.M. ON TUESDAY, 3 NOVEMBER 2020**

**ONLINE 'VIRTUAL' MEETING - [HTTPS://TOWERHAMLETS.PUBLIC-I.TV/CORE/PORTAL/HOME](https://towerhamlets.public-i.tv/core/portal/home)**

**Members Present:**

Councillor Ehtasham Haque (Chair)  
Councillor Amina Ali  
Councillor Marc Francis  
Councillor Helal Uddin  
Councillor Andrew Wood

**Co-opted Members Present:**

Anne Ambrose Tenant Representative

**Other Councillors Present:**

Councillor Sirajul Islam

**Others Present:**

Pam Bhamra – Chair of Tower Hamlets Community Housing  
Helen Wilson – Clarion Housing  
Catherine Kyne – Clarion Housing

**Officers Present:**

Karen Swift – (Divisional Director, Housing and  
Regeneration)  
Una Bedford – Strategy and Policy Officer (Place)  
Mark Slowikowski – (Strategy, Policy and Performance Manager)  
Rafiqul Hoque – Head of Housing Options  
Shalim Uddin – (Affordable Housing Providers Co-ordinator)  
Joel West – (Democratic Services Team Leader  
(Committee))

**1. WELCOME, INTRODUCTIONS AND APOLOGIES FOR ABSENCE**

Apologies were noted from Councillor Dipa Das.

## **2. APPOINTMENT OF VICE-CHAIR**

Nominated by Councillor Andrew Wood and seconded by Councillor Helal Uddin, it was:

**RESOLVED** that Councillor Marc Francis is appointed vice chair of the sub committee for 2020-21.

## **3. DECLARATIONS OF INTERESTS**

There were no declarations of pecuniary interests, although Councillor Helal Uddin declared an interest in Item 5.3, Social Landlords' Performance Report, as his employer worked closely with Poplar HARCA which was a housing provider included in the report.

## **4. MINUTES OF THE PREVIOUS MEETING(S)**

**RESOLVED** that the minutes of the sub committee meeting, 13 July 2020, are approved as a correct record of the proceedings.

## **5. REPORTS FOR CONSIDERATION**

### **5.1 Housing & Regeneration Scrutiny Sub-Committee Terms of Reference, Quorum, Membership and Dates of Meetings 2020/21**

**RESOLVED** that the sub committee:

1. Note its Terms of Reference, Quorum, Membership, and Dates of future meetings as set out in the appendices and report.

### **5.2 Approval of H&RSSC Work Programme 2020/21**

The sub committee indicated that it would welcome further detail on the specific scope of the fire safety progress report scheduled for the 15th April 2021 meeting.

**RESOLVED** that the sub committee's work programme 2020/21 as set out in the report is approved, subject to a request for officers to explore whether one or more additional meetings could be arranged to ensure ample time is available for discussion of all work plan items.

### **5.3 Social Landlords' Performance Report**

Shalim Uddin, Affordable Housing Coordinator, introduced the report which summarised quarterly performance data for 14 registered providers (RPs) within the borough and an update on the work of the benchmarking group, which was in the process of revising a new set of KPI data. Shalim provided a summary of the key achievements and challenges reflected in the report.



Further to questions from sub committee members, officers:

- Reported that some registered providers have reported difficulties drilling down their performance data to just properties within Tower Hamlets, but officers would request that local performance data is provided wherever possible.
- Advised that future reports would follow a consistent format that would allow members to identify quarter-on-quarter comparisons and trends for each of the providers.
- Provided further detail on the Tower Hamlets Housing Forum Benchmarking sub group's initiative to revise and issue a new set of qualitative and quantitative KPI data, including a KPI handbook.
- Would explore if commentary could be added to explain where performance is below expectation (i.e. those highlighted areas in Appendix 1 where performance is below 85%).

Helen Wilson and Catherine Kyne from Clarion Housing presented a supplementary part of the report, that provided the sub-committee with an overview of Clarion's performance and its plans for the future. Helen and Catherine addressed recent achievements and challenges. They explained that Clarion recognised and accepted the performance issues previously highlighted by the Council and would be producing an action plan to explain how they would be improving in those areas. They agreed to provide the sub committee with a draft of the Annual report that will be produced in September.

Members welcomed the hard work and commitment shown by Helen and Catherine, but indicated frustration at the track record of Clarion Housing and its failure to deliver on similar promises of service improvement that had been made in the past. Members highlighted in particular the feedback from residents who had reported difficulties securing needed repairs and problems with customer service and communication.

The sub committee asked Helen and Catherine if relevant local ward councillors could be engaged in the preparation of the action plan.

The chair noted the frustration expressed by members at the performance of some registered providers and the limited power the council has to hold them to account. He indicated he hoped that the good faith and continued strong partnership arrangements enjoyed between the council and providers in LBTH could result in tangible improvements to the experiences of tenants and leaseholders.

RESOLVED that the sub committee:

1. Noted progress in the performance outturns achieved by individual social landlords and the overall performance trend.
2. Asked officers to:
  - a. explore if a KPI could be introduced to measure effective communication between RPs and residents; and

- b. ensure full consideration was given to the potential equalities impacts of future reports and to ensure that both direct and indirect equalities considerations were highlighted in the relevant report section.

#### **5.4 Homeless Reduction Act (HRA)- One Year On - Report for Approval**

Karen Swift, Divisional Director Housing and Regeneration, introduced the report, that made a series of practical recommendations for the housing options service to improve services for users, following a scrutiny challenge session in March 2020 looking at the impact of the HRA 2017.

The sub committee noted:

- the length of time between the challenge session and the sub committee made it hard to recall the discussion that had taken place; and that draft report had been provided between then and now;
- the proposed recommendations were 'light touch' and members questioned whether they were challenging enough to deliver tangible improvements for service users;
- that some of the report's recommendations were already in progress, as demonstrated in Item 5.5; and
- some of the key personnel of the challenge session (including the chair, Cllr Dipa Das) were not present at this meeting and several of the new (2020-21) sub committee members did not participate in the challenge session.

[Note – at this point in the proceedings the chair chose to defer further consideration of this item pending outcome of discussion of item 5.5, Housing Options Service Delivery Briefing. After consideration of Item 5.5 the sub committee resumed and concluded this item as below].

#### **RESOLVED that:**

1. The draft report 'The Homelessness Reduction Act One Year On' is not approved.
2. The sub committee requests a resumed/additional challenge session be arranged to re-explore the matters raised in the report and draft new recommendations, if appropriate.
3. Any resumed/new challenge session to include consideration of evidence provided by councillors from beyond the sub committee.

#### **5.5 Housing Options Service Delivery**

Karen Swift, Divisional Director Housing & Regeneration, introduced the report, that highlighted what the council is doing to take customer improvement forward in the housing options service and address some of the key recommendations from the previous item (Item 5.4). Karen explained that the service is constantly reviewing the way teams are operating to improve service users' customer experience.

Further to the officer presentation, the sub committee made the following observations.

- Recent feedback from residents to councillors indicated a poor customer experience for those accessing the council's housing options team. Noted that housing options customers comprise some of the most desperate and vulnerable of the borough's residents.
- Improving accessibility, readability and layout of electronic information such as the website, forms etc is critical to enable users to confidently access relevant information and could help to free capacity on telephone helplines. Officers will continue to liaise with digital team colleagues.
- Making it easier for users to contact their housing case worker directly, including a direct dial number, but also alternative contact details such as email.
- The Covid pandemic/lockdown period did have notable disruption to telephone service levels, but remedies were put in place quickly.
- Channel shifting can be a useful tool, but is critical it doesn't lead to a reduction in service for vulnerable service users.
- The Council previously attained external accreditations for its customer services such as Charter Mark. Recommended that past experience and process is revisited to understand how previous high standards might be restored.
- Sub committee members requested data on customer-access related complaints and KPI performance from the housing options service.
- The council should seek to raise awareness of the intermediate housing register and the option of intermediate rent.

The Chair invited Councillor Sirajul Islam, Statutory Deputy Mayor and Cabinet Member for Housing, to address the meeting. Councillor Islam provided some more detail on recent work to improve the housing options service.

**RESOLVED that:**

1. The briefing on the Housing Options Customer Access Project Recovery and Renewal is noted.


**6. ANY OTHER BUSINESS**

There was no other business discussed.

The meeting ended at 8.37 p.m.

Chair, Councillor Ehtasham Haque  
Housing & Regeneration Scrutiny Sub Committee

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|   |   |
|---|---|
| Non-Executive Report of the:<br><br><b>Housing Scrutiny Sub Committee</b><br><br>10th February 2021 |  |
| <b>Report of Ann Sutcliffe, Corporate Director, Place</b>   | <b>Classification:</b><br>Unrestricted  |
| <b>Social Housing Landlords Performance Report – QTR2</b>   |   |

|                               |   |
|-------------------------------|---|
| <b>Originating Officer(s)</b> | Shalim Uddin Affordable Housing Coordinator |
| <b>Wards affected</b>         | All wards                                   |

### Executive Summary

Social Landlords in the borough produce quarterly performance data for key customer facing performance indicators so tenants and local residents can be assured they are delivering effective and customer focused services. The performance report attached at appendix 1 provides cumulative performance data ending Quarter two of the Social Landlords with homes in the borough (including THH), who can provide performance data specifically for properties they manage in Tower Hamlets.

### Recommendations:

The Scrutiny Sub Committee is recommended to:

1. Review and note progress in the performance outturns achieved by individual Social Landlords and the overall performance trend.

### 1. REASONS FOR THE DECISIONS

- 1.1 The Chair of the Housing Scrutiny Sub Committee previously agreed that the Social Landlord Performance information will be submitted twice per annum as a standing item on the committee agenda. This provides opportunity for the committee to review and note for information the performance data that is reported to the Statutory Deputy Mayor also the Cabinet Member for Housing. However, the new chair has requested the KPI data and report be provided for every scrutiny meeting going forward.

### 2. ALTERNATIVE OPTIONS

- 2.1 Member review of Social Landlord performance to remain exclusively with the Cabinet Member for Housing.

### **3. DETAILS OF THE REPORT**

- 3.1 Through the Tower Hamlets Housing Forum (THHF), the Council works with key Social Landlords who manage social rented stock in the borough. THHF through its Performance Management Framework has agreed a set of key performance indicators (KPI's); to review and assess performance and drive performance improvements through the THHF benchmarking sub-group. Quarterly performance information is presented to the Statutory Deputy Mayor also Cabinet Member for Housing and circulated to the Housing scrutiny Sub Committee for information. Good performance is an indicator of quality housing management and supports the Council in ensuring the borough is one that residents are proud of and love to live in whilst also support delivery of partnership priorities.
- 3.2 Cumulative performance information on the agreed list of measures below is attached at appendix 1.:
- % repairs completed in target
  - % respondents satisfied with last completed repair
  - % appointments kept as % of appointments made
  - % properties with a valid gas safety certificate
  - % residents satisfied with how the ASB case was handled
  - % complaints responded to in target
  - % Members Enquiries answered in target
  - Average re-let time in days (General Needs only)
  - % General Needs Income collected
  - % of tall buildings (over 18m) owned by RPs that have an up to date FRA in place
- 3.3 Appendix 1 outlines cumulative performance for quarter two for the fourteen key Social Landlords who operate in the borough, (including THH) who can produce borough specific data. The remaining 7 key Social Landlords can only produce regional data; therefore, performance for these is not included.
- 3.4 To note the Benchmarking group are in the process of revising a new set of qualitative and quantitative KPI data. The group will be focussing on setting measurable definitions as currently not all partners are able to do this. This is due to either using different metric systems or capturing data nationally rather than on a regional level.
- 3.5 Currently the Benchmarking subgroup are in the process of discussion and evaluating stages of which KPI's provide the most accurate feedback. Furthermore, the KPI's need to be applicable to every RP in order for them to report directly or manipulate existing KPI's to capture the data. The group will focus on clarity around measurable outcomes and emphasis on trying to provide as much detail and accurate information as possible in relation to Tower Hamlets only. The group have thus far agreed majority of the current KPI's will remain applicable however, the definitions need to be made clearer. For example, repair times reported is this emergency or general

repairs? responding to members enquiries needs to relate to Tower Hamlets only and not the whole organisation and other borough response times.

- 3.6 With regards to quarter Two some key points to note are:
- 3.7 East End Homes managed to achieve a 100% of Fire Risk Assessments being completed for blocks above 18 meters. One Housing achieved 100% with regards to customers and ASB satisfaction levels whilst Peabody Housing Association managed to achieve 100% in ensuring all properties had been Gas checked and certified.
- 3.8 Tower Hamlets Community Housing managed to achieve 100% within the KPI of appointments kept when made and lastly Swan Housing managed to achieve 100% complaints responded to in target. These figures were achieved whilst in tiered (Tier 4) restrictions implemented by central government. Thus, highlighting with closures of suppliers and additional strict measures in place the RP's continued to achieve high levels of satisfaction and quality service to their residents.

#### **4. EQUALITIES IMPLICATIONS**

- 4.1 There are no direct equalities implications arising from this report. The registered housing providers capture the data from all residents irrespective of their age, status, social, economic and ethnic background.

#### **5. OTHER STATUTORY IMPLICATIONS**

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
  - Environmental (including air quality),
  - Risk Management,
  - Crime Reduction,
  - Safeguarding.
- 5.2 There are no direct Best Value implications arising from these reports, although if performance is further improved for performance indicators 1, 2 and 3 which relate to repairs, this may lead to improvements in working practices that will in turn improve efficiency and potentially reduce costs for Social Landlords.
- 5.3 Another indirect Best Value Implication is a landlord's ability to ensure its general needs income target (rent collection) is achieved.
- 5.4 The percentage of properties with a valid gas safety certificate directly relates to health and safety risks to residents. It is important that statutory compliance

of 100% is achieved, and that landlord performance in this area shows continued improvements.

- 5.5 The percentage of tall buildings (over 18m) owned by Registered Providers that have an up to date Fire Risk Assessments (FRA) in place also has a direct health and safety impact. It is a statutory requirement to ensure an FRA has been completed and is up to date.
- 5.6 There are no direct environmental implications arising from the report or recommendations.
- 5.7 Resident satisfaction with the handling of anti-social behaviour cases has an indirect relation to crime and disorder reduction matters.

## **6. COMMENTS OF THE CHIEF FINANCE OFFICER**

- 6.1 This report provides an update to the Housing Scrutiny Sub-Committee on the performance of various providers of social housing (Social Landlords) that operate within the borough. This includes the comparative data for Tower Hamlets Homes which manages the Council's housing stock. There are no direct financial implications arising from this report.

## **7. COMMENTS OF LEGAL SERVICES**

- 7.1 This report is recommending that the Housing Scrutiny Sub-Committee review the performance of individual Social Landlords during 20-21.
- 7.2 Regeneration agency Homes England and the Regulator for Social Housing (RSH), focus of their regulatory activity is on governance, financial viability and financial value for money as the basis for robust economic regulation. The objectives of the social housing regulator are set out in the Housing and Regeneration Act 2008.
- 7.3 The regulatory framework for social housing in England from the 1<sup>st</sup> April 2005 is made up of: Regulatory requirements (i.e. what Social Landlords need to comply with); Codes of practice; and Regulatory guidance. There are nine (9) categories of regulatory requirements and these are:
  - 1. Regulatory standards – Economic (i.e. Governance and Financial Viability Standard; Value for Money Standard; and Rent Standard)
  - 2. Regulatory standards – Consumer (i.e. Tenant Involvement and Empowerment Standard; Home Standard; Tenancy Standard; and Neighbourhood and Community Standard)
  - 3. Registration requirements
  - 4. De-registration requirements
  - 5. Information submission requirements
  - 6. The accounting direction for social housing in England from April 2019
  - 7. Disposal Proceeds Fund requirements



8. Requirement to obtain regulator's consent to disposals
9. Requirement to obtain regulator's consent to changes to constitutions

7.4 In addition to RSH regulation, there is a Performance Management Framework ('PMF') agreed with the Council which also reviews the performance of the Social Landlords in key customer facing areas. These are monitored cumulatively every three months against 8 key areas that are important to residents. This has a direct bearing on the Council's priority to ensure that Social Landlords are delivering effective services to their residents who are also, at the same time, residents in the local authority area. This provides re-assurance for the Council that the main Social Landlords in the Borough are delivering effective services to their residents.

7.5 The Council has no power to act against any Social Landlord (other than THH which it monitors already) but one of its Community Plan aspirations is for Tower Hamlets to be a place where people live in a quality affordable housing with a commitment to ensuring that more and better-quality homes are provided for the community.

7.6 The review of the Social Landlords performance though not a legal requirement fits in with the above Community Plan objective and the regulatory standards as stated above. The standards require Social Landlords to co-operate with relevant partners to help promote social, environmental and economic wellbeing in the area where they own properties.

The review of housing matters affecting the area or the inhabitants in the borough fall within remit of the Housing Scrutiny Sub-Committee and accordingly authorised by the Council's Constitution.

## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- None

### **Appendices**

- Social Housing Landlords Performance Report QTR2 2020-21

### **Local Government Act, 1972 Section 100D (As amended)**

#### **List of "Background Papers" used in the preparation of this report**

- NONE

### **Officer contact details for documents:**

- Shalim Uddin RP Coordinator

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| <u>Organisation</u>                | 1. % Repairs completed in target | 2. % respondents satisfied with last completed repair | 3. % appointments kept as % of appointments made | 4. % properties with a valid gas safety certificate | 5. % residents satisfied with how the ASB case was handled | 6. % complaints responded to in target |
|------------------------------------|----------------------------------|---|--|---|--|--|
| Clarion Housing                    | 83.95%                           | 82.80%  | 97.46%   | 99.81%  | N/A  | 58.00%                                 |
| Eastend Homes                      | 90.01%                           | 93.07%  | 97.73%   | 99.89%  | N/A  | 94.43%                                 |
| Gateway Housing Association        | 85.00%                           | 81.00%  | 97.00%   | 99.80%  | 67%  | 60.00%                                 |
| L and Q                            | 85.01%                           | 81.60%  | 91.2% (Overall percentage)                       | 99%   | Not Collected  | 80%                                    |
| Notting Hill Genesis               | N/A                              | 87%   | N/A  | 99.78%  | N/A  | 82%                                    |
| One Housing                        | 92.29%                           | N/A   | 98.10%   | 99.9%   | 100.00%  | 72.00%                                 |
| Peabody                            | Average Speed Reported Instead   | 87.5%   | Average Speed Reported Instead                   | 100.0%  | 47%  | No target set                          |
| Poplar HARCA                       | 98.78%                           | 98.60%  | N/A  | 99.90%  | 73.74%   | 94.67%                                 |
| Providence Row Housing Association | 94.40%                           | 95.20%  | 94%  | 100%  | No cases closed  | 100%                                   |
| Southern Housing Group             | 95%                              | No Data   | N/A  | 100%  | No Data  | 63%                                    |
| Spitalfields Housing Association   | 99.90%                           | 99%   | 76.00%   | 100%  | 100%   | 100%                                   |

|                                 |        |        |        |        |         |        |
|---------------------------------|--------|--------|--------|--------|---------|--------|
| Swan Housing Association        | 97.07% | 95%    | 97.01% | 100%   | no data | 100%   |
| Tower Hamlets Community Housing | 96.00% | N/A    | 100.0% | 100%   | N/A     | 67.7%  |
| Tower Hamlets Homes             | 98.60% | 79.91% | N/A    | 99.80% | N/A     | 96.41% |

|                        |        |        |        |        |        |        |
|------------------------|--------|--------|--------|--------|--------|--------|
| <b>Bottom quartile</b> | 88.76% | 82.20% | 96.28% | 99.80% | 67.00% | 67.70% |
| <b>3rd quartile</b>    | 94.70% | 87.50% | 97.24% | 100%   | 73.74% | 82.00% |
| <b>2nd quartile</b>    | 97.45% | 95.10% | 97.82% | 100%   | 100%   | 96%    |
| <b>Top quartile</b>    | 99.90% | 99.00% | 100%   | 100%   | 100%   | 100%   |

Below 85%

N/A = The information is either not a PI measured by the RP; measured in a different way or is not available.

NR = The Data was not requested by the borough for the period in question.

RP stock numbers

| 7. % Members Enquiries answered in target | 8. Average relet time (days)                     | 9. % General Needs Income collected (Rent including eligible service charges only) | 10. % of tall buildings (over 18 metres) owned by RPs that have an up to date FRA in place | Quarter 2 General Needs Stock Numbers |  |
|---|--|--|--|---------------------------------------|--|
| 58.00%                                    | 211  | 99.69%   | 91.66%   | 3995                                  |  |
| 63.79%                                    | 40.2   | 90.56%   | 100.00%  | 2243                                  |  |
| 100.00%                                   | 74   | 101.63%  | 93.00%   | 1886                                  |  |
| 87%                                       | 109 days (after Minor repairs)                   | 107.63%  | 100%   | 1365                                  |  |
| 100%                                      | 61 days (after Major repairs) General Needs Only | 100%   | 100%   | 1634                                  |  |
| 75.00%                                    | 94.00  | 99.6%  | 100.0%   | 2875                                  |  |
| No target set                             | 61   | 97.0%  | 100%   | 1494                                  |  |
| 98.97%                                    | 142.97 Days                                      | 98.68%   | 100%   | 5379                                  |  |
| 100%                                      | N/A - no GN relets YTD                           | 94%  | 100%   | 100                                   |  |
| 62%                                       | 20   | N/A  | 100%   | 1159                                  |  |
| 100%                                      | 90   | 61.00%   | N/A  | 732                                   |  |

|        |       |         |
|--------|-------|---------|
| 100%   | 32.3  | 100.00% |
| 95%    | N/A   | 96.03%  |
| 89.51% | 55.44 | 100.92% |

|      |
|------|
| 100% |
| 100% |
| 100% |

|        |  |
|--------|--|
| 1546   |  |
| 2002   |  |
| 11,461 |  |

|        |        |      |      |      |
|--------|--------|------|------|------|
| 75.00% | 211.00 | 0.96 | 1.00 | 1.00 |
| 95.00% | 86.00  | 1.00 | 1.00 | 1.00 |
| 100%   | 62.45  | 1.00 | 1.00 | 1.00 |
| 100%   | 44.01  | 1.08 | 1.00 | 1.00 |

**Tower Hamlets Housing and  
Regeneration Scrutiny  
Sub-Committee**

**The Homelessness Reduction Act  
One year on**

**Scrutiny Challenge Session**



April 2020

## **Chair's Foreword**

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I am pleased to present this report which considers the impact of the implementation of the Homelessness Reduction Act (2017) on residents and the Council which brought new duties and ways of working for officers.

The Challenge session took place before the unprecedented COVID-19 pandemic and focuses on what was business as usual prior to the shift in emphasis that the pandemic brought where the Housing Options Service shifted their focus to COVID care and protect schemes for rough sleepers and ensuring the safety and well-being of single-persons and households placed in temporary accommodation.

This report therefore makes a number of practical recommendations for the Housing Options Service as the Council moves towards a normal service post-pandemic to improve the services available for providing housing options advice and support for those who are homeless or threatened with homelessness.

The recommendations focus on improving the experience of residents and exploring other ways to enhance the experience of residents who use the Housing Options Service for homelessness support and advice.

I would like to thank all of the council officers who gave their time and effort to contribute to this Review. I am also grateful to my Housing and Regeneration Scrutiny Sub-Committee colleagues for their support, advice and insights.

**Councillor Dipa Das**  
**Chair of the Housing & Regeneration Scrutiny Sub-Committee**



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## 1. Recommendations

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| Recommendation |  |
|----------------|--|
| R1             | <p>Benchmark against other authorities' customer journeys and identify best practice which achieves effective service provision, straight-forward customer access, useful Personal Housing Plans and good-quality decisions.</p> <p>In order to independently gauge the quality of the customer service that clients currently receive, post pandemic when the Housing Options Service returns to business as usual, commission mystery shopping to test all aspects of the current service, including but not limited to timeliness, accessibility and appropriateness of the advice and support provided. The resulting report should be brought back to a future Housing &amp; Regeneration Scrutiny Sub-committee as well as the Mayor and Cabinet to inform future scrutiny work.</p> |
| R2             | <p>Consider developing the 'House for Good' application and scope to assess its validity as a route to channel shift enquiries from applicants. This may be particularly useful for younger applicants who are more 'tech savvy' who use mobile phones to access the internet and social media.</p>  |
| R3             | <p>Develop guidelines for the use of cubicle/interview room facilities particularly when using them in the instances where sensitive and personal information is discussed relating to a service user. Ensure that managers regularly monitor compliance with these guidelines.</p>  |
| R4             | <p>The Housing Options Service develops and implements a plan to improve staff satisfaction informed by the staff survey. The plan may include performance indicators, training, regular team meetings and one-to-one as actions.</p>  |
| R5             | <p>Housing Options Service to promote and publicise the good work carried by officers not just internally within the Housing Options Service but to use opportunities corporately and among partners to promote officers within the Service. This will provide recognition and a sense of value to officers.</p>   |
| R6             | <p>Develop and implement a plan for a new IT solution which is effective and efficient for the Housing Options Service.</p>  |
| R7             | <p>Urgently take action to significantly reduce the number of people (1,200) awaiting a decision on their homelessness approach, including setting a target for the 31st March 2022 and identifying the resources needed to achieve this outcome over and above the six additional members of staff already being recruited for this purpose if that is what is necessary.</p>   |
| R8             | <p>Urgently provide details Housing &amp; Regeneration Scrutiny Sub-committee of the number of single homeless people who have (a) approached LBTH under the Homelessness Reduction Act 2017 and (b) been provided with a Personal Housing Plan and (c) been helped to find a private tenancy in 2018/19 and 2019/20, and for the first nine months in 2020/21</p>   |

## 2. Introduction

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- 2.1. This scrutiny challenge session has set out to understand the impacts on residents and the Council which have arisen from the implementation of the Homelessness Reduction Act (HRA - 2017), which came into effect from 3rd April 2018. The Act was the most significant change in the statutory approach to homelessness since the Housing (Homeless Persons) Act 1977.
- 2.2. The Act places new legal duties on local authorities to ensure that everyone who is homeless or at risk of homelessness will have access to meaningful help, irrespective of their priority need status, as long as they are eligible for assistance.
- 2.3. The HRA adds two new duties to the original statutory rehousing duty: the duty to prevent homelessness, and the duty to relieve homelessness.
- 2.4. New provisions introduced by the HRA include:
  - A duty to prevent and relieve homelessness
  - A requirement to carry out an assessment and personalised housing plan
  - Public bodies now have a duty to refer people whom they know are threatened with homelessness
  - Applicants have the right to ask for a review of any points of the new legislation
- 2.5. To assist local authorities the Government provided £73m in new burdens funding for the first 2 years of the new duties and committed to completing a review of the Homelessness Reduction Act by March 2020.
- 2.6. Research from the London School of Economics<sup>1</sup> commissioned by London Councils evidences that this funding was insufficient.
- 2.7. Additional funding was made available through the Private Rented Sector Access fund (£19.52m) for 66 local authorities announced March 2019 for over 8000 households to be supported to access and/or sustain Assured Shorthold Tenancy (AST),
- 2.8. To date, the London Borough of Tower Hamlets (LBTH) has received

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<sup>1</sup> The Cost of Homelessness Services in London – An LSE Project with London Councils published Oct 2019  
<https://www.londoncouncils.gov.uk/sites/default/files/LC%20final%20report%20-%20CA%20edit.pdf>

£1,555,181 in new burdens funding, however, this funding stream does not go far enough.

2.9. The Ministry for Housing, Communities and Local Government (MHCLG) set up a Homelessness Reduction Act working group, to assess the impact of the Act. It also commissioned an independent review and placed a call for evidence, considering the delivery of the HRA and costs for local authorities.

2.10. In December 2019, £263 million funding for local authority homelessness service for 2020-21 was announced. This is on top of £80m homelessness prevention line in the local government finance settlement and the rough sleeping funding. This is an increase of £38m on the Flexible Homelessness Support Grant (FHSG) and new burdens funding allocated 2019-20 year.

2.11. The Council's Housing and Regeneration Scrutiny Sub-Committee want to understand what the impact of the HRA (2017) has been on the Council's Housing Options Service who provide and deliver services for applicants who seek homelessness housing and advice. The Sub-Committees' questions included:

- How has it impacted on the homelessness provision in the Borough?
- Has the footfall of homelessness enquiries increased?
- Are more residents being placed in temporary accommodation as a result of the prevention and relief duties that the Act has placed on the Council?

2.12 This challenge session set out to provide the Sub-Committee with a clear understanding of how the HRA has impacted on both residents who seek homelessness advice in the Borough. This has resulted in the Sub-Committee making recommendations for service improvement as part of the Council's wider review of Homelessness provision in the Borough. The scrutiny challenge session was underpinned by five key questions:

- What impact has the HRA (2017) had in Tower Hamlets and what outcomes have been achieved in the Borough as a result of the HRA, including by protected groups?
- Is the Council meeting its duties under the HRA? What are the barriers and challenges?
- What more can the following do to tackle homelessness and prevent rough sleeping:

- The Council (Local Housing Authority)
- Commissioned partners
- Statutory partners
- Non statutory partners
- Residents affected by homelessness

- Government

- What has been the experience of people approaching the Council and its commissioned partners for help?
- What elements of the Act and processes are working well/not working well in Tower Hamlets and how can this be improved (including customer journey, homelessness/ housing pathways/ accommodation provisions, upstreaming preventions and innovative practice)

**Challenge session approach**

2.12. The challenge session was chaired by Councillor Dipa Das, Chair of the Housing and Regeneration Scrutiny Sub-Committee and supported by Una Bedford, Strategy and Policy Officer (Place); LBTH.

**Housing and Regeneration Scrutiny Sub-Committee Members**

|                             |   |
|-----------------------------|---|
| Councillor Dipa Das         | Housing and Regeneration Scrutiny Sub-Committee (Chair) |
| Councillor Sirajul Islam    | Statutory Deputy Mayor & Lead Member for Housing        |
| Councillor Andrew King      | Housing and Regeneration Scrutiny Sub-Committee Member  |
| Councillor Helal Uddin      | Housing and Regeneration Scrutiny Sub-Committee Member  |
| Councillor Andrew Wood      | Housing and Regeneration Scrutiny Sub-Committee Member  |
| Councillor Ayias Miah       | Housing and Regeneration Scrutiny Sub-Committee Member  |
| Councillor Shah Suhel Ameen | Housing and Regeneration Scrutiny Sub-Committee Member  |
| Councillor Shad Chowdhury   | Housing and Regeneration Scrutiny Sub-Committee Member  |
| Council Leema Omar Qureshi  | Housing and Regeneration Scrutiny Sub-Committee Member  |
| Councillor Mohammed Pappu   | Housing and Regeneration Scrutiny Sub-Committee Member  |
| Anne Ambrose                | Housing and Regeneration Scrutiny Co-Opted Member       |

The panel received evidence from the following officers:

**London Borough of Tower Hamlets**

|               |  |
|---------------|--|
| Rafiqul Hoque | Head of Housing Options                                  |
| Seema Chote   | Team Manager, Statutory & Advocacy Team, Housing Options |

### 3. Homelessness Legislation

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- 3.1. Homelessness affects a wide range of people, covering not just people sleeping rough, but also those in temporary accommodation, sleeping temporarily at friend's houses, living in unfit dwellings and those threatened with homelessness.
- 3.2. The primary homelessness legislation in England is Part 7 of the Housing Act 1996. This sets out the statutory duty for local authorities to take action to prevent homelessness and to provide assistance to people threatened with or actually homeless.
- 3.3. In 2002, the Government amended the homelessness legislation through the Homelessness Act 2002 and the Homelessness (Priority Need for Accommodation) (England) Order 2002 to:
  - a) ensure a more strategic approach to tackling and preventing homelessness, in particular by requiring a homelessness strategy for every housing authority district; **and**,
  - b) strengthen the assistance available to people who are homeless or threatened with homelessness by extending the priority need categories to homeless 16 and 17 year olds; care leavers aged 18, 19 and 20; people who are vulnerable as a result of time spent in care, the armed forces, prison or custody, and people who are vulnerable because they have fled their home because of violence.
- 3.4. The Homelessness Reduction Act 2017 has significantly reformed England's homelessness legislation by placing duties on local authorities to intervene at earlier stages to prevent homelessness in their areas. It also requires housing authorities to provide homelessness services to all those affected, not just those who have 'priority need.' These include:
  - a) an enhanced prevention duty extending the period a household is threatened with homelessness from 28 days to 56 days, meaning that housing authorities are required to work with people to prevent homelessness at an earlier stage; **and**,

- b) a new duty for those who are already homeless so that housing authorities will support households for 56 days to relieve their homelessness by helping them to secure accommodation.
- 3.5. Additionally, local authorities in England have a duty to provide free advisory services to everyone in their district on preventing homelessness, securing accommodation, clarity on the rights of homeless people and those threatened with homelessness. The HRA 2017 still recognises 'priority need' so therefore, non 'priority need' households are entitled to advice and assistance only but not necessarily housing.

#### 4. National Context

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- 4.1. In November 2018 the **Local Government Association** conducted a **survey**<sup>2</sup> of English councils to gather information on their experience of the Homelessness Reduction Act (HRA) since its implementation.
- 4.2. The survey found that the number of homelessness presentations made to councils has continued to rise since the Act's implementation. The majority of councils responding to the survey attributed the increase in presentations directly to the Act. However, there are also indications that this increase in presentations is due to broader trends in homelessness.
- 4.3. The most recent data<sup>3</sup> collated and published by the MHCLG reaffirms that the number of households assessed by Local Authorities as either homeless or threatened with homelessness has increased by 11.4% from April to June 2018 to 68,170 in April to June (Q2) 2019.
- 4.4. For the same quarter, April to June (Q2) 2019, approximately two-thirds (65.2% or 44,480) of households owed a prevention or relief duty were single households (households without children).

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<sup>2</sup> Local Government Association 'Homelessness Reduction Act Survey 2018 - Survey Report' March 2019  
<https://www.local.gov.uk/sites/default/files/documents/Homelessness%20Reduction%20Act%20Survey%20Report%202018%20v3%20WEB.pdf>

<sup>3</sup> MHCLG Experimental Statistical First Release 18<sup>th</sup> December 2019: Statutory Homelessness; April - June 2019: England  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/852953/Statutory\\_Homelessness\\_Statistical\\_Release\\_Apr-Jun\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/852953/Statutory_Homelessness_Statistical_Release_Apr-Jun_2019.pdf)

- 4.5. 30,670 households, or 45.0%, were identified as having one or more support needs. The most common support need was a history of mental health problems, accounting for 14,950 households or 21.9% of households owed a duty.
- 4.6. The new duty to refer which commenced in October 2018 has risen with the number of referrals increasing to 4,340 in April to June (Q2) 2019 (compared with 3,740 January to March 2019) in England. Children's Social services made the most referrals with 740, or 17.1% of the total in Q1 of 2019 whereas in Q2 of the same year, the National Probation Service made the most referrals with 650 of 17.4% of all referrals.
- 4.7. At the same time the Act has resulted in some improvements to homelessness provision. Single homeless people have seen the benefits of an increased focus on prevention, and more targeted support. Many councils have used the Act as an opportunity to refresh their service provision, drawing together new burdens funding and the many other funding programmes which have been made available by Government.
- 4.8. More recent research carried out by Crisis<sup>4</sup> has found that the change in legislation has significantly expanded access to homelessness assistance particularly for single people. The research mirrors the picture emerging from the statutory statistics showing that more people are eligible and are accessing support under the HRA. (The research formed the basis of the 'A Foot in the Door' report and is based on 984 surveys and 89 in-depth interviews across 6 local authority areas with those approaching services for support).
- 4.9. Only nine per cent of those interviewed stated they were given no support – reasons included no recourse to public funds, lack of local connection, not being able to provide evidence of current situation, and a general lack of eligibility for support. The research findings suggest that this is one of the most substantial changes observed since the introduction of the HRA and that the change in legislation has had a noticeable impact on widening access to single homeless people
- 4.10. The implementation of the HRA has brought significant new burdens to English local housing authorities. Local housing authorities have seen increased footfall, and an increased administrative burden associated with each case.
- 4.11. In November 2018, the LGA conducted a survey<sup>5</sup> of councils to gather information on their experience of the Homelessness Reduction Act

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<sup>4</sup> A Foot In The Door: Experiences of the Homelessness Reduction Act ( March 2020)  
<https://www.crisis.org.uk/media/241742/a-foot-in-the-door-2020.pdf>

<sup>5</sup> LGA - Homelessness Reduction Act Survey 2018 - Survey Report (March 2019)  
<https://www.local.gov.uk/sites/default/files/documents/Homelessness%20Reduction%20Act%20Survey%20Report%202018%20v3%20WEB.pdf>



(HRA) since its implementation. Many report that H-CLIC data collection system, (Homelessness case level collection), continues to impose a significant administrative burden six months after the Act's implementation, to the extent that council officers are being diverted from core work. One third of respondents to the LGA's<sup>6</sup> survey on the Act did not think they had been sufficiently resourced to deliver their new duties.

- 4.12. The Act is also not having the anticipated effect on temporary accommodation costs, and demand for temporary accommodation is increasing as a wider range of people are owed interim housing duties. However, moving people onto settled housing, and sustaining the tenancies of those already in housing, is becoming increasingly difficult as freezes to the local housing allowance rate continue to widen the gap with housing support and rents. This is likely to have a significant and rising cost implication for councils, which will require a review of new burdens funding.
- 4.13. The Act has not improved the availability of the tools which local authorities need to successfully prevent and relieve homelessness, i.e. affordable housing, sustainable funding for services, and the support of a wide range of public sector partners. The intention and ambition of the HRA is being constrained by the housing market, welfare system and funding.
- 4.14. In particular, the local authority finance context is having a significant impact on councils' ability to prevent homelessness, with the previously cited LGA analysis showing that local homelessness services are facing a £421 million spending gap by 2024/25.
- 4.15. The Duty to Refer has seen an increase in referrals, but councils' ability to work in partnership is again limited by broader cuts to services. In this context, councils have expressed concerns that the Duty does not incentivise upstream prevention work by a broad range of services, but instead risks a shunt in responsibility.
- 4.16. As a result, research using data and information across England illustrates that councils are constrained in their ability to help people, even as homelessness demand pressures increase.

## **5. Local Context**

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- 5.1. There has been an increase in the footfall count of homelessness presentations overall, of around 8 per cent compared to the period prior to the implementation of the Homelessness Reduction Act.
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- 5.2. The Housing Options team has seen an increase in homeless approaches from singles and early intervention opportunities. This has resulted in an increase in the number of single persons in temporary accommodation because officers are unable to prevent their homelessness due to lack of affordable accommodation in the Borough.
- 5.3. A considerable number of approaches to the Housing Options Service are from those who have been evicted or threatened with eviction where they have been residing with family or friends.
- 5.4. The chronic shortage of affordable housing in the Borough and the consequent inability to meet current demand lie at the root of Tower Hamlets' homelessness situation. As well as the Borough's changing demographics and socio-economic profile, central government funding, and the additional burdens placed on English local authorities as a result of the HRA (2017) has led to the prediction that this trend is set to continue.
- 5.5. The Private Rental Sector is often the Council's only option for securing accommodation and the Housing Options Team recognises that there is a need to procure more accommodation from within this sector to meet housing need.

## **6. Findings and Recommendations**

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- 6.1 The Council has utilised funding opportunities which have been made available to all local housing authorities: Private Rented Sector Access Fund, 'No First Night Out', Transitional Insurance, the Private Rented Sector Team Rough Sleeping Initiative and the Flexible Housing Support Grant.
- 6.2 However in most cases, submitting a bid for these funding streams is time limited and this can pose a challenge for the Housing Options Service as managers are moved from day-to-day operational functions to prepare and write bids for funding. Similarly, the procurement and process for amending existing contracts to implement initiatives is not always clear and often slow. Uncertainty over future funding makes it difficult to plan services and retain staff.
- 6.3 There has been some success in improving and increasing working in partnership with other agencies and service providers which include:
  - Work undertaken within East London Housing Partnership identifying gaps to tackle roughs sleeping in East London - Navigators for ELHP.
  - Recent funding for Independent Domestic Violence Advisors and Floating Support for Domestic Abuse cases working in

partnership with the Violence Against Girls and Women team.

- Mediation Services – the Service has increased its in-house provision and works with external partners to improve prevention to keep applicants in their existing accommodation.
- Complex need cases in supported accommodation requiring end of life care – identified gap in service requires developing through Integrated Commissioning Service.

6.4 The Housing Options team recognises that the increased footfall of clients seeking homelessness or housing advice necessitates better ways of managing processes along the customers journey to facilitate service improvement and better customer access. Officers are seeking a better understanding of customers' needs and the reasons why they access Albert Jacobs House.

**Recommendation 1:**

*Benchmark against other authorities' customer journeys and identify best practice which achieves effective service provision, straight-forward customer access, useful Personal Housing Plans and good-quality decisions.*

*In order to independently gauge the quality of the customer service that clients currently receive, post pandemic when the Housing Options Service returns to business as usual, commission mystery shopping to test all aspects of the current service, including but not limited to timeliness, accessibility and appropriateness of the advice and support provided. The resulting report should be brought back to a future Housing & Regeneration Scrutiny Sub-committee as well as the Mayor and Cabinet to inform future scrutiny work.*

- 6.5 The intention is to use this data to channel shift – to allow service users more choice and access to information; to ensure better outcomes for service users and the Council. The channel shift could involve using the Customer Contact Centre to deal with general and non-complex Housing Options enquiries or improving customer's ability to self-help via information on the Council's Housing Options Internet pages. It is hoped that this will also free up staff on duty to allow them more time to better manage their case work and to improve decision making.
- 6.6 With the current constraints on resources within the Housing Options Service due to the increased demand and workload pressures as a direct consequence of the pandemic, now would not be the appropriate time to conduct this benchmarking work or to carry out a mystery shopping exercise given these extraordinary times.
- 6.7 Despite the pandemic, and since the Scrutiny Challenge session of March 2020, the Housing Options Service has been transforming its

services to meet the needs of customers. It would be more beneficial to undertake this work once we move out of the pandemic situation and have returned to business as usual, once the current level of demand and workload of the team return to normal.

**Recommendation 2:**

*Consider developing the 'House for Good' application and scope to assess its validity as a route to channel shift enquiries from applicants. This may be particularly useful for younger applicants who are more 'tech savvy' who use mobile phones to access the internet and social media.*

- 6.8 The Housing Options Service are part of the second wave of Customer Access Programme and officers are currently producing a Project Initiation Document to bring about changes in the long and short term - to include an expert advisor to assist with the delivery of service improvements through the lens of customer and prevention.
- 6.9 The Housing Options Service recognises that a review needs to be undertaken of its triage service to reduce the number of officers involved in a case. At present there remains considerable duplication within the triage process and the Service needs to effectively filter reception, online, telephone and Duty to Refer contacts. This will mean that the current structure within the Service will need to be redesigned with the possibility that separate singles and family's teams are created.
- 6.10 The Housing Options Service is aware that the environment within the contact centre is not always conducive and welcoming to service users and work is planned to refresh this area. Despite there being cubicles and private interview rooms to meet with service users, these are not always used. Further concern was expressed by members that the appropriate settings are not always used when conducting delicate and highly personal interviews where there is a safeguarding or perceived threat of violence against a service users.

**Recommendation 3:**

*Develop guidelines for the use of cubicle/interview room facilities particularly when using them in the instances where sensitive and personal information is discussed relating to a service user. Ensure that managers regularly monitor compliance with these guidelines*

- 6.11 In addition any restructure process will take a wider look at how Lead Professional, Complex Assessment, Housing Options Singles and Housing Advice Teams interlink on casework to ensure the service is customer centric.

- 6.12 To facilitate these changes, the Housing Options Service has had approval and agreement to recruit a Service Improvement Team to implement changes required over the next 12 to 24 months and beyond.
- 6.13 The complexity of cases and time spent by staff in carrying out assessments has led to an increase in demand and pressure on staff. The Homelessness Reduction Act has brought higher expectation on officers to keep clients informed and added to the administrative burdens on staff.

**Recommendation 4:**

The Housing Options Service develops and implements a plan to improve staff satisfaction informed by the staff survey. The plan may include performance indicators, training, regular team meetings and one-to-one as actions.

- 6.14 The morale of staff within the Service is consequently low while staffing turnover is high and this contributes further to increased stress and pressures on staff.
- 6.15 There is presently 1200 cases still outstanding (in terms of a decision). The backlog of work remains a major concern, with the Service having taken on six additional staff to tackle backlog within next 9-12 months.
- 6.16 It is a challenge for the Housing Options Service to recruit and retain skilled temporary staff (agency/fixed term). This is attributable to the increased demand, particularly in London for Homeless/Housing Options officers since the introduction of Homelessness Reduction Act 2017.
- 6.17 Where practical, posts are now first being offered to internal staff. This however is time consuming and mean that other staff have to back-fill posts.

**Recommendation 5:**

*Housing Options Service to promote and publicise the good work carried by officers not just internally within the Housing Options Service but to use opportunities corporately and among partners to promote officers within the Service. This will provide recognition and a sense of value to officers.*

- 6.18 Staff within the Housing Options Service are also hindered by having to use multiple IT systems to process homelessness enquiries and applications. Having these numerous IT systems leads to the duplication of work (information and processes) which are onerous and

time consuming for staff creating implications in reporting. This has a major impact both on service delivery and staff morale.

**Recommendation 6:**

*Develop and implement a plan for a new IT solution which is effective and efficient for the Housing Options Service.*

- 6.19 Following the resumption of the Council's scrutiny activities in November 2020, additional recommendations (R7 and R8) were submitted by committee members.

6.20

**Recommendation 7:**

*Urgently take action to significantly reduce the number of people (1,200) awaiting a decision on their homelessness approach, including setting a target for the 31st March 2022 and identifying the resources needed to achieve this outcome over and above the six additional members of staff already being recruited for this purpose if that is what is necessary.*

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a ringfence these cases to ensure that a dedicated resource is assessing these cases.

- 6.21 A team of six officers, (including a team principal officer), have been in place since August 2020. These officers are working to reduce all outstanding homelessness decisions up to 31st December 2019. The Housing Options Service have, like most local authorities, have had difficulties in recruiting and retaining experienced contractors, due to the demand and competition in the recruitment marketplace. As at the 15<sup>th</sup> January 2021, there was a total of 852 cases still outstanding. When the team commenced this project, there were 1269 cases outstanding. The backlog team anticipate that these cases will be cleared by 31st May 2021.

- 6.22 Any outstanding cases from 1st January 2020, are being cleared by the existing compliment of case officers from within their caseload. The Housing Options Service would welcome further resources to speed up the determination of all outstanding main duty decisions.

6.23

**Recommendation 8:**

*Urgently provide details Housing & Regeneration Scrutiny Sub-committee of the number of single homeless people who have (a) approached LBTH under the Homelessness Reduction Act 2017 and (b) been provided with a Personal Housing Plan and (c) been helped to find a private tenancy in 2018/19 and 2019/20, and for the first nine months in 2020/21.*

2018/19 and

s

, may take a little while to provide. The Service will endeavour to

provide this information at the earliest opportunity to the Housing and Regeneration Scrutiny Sub-committee.

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# H&RSSC: REGENERATION UPDATE

10<sup>th</sup> February 2021

**SRIPRIYA SUDHAKAR**  
**HEAD OF REGENERATION**



## STRUCTURE OF PRESENTATION

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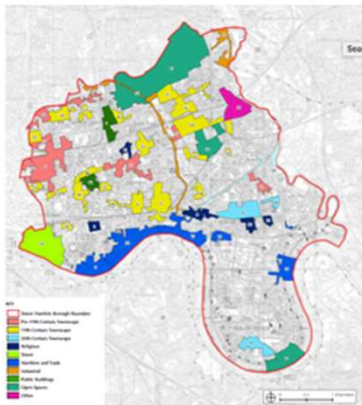
- 1. Overview (Slides 3-16)**
- 2. Embedding our approach to regeneration into different workstreams (Slides 17-22)**
- 3. Improving our communication on the benefits of regeneration ( Slides 23-30)**
- 4. Our approach and regeneration team size compared to other London boroughs(Slides 31-38)**
- 5. Questions?**

**TARGETS**

- 2004 : 2070 homes/year
- 2008 : 2885 homes/year
- Current London Plan : 3931 homes/year
- Draft/New London Plan - 3473 homes/year and small sites target of 529 homes/year

**AREA CONSTRAINTS**

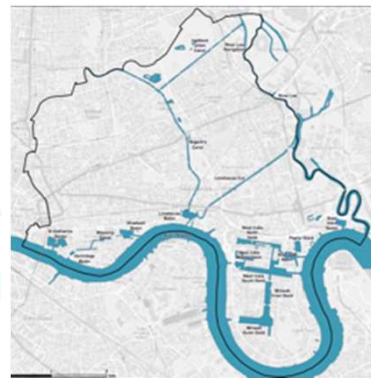
- Conservation Area - 31%
- Public Open Space - 12.5%
- Water space- 12.5%
- Employment Land/Industrial - 18.75%
- Railways/Highways



Conservation Areas



Open Space



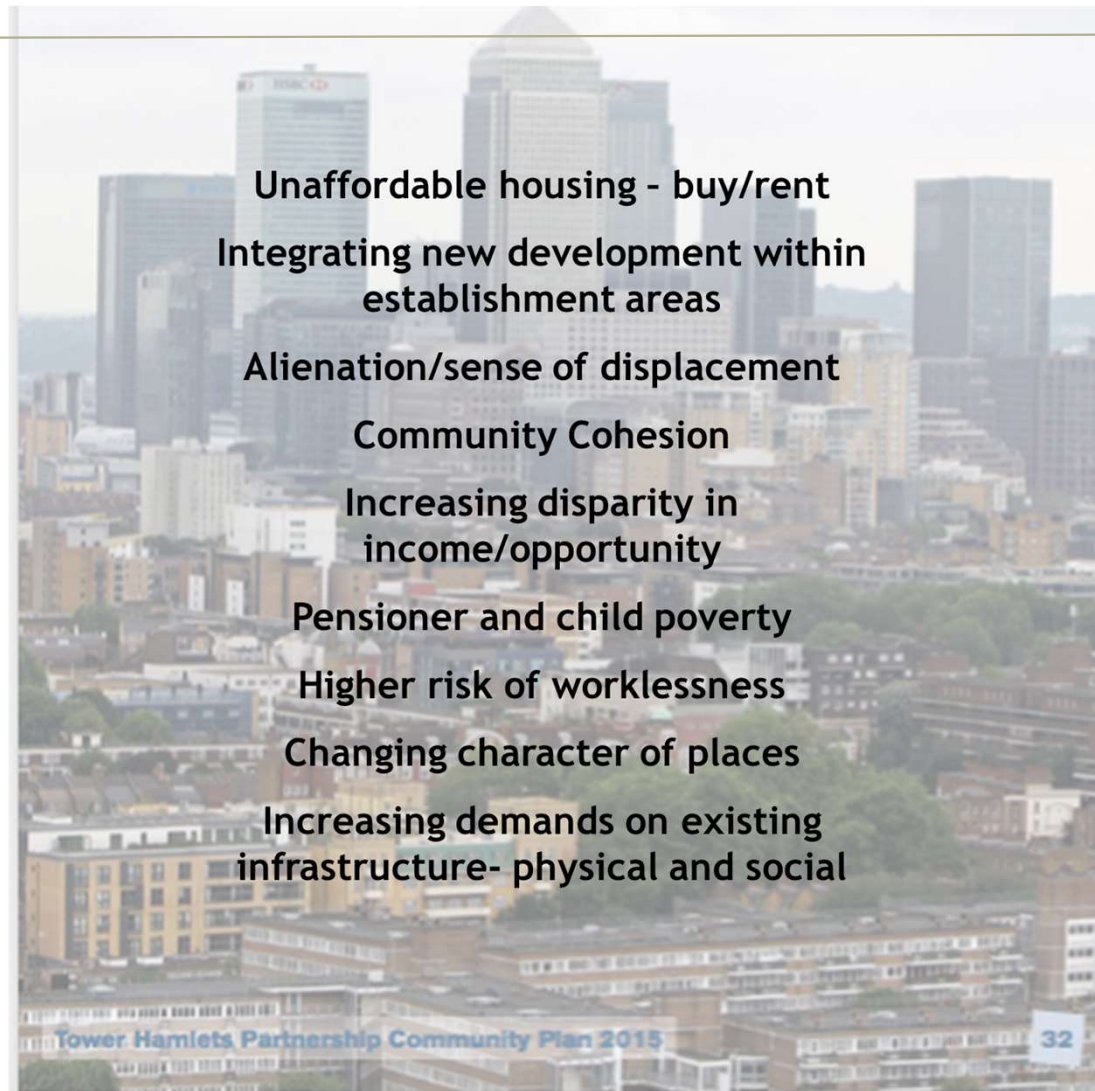
Water Space



Industrial/Office

## CHALLENGES

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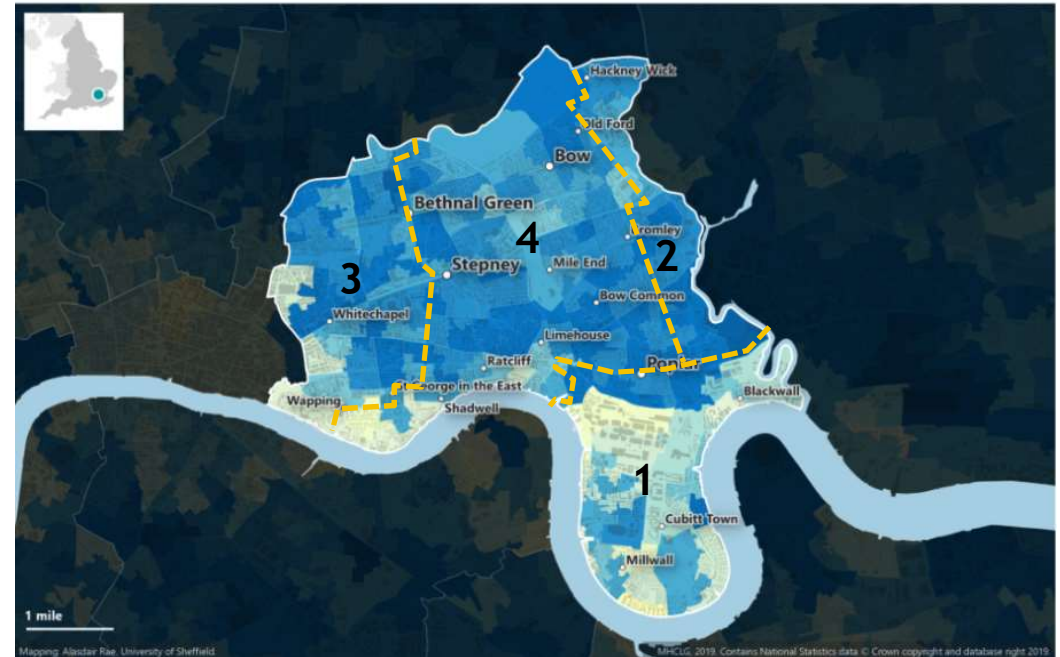


## APPROACH TO REGENERATION - ADOPTED 2020

1. Isle of Dogs & South Poplar
2. Lower Lea Valley
3. City Fringe
4. Central Area

## English Indices of Deprivation 2019

### TOWER HAMLETS



2019 : 5<sup>th</sup> most deprived borough behind Barking and Dagenham, Hackney, Newham and Haringey.

<https://democracy.towerhamlets.gov.uk/documents/s162600/6.9.2%20Approach%20to%20Regeneration%20-%20Report%20to%20Cabinet%2029th%20January%202020%20-%20Final.pdf>



### Regeneration Board

An internal facing high-level Board to steer the development of a strategic approach to regeneration across the Borough. The board has two functions,

- strategic approach to regeneration across the Borough (set the vision, ambition and direction for regeneration commitment across the Council)
- oversee the development and delivery of key programmes of work for identified regeneration areas

### Membership (current)

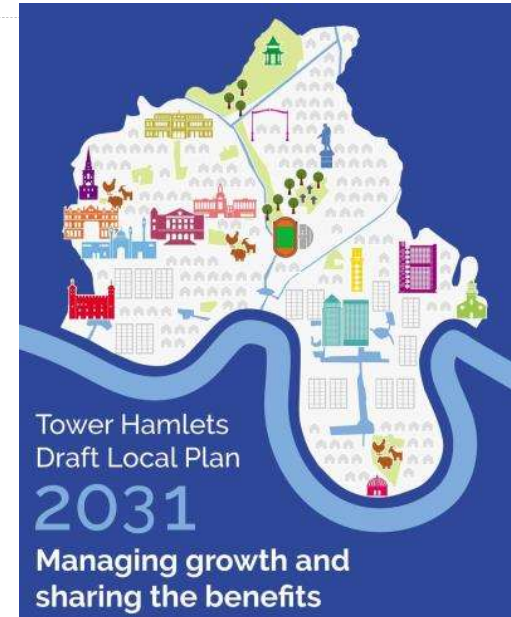
- Mayor John Biggs (Chair)
- Cllr Rachel Blake (Adults, Health & Wellbeing).
- Cllr Motin Uz Zaman (Work and Economic Growth)
- Cllr Sirajul Islam (Statutory Deputy Mayor and Cabinet Member for Housing)
- Cllr Eve McQuillan (Cabinet Member for Planning & Social Inclusion)
- Will Tuckley (Chief Executive)
- Ann Sutcliff (Corporate Director, PLACE)
- Jennifer Peters (Divisional Director, Planning and Building Control)
- Sripriya Sudhakar (Head of Regeneration)
- Vicky Clark (Divisional Director, Work & Economic Growth)
- Dan Jones (Divisional Director, Public Realm)
- Andy Simpson (Head of Strategic, Policy, Performance, Place Directorate)
- David Courcoux (Head of the Mayors Office)

## REGENERATION APPROACH

Urban regeneration is defined as

*'a comprehensive and integrated vision and action which leads to the resolution of urban problems and which seeks to bring about a lasting improvement in the economic, physical, social and environmental condition of an area that has been subject to change'.*

Urban Regeneration: A Handbook, Peter Roberts, Peter W. Roberts, Hugh Sykes, SAGE, 2000,



**Borough's approach to regeneration should**

- include economic, physical, sustainability, and social / cohesion dimensions
- recognise the importance of partnership in delivering regeneration
- Re-emphasise the regeneration ambition/vision in the new Local Plan

## REGENERATION VISION

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A strategic approach to regeneration will ensure Tower Hamlets embraces its role as a key focus for London's growth, making the best use of the economic benefits provided by a thriving enterprise sector and improving connections between the borough and surrounding areas.

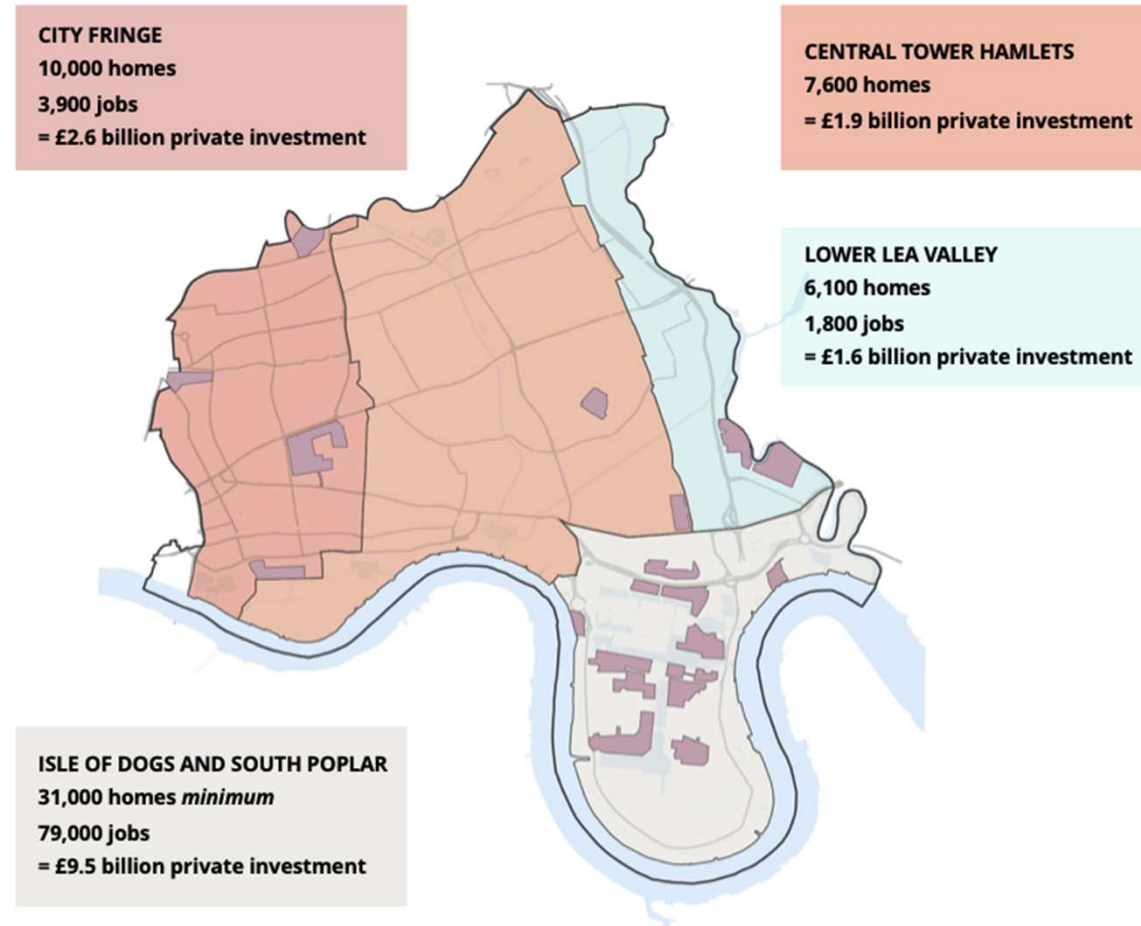
The benefits will be shared throughout our borough, amongst all residents, ensuring no one is left behind and everyone has access to the economic opportunities derived through growth. We will support our existing communities as well as welcome new residents to make their home within liveable, mixed, stable and cohesive neighbourhoods.

We will work hard to ensure our neighbourhoods are transformed with high quality buildings and well-designed spaces, while ensuring their distinct character is protected and enhanced. They will contain a mix of housing types, served by a range of excellent facilities and infrastructure. They will be green, safe and accessible to all, promoting sustainable transport and making the best use of both our borough's heritage and natural resources such as parks and waterways.

**Managing growth and sharing the benefits**



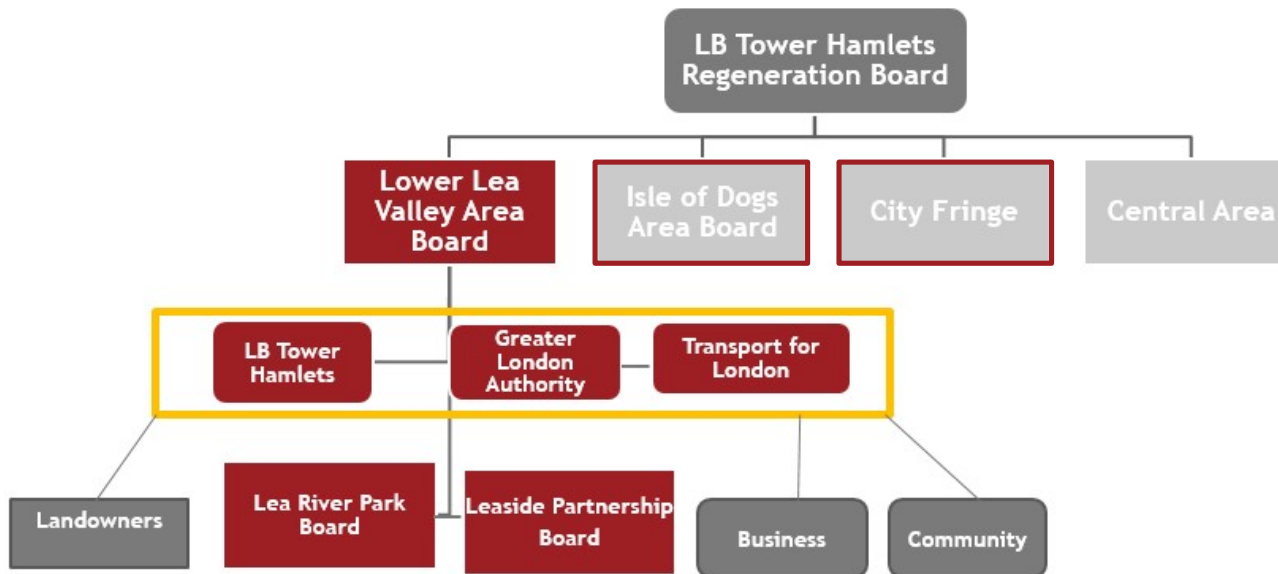
## AREA BASED APPROACH TO REGENERATION



Place-based approach is taken to development in line with the vision in the new Local Plan

# GOVERNANCE

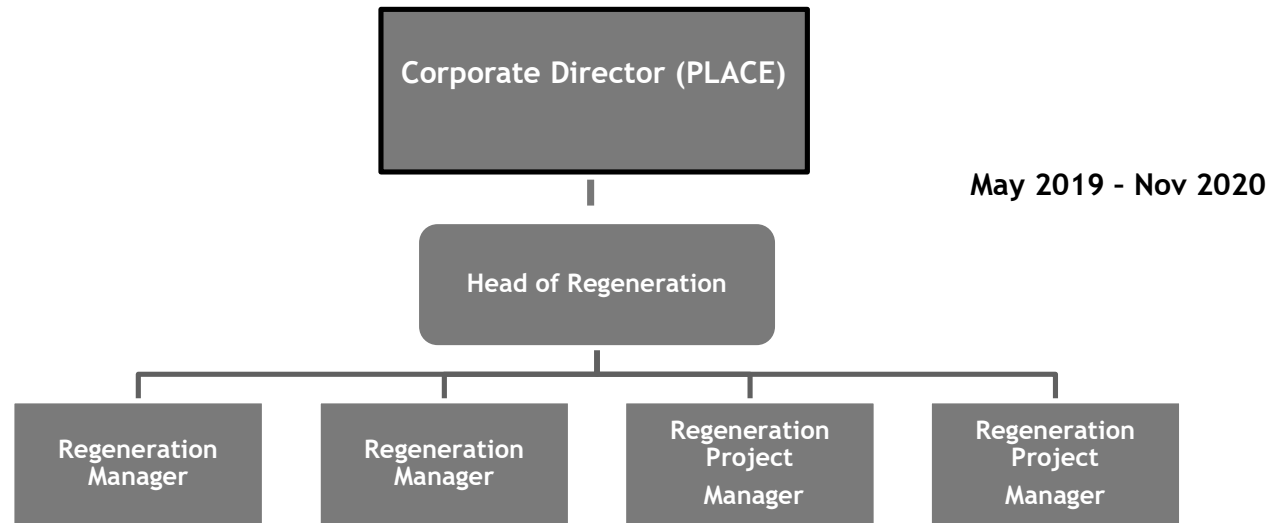
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**Clear Governance and Consultation and Engagement Framework**

## REGENERATION TEAM

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**Interim Regeneration Team to help develop the Regeneration Delivery Plan and develop Year 1 Priorities**

# OUTCOME BASED APPROACH

STRATEGIC PLAN

**Priority 1: People are aspirational, independent and have equal access to opportunities:**

- education, training, and employment 6 ; 7
- children and young people are protected so they get the best start in life 2 ; 3
- joined-up services, feel healthier, independent 1 ; 2 ; 3
- reduced inequality 2 ; 6

**Priority 2: A borough that our residents are proud of and love to live in:**

- clean and green 1 ; 3 ; 4
- good quality affordable homes and well-designed neighbourhoods 1 ; 4 ; 5
- safety and tackled anti- social behavior 3
- being part of a cohesive and vibrant community 3 ; 8

**Priority 3: A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough:**

- open and transparent 2 ; 3
- work together across boundaries in a strong and effective partnership 2 ; 3
- Innovation and excellence to achieve sustainable improvement 1

**1. Infrastructure & Placemaking**  
New development that is designed to promote inclusivity and enhance quality of place, and is matched by timely delivery of social, transport and services infrastructure in order to support sustainable growth.

**2. Reducing inequalities and enhancing wellbeing**  
Reducing health and other inequalities between people from different communities and different areas, and better air quality.

**3. Making communities safer and more cohesive**  
Making communities safer and more cohesive through ensuring the accessibility of spaces, places and facilities; enabling community participation & strong relationships, and promoting culture and leisure opportunities.

**4. Public realm & environment**  
The local environment is improved – cleaner and more attractive streets, open and green spaces.

**5. Affordable housing**  
More high quality, affordable housing which meets the needs of residents is provided.

**6. Employment**  
More local people are in work and progressing to better paid employment.

**7. Enterprise**  
Locally owned businesses and those that employ local people are starting, growing and staying in the borough.

**8. Town Centres & markets**  
Well-functioning town centres and markets provide existing and new residents with access to a range of local shops, services, leisure, cultural and community facilities that meet their needs.

**Managing growth and shaping change:  
Growth must..**

- 1 ..contribute positively to existing 4 ; 5 identified social, economic and 2 3 environmental needs. 6 ; 7 ; 8
- ..be delivered alongside social and transport infrastructure, recognizing 1 that without provision of adequate infrastructure growth cannot be supported.
- ..be balanced, containing a range of 1 3 employment, retail and community 8 5 7 facilities, alongside increasing residential development.
- ..be well-designed and enhance the 1 distinctiveness of our places, ensuring 8 old and new are properly integrated.
- 1 ..respect, protect and enhance our 4 environment and our health and well- 2 being.
- 1 ..optimize the use of the best available 7 technological innovations.

**Spreading the benefits of growth:  
Growth must..**

- 2 ..deliver social, economic and 3 environmental net gains jointly and 6 simultaneously and reduce inequalities, benefitting the lives of existing residents.
- 1 ..promote community cohesion, 3 ensuring the accessibility of spaces, 2 places and facilities.
- 3 ..enable community leadership and engagement.
- 2 ..bring an improved quality of life, 4 health benefits and reduce health inequalities.

LOCAL PLAN

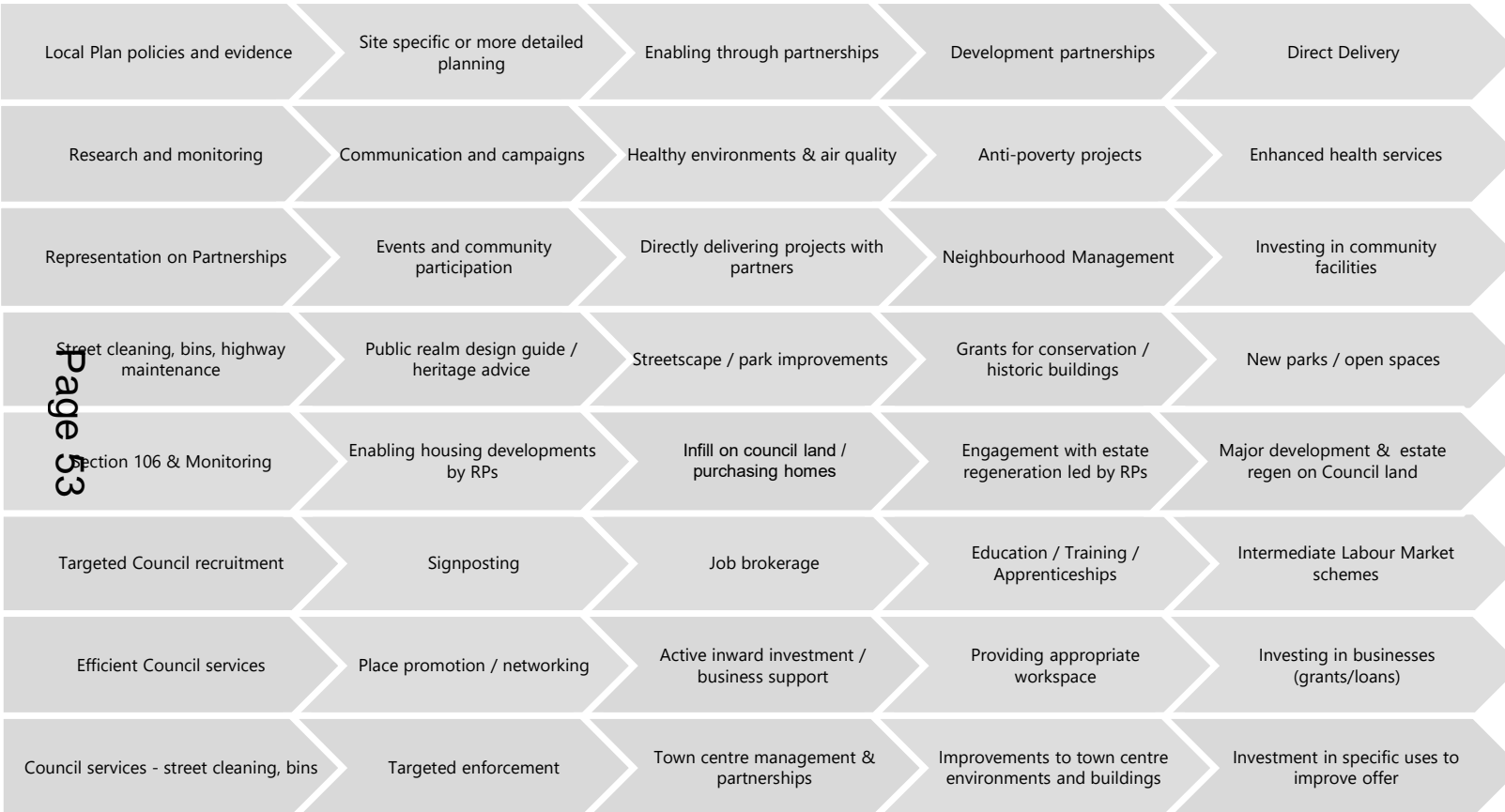
## MAYOR'S PLEDGES

- Reducing Poverty and Inequality, Improving Health
- Tackling The Housing Crises
- Putting Young People at the Heart of What We Do
- Cleaning Our Streets. Cleaning Up Our Air
- Being on your side
- Making Tower Hamlets Safer

# OUTCOME BASED APPROACH - INTERVENTIONS TOOLKIT

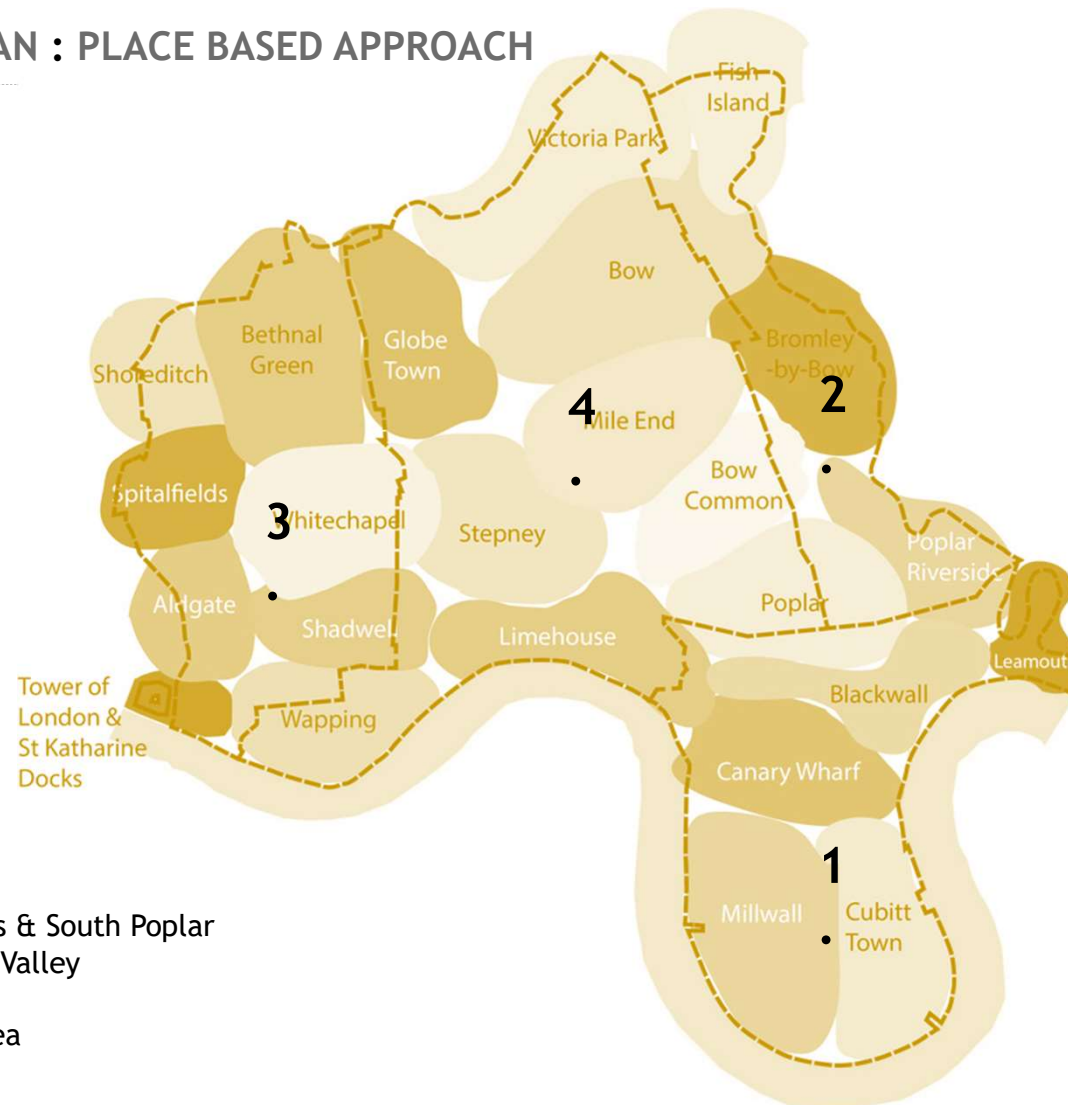
## LOW LBTH INTERVENTION

## HIGH LBTH INTERVENTION



1. **INFRASTRUCTURE AND PLACEMAKING**
2. **REDUCING INEQUALITIES & ENHANCING WELLBEING**
3. **MAKING COMMUNITIES SAFER AND MORE COHESIVE**
4. **PUBLIC REALM & THE ENVIRONMENT**
5. **AFFORDABLE HOUSING**
6. **EMPLOYMENT**
7. **ENTERPRISE**
8. **TOWN CENTRES & MARKETS**

## REGENERATION DELIVERY PLAN : PLACE BASED APPROACH



1. Isle of Dogs & South Poplar
2. Lower Lea Valley
3. City Fringe
4. Central Area



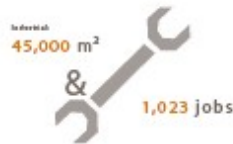
Employment floorspace and job numbers



Retail and leisure floorspace



Potential capacity in existing and newly designated town centres will provide local retail and leisure needs for the community



Infrastructure



## Outcome 1- Infrastructure & Placemaking

Physical and psychological severance by the A12, A13, Burdett Road, River Lea & the railway line.

## Outcome 2 - Reducing inequalities and enhancing wellbeing

LLV have some of the highest percentage of individuals with health problems or disabilities. Poor air quality levels especially at the southern area of Lower Lea Valley and along the A12.

## Outcome 3 - Making communities safer and more cohesive

Reducing existing spatial inequalities and barriers and preventing the future polarisation of areas or communities is a priority for the area.

## Outcome 4- Public Realm

Projected open space deficiencies in the Lower Lea Valley.

## Outcome 5- Affordable Housing

LLV contains wards which have some of the

- highest % of households classed as overcrowded.
- highest % of households socially renting in the borough.

## Outcome 6- Employment

Some wards in LLV have the highest rates of

- employment deprivation in the Borough
- working age residents with no qualifications in the Borough

## Outcome 7- Enterprise

Promote, provide, manage and maintain flexible affordable workspace which responds to local economic needs of micro and small businesses, including supporting facilities (e.g. childcare).

## Outcome 8- Town Centres and Markets

Encourage activity with a range of retail units and employment business spaces, including small shops and flexible workspaces for small businesses.

# LOWER LEA VALLEY - REGENERATION DELIVERY PLAN

## 1. INFRASTRUCTURE & PLACEMAKING

- Major severance - main roads, railway lines and River Lea.
- Remaining development sites harder to bring forward providing time for much needed more detailed planning.

## 2. REDUCING INEQUALITIES AND ENHANCING WELLBEING

- Most deprived part of the borough and worst health.
- Particularly poor air quality, especially at the southern area of Lower Lea Valley and along the A12.

## 3. MAKING COMMUNITIES SAFER AND MORE COHESIVE

- Polarisation of communities due to spatial barriers and social exclusion.
- Challenge to integrate new and old residents due to lack of town centres and lower levels of affordable housing in new developments

## 4. PUBLIC REALM & ENVIRONMENT

- A number of new green spaces proposed along the River Lea but need to ensure coordinated delivery of complementary spaces that meet local needs.
- Variety of public realm improvements planned. Need to ensure they fit together to create a better place.

## 5. AFFORDABLE HOUSING

- Significant need – borough's highest rates of overcrowding
- Viability challenges (due to low property values and high infrastructure costs) mean high levels of affordable housing will be hard to achieve through S106.

## 6. EMPLOYMENT

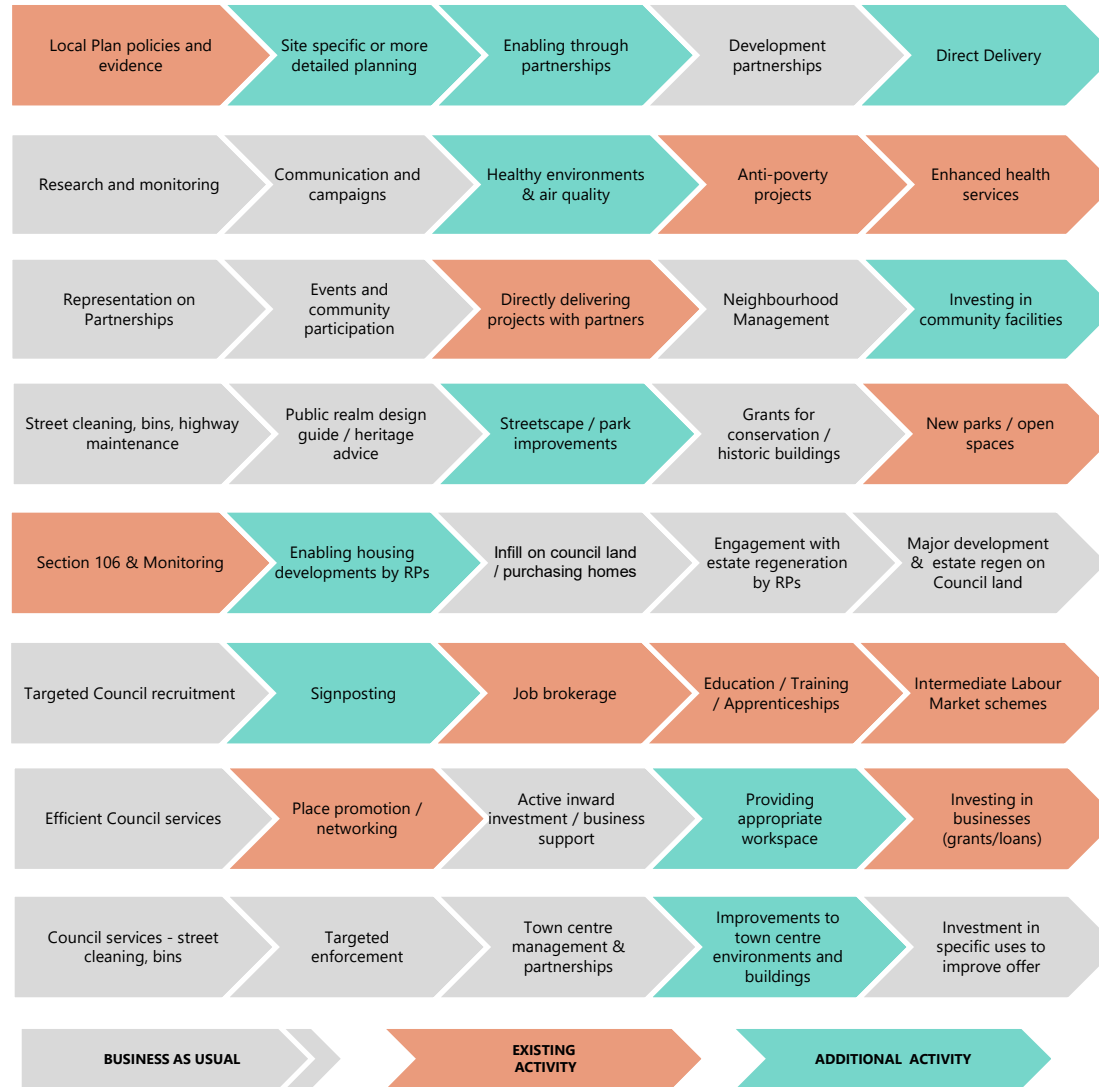
- Highest levels of worklessness and lowest skills/qualifications in Tower Hamlets suggesting need to better target employment programmes on this area
- Despite employment growth, still far fewer job opportunities than Isle of Dogs or City Fringe.

## 7. ENTERPRISE

- High rates of business growth.
- Developing cluster of flexible and creative workspaces.
- Premises for mid-sized businesses and grow-on space for small businesses are under threat from residential-led development.

## 8. TOWN CENTRES & MARKETS

- The area lacks a proper town centre.
- Bromley-by-Bow is subject to major change and could provide this function.
- Aberfeldy Neighbourhood Centre needs to adapt to survive due to local developments.



## PROPOSED INTERVENTIONS

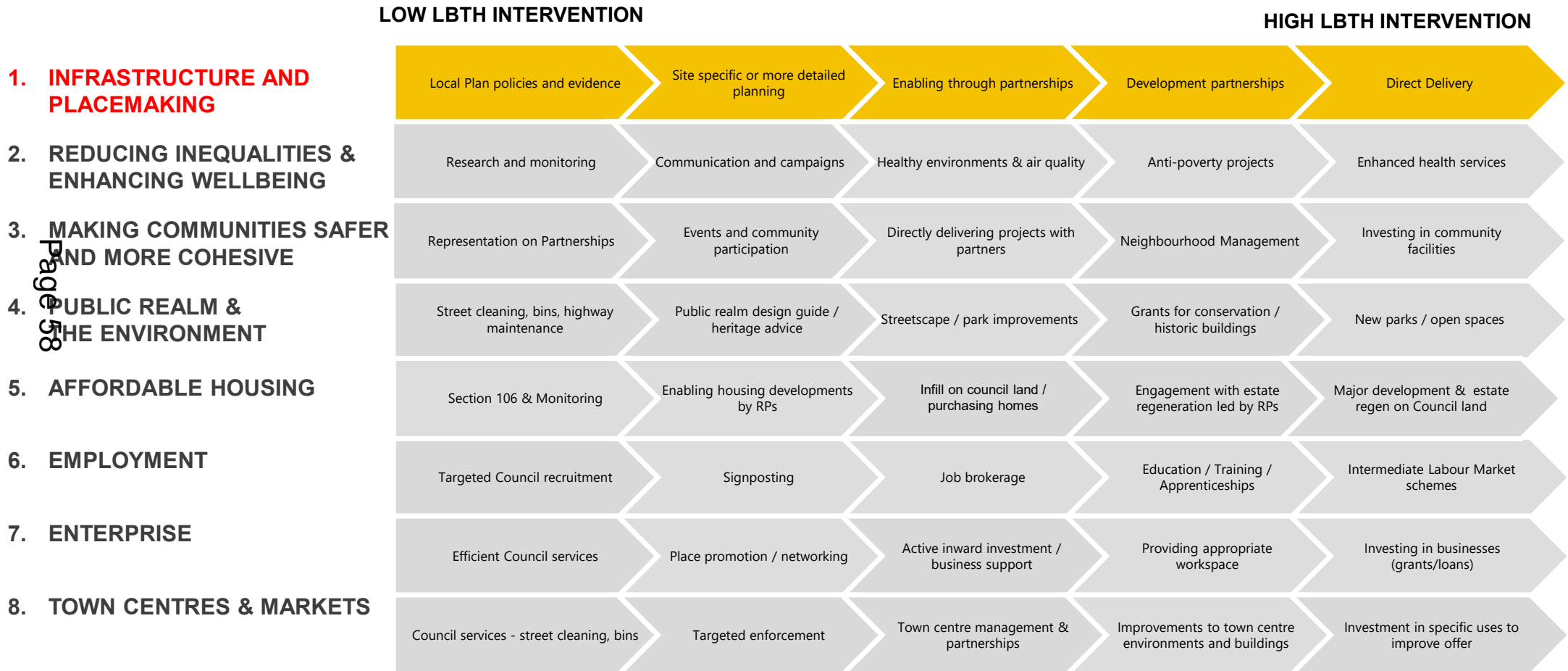
- East of the Borough AAP
- East of the Borough Land Audit (complete)
- Lower Lea Valley Bridge Programme
- LLV Movement Strategy (evidence base draft delivered led by Strategic Planning)
- LLV Intensification of Industrial Uses (GLA led )
- A12/A13 air quality mitigation - Implementation projects (plan approved, led by Public Realm officers)
- Lower Lea Valley meanwhile uses for all (to commence in the next financial year) - Development brief for Bromley Hall School
- LLV Environmental improvements
- River Lea Green spaces / Delivery of the River Lea Regional Park (focusing on East India Basin)
- Engagement with estate regeneration (Aberfeldy West)
- Targeting employment deprivation in the Lower Lea Valley (GED officers)
- Strengthening Aberfeldy / LLV South Neighbourhood Centre (s) (achieved through estate regeneration and East of Borough AAP, currently in discussions)



# Embedding our approach to regeneration

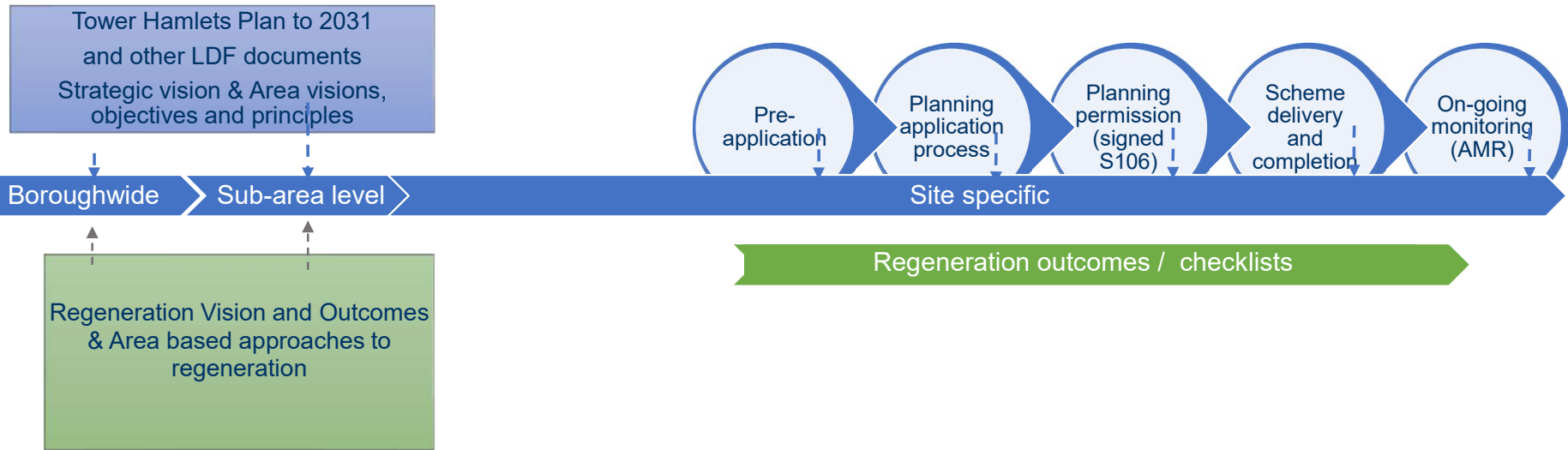


# EMBEDDING THE APPROACH



# EMBEDDING THE APPROACH

Page 59



## INTEGRATING PLANNING POLICY AND REGENERATION OUTCOMES

| REGENERATION OUTCOMES   | TOWER HAMLETS PLAN 2031                  |  |   |
|---|--|--|---|
|   | Topic area                               | Objective  | Policies  |
| 1. Infrastructure & place-making: New development that is designed to promote inclusivity and enhance quality of place, and is matched by timely delivery of social, transport and services infrastructure in order to support sustainable growth.                      | Achieving sustainable growth             | Key objective 1:<br>All principles<br>Key objective 2:<br>All principles                       | S.SG1: Areas of growth and opportunity within Tower Hamlets<br>S.SG2: Delivering sustainable growth in Tower Hamlets<br>D.SG2: Health impact assessments<br>D.SG3: Planning and construction of new development<br>D.SG4: Developer contributions |
|   | Meeting housing needs                    | Key objective 1:<br>Principles 1, 2, 11, 12<br>Key objective 2:<br>Principles 3, 6             | S.H1: Delivering housing<br>D.H4: Specialist housing<br>D.H5: Gypsies and travellers accommodation<br>D.H6: Student housing<br>D.H7: Housing with shared facilities (houses of multiple occupation)   |
|   | Delivering economic growth               | Key objective 1:<br>Principles 1, 4, 5, 6, 7<br>Key objective 2:<br>Principles 4, 5, 7         | S.EMP1: Creating investment and jobs<br>D.EMP2: New employment space<br>D.EMP3: Loss of employment space<br>D.EMP4: Redevelopment within designated employment areas  |
|   | Improving connectivity and travel choice | Key objective 1:<br>Principles 3, 4, 6, 8, 13, 14<br>Key objective 2:<br>Principles 1, 2, 7, 8 | S.TR1: Sustainable travel<br>D.TR2: Impacts on the transport network<br>D.TR3: Parking and permit-free<br>D.TR4: Sustainable delivery and servicing   |
|   | Protecting and managing our environment  | Key objective 1:<br>Principles 3, 12, 13, 14<br>Key objective 2:<br>Principles 2, 8            | D.ES2: Air quality<br>S.SG2: Delivering sustainable growth in Tower Hamlets<br>D.SG2: Health impact assessments   |
| 3. Making communities safer and more cohesive: Making communities safer and more cohesive through ensuring the accessibility of spaces, places and facilities; enabling community participation & strong relationships and promoting culture and leisure opportunities. | Achieving sustainable growth             | Key objective 1:<br>Principles 1, 3<br>Key objective 2:<br>Principles 1-4                      | Working across policies   |

## INTEGRATING PLANNING POLICY AND REGENERATION OUTCOMES

| REGENERATION OUTCOMES  | TOWER HAMLETS PLAN 2031                               |  |  |
|--|---|--|--|
|  | Topic area  | Objective  | Policies   |
| 4. Public realm & environment: The local environment is improved – Cleaner and more attractive streets, open and green spaces.   | Enhancing open and water spaces                       | Key objective 1:<br>Principles 3, 6, 8, 9, 10<br>Key objective 2:<br>Principles 1, 2, 6, 8 | S.OWS1: Creating a network of open spaces<br>S.OWS2: Creating a network of water spaces<br>D.OWS3: Open space and green grid networks<br>D.OWS4: Water spaces  |
| 5. Affordable housing: More high quality, affordable housing which meets the needs of residents is provided.   | Achieving sustainable growth<br>Meeting housing needs | Key objective 1:<br>Principle 1  | D.H2: Affordable housing and housing mix<br>D.H3: Housing standards and quality  |
| 6. Employment: More local people are in work and progressing to better paid employment.  | Delivering economic growth                            | Key objective 1:<br>Principle 1<br>Key objective 2:<br>Principle 1                         | S.EMP1: Creating investment and jobs   |
| 7. Enterprise: Locally owned businesses and those that employ local people are starting, growing and staying in the borough.   | Delivering economic growth                            | Key objective 1:<br>Principles 1, 3, 6   | D.EMP2: New employment space<br>D.EMP4: Redevelopment within designated employment areas   |
| 8. Town centres & markets: Well-functioning town centres and markets provide existing and new residents with access to a range of local shops, services, leisure, cultural and community facilities that meet their needs. | Revitalising our town centres                         | Key objective 1:<br>Principles 1, 5, 6, 7, 9<br>Key objective 2:<br>Principles 4, 6, 8     | S.TC1: Supporting the network and hierarchy of centres<br>D.TC2: Retail in our town centres<br>D.TC3: Retail outside our town centres<br>D.TC4: Financial and professional services<br>D.TC5: Food, drink, entertainment and the night-time economy<br>D.TC6: Short-stay accommodation<br>D.TC7: Markets |
|  | Supporting community facilities                       | Key objective 1:<br>Principles 1, 5, 6, 7, 9<br>Key objective 2:<br>Principles 4, 6, 8     | S.CF1: Supporting community facilities<br>D.CF2: Existing community facilities<br>D.CF3: New and enhanced community facilities<br>D.CF4: Public houses   |

## REGENERATION PRIORITIES FOR SUB AREA TO INFORM PRE\_APPLICATION DISCUSSIONS

| REGENERATION OUTCOMES  | LOWER LEA VALLEY REGENERATION DELIVERY PLAN CONTEXT  | HOW THE PROPOSAL WILL ADDRESS ISSUES IN THE LOCAL AREA |
|--|--|--|
| 1. INFRASTRUCTURE & PLACE-MAKING: New development that is designed to promote inclusivity and enhance quality of place, and is matched by timely delivery of social, transport and services infrastructure in order to support sustainable growth.                       | Physical and psychological severance by the A12, A13, Burdett Road, River Lea & the railway line.  |  |
| 2. REDUCING INEQUALITIES AND ENHANCING WELLBEING: Reducing health and other inequalities between people from different communities and different areas, and better air quality   | LLV have some of the highest percentage of individuals with health problems or disabilities.<br>Poor air quality levels especially at the southern area of Lower Lea Valley and along the A12. .         |  |
| 3. MAKING COMMUNITIES SAFER AND MORE COHESIVE: Making communities safer and more cohesive through ensuring the accessibility of spaces, places and facilities; enabling community participation & strong relationships, and promoting culture and leisure opportunities. | Reducing existing spatial inequalities and barriers and preventing the future polarisation of areas or communities is a priority for the area.   |  |
| 4. PUBLIC REALM & ENVIRONMENT: The local environment is improved – Cleaner and more attractive streets, open and green spaces.   | Projected open space deficiencies in the Lower Lea Valley.   |  |
| 5. AFFORDABLE HOUSING: More high quality, affordable housing which meets the needs of residents is provided.   | <ul style="list-style-type: none"> <li>highest % of households classed as overcrowded.</li> <li>highest % of households socially renting in the borough.</li> </ul>                                      |  |
| 6. EMPLOYMENT: More local people are in work and progressing to better paid employment.  | Some wards in LLV have the highest rates of <ul style="list-style-type: none"> <li>employment deprivation in the Borough</li> <li>working age residents with no qualifications in the Borough</li> </ul> |  |
| 7. ENTERPRISE: Locally owned businesses and those that employ local people are starting, growing and staying in the borough.   | Promote, provide, manage and maintain flexible affordable workspace which responds to local economic needs of micro and small businesses, including supporting facilities (e.g. childcare).              |  |
| 8. TOWN CENTRES & MARKETS: Well-functioning town centres and markets provide existing and new residents with access to a range of local shops, services, leisure, cultural and community facilities that meet their needs.   | Encourage activity with a range of retail units and employment business spaces, including small shops and flexible workspaces for small businesses.  |  |

- Checklists for applicants to complete at pre-application and outline application stage
- Four checklists – one for each sub-area
- Outlines the regeneration context per area for developments to respond to
- Used internally for stages beyond planning application
- Example shown: Lower Lea Valley

# Improving our communication on the benefits of regeneration



## REGENERATION AS A CUMULATIVE PROCESS

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Urban regeneration is defined as

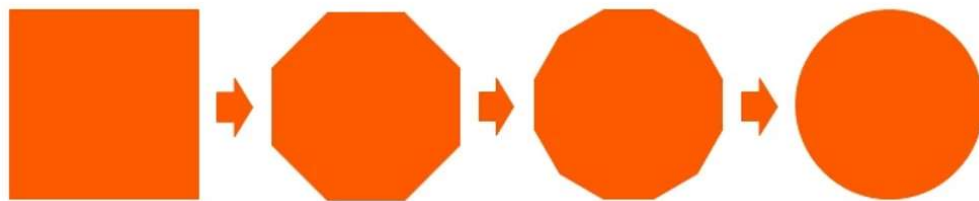
*'a comprehensive and integrated vision and action which leads to the resolution of urban problems and which seeks to bring about a lasting improvement in the economic, physical, social and environmental condition of an area that has been subject to change'.*

Urban Regeneration: A Handbook, Peter Roberts, Peter W. Roberts, Hugh Sykes, SAGE, 2000,

Every site is an opportunity to deliver regeneration outcomes

Regeneration is a cumulative process and transformation happens incrementally

Improvement across all Regeneration Outcomes





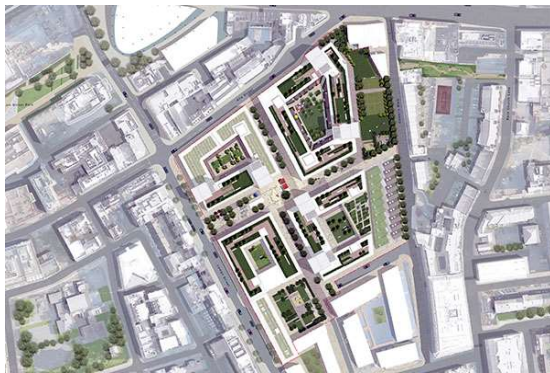
## REGENERATION - OUTPUTS/OUTCOMES

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### Outputs (Short/Medium Term)

Number of affordable homes, no of jobs created, new GP surgery, Community Centre, Schools, new open space etc.

At site level.



Project level.



### Outcomes (Long term )

Improved Health, Housing that is Affordable, More people in employment, Educational achievement etc.

Area Level. Borough level.



### At site level. Project level.

- How we integrate outcomes in the delivery of projects (Planning, Capital Programme, Procurement etc)
- How we gather information about outputs
- How we evaluate outcomes

### Area Level. Borough level.

- How we direct Proposals to deliver outcomes for the area
- How we collate Information about the place/area
- How we gather area level updates; explore opportunity for longitudinal studies to assess impact

Working with Communications Team

## REGENERATION : OUTPUTS/OUTCOMES

| REGENERATION OUTCOMES   | PLANNING PERMISSIONS  |  |  |   |
|---|---|--|--|---|
|   | GOODMANS FIELDS   |  | ALDGATE PLACE  |   |
|   | Former Goodmans Fields, 74 Alie Street and Land North of Hooper Street and East of 99 Leman Street, Hooper Street, London E1(PA/11/03587) |  | Aldgate Place Land Bounded By Whitechapel High Street, Leman Street, Buckle Street & Commercial Rd, London, E1 (PA/13/00218 AND PA/13/00219)   |   |
|   | QUANTUM   |  | QUANTUM  |   |
| <p>1. Infrastructure &amp; place-making: New development that is designed to promote inclusivity and enhance quality of place, and is matched by timely delivery of social, transport and services infrastructure in order to support sustainable growth.</p> | Residential units (Use Class C3)  | 164 units                                  | Residential units (Use Class C3)   | 463 units   |
|   | Commercial and leisure floor space at ground level (Use Classes A1 - A5, B1a, D1 and D2)  | 1758 sqm                                   | Office (use class B1), hotel (use class C1), retail including restaurants, cafes and drinking establishments (use classes A1-A4) and leisure (use class D2) uses; creation of new pedestrianised street, public open spaces, children's play spaces and associated car and cycle parking together with associated highways works and landscaping | <ul style="list-style-type: none"> <li>Examples of Goodmans Fields and Aldgate Place, using signed S106 agreements to extract provisions relating to regeneration outcomes</li> </ul> |
|   | Hotel (Use Class C3)  | 250 bedrooms                               |  |   |
|   | Ancillary swimming pool   | 857 sqm                                    |  |   |
|   | Basement level parking and ancillary facilities for storage, management facilities and plant  | 255 car parking spaces                     |  |   |
|   |   | 35 motor cycle spaces                      |  |   |
|   | 50 electric car charge points   | 1388 cycle parking spaces                  |  |   |
|   | Residential units (Use Class C3)  | 700 units                                  | Education  |   |
|   | Commercial and leisure floor space (Use Classes A1 - A5, B1a, D1 and D2)  | 6,891 sqm                                  |  |   |
|   | Public Open Space   | 9,380 sqm                                  |  |   |
|   | Education (off site and mitigation)   | £29,660                                    |  |   |
|   | Education   | £2,946,773                                 |  |   |
|   | Transport   |  | Crossrail contributions  | £909,179  |
|   | Sustainable transport measures  | £339,300                                   | Additional sustainable transport facilities  | £13,980   |
| 2 car club spaces located in the vicinity of the development  |   | TFL cycle superhighway 2, specified routes | £154,000   |   |
| A location set aside for a docking station for cycle hire spaces  |   | Traffic management order                   | £106   |   |

| REGENERATION OUTCOMES  | PLANNING PERMISSIONS  |           |  |           |
|--|---|-----------|--|-----------|
|  | GOODMANS FIELDS   |           | ALDGATE PLACE  |           |
|  | Former Goodmans Fields, 74 Alie Street and Land North of Hooper Street and East of 99 Leman Street, Hooper Street, London E1(PA/11/03587) |           | Aldgate Place Land Bounded By Whitechapel High Street, Leman Street, Buckle Street & Commercial Rd, London, E1 (PA/13/00218 AND PA/13/00219) |           |
|  | QUANTUM   |           | QUANTUM  |           |
| 2. Reducing inequalities and enhancing wellbeing: Reducing health and other inequalities between people from different communities and different areas, and better air quality.  | Health Centre   | 1,626 sqm |  |           |
|  | Air quality financial contribution  | £10,000   |  |           |
| 3. Making communities safer and more cohesive: Making communities safer and more cohesive through ensuring the accessibility of spaces, places and facilities; enabling community participation & strong relationships, and promoting culture and leisure opportunities. | Range of leisure, community and employment uses   |           | Requirement for portion of affordable housing provision to be wheelchair accessible or capable of being adapted                              | 10.00%    |
|  | Provision of facilities to promote accessibility through sustainable modes of transport and accessible parking spaces.                    |           |  |           |
| 4. Public realm & environment: The local environment is improved – Cleaner and more attractive streets, open and green spaces.   | Communal amenity space  | 3,564 sqm | Public realm improvements in specified areas   | £241,100  |
|  | Child Playspace   | 2,900 sqm |  |           |
|  | Public open space   | 8,230 sqm |  |           |
|  | Area of biodiverse roof   | 1,425 sqm |  |           |
|  | Public realm improvements   | £600,000  | Street scene improvements in specified areas   | £341,640  |
|  | Local open space improvements   | £699,200  | Provision of new public open space or improvements to existing open space in specified locations   | £863,392  |
| 5. Affordable housing: More high quality, affordable housing which meets the needs of residents is provided.   | Social rent   | 53 units  | Affordable rent  | 105 units |
|  | Affordable rent   | 47 units  |  |           |
|  | Intermediate  | 100 units | Shared ownership   | 45 units  |
|  | Overall provision   | 30%       |  |           |

| REGENERATION OUTCOMES  | PLANNING PERMISSIONS   |                                |  |             |
|--|--|--------------------------------|--|-------------|
|  | GOODMANS FIELDS  |                                | ALDGATE PLACE  |             |
|  | Former Goodmans Fields, 74 Alie Street and Land North of Hooper Street and East of 99 Leman Street, Hooper Street, London E1(PA/11/03587)  |                                | Aldgate Place Land Bounded By Whitechapel High Street, Leman Street, Buckle Street & Commercial Rd, London, E1 (PA/13/00218 AND PA/13/00219)   |             |
|  | QUANTUM  |                                | QUANTUM  |             |
| 6. Employment: More local people are in work and progressing to better paid employment.  | Prior to commencement of blocks agree with Council's Access to Employment Team basis and methodology to participate in initiatives and agree method of monitoring.   |                                | Prior to commencement of development agree with Council's Access to Employment Team basis and methodology to participate in initiatives, set up a working group to consider and implement any employment, training and enterprise initiatives and agree method of monitoring.  |             |
|  | Provide a schedule of job opportunities created. Advertise jobs exclusive to local residents through Council job brokerage service for a period of at least 2 weeks and use reasonable endeavours to ensure target 20% is achieved   |                                | Provide a schedule of anticipated job opportunities created by the construction phase of development. Advertise jobs exclusive to local residents through Council job brokerage service for a period of at least 2 weeks and use reasonable endeavours to ensure target 20% is achieved  |             |
|  | Non-technical jobs for construction phases   | Minimum 20%                    | Non-technical vacancies, work placements and new apprenticeships   | Minimum 20% |
|  | Non-technical jobs for end users phase   | Minimum 20%                    | Non-technical jobs for end users phase   | Minimum 20% |
| 7. Enterprise: Locally owned businesses and those that employ local people are starting, growing and staying in the borough.   | Provide a schedule of construction contracts and suppliers required during construction phases.  |                                | Provide a schedule of construction contracts and suppliers required during construction phases.  |             |
|  | Ensure procurement of local companies and suppliers for a portion of the total value   | Minimum 20%                    | Ensure procurement of local companies and suppliers for a portion of the total value   | Minimum 20% |
|  | Operator of the hotel to enter into social compact with the Council recruiting and training staff within the locality :<br>-Mentoring staff to ensure retention and advancement<br>-Offer bespoke training opportunities<br>-Offer work placement initiatives to provide young people with an insight into hotel hospitality careers |                                | Operator of the hotel to enter into social compact with the Council recruiting and training staff within the locality :<br>-Mentoring staff to ensure retention and advancement<br>-Offer bespoke training opportunities<br>-Offer work placement initiatives to provide young people with an insight into hotel hospitality careers |             |
|  | Apprenticeships of young unemployed people   | Minimum 10                     | Recruitment and training staff living in the Borough two year level 2 apprenticeships to young unemployed people   | 10          |
|  |  |                                | Prior to commencement submit to the Council the Local Apprenticeship Specification and ensure compliance   |             |
|  |  |                                | Provide NVQ Level 2 apprenticeships inc shared apprenticeship schemes during construction phase  | 25          |
|  |  |                                | Provide 2,888 sqm flexible workspaces for local start ups and SMEs.  |             |
|  | Provision of a local training centre, with user and lease terms which make provision for a lease term of 15 years at peppercorn rent   |                                | Enterprise and employment  | £202,856.00 |
| Community facilities   | £1,248,201.13  | Community and youth facilities | £124,878.00  |             |
| Hotel, swimming pool, health centre, office and retail spaces, open spaces and public realm  | As above   | Leisure and youth facilities   | £466,200.00  |             |
| 8. Town centres & markets: Well-functioning town centres and markets provide existing and new residents with access to a range of local shops, services, leisure, cultural and community facilities that meet their needs. |  |                                |  |             |



## Outcomes (Long term )

## Outputs (Short/Medium Term)



### REGENERATION OUTCOMES

4. **Public realm & environment:** The local environment is improved – Cleaner and more attractive streets, open and green spaces.

### GOODMANS FIELDS

Former Goodmans Fields, 74 Alie Street and Land North of Hooper Street and East of 99 Leman Street, Hooper Street, London E1(PA/11/03587)

### QUANTUM

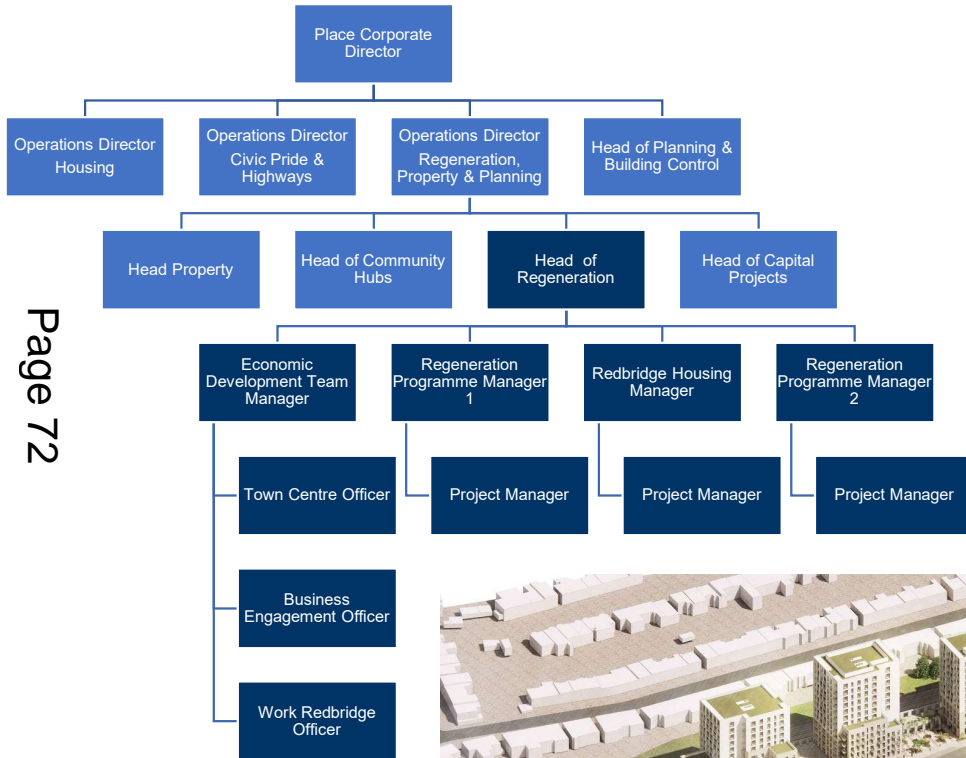
|                               |           |
|-------------------------------|-----------|
| Communal amenity space        | 3,564 sqm |
| Child Playspace               | 2,900 sqm |
| Public open space             | 8,230 sqm |
| Area of biodiverse roof       | 1,425 sqm |
| Public realm improvements     | £600,000  |
| Local open space improvements | £699,200  |



# Our approach and regeneration team size compared to other London boroughs



# LONDON BOROUGH OF REDBRIDGE



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Total Regeneration Team Members: 11

*\*indicative understanding of the Council regeneration team structures*

Current projects include:

## Ilford - Clements Road

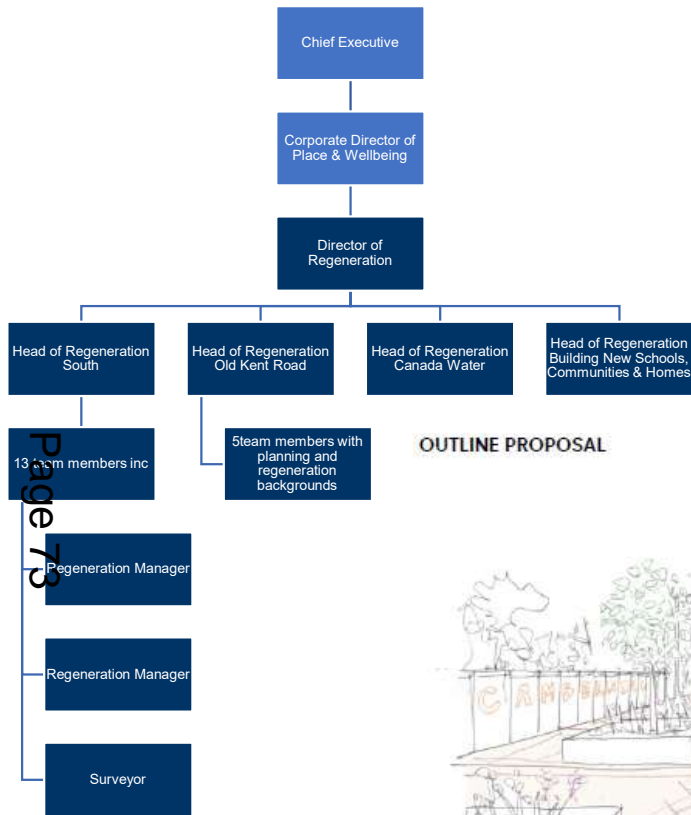
- Proposal for a new residential development of consent was given in June 2020 for approximately 94 homes at the former council offices, and 17-23 and 22-26 Clements Road, which will include 35 per cent affordable.
- A planning application was submitted in Oct 2019 and resolution to grant .

## Seven Kings Car Park

- Mixed use scheme as part of a Community Hubs programme
- Planning application submitted in August 2020 for 236 homes (inc.35% affordable units), an integrated Community/Health Hub and a Business Enterprise Hub.



# LONDON BOROUGH OF SOUTHWARK



## OUTLINE PROPOSAL



Current projects include:

### The Social Regeneration Charter

- LB Southwark developed a social regeneration charter tool for creating a common vision and programme to improve the well-being of residents
- Culminated in the Regeneration That Works for All Framework and the Social Regeneration Indicators which were approved by Cabinet in January 2019.
- Charters have been created for Canada Water in 2018, and draft charters for Old Kent Road and St Thomas Street in 2019.

### Camberwell Area Plan

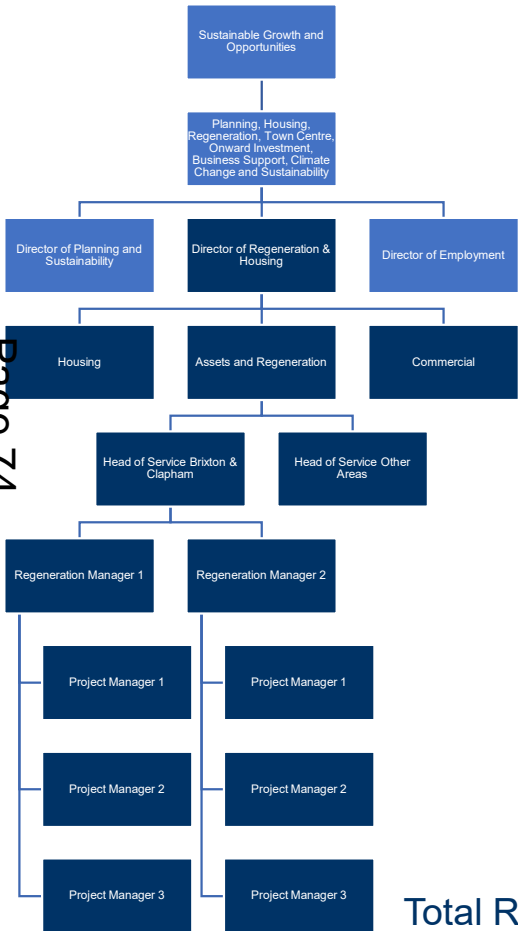
- The Camberwell Area Plan was produced following research and analysis to look at ways to improve the area funded by £110,000 from the Mayor's Good Growth Fund, aiming to develop a plan and produce recommendations to maximize its potential for people who currently live, work or visit the area and for people who wish to come in the future
- Three key improvement areas: (1) better connections between Denmark Hill station and the hospitals and town centre, (2) help to open more space at Camberwell College of Arts to local people, and (3) improve the landscaping on Camberwell Station Rd and open up empty arches to businesses.
- Practitioners are being procured to progress detailed design work with partners including local residents.

Total Regeneration Team Members: 10

*\*indicative understanding of the Council regeneration team structures*

# LONDON BOROUGH OF LAMBETH

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Total Regeneration Team Members: 14

*\*indicative understanding of the Council regeneration team structures*



Current projects include:

## Rush Common Woodland Walk

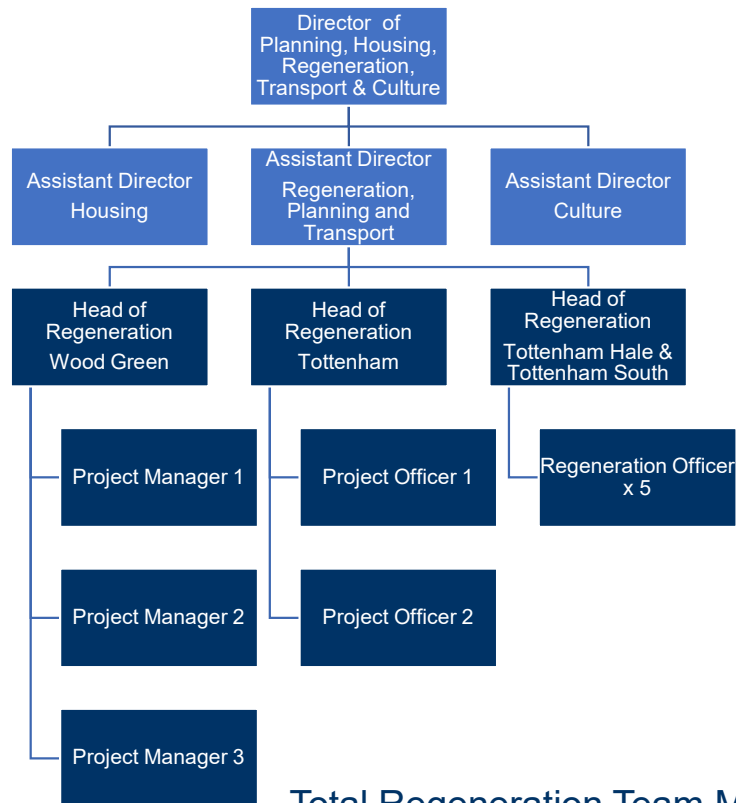
- Improvements have begun on Rush Common Woodland Walk, utilized for fitness and play by nearby residents.
- The completed works include; the revitalisation and extension of the children's play area and the first tranche of tree planting.
- Funding includes grants: GLA Greener City Fund, and the London Marathon Charitable Trust, plus a capital investment from S106. St Matthews Estate TRA were also awarded a DHCLG Pocket Parks grant towards planting and play.
- A Launch event is anticipated in May 2021.

## Low traffic neighbourhoods temporary scheme

- Part of Lambeth's response to the current pandemic is the creation of a low traffic neighbourhoods in Tulse Hill, Ferndale and Raitton
- The scheme is delivered in two stages
  - Immediately creating a low traffic neighbourhood with a temporary scheme (complete)
  - Developing a permanent scheme, which will be informed by engaging with the community and learning lessons from the temporary scheme

# LONDON BOROUGH OF HARINGEY

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**Total Regeneration Team Members: 13**

*\*indicative understanding of the Council regeneration team structures*

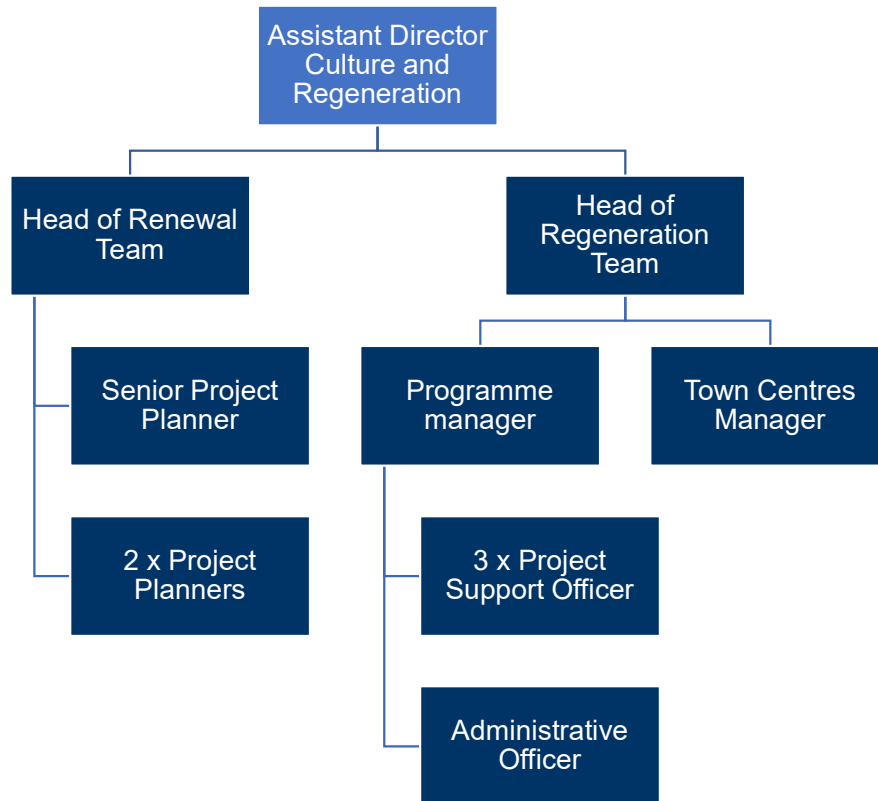
Current projects include:

Welbourne

- Scheme providing 131 new council homes with a mix of 1, 2 and 3 bed flats arranged over three blocks, a raised landscaped courtyard and roof terrace for residents, space for a new health centre to serve up to 30,000 local people and retail space on the ground floor.
- Haringey Council signed a Strategic Development Partnership (SDP) with Argent Related to regenerate the heart of Tottenham Hale in 2017. Argent Related is developing 5 sites: Welbourne, North Island, Ferry Island, Ashley Road West and Ashley Road East.
- Haringey Council will own the homes, and they will be managed by Homes for Haringey.
- United Living were appointed to progress the works last year.



# LONDON BOROUGH OF BROMLEY



**Total Regeneration Team Members: 11**

*\*indicative understanding of the Council regeneration team structures*

Current projects include:

Bromley Town Centre Regeneration: Churchill Quarter

In a joint venture with Countryside, LB Bromley will deliver a new housing development in central Bromley encompassing 400 homes with 35% affordable housing.

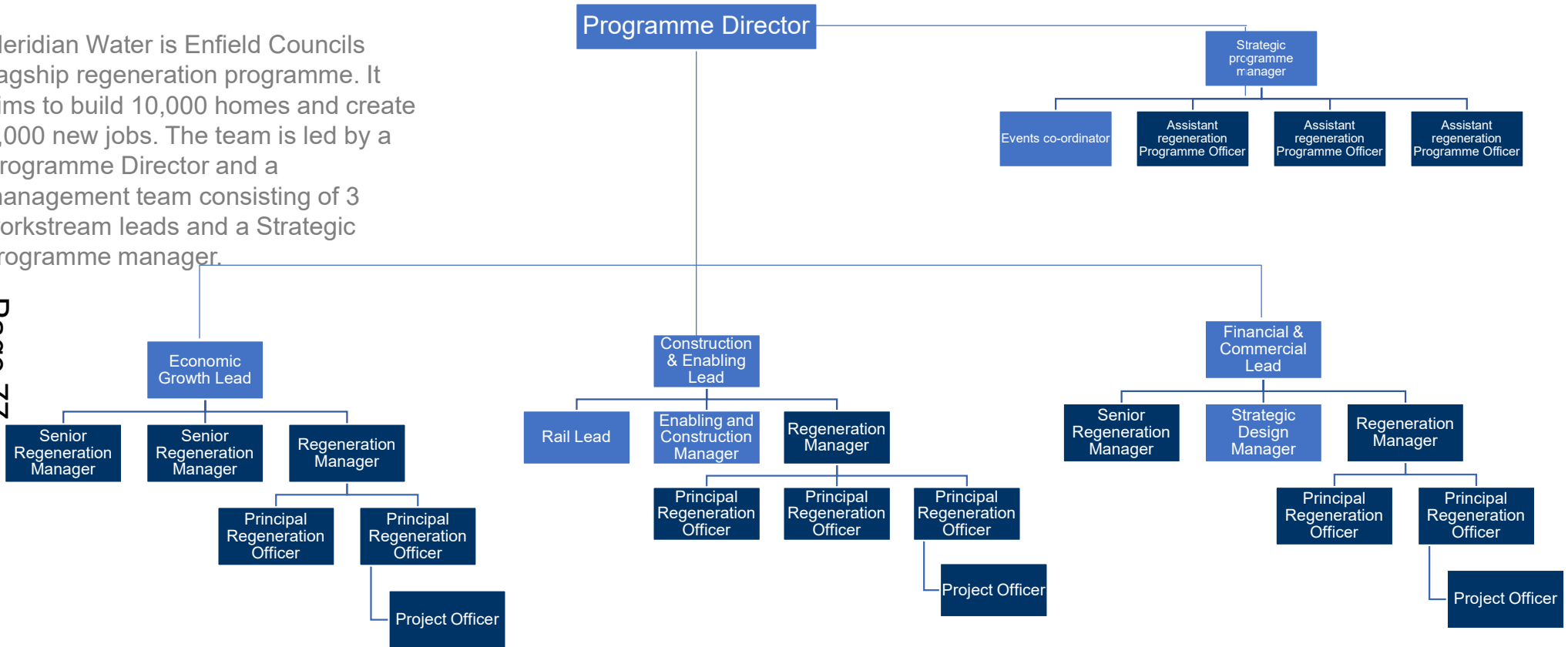
- The proposals include the demolition of maisonettes in Ethelbert Close, Bromley Town Church and three shops in Bromley High Street.
- The demolished church would move into a new community space, with room for shops, restaurants and bars also included in the plans.
- Significant CPO required to acquire the full site.



# MERIDIAN WATER, LONDON BOROUGH OF ENFIELD

Meridian Water is Enfield Council's flagship regeneration programme. It aims to build 10,000 homes and create 6,000 new jobs. The team is led by a Programme Director and a management team consisting of 3 workstream leads and a Strategic programme manager.

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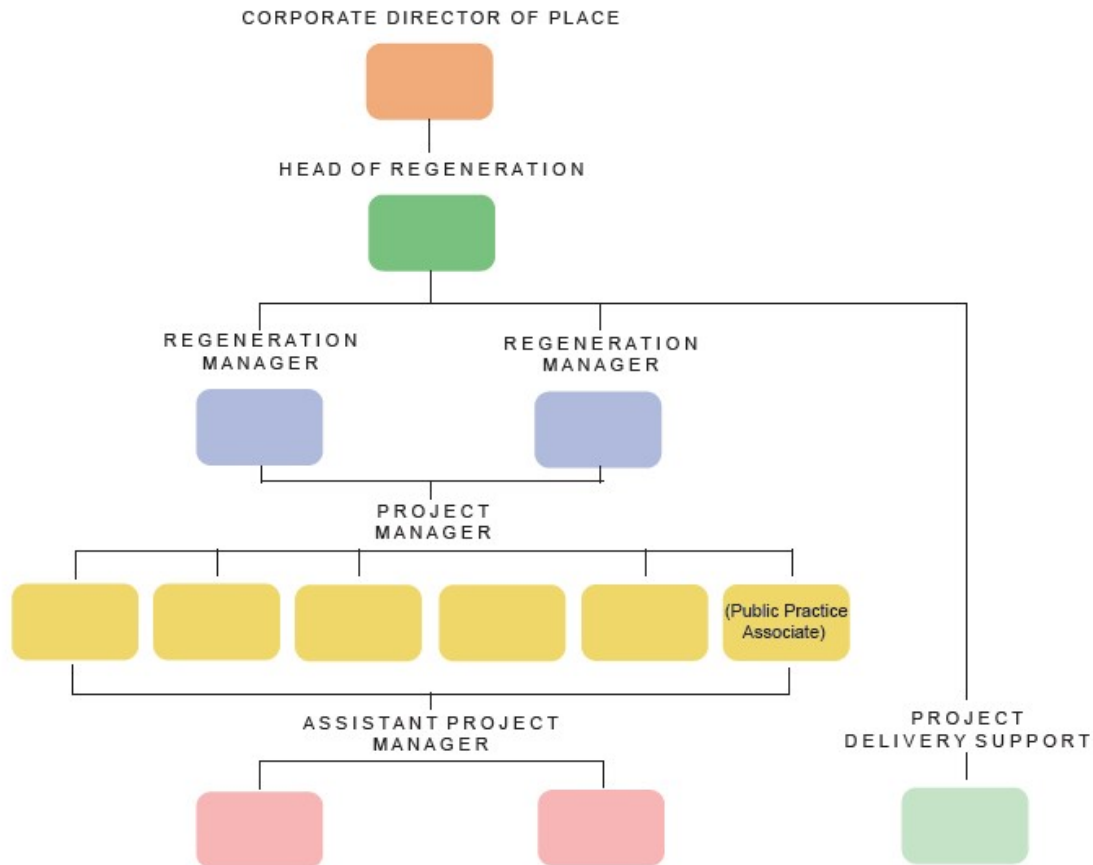


Total Regeneration Team Members: 19

*\*indicative understanding of the Council regeneration team structures*

# LONDON BOROUGH OF TOWER HAMLETS

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Total Regeneration Team Members: 12

- Specific Projects/Areas
- Timeframe
- Structures
- Numbers
- Funding
- Links to other services



# Questions?



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**Tower Hamlets Homes**  
**Update on the Leasehold  
Improvement Plan**

**Richard Hards**  
**Head of Leasehold Services**

**February 2021**

- Provide up to date context on the LBTH leasehold portfolio.
- Update members on the development and progress of the leasehold service improvement plan and supporting communications strategy .

- Currently there are just over 10,000 leaseholders/freeholders in a portfolio of 21,000 homes. We have around 30% of lessees formally registered as sublet.
- The proportion of original RTB purchasers is constantly reducing. Currently at 45% but only 33% are resident.
- The current level of leasehold overall satisfaction is at 77%, with caretaking at 79%, which compares favourably with other landlords.
- The amount of service charge we bill does vary but is around £16m per annum on day to day charges and around £4m for major works.

## **Our Overall Business Plan objectives**

- Deliver organisational excellence
- Maintain homes and neighbourhoods to be proud of
- Provide excellent customers services

## **Key Messages**

- We are committed to improving services to leaseholders
- We have carried out an independent review of our services to leaseholders, including talking to leaseholders and asking for their views.
- We have listened to what leaseholders have told us and are acting on Housing Quality Network's (HQN's) recommendations. HQN are a well-respected housing consultancy.

In 2019 Housing Quality Network (HQN) carried out an independent review of services to leaseholders.

The objective of the review was to identify service improvements to improve the Leasehold customer experience.

Review included:

- Leaseholder Focus Groups - 4 sessions with 16 leaseholders.
- Leaseholder Survey - 250+ responses.
- Interviews with 34 THH staff.
- Benchmarking - 4 Local authorities & 1 ALMO.
- Review of policies and procedures.

HQN concluded the review and provided their findings and recommendations, details of the review can be found [here](#)

## Leasehold Improvement Plan

---

The development of the Leasehold Improvement Plan was overseen by a Steering Group chaired by a leaseholder.

The plan consists of 5 main themes with a total of 39 actions

Improving Communication to Leaseholders (20)

Improving Transparency (9)

Improving Value for Money (5)

Governance (3)

RTB and Re-sales (2)

The delivery of the plan is overseen by our Customer Experience Task Force which is Chaired by Councillor Pierce, acting in his capacity as a THH Board member.

In addition to the plan, we have also developed a communications strategy which seeks to publicise the action plan to as many interested parties as possible.

This obviously includes our leaseholders but also our TRA's, Councillors and Cabinet Members and our 2 local MP's.

The actions are progressing well and of the 39 action points 20 have been completed. Some recent work includes

- Leasehold training for Neighbourhood Housing Officers
- Easy storage of all out guarantees and warranties
- Explaining our approach to major works
- Reviewing our letters with leaseholders to identify ways to make them clearer

There are supporting and additional digital projects which we are progressing including

- Our on-line offer
- Better use of our website, including explanation of our charges and other information
- Smarter and more efficient methods of payment
- Clearer online statements



THH continues to work to improve the services to our leaseholders and tenants.

- Improve the information available and transparency, primarily via our website
- Continue to strive for value for money for lessees and an efficient service –
- Ensure we complete the Leasehold Action Plan.

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# LBTH Housing Companies – Mulberry Housing Society and Seahorse Homes Limited

Housing and Regeneration Scrutiny Sub-  
Committee

10<sup>th</sup> February 2021

Nicola Klinger, Housing Companies Manager



# Background



- In 2017 Cabinet agreed to set up two companies; Mulberry Housing Society and Seahorse Homes Limited to provide an additional housing delivery option outside of the Housing Revenue Account.
- The principles for how the companies would operate were set out in that report. They are as below.
- Seahorse Homes Limited was set up to acquire and develop housing for market rent.
- The Council would provide Seahorse Homes with equity and loans at commercial rates.
- The Company returns a dividend to the Council and potentially grants funds to Mulberry Housing Society to cross-subsidise affordable housing.
- Mulberry Housing Society was set up to acquire and develop housing for social and intermediate tenures.
- The Council would provide loan funding, as well as Right-to-Buy receipts and commuted S106 sums.
- Homes held within Mulberry Housing Society do not qualify for the Right to Buy.
- Funding for the companies would be based on the viability of business cases on an acquisition-by-acquisition basis and in line with MHCLG and CIPFA guidance.



# Mulberry Housing Society



- Charitable community benefit society (CBS)
- Its charitable objects are to carry on for the benefit of the community:
- The business of providing and managing housing, including Social Housing, and providing assistance to help house people and associated facilities, amenities and services for poor people or for the relief of aged, disabled (whether physically or mentally) or chronically sick people;
- Such other charitable purposes beneficial to the community consistent with the objects above as the board shall determine.

Page 93 • Following a review of their purpose in 2020, the Board has resolved to specialise in the provision of intermediate housing in Tower Hamlets, though will continue to provide social housing alongside intermediate tenures.

- Cannot trade for profit and any profits must be used for the purpose of furthering its objects.
- The Council holds a minority share (40%) and has agreed a Deed of Covenant with the Society.
- The Board is composed of three independent board members (Mike Tyrrell, Ken Jones and Syed Uddin) and two Council board members (Ann Sutcliffe and Paul Butler).
- They have not yet begun trading or made any acquisitions.



# Seahorse Homes Limited



- Wholly-owned council company (WOC) limited by shares. The Council is the sole Shareholder.
- The business of Seahorse Homes Limited is:
  - To operate as a commercial company;
  - To purchase land and property within the UK at market value from either the Council or on the open market; and
  - To acquire, develop, construct and refurbish residential homes within the UK which it will rent on the open market
  - Together with any activities reasonably incidental to the above.
- The Company will acquire and develop properties in Tower Hamlets, London and beyond for market rent and sale
- The Council CEO (Will Tuckley) is the Shareholder Representative and can exercise the Council's rights as a shareholder
- The Board is comprised of three executive directors (Ann Sutcliffe and Karen Swift; there is currently a director vacancy)
- They have not yet begun trading or made any acquisitions.



# Changes in national and local contexts



- Removal of the HRA borrowing cap (though there is still an obligation to borrow prudentially within the HRA).
- LBTH is delivering new homes & increasing housing supply through Housing Revenue Account.
- Following reform to Public Works Loan Board lending terms on 23<sup>rd</sup> November, should an LA buy an investment asset(s) primarily for yield, or on-loan to a company that does so, it will not be able to take out new loans from the PWLB in the three years following the acquisition of the asset. This could possibly impact funding for Seahorse Homes if they are acquiring a property primarily for yield.
- Impact of Covid-19 on London and wider UK housing markets and rental yields.
- Developments in national policy, for example the Social Housing White Paper (which sets out a new Charter for Social Housing Residents, increases the powers of the Regulator for Social Housing and includes focus on affordable home ownership) and the 'Right to Regenerate' consultation (which proposes a strengthened right for individuals, businesses and organisations to purchase and redevelop underused or empty Council land).

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# Opportunities and future activity



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| Seahorse Homes Limited  | Mulberry Housing Society  |
|---|---|
| <ul style="list-style-type: none"> <li>Buy market units on mixed-tenure Council developments off-plan</li> </ul>  | <ul style="list-style-type: none"> <li>Buy intermediate tenure units on Council developments off-plan</li> </ul>                                    |
| <ul style="list-style-type: none"> <li>Acquire individual units or blocks for market rent or sale, generating a profit</li> </ul>   | <ul style="list-style-type: none"> <li>Develop affordable housing in joint-venture arrangements, for example with Seahorse Homes Limited</li> </ul> |
| <ul style="list-style-type: none"> <li>Partner with developers to build market rent and sale housing</li> </ul>   | <ul style="list-style-type: none"> <li>Acquire S106 social housing schemes</li> </ul>   |
| <ul style="list-style-type: none"> <li>Cross-subsidise affordable housing through joint-venture or grant arrangements, for example with Mulberry Housing Society</li> </ul> | <ul style="list-style-type: none"> <li>Become a Registered Provider of Social Housing (RP) and access GLA grant</li> </ul>                          |
| <ul style="list-style-type: none"> <li>Use as a vehicle for other commercial activities or to support strategic aims of the Council</li> </ul>                              | <ul style="list-style-type: none"> <li>Links into work on the Council's Intermediate Housing Register of Interest</li> </ul>                        |





# Questions?



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