

MUNICIPAL YEAR 2015/2016 REPORT NO.

MEETING TITLE AND DATE:

REPORT OF:

Director of Finance,
Resources and Customer
Services

Agenda – Part:

Item:

**Subject: Temporary Accommodation
Scrutiny Workstream
Wards: All**

Cabinet Member consulted:

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1. EXECUTIVE SUMMARY

- 1.1 This Scrutiny Workstream was set up by the Overview and Scrutiny Committee to look at Temporary Accommodation.
- 1.2 Tackling homelessness is a key priority both locally and nationally. Statutory homelessness acceptances are rising everywhere especially across London. The use of temporary accommodation is increasing; Enfield fluctuates between fourth and seventh in terms of the highest number of households living in temporary accommodation in London (approximately 2,700 households).
- 1.3 The demand for properties in London is pushing up prices and private rents, causing more people to apply for social housing. The impact of the benefit cap is also causing Councils in London to move their homeless families to cheaper areas like Enfield
- 1.4 The projected cost pressure of temporary accommodation if the Council takes no mitigating actions is £7.5m and this has been identified as the single largest cost pressure in 2015/16.
- 1.5 This report looks at the evidence and identifies the principal supply and demand measures to help alleviate this problem and reduce costs in this area.

2. RECOMMENDATIONS

- 2.1 Overview and Scrutiny is asked to consider this report in its entirety and advise on how it can be taken forward.
- 2.2 The Workstream request that the Overview and Scrutiny Committee consider the following proposals:
- 2.3 More publicity is needed to ensure that households seeking or in private rented accommodation are aware that they can approach the Council for advice or assistance if they are in financial difficulty.
- 2.4 More work is needed to ensure that all tenants in temporary accommodation are fully aware that they are required to bid for permanent properties and have been provided with advice and guidance on how to do this.
- 2.5 In view of the rising number of successful applicants for homelessness status and concerns over interpreting the Government's guidelines, LBE's Housing Department should consider recording in the case of future applicants for social housing:
- their place of birth and country of origin;
 - the nature of their local connection to Enfield;
 - those with un-resolved immigration status placed in temporary accommodation under non- housing legislation.
- 2.6 Review the rental levels paid to private landlords providing temporary accommodation to establish whether a more flexible rent regime would reduce overall costs.
- 2.7 The Council should consider the option of moving more homeless households out of NPA accommodation into alternative accommodation which provides better value for money, including areas beyond the M25 to districts where this is likely to achieve significant financial savings. There needs to be a clear policy framework which takes into account of the needs of the children and any other welfare or medical requirements of the households in question.

3. BACKGROUND

- 3.1 Following agreement of the Overview and Scrutiny Committee (OSC) a workstream was set up to look at the issues of Temporary Accommodation.
- 3.2 Workstream members recognising that this is a highly complex issue received a considerable amount of information from officers to assist in gaining a full understanding of the issue. The Workstream members wished to express gratitude for the help provided.
- 3.3 The workstream has met on 4 occasions with the first two meetings used to fully brief members on the local and national issues and the policies and systems in place on temporary accommodation. The remaining two meetings were used to receive information on how Enfield is affected by these issues including the numbers and types of households affected. The terms of reference for the workstream are attached as Appendix 1.

4 TEMPORARY ACCOMMODATION OVERVIEW

- 4.1 The numbers of people in temporary accommodation had declined from a high of 3,200 in 2008 to a low of 1,948 in the summer of 2012. However numbers are now steadily increasing. Enfield has in excess of 2,600 people currently in temporary accommodation. Since 2011/12 the amount of Homeless Acceptances has gone up and the amount of refusals has gone down.
- 4.2 Lone parents make up the vast majority (54%) of households in temporary accommodation. The percentage for this group in November 2014 is now higher than it was in 2009 (45%).
- 4.3 The cost of temporary accommodation varies according to the size of the property concerned. The cost has been increasing at a rate of between 9 and 11% over the last two years. The average cost of a household in temporary accommodation is now around £6,000 per year. This is the difference between the rent paid to the landlord and the housing subsidy received from the government and has to be paid for by the Council.
- 4.4 The projected gross cost pressure of the rising costs of temporary accommodation has been identified as the single largest cost pressure for the Council in 2015/16 if the Council takes no mitigating actions.

5 STATUTORY HOMELESSNESS DUTY

- 5.1 The legislation on homelessness places a general duty on housing authorities to ensure that advice and information about homelessness, and preventing homelessness, is available to everyone in the borough free of charge. There is also a statutory Homelessness duty on local authorities to secure accommodation for households, where it is deemed they are unintentionally homeless and in a priority need category.

- 5.2 To be classed as statutory homeless you have to fulfil all five of the following:
- Have nowhere suitable to live e.g. no legal right to the accommodation in which you live, your accommodation is overcrowded, or you are likely to lose your home within the next 28 days
 - Be eligible for help- this considers things such as immigration status and whether or not you normally live in the UK
 - Be in priority need
 - Not be 'intentionally' homeless- you will be classed as intentionally homeless only if you deliberately did (or did not do) something which made you homeless without good reason.
 - Have a connection with the local area- this means that the local council which provides you with help has to be one which you have some kind of connection with such as you have lived, worked or have family connections there.
- 5.3 Priority need groups include households with dependent children or a pregnant woman and people who are vulnerable in some way e.g. old age, mental illness or physical disability, who are homeless or threatened with homelessness as a result of any emergency such as flood, fire or other disaster. This was extended in 2002 to include applicants:
- Aged 16 or 17
 - Aged 18 to 20 who were previously in care
 - Vulnerable as a result of time spent in care, in custody, or in HM Forces
 - Vulnerable as a result of having to flee their home because of violence or the threat of violence.
- 5.4 When a household applies to be re-housed, the local authority must carry out enquiries to satisfy itself on the level of duty owed. If the applicant has nowhere to stay and is in priority need, there is an immediate duty to make temporary accommodation available while further enquiries are made. If an absolute duty exists, the household may have to spend a period of time in temporary accommodation before a final offer of accommodation can be made. This is dependent on the availability of suitable accommodation in the borough. Where a main duty is owed such households are referred to as acceptances.
- 5.5 Households placed in temporary accommodation will either be awaiting the outcome of a homeless application or an offer of suitable accommodation.
- 5.6 Temporary Accommodation is procured by the local authority but not owned by them in the following ways:

- Private Sector Leased accommodation (PSL), this is renewable on a 3 year lease from a private sector landlord and the Council provides a full management service.
- Private Leased Annexe accommodation (PLA), this is similar to PSL but managing agents deal with day to day repairs.
- Nightly Paid Accommodation (NPA); this is accommodation procured from private landlords and letting agents on flexible, short term lets for emergency provision. (It will not necessarily be short term for the person living in it).

5.7 The first two types represent the best value for money for the Council; however they are becoming less popular with landlords who can achieve better financial returns elsewhere in the property market. There has been a London wide shift towards NPA. The use of nightly paid accommodation is increasing very rapidly in Enfield and is by far the most expensive type of accommodation for the Council to procure. At the end of January 2015, there were 1,046 households in NPA and 56 in B & B out of a total of 2,698 households, i.e. 41% in temporary accommodation in Enfield.

5.8 NPA is attractive to landlords as this provides high rents with little responsibility and a guaranteed rent. The cost of nightly paid accommodation is typically 40% above the average private rent level for assured short hold tenancies. There is no payment though for voids costs, but with the current high demand there is unlikely to be many voids at the present time. However on the other hand, landlords do not get to choose their tenants and there is a high turnover with consequential cleaning and other costs.

5.9 Officers report that a lot of private Assured Shorthold Tenancies used by homeless households are being converted by landlords to nightly Paid Accommodation (NPA) driven by the higher rental returns available for NPA.

5.10 The cost to the Council of temporary accommodation is the difference between the Local Housing allowance on which government subsidy is calculated and the rents the Council has to pay local private landlords to secure temporary accommodation. This gap has widened in recent years and has led to the sharp increase in the cost of homelessness to the Council.

5.11 London faces much higher housing costs than the rest of the country and consequently has significantly higher levels of temporary accommodation than elsewhere. It is a particular feature of the London market that there is not enough social or private rented housing to meet the demand for housing of people that councils in London have a statutory duty to help.

Changes to the Homelessness Duty

- 5.12 Localism Act 2011: This legislative change allows the Local Authority to discharge the duty to house households accepted as unintentionally homeless and in priority need into the private rented sector, without the applicants consent.
- 5.13 The Homelessness (Suitability of Accommodation) (England) Order 2012 requires that the local authority in discharging its duty into the private rented sector must have regard to the suitability of the accommodation. It must also be satisfied that the individuals/family's needs for schooling, employment, cultural and religious requirements will be met by the accommodation offered.
- 5.14 These statutory changes both came into effect on 9 November 2012.

Changes to the LHA Calculation

- 5.15 There was also a change to the calculation of Local Housing Allowance (LHA) from April 2011 in order to reduce government expenditure on Housing benefit subsidy. The basis of the subsidy calculation was changed so that only the average rent of properties in the bottom 30% of the housing market could be used (it had previously been 50%). Local Housing Allowance rates are assessed within Broad Market Rental areas (BMRA) designated by the government's Valuation Agency. Rental rates in the BRMA including Enfield were raised by 4% on the 1 April 2015 apart from the four bedroom rate which was increased by 1%.

6 INTRODUCTION OF THE BENEFIT CAP

- 6.1 The Benefit Cap came into effect in Enfield in April 2013. The cap means that working age families cannot receive more than £500 per week in benefits (£350 for single people). There are some exceptions such as those in receipt of the highest level of Disability Living Allowance. No pensioners are subject to the benefits cap, as it only affects people of working age and no-one who works enough hours to claim Working Tax Credit is affected (at least 16 hours a week if you're single, or at least 24 hours between you if you're in a couple, with one of you working at least 16 hours a week).
- 6.1 The intention of the cap was to reduce dependency on social security and to encourage employment. However, the most affected households live in private rented accommodation. The number of Council and housing association tenants affected is much lower because their rents are substantially below the levels of the private rented sector, particularly in London. In Enfield, the largest category of Households affected are single mothers who live in temporary accommodation and have difficulty in or are reluctant to obtain even 16 hours of work because of practical issues around childcare.
- 6.2 The cap has made finding affordable rented accommodation in Enfield a challenge for many non-working families. There are a substantial number of such households where the housing benefit does not cover the rent.

- 6.3 London was amongst the areas most affected by the introduction of the Benefit cap due to the combination of high housing costs and high receipt of benefit. Enfield had the second highest number of households in London affected by the benefit cap (around 1800 households). Broadly speaking, at present benefit dependent households in 2 bed properties can still afford to live in private rented accommodation in Enfield, but such households in larger properties cannot.
- 6.4 Recent figures show that just over 64% of homeless households entering temporary accommodation are wholly dependent on benefit.

7 THE ENFIELD HOUSING MARKET

- 7.1 Enfield has changed significantly in demographic terms since 2001. We have seen an increase in population of 46,965. The tenure of properties has also changed substantially, with decreases both in Home Owners and Council homes and increases in the number of Registered Social Landlord homes. The most dramatic increase, however, by more than 100%, is the amount of households privately renting properties. This dramatic growth in private rented sector housing has now reached 30% of the total stock, but demand is still growing faster than the supply of rented properties available.
- 7.2 The high cost of home ownership partially driven by the increase in the private rented sector has made it very difficult for first time buyers to enter owner occupation, with prices rising faster than earnings. More competition for the supply of private sector properties means that it is increasingly difficult for the Council to find suitable private rented accommodation for homeless households and therefore more such households are having to be placed in temporary accommodation.
- 7.3 Enfield is very popular with other London local authorities due to the affordability of its private rented accommodation. The rents, e.g in Edmonton, are relatively low but the Local Housing allowance (on which subsidy is paid) is relatively high because Edmonton is located in a BRMA which includes Barnet and Muswell Hill. This artificial situation means that there is a smaller difference to be paid to the landlord and hence lower costs to the local authority. The higher LHA in Enfield makes rented properties in Enfield more affordable and hence more attractive to other councils in London.
- 7.4 Social rented homes, i.e. council or housing association properties, are in short supply. Council housing stock in Enfield has reduced through Right to Buy whilst at the same time the Indices of Deprivation have increased. The higher discount now offered on the Right to Buy scheme has encouraged more residents to purchase their property and presents a challenge when trying to build up Council stock. Government policy requires local authorities to replace council housing sold using a

proportion of the receipts plus borrowing. Enfield has struggled to do this because it is already near the government cap on HRA borrowing. Councils nationwide have for a variety of reasons struggled to replace stock purchased under a right to buy by Council development. The Council recently approved a number of innovative ways in which to use the receipts it currently holds (£6m) to kick start more social housing although these initiatives will take some time before they translate into additional social housing.

- 7.5 There has also been a significant increase in rented properties being taken back by landlords and benefit dependent tenants being evicted. No reasons need to be provided for this legally if a landlord wishes to repossess his property. In such circumstances, Landlords issue a Section 21 notice (giving 2 months' notice) to get their properties back. In 2013/14 this was the reason for 71% of homeless acceptances and from April 2014 to December 2015 it was 67%. This is an issue not only in London but also in England as a whole. The ending of an assured shorthold tenancy has been the most frequently occurring reason for loss of a settled home for the last ten quarters (GLG Statistical release, 11/12/14, Statutory Homeless England).
- 7.6 Enfield has a lot of larger families (3 or more children). Dependent Households that need 3 or more bedrooms will find it difficult to secure affordable private rented accommodation in the Borough of Enfield.
- 7.7 Members were told by officers that if they hear that a family is getting into difficulties/arrears they should be advised to approach the Council immediately as it may be possible to provide a financial top up using Discretionary Housing Payments for up to 6 months. This can help to keep them in the property as otherwise the landlord may evict if they get into arrears. The discretionary housing payment budget is around £3m and can be used to fund things such as helping people move, finding cheaper properties and rental costs.
- 7.8 Members commented that in their experience households found it difficult to secure their own private rented accommodation owing to the fact that they could not afford to pay the agency fees and the deposit in advance which often amounted to £3,000 per property. On average it costs the Council £6,000 per year to house a household in temporary accommodation. Households therefore should be advised to approach the Council who could assist them with these expenses.
- 7.9 A member of the public attending one of the meetings also commented that people were generally not aware that struggling households could approach the Council for funding in these circumstances to help them overcome barriers to finding a privately rented home.

Recommendation: *More publicity is needed to ensure that households seeking or in private rented accommodation are aware that they can approach the Council for advice or assistance if they are in financial difficulty*

8 ALLOCATION SYSTEM

- 8.1 Enfield introduced an Allocation Scheme in 2012 to assess applications for housing and allocate homes owned by Enfield Council and our partner housing associations to households on Enfield's Housing Register. Under the previous allocations policy virtually all new lettings were allocated to homeless families.
- 8.2 Most successful applicants for social housing obtain it through the Choice Based Bidding System operated through the Enfield website. Newly vacant homes are shared out between six groups. The Council's number one priority in the sense they get first choice are tenants in Estate regeneration projects who require decants during the construction period. The Allocation Scheme prioritises applicants within each category using points and/ or date order. The categories are as follows:
- Group 1 – Enfield Council and Housing Associations tenants who need to move for health or reasons of overcrowding
 - Group 2 - Enfield Estate Regeneration tenants
 - Group 3 – Special Application and Quotas
 - Group 4 - Tenants in Enfield's Temporary Accommodation
 - Group 5 – Mobility Applicants
 - Group 6 – Older Applicants
- 8.3 In 2013/14, the overall total of social housing lettings available was 691. Temporary Accommodation was the biggest category, with 238 households being housed. The Council prioritises households in Temporary Accommodation who were placed there before November 2011.
- 8.4 The list of available properties is refreshed on a weekly basis but the numbers of available properties each week is fairly low.
- 8.5 The Council has just started an exercise to look at people who are either not bidding or rarely bidding on the system. This is to ensure that they have all the details needed to bid and to see why they are not bidding. The Council can assist people with the bidding system and if required can bid on their behalf.
- 8.6 There is insufficient data at present to identify any common reasons for the lack of bidding, but it likely that many households in temporary accommodation who are housed in street properties do not wish to move to permanent accommodation if it is on an estate or in a tower block.

- 8.7 A tenant in temporary accommodation provided her views and experiences. She was not aware that she had to bid for properties she had assumed that she would be housed permanently when a property became available. She felt that many other people may well assume the same.

Recommendation: More work is needed to ensure that all tenants in temporary accommodation are fully aware that they are required to bid for permanent properties and have been provided with advice and guidance on how to do this.

9 ACTIONS

Supply measures

- 9.1 In response to the rising budget pressure from temporary accommodation the Council has sought to address the problem primarily by seeking to increase the supply of social housing (additionally) and hence reduce the demand for expensive nightly paid rented accommodation.
- 9.2 In February 2014, Enfield Council's Cabinet agreed to establish a wholly owned local authority company to manage and acquire properties in the private sector. This is known as the **Housing Gateway Project**. The Council is able to use this company to discharge its statutory homelessness duties. These properties are used as an alternative to temporary accommodation.
- 9.3 The aim of the project is not only to alleviate temporary accommodation budget pressures but also increase the supply of social rented housing and secure local properties for local people. Housing Gateway Limited was established in March 2014 with a potential budget over 5 years of £100m. As of March 2015, viewings had been undertaken and 117 offers had been accepted and are proceeding. Housing Gateway Ltd has successfully completed on 58 acquisitions and 26 tenants were in place.
- 9.4 The Council is also committed to building more social housing on seven sites within its own ownership, known as the **Small Sites programme**. A number of small housing developments providing a range of tenures including social housing are underway or programmed. In addition, a large scale estates regeneration programme has started which will also provide additional social housing although its primary purpose is to replace existing stock in poor condition. The largest new residential scheme planned by the Council is known as **Meridian Water**, which is eventually intended to create 8,000 – 10,000 new housing units on a large former industrial site close to the North Circular. All these schemes

should substantially increase the supply of new social housing units, but will take several years to come on stream.

Demand measures

- 9.5 ***Homeless applicants.*** Households presenting themselves as homeless face several tests laid down by government before they can be accepted as homeless. EU citizens can also apply for homelessness status in LBE providing they have a local connection, i.e. a family member in the area and meet the other criteria. The main reason why households present as homeless has changed over the past few years from ejection from family or friends accommodation to eviction from private rented property. Therefore the reasons for becoming homeless are more easily evidenced now than in the past and the possibility of collusion is greatly reduced. Nevertheless, fraudulent applications are a concern in this area given the enormous importance and value of securing a decent home. The Council needs to be vigilant within the existing guidelines to ensure that the system operates fairly to all concerned and meets the needs of the most vulnerable.

Recommendation: *In view of the rising number of successful applicants for homelessness status and concerns over interpreting the Government's guidelines, LBE's Housing Department should consider recording in the case of future applicants for social housing:*

- *their place of birth and country of origin;*
- *the nature of their local connection to Enfield;*
- *those with un-resolved immigration status placed in temporary accommodation under non- housing legislation.*

- 9.6 ***Incentive payments to landlords.*** Tenants that are benefit dependent are often seen as risky by landlords. Therefore private landlords often prefer not to let to tenants in receipt of housing benefit. The Council does provide incentives to de-risk people to counter this so that landlords will let properties, this takes the form of:

- paying rent in advance
- paying a deposit in the form of cash payments or guaranteed bonds for one month's rent
- providing a guarantee against property or a direct contact at Council if issues arise
- one-off and non-refundable payments of £1,000 to landlords and agents to secure rented properties.

- 9.7 There is a lot of competition for private rented accommodation from other boroughs who are willing to pay higher rents than Enfield pay, e.g. Brent is said to be paying large amounts for properties let on a 2 year Assured Shorthold Tenancy. The more properties made available by a landlord in a month the greater the incentive paid.

- 9.8 A further financial incentive was suggested during discussion in the case where a tenant in temporary housing was in danger of being evicted because the landlord felt they could secure a higher rent. If the only option was moving the tenant into nightly paid accommodation, it was felt that the Council should consider paying up to the median market rent even if this was higher than the LHA level because it would still be cheaper than NPA.
- 9.9 Private landlords will generally seek the highest rent they can get from other Councils or other prospective tenants. If the Council is not flexible with rental levels the unintended consequence could be that the Council end up losing properties and having to use nightly paid accommodation that is far more expensive.

Recommendation: Review the rental levels paid to private landlords providing temporary accommodation to establish whether a more flexible rent regime would reduce overall costs.

- 9.10 ***Moving homeless households in temporary accommodation beyond borough boundaries.*** Enfield is a large recipient of placements in London and is a net importer of homeless families. Most out of borough placements in Enfield come from neighbouring boroughs who themselves have lots of other borough placements, but we do also receive some households from central London authorities. In the second quarter of 2014/15 the Inter- Borough Accommodation Agreement report showed that Enfield had 392 households placed here by 21 other London boroughs. The annual figure is not yet available.
- 9.11 In response to a councillor question at full Council on the 13th May, councillors were provided with details of the numbers of households in Temporary Accommodation Lets that were housed out of Enfield over the last calendar year. This showed that Enfield also places substantial numbers of homeless families in other London Boroughs (380) although fewer households are placed outside London Boroughs (121). The large net increase in vulnerable families coming from other boroughs not only places an immense strain on the availability of housing, but it is also putting substantial pressure on local healthcare facilities and schools.
- 9.12 The Inter-Borough Accommodation Agreement is a document detailing guiding principles as opposed to an agreement. The principles are to inform receiving local authorities, monitor prices between areas and to monitor rent inflation in the private sector. London local authorities are expected to behave in a responsible and co-operative way so as to not to inflate prices. This agreement is voluntary and not enforceable in law.
- 9.13 Officers report that Enfield is currently working on a framework contract agreement with an adjacent council. This would be a joint contracting venture to enable both councils to procure packages of rental properties. It is anticipated this will be a 5 year agreement for a certain amount of

properties at a fixed rate for a fixed time, which will help lock in financial certainty for both parties.

- 9.14 Officers have also looked at the cost savings that could be achieved by moving more households outside the M25. In some areas Enfield will not achieve a cost saving by moving households north of the M25. Cost savings are achieved by moving households to areas where the difference between the rental cost and the LHA is lower than in Enfield. Some areas have been identified where this could be viable.
- 9.15 It should be noted that if households are moved outside of the borough we must ensure that the requirements of the Suitability Order have been met. The Department for Communities and Local Government (DCLG) has issued detailed guidance on the definition of a suitable rented property. This guidance was tested in the Courts recently in the case of a homeless household who were placed by Westminster Council in Bletchley. The Supreme Court overturned the judgements of the County Court and the Court of Appeal quashing Westminster's decision. The Supreme Court judged that Westminster did not sufficiently evidence or explain its decision in relation to an up to date, publicly available policy for securing temporary accommodation. LBE's current policy is not to move families outside the M25 without their consent.

Recommendation: *The Council should consider the option of moving more homeless households out of NPA accommodation into alternative accommodation which provide better value for money including areas beyond the M25 to districts where this is likely to achieve significant financial savings. There needs to be a clear policy framework taking into account of the needs of the children and any other welfare or medical requirements of the households in question.*

10. ALTERNATIVE OPTIONS CONSIDERED

The Workstream looked at a wide range of options primarily on the demand side.

11. REASONS FOR RECOMMENDATIONS

To assist the Council reduce its dependence on placing homeless families in expensive nightly paid private rented accommodation.

12. COMMENTS OF THE DIRECTOR OF FINANCE, RESOURCES AND CUSTOMER SERVICES AND OTHER DEPARTMENTS

a. Financial Implications

Temporary accommodation expenditure remains volatile and there has been a significant increase in the number of families placed in more expensive nightly paid temporary accommodation in 2014/15 (Average

2,350 compared to the budget of 2,059 in temporary accommodation as per the information available in March 2015 - an increase of 14.1%). The underlying pressure due to increased number of homelessness still remains.

The projected cost pressure of temporary accommodation if the Council takes no mitigating actions is £7.5m and this has been identified as the cost pressure in 2015/16. If the situation continues to worsen, future cost pressure is forecast to rise to £13.4m in 2016/17 and £18.7m in 2017/18.

Any costs arising from the Temporary Accommodation Scrutiny Workstream recommendations will be found within the existing budgets.

b. Legal Implications

Under s.179(1) Housing Act 1996, councils have an obligation to ensure that advice and assistance about homelessness and its prevention are available to any person in their area, free of charge.

With regard to taking and recording people's personal data, the council will need to ensure that it is kept and recorded in accordance with the Data Protection Act 1998.

With regard moving households out of borough to save costs, the council will need to have regard to the recent Supreme Court's judgment in the case of *Nzolameso v City of Westminster* [2015] UKSC 22. This case clarifies the way that local authorities must now approach out of borough accommodation placements.

Under the Housing Act 1996 local authorities have a duty to provide suitable accommodation to homeless people and "so far as reasonably practicable", accommodate them within their district. What this means in practice is it will no longer be enough for the local authority to cite the scarcity of accommodation within borough as the only reason to offer accommodation out of borough. The authority will now need to show that it has carefully considered the household's circumstances before the offer is made or there is a decision to relocate. The council's financial burdens are relevant but the primary duty is to ensure so far as reasonably practicable that homeless people are accommodated in suitable accommodation in borough. Each case would therefore have to be considered on its merits.

c. Property Implications

Property implications are dealt with in the main body of this report. However, it is important to reiterate the Borough is experiencing significant housing pressures with increasing house prices (16% on average over the last year) and increasing private sector rents. Any TA

strategy therefore needs to holistically take into account supply and demand side measures.

While the Borough is actively stimulating housing supply, and is putting in place appropriate demand side measures, the role of the Inter Borough Accommodation Agreement should not be underplayed and efforts should be aimed at minimising competition for stock between boroughs.

Given these various housing pressures within the Borough, and indeed within the M25, a policy aimed at providing suitable accommodation beyond the M25 is welcomed.

13. KEY RISKS

The issue of the rising costs of temporary accommodation has been identified as a key risk for the Council.

The recommendations within this report should help towards mitigating this risk, however further additional measures may need to be considered

14. IMPACT ON COUNCIL PRIORITIES

Fairness for All, Growth and Sustainability, Strong Communities

Residents in temporary accommodation are some of the most vulnerable and deprived in Enfield. Developing more sustainable accommodation will improve their life chances, enable them to contribute to the local economy and help build strong communities.

15. EQUALITIES IMPACT IMPLICATIONS

Corporate advice has been sought in regard to equalities and an agreement has been reached that an equalities impact assessment is neither relevant nor proportionate for the approval of this report to approve work streams. However as some of the identified work streams are implemented it may be appropriate to undertake EQIAs to ensure all equalities issues are considered.

16. PERFORMANCE MANAGEMENT IMPLICATIONS

Implementing the workstream's recommendations will contribute to achieving the Council's target of reducing the number of people in temporary accommodation.

17. PUBLIC HEALTH IMPLICATIONS

The recommendation that Overview and Scrutiny is asked to take forward this report in itself does not have any public health implications. Housing though remains a fundamental determinant of health.

18. Background Papers

None