

## **London Borough of Enfield**

### **Cabinet**

**Meeting Date**                      **15th September 2021**

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**Subject:**                      **Implementation of the Intermediate Housing Policy**

**Cabinet Member:**    **Cllr Gina Needs**

**Executive Director:** **Sarah Cary**

**Key Decision:**              **5319**

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### **Purpose of Report**

1. This report updates Cabinet on progress towards encouraging a range of appropriate housing options for the residents of Enfield, in line with the Council's Housing and Good Growth strategy to 2030. It identifies progress on the implementation of the Intermediate Housing Policy as a means to help more people realise their aspiration for home ownership or sustainable rented homes. A range of types of Intermediate housing are available and include shared ownership and London Living Rent (as funded by the Mayor of London) as well as other discounted market rent or sale products.
2. The core housing challenge experienced by residents in Enfield is affordability, whether that be of owner occupation, or of the cost and insecurity of private rented housing. The Council wants to encourage providers to build a range of intermediate housing options and to ensure that those quality homes are available to residents most in need.
3. The implementation of the Intermediate Housing Policy will support residents to access Council led development schemes such as Meridian Water and the Joyce & Snells regeneration scheme by providing a supply of potential residents. This will support off plans sales and the fast lease up of schemes in turn supporting the financial viability of schemes.
4. The report seeks approval for the implementation of the Intermediate Housing Policy operational structure, including resource and budget.

## **Proposal**

5. To promote and create an intermediate housing register with the aim of making Intermediate Housing more accessible to Enfield residents and support development in the Borough.
6. To agree that the Intermediate Housing Policy adopted by the Cabinet on 15<sup>th</sup> July 2020 will need further amendments to incorporate the changes outlined in this report and to delegate this to the Director of Housing and Regeneration in consultation with the Cabinet Member for Social Housing.

## **Reason for Proposal**

7. Enfield currently has an Intermediate Housing Policy that was approved in July 2020. However, the policy requires an operational structure, such as the recommended intermediate housing waiting list, to support residents to access intermediate housing in the Borough. The policy also requires updating in the light of new priorities to support key workers announced following the GLA Mayoral election and to outline the platform that will be used to collate residents eligible for this product and to promote opportunities to them and to consider arrangements to implement the First Homes policy.
8. Enfield seeks to implement the Intermediate Housing Policy to maximise the access to intermediate housing in Enfield and providing suitable homes to those eligible based on income and housing needs. To be successful at the provision of affordable homes to the eligible residents in Enfield a robust and sustainable solution is required. This report recommends the implementation of an intermediate housing waiting list and a web page which will promote the products and how homes can be accessed in the borough.
9. The Council has an ambitious programme of Council led development over the next 25 years including the development of 10,000 new homes at Meridian Water and new homes at Joyce and Snells which is the subject of a separate report on this agenda. The intermediate housing waiting list will assist with the quick sale and letting of intermediate housing products on these developments by supplying a pre-assessed list of potential residents.

## **Relevance to the Corporate Plan**

10. Intermediate Housing delivers on the priorities of the 2020-2022 Corporate Plan, 'A Lifetime of Opportunities'. Providing good homes in well-connected neighbourhoods. The provision of new affordable housing for a variety of needs will serve to improve the housing offer at affordable prices and the quality of the environment.

## **Background**

### **Policy and Legislation Background**

11. The London Plan defines Good Growth as "Working to re-balance development in London towards more genuinely affordable homes for

working Londoners to buy and rent. It is about delivering a more socially integrated and sustainable city, where people have more of a say and growth bringing the best out of existing places while providing new opportunities to communities.

12. The London Plan 2021 identifies the need for 12,460 new homes in Enfield over the next 10 years, identifying at least 35% should be affordable. Of the affordable homes, 30% should be low-cost rent (social or London Affordable Rent), 30% intermediate (London Living rent, First Homes or Shared Ownership) and 40% to be identified by each Borough.
13. The Council is currently consulting on a new local plan, which will provide a new vision for how Enfield will spatially develop to 2039 and beyond. The Local plan aims to secure 50% of all new homes across the plan period as genuinely affordable. Within that allocation homes should be split 50/50 between social rented housing and intermediate housing. The plan seeks to deliver on average 623 new affordable homes each year.
14. The council's Good Growth Housing Strategy 2020 with the updated targets in August 2020 states 'Ambition 1 – More affordable homes for local people' with a target of 775 units to be completed 2021-2022 with 30% of these to be affordable. In addition, 2018-2022 Corporate Plan, has the aim of 'Creating a lifetime of opportunities in Enfield', by providing good homes in well-connected neighbourhoods.

### **What is Intermediate Housing?**

15. Intermediate housing is traditionally defined as affordable housing which is targeted at people who are unlikely to qualify to access homes at social rent levels, but who are not able to afford to buy or rent an adequate home on the open market. Intermediate Housing differs from social housing as it is not governed by a legal framework which determines who it is allocated to and how rents are set. Intermediate housing in London is delivered either with the support of funding through the Affordable Homes Programme (administered by the Mayor of London), or as part of affordable housing requirements in planning applications.
16. Intermediate housing falls into two broad categories:
  - **Affordable home ownership** to support households to purchase their own home
  - **Intermediate rent** to support those who would struggle to afford private rents
17. The two types of intermediate homes preferred by the Mayor of London are Shared Ownership and London Living Rent. Enfield aims to encourage all types of intermediate homes by developing relationships with Registered Providers and private developers. Intermediate Housing consists of homes for sale and rental homes provided at a cost above social rent, but below market levels. These will include:
  - **Ownership Products**

- **Discounted Market Sale** – Properties offered at a discounted price (e.g. a percentage of the market value).
    - **First Homes** – A discount of 30% with prioritisation to first time buyers. Individual authorities can request a higher discount level up to 50%.
    - **Starter Homes** – Minimum discount of 20% for first time buyers between the ages of 23-40.
  - **London Shared Ownership** – This is supported by the Mayor of London. Purchasers buy a minimum of 25% (to be reduced to 10% under new Government rules) via a mortgage and deposit, rent is then paid on the rest. The purchaser is responsible for the maintenance of the home. The purchaser can increase the share they own of the home which is known as staircasing.
  - **Shared Equity** – Relevant on estate regeneration schemes, enabling existing leaseholders to stay on the estate, a loan is provided against the property and repaid either under a fixed term contract or upon the sale of the property
- **Rental Products**
    - **London Living Rent (LLR)** - This is supported by the Mayor of London. Intermediate rented homes for which rents are set at or below benchmarks published by the GLA, which are based on a third of local household incomes. Tenants of LLR homes are offered the opportunity to purchase the home on a shared ownership basis within 10 years.
    - **Discounted Market Rent** – Provided in Build to rent developments and based on a proportion of the market rent e.g. 70% and usually re-let on similar proportions.
    - **Social Rent** – Set using a capped formula set out in the Social Housing Regulators Rent Standard Guidance
    - **London Affordable Rent (LAR)** – Set using a capped formula set out by the Mayor of London.

### **Current Intermediate Housing**

18. The current Intermediate Housing Policy (July 2020) which has been approved explains what falls within the description of intermediate housing, who it is intended for, eligibility criteria, priorities for new supply and how it can be accessed in the Borough.
19. Currently in Enfield there is no process in place for the promotion of Intermediate Housing schemes and matching residents to them.

### **Who is eligible for Intermediate Housing?**

20. The Mayors' investment and planning powers enable the setting out of eligibility and prioritisation criteria, including income thresholds, for intermediate homes. This helps to ensure that these homes are accessible to households who need them the most. While there is a clear legal framework for the allocation of social housing, the process for allocating intermediate housing is less defined. This creates a risk that intermediate housing is not always accessed by those who need it most.
21. Eligibility for intermediate housing is based on affordability and housing needs. The following eligibility criteria have all been agreed within the Intermediate Housing Policy. Eligibility for intermediate housing will be restricted as per the GLA's criteria:
22. For affordable (intermediate) home ownership, households are eligible if they:
- Have a household income of up to £90,000 per annum
  - Do not currently own their own home or have sold their home
  - Are unable to find a property to suit their needs on the open market
23. For intermediate rented homes, households are eligible if they:
- Have a household income of up to £60,000 per annum
24. While households earning up to the income thresholds above are eligible for intermediate housing, these thresholds are caps and providers should be delivering, and Enfield should be planning for, intermediate housing that is affordable to households on a range of incomes below these caps.
25. The Council has identified its priority groups that qualify for intermediate housing subject to achieving the income criteria. Priority groups are deployed to determine who has highest priority for any eligible properties when a number of individuals who meet the above stated eligibility criteria have expressed interest and are as follows:
- Priority 1 – Workers in essential services that work in Enfield
  - Priority 2 – Social and affordable housing tenants in Enfield
  - Priority 3 – Members of the armed forces
  - Priority 4 – Enfield residents on housing needs register
  - Priority 5 – Enfield residents
  - Priority 6 – Non-Enfield residents who work in the borough
  - Priority 7 – London Resident
26. The definition of workers in essential services (priority 1) as set out in the Intermediate Housing Policy is:
- Social workers, youth offending managers and case workers, nursery nurses, educational psychologists, and therapists (e.g. occupational therapists), care workers
  - Clinical NHS staff (with the exception of doctors and dentists)
  - Teachers, teaching assistants and nursery nurses in schools and further education/sixth form colleges
  - Police officers, Community Support Officers and some civilian staff

- Firefighters and other uniformed staff below principal level in Fire and Rescue Services

27. The GLA is currently reviewing and redefining its definition of key workers in light of the pandemic and new priorities. The priority groups listed above, will need to be reviewed when the GLA's work has concluded.

28. Household size and income level will be taken into consideration along with the priority cascade, where several applicants are in the same priority band, precedence will be given to households on the lowest income who meet the affordability criteria.

## **Need for Intermediate Housing**

### **Affordability of Private Rented Housing**

29. Between 2011 and 2020 median rent has increased by 33% compared to an increase of only 8% in gross income. A clear indication that affordability is a key issue for residents wanting to rent.

30. The Enfield Intermediate Housing policy states that an intermediate home should not cost more than 40% of the net household income.

### **Affordability of Ownership**

31. Homes to purchase on the market are unaffordable to people on median average salaries in Enfield unless they are supported by family members to get a step on the housing ladder. The UK House price index in March 2019 shows the average house price in Enfield was £393,237. This is 15% lower than London as a whole but 62% higher than England. An average house in Enfield costs 12.3 times the median average salary.

32. House prices have increased by 64% over the last 10 years compared to the increase in income of only 8%, with most banks only lending four times the amount on income for a mortgage an Enfield resident earning an average income of £25,994 will not be able to afford ownership of a property.

33. The graph below demonstrates the widening gap between an average income of an Enfield resident and house prices over the last 10 years and the clear need for intermediate housing ownership products in Enfield.

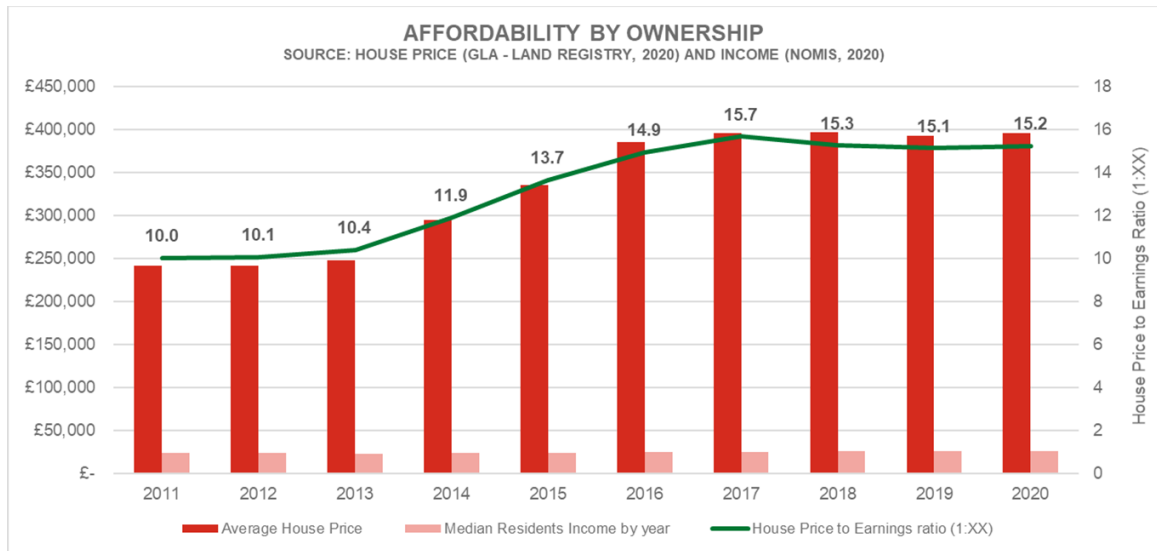


Figure 1 - Affordability by Ownership.  
Source: Rent (GLA - Land Registry, 2020) and Income (NOMIS, 2020)

34. The Government has recently introduced a new home ownership product, First Homes. This is aimed at first time buyers on lower incomes. In order to ensure the product is suitable for first time buyers, First Homes has a provision for the initial property price to be discounted.
35. First Homes policy dictates that a minimum of 25% of all affordable housing units secured through developer contributions should be First Homes and Local Plans should take the new First Homes requirement in to account from 28th June 2021.
36. The maximum discount that can be applied to First Homes is 50%. However, LBE's First Homes consultation response indicated that a higher discount rate (in excess of 60% of sale price) would be required in order to meet the needs of local residents. The consultation response also highlighted the need for flexibility in the future to allow for changes to the housing market and resident incomes.
37. LBE has called on central Government to recognise that additional resources will be required to successfully deliver the First Homes policy.

### Enfield Case Study

38. Scenario: Mr and Mrs F live in a two-bedroom Council flat in Edmonton, N18 with their three children. The flat was ideal when they moved in expecting their first baby, but since then their family has grown, and with all children now at school it doesn't suit their needs and is over-crowded. Having contacted the council they have been told that they are unlikely to be able to transfer to a larger Council flat due to the increased number of residents/households placed at a higher priority than them who are also waiting.
39. Income Status: Mr F is a Warehouse Supervisor and earns £25,500 a year, Mrs F works part time as a Care Assistant, and earns £10,800 a

year. Their monthly household net income is £2,360 (post tax and NI) with an approx. of £135 per month on household bills (council tax and utilities) leaving £2,225 net household income. Based on household income and number of children Mr and Mrs F will be entitled to an element of universal credit. Mrs F has looked into renting a larger property in the private rented sector but will require approx. £1,550-£1750 a month along with a 4 - 6 week deposit, and without a long tenancy, this is unaffordable long term and does not provide the security for the family. The children are settled in school and moving locations to a cheaper area would cause great disruption for the entire family along with questionable job security.

40. Intermediate Housing Solution: Recently Mrs F has been informed of a new development near the children’s school, which is being built by a Housing Association and is offering rented homes with long tenancy agreements, at a London Living Rent. She and Mr F would have to pay approx. £900 a month for a new three-bedroom flat, a much more affordable option for her family. She is hoping that they may even be able to afford to save towards a deposit and eventually buy a home through the shared ownership schemes being built locally.

### **Intermediate Housing Supporting Development in the Borough**

41. The Council has ambitious targets to support the development of new homes, public spaces and community facilities within the Borough. The draft Local Plan’s housing target is for 1,246 homes per year.
42. There are significant housing schemes planned in the Borough in forthcoming years such as the Council led Meridian Water scheme which will regenerate the South of the Borough bringing 10,000 homes and thousands of jobs to the area. Also, the Council has an extensive development programme regenerating smaller sites across the Borough, in total creating 3,500 new homes. Private developers have also identified Enfield as a Borough with significant opportunities and are bringing forward housing schemes, such as the TFL / Grainger partnership to redevelop land around tube stations in the Borough. Table 2 identifies the estimated number of intermediate homes which will be development via key schemes in the Borough.

	<b>Scheme</b>	<b>Estimated no. of Intermediate Homes</b>
<b>Council Led Development</b>	Meridian Water	4,000
	Joyce & Snells Regeneration Scheme	220
	Council led schemes	1,000
<b>TFL Development</b>	Arnos Grove	64
	Cockfosters	130
	<b>Total</b>	<b>5,414</b>

Table 2 – Estimated intermediate housing via key development schemes.



43. The Intermediate Housing register will support schemes such as these by providing developers (including Council led schemes) with a list of suitable residents who have already been assessed by the Council and are seeking intermediate housing products. This scheme will maximise the developers ability to sell intermediate home ownership products off plan and ensure schemes are leased up quickly. In turn this will help to de-risk the financial model of new developments giving investors more confidence in developing in the Borough.
44. Residents requiring intermediate housing are unable to afford market sale or market rent products and therefore are at risk of requiring temporary accommodation if an affordable home cannot be found. Therefore, it is essential that the development of intermediate housing in the borough is encouraged in order to provide a viable housing product for these residents. The intermediate housing register will ensure residents have access to the intermediate products and avoid the need for temporary accommodation. Based on the developments listed above it is anticipated that an average of 550 intermediate homes will come forward each year, providing potential cost avoidance for the temporary accommodation budget.
45. Furthermore, the intermediate housing register will be of benefit to Enfield residents, making sure they have priority access to these homes. The proposal is to monitor the sales and lettings of intermediate products ensuring intermediate products are being let to the residents in the most need.

## **Main Considerations for the Council**

### **Implementation of the system for allocation of Intermediate Housing**

46. Work is currently underway to design a system for implementing the fair allocation of intermediate housing, via a Council run registration system accessible to partners with properties to allocate.
47. Policy Development – in line with the LBE intermediate housing policy and the GLA guidance LBE will develop an intermediate housing register that has been proposed to sit separately from the existing Housing Allocations register. The intermediate housing market is very different from social housing and hence a more dynamic environment for this register is required to engage both eligible applicants along with housing stock developers
48. Analysis of the current Enfield Intermediate Housing Policy has been completed which has raised some key areas that require further work, amendments and additions in accordance with the design and implementation of the service. This analysis has been useful to understand the detail required within the policy but also the fact that the development of the policy will be iterative whilst designing the service.
49. LBE has further developed its eligibility criteria following the guidance from the GLA. The GLA will be consulting on the definitions of 'key worker' post London Mayoral elections following the COVID pandemic such definitions

need a lot more work to assist councils in the correct prioritisation mechanism for applicants that are fair and just in relation to intermediate housing.

50. The eligibility criteria and prioritisation methodology has been completed to ensure that the correct assessment can be obtained in line with:

- Affordability, employment and income brackets.
- Housing Needs and property size requirements.

51. Following a review of options it is concluded that the best way forward is to create an Intermediate Housing Register (including eligible applicants) with intermediate homes marketing for the first three months to those on the register before going out to the open market, ensuring that Enfield applicants are offered the Intermediate housing units first. This register of interest is then passed to RP's and developers who advertise their properties and allocate accordingly. In partnership arrangements it may be possible for Enfield to require homes to be marketed to residents on the list first. Enfield's control stops at producing the register post assessment of resident affordability and housing needs.

52. Enfield will need to build relationships with the RP's and developers to build trust that the demand will be provided to meet the volume of units produced following this a basic framework along with data protection agreements can be finalised for access to the register.

53. This will work as follows:



Core Service Process	Objective
Manage RP / Developer Relationships	• This process involves managing relationships with new and existing RPs / Developers to market and share details of upcoming developments and intermediate housing products.
Apply for Intermediate Housing	• This process involves an applicant successfully submitting an intermediate housing application with supplementary documentation.
Carry out eligibility & prioritisation assessment	• This process involves determining an applicant's eligibility (income) to join the register. For eligible applicants a priority group is assigned.
Make Intermediate Housing Register decision	• This process involves determining and informing the outcome of the applicant's registration.
Provide Intermediate Housing Register to RP	• This process involves sharing the Intermediate Housing Register with the RPs.
Manage Intermediate Housing Register / KPIs	• This process involves ensuring that the register is kept up-to-date. The provision of data upon close of application along with KPIs.

Figure 3 - Core Intermediate Housing Service Delivery Model

### Working with Affordable Housing Registered Providers and Developers

54. Meeting the housing need through types of intermediate housing, now forms a core part of the business models of many housing associations and developers – and working in partnership with these providers is crucial to developing a sustainable local housing market.

55. The Council has nomination agreements with the active Housing Associations in the Borough to enable it to nominate those most in need for available social rented housing. Currently Housing Associations make

their own allocations to the Intermediate housing that they build. This means that they may not be able to reach as many local residents as the Council could were it to run a waiting list or nomination system.

56. Encouraging the use of grant funded rental and ownership schemes like Shared ownership, London Living Rent and Build to Rent will encourage providers to provide more intermediate housing in Enfield

57. There is a vital need as part of the service design to build ongoing and constructive relationships with the registered providers and developers, to understand their challenges and how Enfield working with other departments e.g. planning can collaboratively assist to mitigate such difficulties. Building these relationships will enable Enfield to attain the support of the providers for the service with a potential of exclusive marketing for 3 months to those on the eligibility register by the providers before they move to the open market.

### **Improving data for intermediate housing**

58. A challenge to assessing the supply and characteristics of intermediate housing is the lack of comprehensive data on less common intermediate tenure products such as intermediate rent, London Living Rent, Discounted Market Sale (DMS) and shared equity. This is a key area that will be part of the transition plan to ensure that upon go live of implementation there is a future plan of data collection in line with intermediate housing.

### **Resources**

59. The implementation and operation of the intermediate housing register will be a General Fund expense.

60. It is anticipated that the implementation phase could be achieved within a 4-month timescale and a budget of c. £95k

61. Ongoing resources would be required to deliver and maintain the intermediate housing register. These will be further defined in the next stage of the project. However, it is estimated that 1 x MM1 (£58,478), 1.5 x PO1 (£70,297) will be required. An invest to save bid is to be made to establish and maintain the register.

### **Safeguarding Implications**

62. There are no safeguarding issues that arise from this proposal. When relationships are offered under existing frameworks or new frameworks formulated all relevant parties will be required to evidence their safeguarding policies in accordance with the Council's requirements.

### **Public Health Implications**

63. The provision of Intermediate Housing to Enfield residents will improve health and wellbeing by providing more long term and sustainable housing

options, it will support the employment of local people and build communities within Enfield.

### **Equalities Impact of the Proposal**

64. An equalities impact assessment has been undertaken. It concludes that residents with protected characteristics will not be disadvantaged by the implementation of the Intermediate Housing Policy.

65. However, it is noted that residents who are disadvantaged due to socio economic factors, such as low income will be positively impacted by the proposal as it will facilitate easier access to affordable housing options.

### **Environmental and Climate Change Considerations**

66. The Intermediate Housing Policy does not have any immediate environmental considerations. However, it will support sustainable development and good quality housing in the Borough which will align to the Council's climate agenda.

### **Risks that may arise if the proposed decision and related work is not taken**

<b>Risks</b>	<b>Mitigation</b>
Lack of options of Affordable Housing to Enfield Residents who do not fall into the social housing bracket and cannot afford rent or ownership in the open market.	Further work within the Private Rented Sector to ensure rents and living conditions are affordable and up to standard – Selective and Additional Licensing Schemes.
Lack of Affordable Housing Stock from RP's and developers and a potential of reduced regeneration within Enfield.	Further work on developing relationships with RP's and developers in collaboration with planning to engage more affordable homes and hence encourage regeneration.
Increased strain on the existing services within temporary accommodation and social housing of applicants that may not meet criteria.	Provide further resource and cost to the alternative housing departments in Enfield to reduce the strain on services.

Table 4 - Risks and Mitigations if the proposed decisions and work is not taken

### **Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks**

67. Performance KPI's will be set following implementation, and these will be regularly measured to ensure performance standards and expectations are met.

<b>Risks</b>	<b>Mitigation</b>
Cost and allocation of resource to Intermediate Housing Process.	Various options have been appraised for the design of the service; the service can be amalgamated with the existing Housing Register with configuration to the existing IT

	systems.
Lack of IT resource and time allocated to the project	Initial discussions have already taken place during Phase 1 to ensure that a scope has been provided. The digital and IT department have been informed of the project and briefed on the coming requirements. It has been planned that the IT requirements assessment will be completed as a priority upon approval.
Failure to meet the Intermediate Housing stock required for eligible applicants.	Building relationships at an early stage with registered providers and developers is key to gain a full understanding of the volumes of homes coming into Enfield. Collaboration with the existing team in line with the RP forum engagement along and the building of an 'Approved registered provider list'.  It has also been proposed that a new role be placed who will work across the intermediate housing service and planning to engage the RP's and developers.
Reputation – failure of the scheme.	Manage the process robustly to ensure that all stages are approved and confirmed from an operational aspect. Initial data review will be needed to further understand the demand for intermediate housing concurrently enabling Enfield to formulate a communications and marketing strategy to engage all stakeholder groups to this service.

Table 5 - Risks and Mitigations if the proposed decisions and work is taken

### Financial Implications

68. The implementation of the intermediate housing register will enable the residents most at need of intermediate housing to find suitable accommodation. These are predominantly residents who are unable to afford market prices which necessitates a sub-prime solution.
69. Many of these residents may otherwise eventually become homeless and would need to be housed in emergency accommodation. The average cost to the Council of being housed in those circumstances is £2.5k per annum.
70. It is projected c.5.5k of intermediate housing will be available within the borough over the next 10 years. This equates to an average cost avoidance of £1.375m per annum.

71. The cost of the staff needed to undertake this work will be in the region of £130k per year. An “invest to save” bid is currently being prepared to fund this. The costs of the scheme will be monitored as part of the overall monthly budget monitoring cycle and will be added to the Emergency Accommodation and Homelessness Business Plan and the Council’s Medium-Term Financial Plan as appropriate.

### **Legal Implications**

72. The Localism Act 2011 allows the council to discharge its housing duty to statutory homeless households by offering a tenancy in the private rented sector. Any private rented sector offer must be suitable and must comply with the provisions of the Homelessness (Suitability of Accommodation) Order 1996.

73. The Scheme of Delegation ensures that the Council has defined and transparent decision making under its constitution.

74. All Intermediate housing should be affordable and comply with the criteria set out in The London Plan. In addition to the relevant income caps, local authorities may set their own eligibility criteria for intermediate housing reflecting local needs. The local authority will need to ensure that the policy complies with The London Plan and that the council’s eligibility criteria does not offend the Equality Act 2010.

75. In addition, the Intermediate Housing Policy needs to comply with planning policy definitions of intermediate housing, as set out in the National Planning Policy Framework and the London Plan, which is outlined in the Intermediate Housing Policy. Compliance for new developments with the Intermediate Housing Policy will be sought through planning obligations, pursuant to section 106 of the Town and Country Planning Act 1990 (as amended).

76. The broader policy setting for the Policy is set out in the body of the report. The Policy is consistent with and advances the Council’s overarching Housing Strategy. Linkages with that Strategy are set out in the body of the report. Regard should be paid to the Equalities Impact Assessment also.

### **Workforce Implications**

77. None other than outlined in the report.

### **Property Implications**

78. HRA property implications: these are found throughout this report.

79. Corporate property implications: none.

### **Other Implications**

80. None.

## Options Considered

81. **Option A – Do nothing:** There is no implementation of the Intermediate Housing policy in Enfield, and we keep to the 'hands off approach' currently in action. Where RP's and developers provide information on housing stock currently available and forecasted, and Enfield provides these details to eligible residents who have shown an interest.

- If this option were taken RP's and developers would not be encouraged to provide intermediate housing in the borough. LBE would have no oversight of the allocations of these properties and would not be able to ensure they were being accessed by the most appropriate residents.

82. **Option B – Integrating into the existing Housing Register:** We integrate the Intermediate Housing register within the current systems. Defining the different eligibility and prioritisation criteria. Utilising the existing resources in terms of registration and assessment steps.

- This option does not align with the Council's messaging for housing. By linking intermediate housing to the social housing register, it could result in residents having unrealistic expectations.

83. **Option C – LBE Partial Control (Recommended):** Enfield has a separate Intermediate Housing register and defined process for applications, registration, and assessment for those who would be placed on this register. This register of interest is then passed to RP's and developers who advertise their properties and allocate accordingly. Enfield's control stops at producing the register post assessment of affordability and housing needs.

- Recommended option.

84. **Option D – LBE Full Control:** Enfield has full control of the end-to-end process for Intermediate Housing. Application, register, assessment, and property allocation.

- This option would require significant funding and resource and is not deemed to be a proportionate solution given the current level of intermediate housing.

## Conclusions

85. There is demand for Intermediate Housing and the opportunity to better promote these opportunities to benefit local residents. This report sets out a way forward to respond to this demand.

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Date of report: 19/07/21

## **Background Papers**

The following documents have been relied on in the preparation of this report:

- LBE Intermediate Housing Policy 2020.