

Dame Louise Casey DBE CE
Rough Sleeping Taskforce
Ministry of Housing, Communities &
Local Government
2 Marsham Street
London SW1P 4DF

Date: 29th May 2020
Our Ref: NP- BHCC
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Dear Dame Louise Casey,

We are writing in relation to the work you are developing through the Rough Sleeping Taskforce and further to the online meeting you had with Brighton & Hove City Council officers last week and in acknowledgement of the letter to the council's Chief Executive from Luke Hall MP, dated 28th May 2020, regarding working closely with us on the next phase of accommodating rough sleepers.

The proposals outlined in this letter also build upon our [recent submission](#) to the Housing, Communities & Local Government Select Committee inquiry on the impact of Covid-19 on homelessness and the private rented sector.

We very much welcome your leadership on this new taskforce and share your ambitions to ensure all rough sleepers we and other local authorities have accommodated during the Covid-19 crisis are successfully supported into sustainable long-term accommodation.

The Government's proactive approach to helping us move people into accommodation is extremely welcome and we would like to build on this through contributing to the work of the taskforce by outlining some of our local challenges, opportunities and solutions we believe could be applied nationwide to ensure homelessness is ended for good in the UK.

Ending Homelessness

Our **immediate challenge** is to keep homeless people safe, supporting them into sustainable accommodation and a secure life, and ensuring rough sleepers do not return to the streets after lockdown.

Our **immediate concern** is around the 280 homeless people we are currently accommodating in hotels and what happens to them when the public health crisis is over, as we do not want to put them back out on the streets. We see these months inside the hotels as a Government investment in keeping people safe and we believe the regular engagement we have been able to achieve has given some homeless people a route to a more secure lifestyle and hope for a better future.

We are still unclear on how long this window of opportunity will last and our immediate objective is to start moving people to more sustainable accommodation. The number of people we are currently accommodating is growing to around 350 because we are including those who might otherwise be in hostels with shared facilities; picking up people who might have had to resort to sleeping rough without our intervention and people continuing to arrive in the city.

The Covid-19 crisis response has provided an opportunity to develop a **long-term solution to homelessness** and we believe the most effective approach would be to adopt the Housing First model nationally with funding provided for addiction rehab, wrap-around support and specialist furniture adapted for high-risk management and capital funding for the purchase of buildings.

There is an emerging opportunity to apply the Housing First model to Brighton & Hove. The city is home to two universities who have seen many of their international students returning home and leaving HMO's empty. As a result, landlords may be looking to re-let. The council would like to secure these properties as licensees for living co-ops (for single people with no addiction problems) and supported living accommodation (for those going through rehab). To ensure this happens the council needs to purchase the buildings or the Government could introduce a 'living rent' cap for landlords.

We are currently reviewing our lettings policy to identify accommodation that would best lend itself to supported housing and 'move-on' accommodation as part of a short-term fix on the way to a more systemic solution as we recognise this can only be a short-term solution and not at the long-term expense of other priority needs.

Our RSI grant is currently funding 50 rough sleepers to be moved, this financial year, through our private rented sector direct lets scheme, but with further Government funding we would be able to expand this.

Emergency and temporary accommodation is never an ideal solution so in order to move away from this model we now have the opportunity to continue the unconditional offer of shelter to all by beginning a programme of converting temporary accommodation from the home purchase scheme into permanent accommodation and as well as bringing emergency accommodation in-house, see if we can use the opportunities of more accommodation (provided by ex-student homes & hotels no longer being viable) to bring emergency accommodation back to the city.

Another key element of this solution is to prevent more people coming to Brighton & Hove, which again requires a national approach to homelessness with a national programme of funding that would help other local authorities to make adequate provision for homeless and rough sleepers in their own areas to enable safe reconnection of those who have no local connection to the city.

Housing supply is a very high priority in the council's [corporate plan](#) and our [Housing Committee Work Plan](#) with both including additional affordable homes targets of 800

additional council homes and 700 other homes by 2023. We anticipate the Covid-19 crisis will cause a building delay, but there is likely to be an opportunity to compensate for this by buying more properties as demand for student housing, general private rented sector and hotels/guest houses falls.

Housing Provision

Our concern is local housing could remain unbuilt as a result of reduced funding available in the aftermath of the Covid-19 crisis. Also, pressure on housing associations and sheltered housing providers could lead to potential increased demand on council care homes.

The LGA has called on the Government to extend the time councils have to use Right to Buy receipts from three to at least five years, the danger being that social housing could otherwise remain unbuilt. Though we do not expect the current time limit to be an issue for Brighton & Hove **our solution to a potential decrease in housing provision** is for the Government to allow us to retain 100% of those receipts. We would also like the flexibility to exceed the cap of allowable RTB spending on each scheme to enable schemes to be more affordable.

The council plans to have a conversation with Housing Associations to assess how badly affected they are by the Covid-19 crisis and with local providers of sheltered housing in order to anticipate potential increased demand on council care homes. We believe these conversations could also usefully be taking place nationally through the work of the taskforce.

Private Rented Sector - Home Loss and Affordability

Brighton & Hove has a large private rented sector which places both the council and local economy at particular risk should there be market failure, which we, working with landlords would wish to avoid with some of the Government support we are asking for in this letter.

Our concern is that through loss of permanent or temporary work due to the Covid-19 crisis, tenants will be extremely vulnerable to eviction (Section 21 or otherwise). We know many evicted households will likely become homeless, therefore we want to ensure we are effectively preventing evictions. Landlords lose money through evictions of households in the private rented sector and are potentially facing a fall in demand at current rent levels and tenants are subject to heightened levels of insecurity.

We want to prevent insecurity and promote more long-term affordable private rented sector housing so we would like to see the moratorium on evictions extended, the introduction of rent controls to cap rents in high rent areas like ours or national promotion of voluntary rent controls capped at LHA rates.

We have had positive engagement with local private landlords associations and would like to build on this to provide **solutions to preventing potential home loss** with

development of a revamped 'good landlord scheme' with pledges on longer tenancies, rents at LHA levels, support for resolving rent arrears from the council and pledges from landlords to pause evictions and work to sustain someone's home. Other options would be to use flexible homeless grants to guarantee that arrears do not exceed an agreed maximum e.g. 3 months rent, offering to buy properties from landlords and set up an ethical lettings agency.

There is also very likely to be a dip in the local housing rental market due to people being unable to pay and a reduction in student demand. In order to seize this potential opportunity we would like the Government to consider funding to help us sustain tenancies and prevent homelessness. Brighton & Hove City Council has a good relationship with landlords and vast experience of the private rented sector direct access scheme which we can effectively build on to do this with Government support.

The council also has a role in alerting landlords and tenants to their Energy Performance Certificate obligations and rights. At the most basic level this can be done by pointing them to the information available on www.simpleenergyadvice.org.uk, however EPC enforcement within the private rented sector is currently limited and landlords cannot be required to spend more than £3500 upgrading their properties even if such expenditure fails to get the property to the required EPC standard. In order for landlords to meet the required standard we would like to see the Government increase the landlord spending cap and provide funding through grants or loans to incentivise landlords to make efficiency improvements. This would be particularly useful in Brighton & Hove where we have a large number of hard to treat homes and 11.7% of households are in fuel poverty, above the average for the South East region.

Our recommendations in summary:

- We advocate adopting the Housing First model nationally with Government provision of funding for addiction rehab, wrap-around support and specialist furniture adapted for high-risk management and the key element to enable delivery of this model - capital funding for the purchase of buildings.
- We urge the Government to introduce a 'living rent' cap for landlords.
- We urge the Government to extend the time local authorities have to use Right to Buy receipts from three to at least five years.
- We urge the Government to allow us to increase the percentage of Right to Buy receipts we can use on new homes and to allow us to retain 100% of those receipts.
- We urge the Government to extend the moratorium on evictions.

- We urge the Government to introduce national legislation to give local authorities rent control powers to cap rents in high rent areas like Brighton & Hove.
- We would welcome Government funding to help sustain tenancies and prevent homelessness.
- We urge the Government to raise the £3500 cap on what landlords are required to spend upgrading their properties to the required EPC level and provide grants or loans to help them achieve this.

We do hope these proposals can be considered as part of the developing work of the taskforce and look forward to further discussion with you on these and the continued support of the Government in helping us provide the short and long-term solutions we believe are required to end homelessness in Brighton & Hove and the UK.

We look forward to hearing from you soon.

Yours sincerely,



Cllr Nancy Platts
Leader of the Council



Cllr Phélim Mac Cafferty
Leader of the Opposition

CC: The Rt Hon Robert Jenrick MP, Secretary of State for Housing, Communities and Local Government; Luke Hall MP, Minister for Rough Sleeping and Housing; Steve Reed MP, Shadow Communities & Local Government Secretary; Thangam Debbonaire, Shadow Housing Secretary