

A COMPREHENSIVE COMMUNITY AND VOLUNTARY SECTOR RESPONSE TO CONSULTATION ON THE DRAFT REVISED LONDON HOUSING STRATEGY

1. Introduction

- 1.1 This response brings together, the views of a number of London's voluntary and community sector organisations in a comprehensive response to the consultation on the draft Revised London Housing Strategy. We bring to the response the specialist understanding and experience of our own individual organisations.
- 1.2 Together our overriding concern is London's housing crisis, which exists as a result of: decades of failures to address the unaffordability of housing in the capital; the application of housing policy that in terms of supply predominantly meets the needs of the top third of households by income; the feeding of the property market and property investment rather than ensuring the provision of stable and genuinely affordable homes within communities, where household members can demonstrate a long-term commitment and might safely raise the next generation.

In total this

- has created high levels of homelessness, families living in temporary accommodation, overcrowding and transience
 - facilitates large parts of central and inner London becoming increasingly accessible / affordable only to the wealthy, with lower income households being pushed out
 - has resulted in tens of thousands of households who can only genuinely afford social-rented homes being housed of late¹, in expensive private sector homes and in the past, in bed and breakfast accommodation – with huge amounts of public money used to support the provision of inadequate and expensive short-term rather long-term stable and affordable homes
- 1.3 With the new powers invested in the London Mayor around housing and planning, he is uniquely placed
- to make the case for London now, as well as in the run up to the next spending review – particularly in instances where national policy impacts in a distinct and detrimental way on London's communities
 - to develop appropriate ways (consistent with his new powers) to consult and engage with communities around London's strategic housing issues
 - to gather / commission the evidence needed to make the case for London
 - to use existing, new and innovative methods of addressing London's housing crisis.

2 Community engagement / empowerment

- 2.1 The draft Housing Strategy's proposals to support community-led development and to work closely with community groups are welcome. However, there are too few concrete proposals suggesting how this will be implemented and insufficient emphasis on this area of work within the document as a whole.

¹ The 2008 Greater London Strategic Housing Market Assessment assumed that 66,700 households that had been placed in private rented homes by their boroughs, would remain there (rather than being assessed as needing social-rented homes) covered by housing benefit.

- 2.2 By providing the Mayor with new powers over housing, the Government has demonstrated that it believes housing policy needs to be co-ordinated across London. This can only be developed in co-ordination with its localism strategy if it effectively engages Londoners in addressing local housing need and developing and monitoring the London Housing Strategy. The present government has said that ‘decades of disempowering government have suppressed initiative, undermined incentives and multiplied the excuses for not getting involved’²
- 2.3 The current transfer of housing powers to the Mayor of London offers an opportunity to address this. If community empowerment becomes a focus of such devolution of central government powers from the outset research suggests that it can:
- empower citizens and make a significant difference to the way services are designed and run;
 - secure widely valued policy outcomes – indeed community engagement has been shown, at least in some cases, to cut crime, promote health and well-being, improve public trust and satisfaction with public services; and
 - sustain itself over the medium to long term.³
- 2.4 The Mayor’s London Health Inequalities Strategy⁴ provides evidence of the importance of community engagement and empowerment in improving people’s well-being, as well as highlighting the impact of housing as one of the most important social determinants of health. We suggest that the Housing Strategy should build on this to ensure that community engagement in housing development in London forms the core of the Strategy. This would ensure that Londoners have more control over policy affecting the homes and communities within which they live and achieve the health and social benefits of such involvement, particularly for those who cannot afford to buy their own homes.
- 2.5 A specific commitment in the London Health Inequalities Strategy states: “excluded groups of Londoners, particularly those who move around the city, require a special focus from commissioners. These mobile groups include new migrants, rough sleepers, ex-offenders, homeless families and those who have to relocate because of insecure housing or problems related to substance misuse.” Recent welfare reforms from national Government have had a disproportionately negative impact on these groups and it is particularly important that the London Housing Strategy engages these groups in informing housing policy in the capital to address the difficulties they face.
- 2.6 The involvement of Just Space, and its engagement of a diverse range of London’s voluntary and community sector groups, in the recent Examination in Public of the Mayor’s London Plan, illustrates the value that can be brought through community engagement in not only in operational issues of estate and housing management, but in strategic discussions relating to London housing policy. Through greater community engagement the Mayor can support the Examination in Public’s Inspectorate who stated that: “... the inspectors took on board the comments about the perceived imbalance of participants and are looking to include more voluntary and community sector groups in the final list of participants, as well as acknowledging the important role that can be played by umbrella groups such as the Just Space Network....”
- 2.7 Borough-wide council tenant organisations’ engagement in strategic housing issues is well co-ordinated by London Tenants Federation and while some of its member organisations also

² Decentralisation and Localism Bill: an essential guide.

³ B. Rogers & E. Robertson (2004) The Benefits of Community Engagement London: Civic Renewal Unit, Home Office

⁴ <http://www.london.gov.uk/sites/default/files/LondonHealthInequalitiesStrategy.pdf>

represent housing association tenants, there is need to support the development of wider engagement mechanisms for both housing association tenants and the rapidly growing number of private tenants.

2.8 The new powers invested in the Mayor in April this year provide opportunities to create community engagement structures that can address these London-specific housing issues by linking closely with the affected communities.

2.9 **We therefore recommend:**

- **Building on the work of the Mayor's Housing Forum and Housing and Equalities Group, to ensure that there is accountable voluntary and community sector representation from those working with excluded Londoners and those representing tenants groups on the new London Housing Board that directs the implementation of London's Housing Strategy. The Mayor has assured London's voluntary and community sector groups that he will consider voluntary and community sector representation on all the new cross-sector partnerships created as a result of his new powers⁵, in recognition of the sector's work to reduce social problems and its ability to engage with the most disadvantaged Londoners. This commitment should be honoured through accountable voluntary and community sector membership of the London Housing Board**
- **Facilitate engagement, through the support of appropriate grass roots representation, of council, housing association and private tenants' groups. There are increasing commonalities across these different tenancies and the balance between these types of tenure in London is changing significantly. All groups need to be provided with effective engagement mechanisms to ensure that the issues they face are presented to policy makers. Such mechanisms need to be developed / strengthened particularly for housing association and private tenants.**
- **Lobby to bring the tenant empowerment role of the Homes & Communities Agency, which has been transferred to the Department of Communities and Local Government, back to the London Mayor to address tenant empowerment and engagement issues in the capital. Tenants in London face particular difficulties caused by a lack of government acknowledgement of higher rents and house prices in London, and the fact that these are increasing in the capital, whilst falling in other parts of the country. In particular the Greater London Authority should set a particular budget line within its expenditure for tenant engagement and take control of the Tenant Empowerment Grant for London.**
- **Build on the work of the London Housing and Equalities Group and the Just Space model of community involvement in planning issues, to develop a wider voluntary and community sector housing forum (which includes representatives from tenants of all tenures and the most excluded communities in London), with which the Mayor can regularly consult on housing issues and use to engage all Londoners in the housing policy that affects them, perhaps through an annual regional housing conference.**
- **Build on current local work on tenant engagement in the spending of the London "Decent Homes" grant to ensure that there is community engagement, accountability and transparency in how this funding, now transferred to the Mayor, is spent to best improve the lives of London's tenants.**
- **Such engagement with tenants and the most disadvantaged Londoners needs to be more formalised, better resourced and better supported in developing the London Housing Strategy.**
- **In this way the London Mayor could use his new powers to develop the best practice in community engagement and empowerment to develop housing policy in London that reflects his stated objective of an "equal life chance for all".**

⁵ Letter from the Mayor of London to London Voluntary Service Council (July 2011)

3. Demographic change and the basis for need and demand estimates

- 3.1 We are deeply concerned that both the London Housing Strategy and the London Plan are based on inadequate understanding of
- changing composition and direction of migration flow into, out of and within London
 - the role of rent and price differences as influences on migration
 - the role of benefits (housing and other) as influences
 - the role of 'regeneration' areas and policies as influences on migration and the class composition of localities
- 3.2 London housing has been changing very fast in the last decade, with the rapid growth of private renting facilitating (or at least being associated with) high levels of mobility within the stock. While house prices in England have tended to be rather flat since 2007, London prices have recovered and continued to grow, driven directly and through ripple-effects by demand coming from abroad. The growth of demand for high-end (expensive) student housing has been seized as a low-risk market opportunity by developers and many sites are being approved for student housing which were previously envisaged for regular housing or in employment use.
- 3.3 The demographic picture on which the 2011 London Plan was based was characterised by continuing heavy in-migration (domestic and international) of typically-young people, offset by out-migration, often to other parts of the region and the UK and by people on average rather older as they sought more space to raise families and in some cases more class-segregated schools. With incomes for most of the population now static or falling in real terms, and with housing costs remaining buoyant, affordability has become worse and this will have reduced the migration outflows from London where people have been unable to afford the larger homes they wanted. On the other hand the increased affordability pressures inside London may have driven people to leave in larger numbers – not to improve their housing but just to find somewhere they can afford. Those whose survival in London (or in expensive areas within London) has been dependent on historic levels of benefit have already started to take this outward path and most of that displacement is yet to come.
- 3.4 These two paragraphs are not offered as a scientific assertion that we know what is happening but as anecdotal evidence that London has to make its plans in a very fast changing environment. Making good plans in this situation depends on having good, up-to-date, evidence and on interpretations (models, theorisations) which enable forecasts to be made and policies designed which have the best hope of delivering the right outcomes.
- 3.5 An example of where this understanding is lacking arose in the EiP on the 2009 Draft Replacement London Plan where community organisation representatives of Just Space gave evidence that 'regeneration', normally targeted at areas of high deprivation, rarely produced benefits for the deprived residents of those areas, frequently scattering and displacing those communities in a damaging and stressful way while benefits accrue to property owners, developers and new arrivals in the regenerated areas. The EiP panel expressed its support, or at least sympathy, for this view and noted the lack of evidence to the contrary. (Panel Report § 2.94 - 2.103)
- 3.6 This very serious information vacuum surrounding 'regeneration' has been taken up by GLA Economics in its working paper 48 which concludes '*One of the criticisms of regeneration is that it often 'gentrifies' an area by displacing poor residents or by attracting a different, and often richer, population to move into an area. While this obviously happens, there is no reason to think it is necessarily a bad thing. But it will never be fully understood without longitudinal data that tracks the movement and changes to the lives of people.*' and argues that...'*The availability of data poses a great challenge to this, though, and without longitudinal data that records changes to the*

lives of individual people it may not be possible to determine conclusively whether culture-led regeneration, or indeed any regeneration, works.'

- 3.7 When the Mayor's planning team has been pressed to stick to its undertaking (given to the EiP)⁶ to proceed quickly to a revised housing needs estimate / Strategic Housing Market Assessment, we were told that the high cost of such an exercise made it prohibitively expensive in the current public spending context. Costs of £1-2 million were mentioned. We regard this response as ridiculous seen in context
- In many London streets, £2m buys two houses;
 - The Mayor's share of HCA revenues for London is around £3bn for 2011-15;
- 3.8 **We propose that there is need for both expanded short-term studies and analysis (which the GLA can do) and for long-term (longitudinal) research of a kind which might involve partnership with the Research Councils, Universities etc.**

4 Housing need and supply

- 4.1 We feel it is essential that the Mayor commission a new assessment of housing need in the capital, particularly to take into account the impact of Local Housing Allowance caps, Universal Credit caps and the introduction of the 'affordable rent' (close-to-market) tenure in London.
- 4.2 The 2008 Greater London Strategic Housing Market Assessment (SHMA) provided evidence that the need for social-rented homes had increased since the previous 2004 Housing Needs Survey. While the Mayor assumed that the use of the private-rented sector to house homeless households, who would ordinarily have been assessed to require social-rented homes, would be a long-term housing solution with rents covered by housing benefit; the introduction of Local Housing Allowance caps requires a reassessment. We are already aware of boroughs housing families not only outside their borough boundaries, but also outside London to facilitate keeping within the LHA limits.

Delivery of new and additional social-rented homes has consistently been at lower levels than London Plan targets (only 47% of the London Plan target being achieved in 2007-10)⁷; and falling far short of evidenced need.

The target set in the Revised London Housing Strategy; amounting to 5,048 new (but not necessarily additional) social-rented homes a year is totally inadequate in comparison to the 24,500 (including households housed in the private-rented sector that would previously have been assessed as needing social-rented homes) identified in the 2008 SHMA

Given that 27% of the social-rented homes delivered in 2008-10 were replacements for others demolished, the Revised London Housing strategy targets should, as the London Plan does, set targets for 'new and additional' homes.

⁶ Just Space recordings and transcripts of the Examination in Public of the Draft Replacement London Plan - <http://ucljustspace.wordpress.com/eip-recordings/> On the morning of 7th October 2010, John Lett of the Mayor's London Plan team said (page 10 of transcript) *On the timing of the SHMA and indeed the timing of the SHLAA revision we will do them as soon as possible. There is of course, as ever a resource implication on this. The Mayor has given a very clear indication that he wants the SHLAA refreshed and be done as soon as possible and there is a great deal of sense in trying to do the SHMA at the same time in parallel with it. But, we also need to be integrated as far as possible with the London Housing Strategy because there is little point in having a review of the spatial plan which is not integrated with the investment plan. So we will try to do the two together and we are certainly internally thinking about a work programme as London Councils indicated, towards 2011 and 2012'.*

⁷ Analysis of delivery of new and additional social-rented homes in London compared to London Plan targets (from annual monitoring reports of the London Plan) – p30 London Tenants Federation's 'The Affordable Housing Con' www.londontenants.org

- 4.3 We are pleased to see the reference to the St Clements' Hospital site in the Revised Strategy. However, we are disappointed that there is no reference to community land trusts as one of the solutions to the difficulty of building housing in London which will be affordable in perpetuity.
- 4.4 We feel that the Mayor's new powers provide him the opportunity to begin to address the chronic need for low-cost, particularly rented homes. He has the ability with the boroughs to set aside land specifically for Community Land Trusts, Housing Co-operatives, self-build housing and other innovative and community-focused ways of delivering low cost homes. This would not only be entirely consistent with the Localism agenda, but could provide good practice models that might be used elsewhere in the country.
- 4.5 While it is suggested in the Draft that the 'affordable rent' tenancies will meet the needs of households that would previously have accessed social-rented homes, this is clearly not the case in all parts of London particularly central and inner London. Housemark assessed that the average household income required to meet the cost of 80% market rents in the capital was £44,500. Clearly this could be much higher in Central and Inner London boroughs. While the Mayor hopes that the average cost of 'affordable rents' in London will be 65% market rents, we assume that since the Mayor is suggesting that family sized affordable rent homes will be 'near to' target rents, that smaller homes will be above 65% market rents.

We are particularly concerned about the following issues -

- where the majority of the affordable rent homes, particularly the family sized homes, are to be situated in order to ensure that benefits meet the cost
 - the impact of this on London's social demographics
 - the increase in the housing benefit bill and in the numbers of households that will be dependent on benefits to meet the cost of their rents, compared to living in social-rented homes
 - the impact of welfare and tenancy changes on levels of over-crowding
- 4.6 The English Housing Survey 2009-10 estimates that 237,000 (7.8%) of London homes are overcrowded and that a third of overcrowded households in England are in London. A new housing needs survey should take into account London-specific overcrowding issues, but this is also something that requires ongoing monitoring. The Mayor states that delivery of family housing is a strategic priority, but targets for addressing this are missing. The target for 42% of new social-rented homes to be 3-bedrooms plus in the existing London Housing Strategy should be kept in the revised strategy. Targets for affordable and intermediate family sized homes also need to be included.
- 4.7 The focus on encouraging more home ownership in London fails to take account of the evidence available on what households in London can afford (through the 2008 SHMA) and is based on a assumption of aspiration which is non-evidence based and could potentially result in a greater numbers of households with debt problems, already a greater problem in London, where there are more people in arrears with their debts than in other English regions⁸.

It is clear that not only are house prices increasing in London, but that the increases are being inflated by purchases at the top end, much as a result of property investment from abroad. The Sunday Times suggested that £100bn of central London properties are held in offshore tax

⁸ London Debt Strategy Group (2011) Treading Water. Available at: <http://www.capitalise.org.uk/page.asp?section=0001000100030006> [4th March 2012]

havens. We suggest that this also impacts significantly on the number of homes that are empty for long periods of time in London.

- 4.8 Private rents also continue to rise in London. LSL Property Services buy-to-let has recently highlighted increases of 6.3%. We are concerned that the movement of private tenants dependent on local housing allowance from more expensive central and inner London boroughs to outer London will inevitably result in private rent increases in outer London potentially above LHA limits.
- 4.9 We are concerned that with the increase in private renting in London, there is a need not only for sign-posting of rights advice and information services for private tenants.

4.9 We propose that the Mayor

- **commission a new housing need survey in London, to take into account welfare benefit changes and the introduction of affordable rent tenancies**
- **provide targets in the London Housing Strategy for ‘new and additional’ homes, as the London Plan does**
- **monitor delivery of new and additional social-rented, affordable rents and intermediate homes separately**
- **set targets for delivery of family sized homes for social, affordable rent and intermediate homes**
- **make specific reference in the strategy in terms of addressing housing need, to encouragement to support community land trusts, co-operatives, self-build and other innovative and community focused ways of delivering low cost homes**
- **set aside a significant proportion of the land from the proposed London Public Land Pool to hand over for community based housing (including support to develop models such as community land trusts and housing co-operatives)**
- **support a London-wide information campaign for private tenants – potentially using transport, bus shelters / tube stations**

5. Homelessness / Rough Sleeping

- 5.1 A great deal has been achieved towards tackling rough sleeping in the last four years and we are keen to see this progress consolidated and improved upon. All measures of rough sleeping currently show an upward trend and, in the light of benefit and local authority spending cuts, this is unlikely to change even when London’s economy begins to grow again. Even greater efforts and focus are going to be required just to maintain the current situation. Therefore we encourage the Mayor to ensure that the legacy is a lasting one and not just geared to 2012.
- 5.2 We welcome the No Second Night Out (NSNO) initiative which has been a success in a number of ways. We are pleased with the way it has improved the reach and practice of commissioned outreach teams, with the pressure it has put upon local authority housing and homeless persons teams to find the solutions to which people are entitled, and with the high success rates it is achieving for people who access the assessment hub. Therefore we encourage the Mayor to press on with the roll out of NSNO beyond the initial ten boroughs involved in the pilot. In 2009-10 28% of new rough sleepers were first seen on the streets outside the pilot boroughs. (This percentage may increase if NSNO leads to a more comprehensive outreach service across outer London boroughs.)

- 5.3 Alongside NSNO the '205' approach to long-term rough sleepers has probably been the most significant achievement since 2009. We welcome the dissemination of the learning from this flexible and individualised approach to wider groups. We ask the Mayor to ensure that the focus and approach that has been so successful in London Delivery Board boroughs is replicated wherever need exists. We recognise that most outer London boroughs lack the resources and expertise of the LDB counterparts and suggest that sub-regional work may offer a solution to this.
- 5.4 One of the impacts of central and local government cuts has been a reduction in the commissioned support services available to former rough sleepers once they have become housed, such as tenancy sustainment services. While some of this can be covered by volunteering and community initiatives we are concerned that the erosion of support services is increasing the number of people returning to the street, for example by failing to provide the support people need to help them to tackle substance abuse problems or manage their finances, leading to evictions and abandonments due to anti-social behaviour and arrears.
- 5.5 We are very concerned about the situation of migrants who are sleeping rough in London, especially those with little or no recourse to public funds. We recognise and support the reconnection work for EU migrants carried out by agencies like The Barka Foundation and the Olallo Centre and the support given to refugees and asylum seekers by, for example, Praxis and the Jesuit Refugee Service. We would encourage the Mayor to promote and support the work of these organisations and of the many small community groups who provide vital support for their fellow nationals. There could be more productive liaison and better practical assistance provided by consular officials from the relevant countries, both within and outside the EU.
- 5.6 We recognise that the changes affecting local authorities' responsibilities and powers in the 2012 Localism Act present both challenges and opportunities in relation to housing, particularly where decisions made by one council will inevitably have an impact upon its neighbours. The evidence from NSNO, from the mystery shopper research into local authority housing decisions carried out by Crisis and from Homeless Link is that the quality of advice and assistance at the point of first approach can either promote or prevent homelessness.
- 5.7 The Localism Act permits local authorities to discharge their statutory homelessness duties by housing people in the private rented sector. However, with the wider economic and benefits climate making large parts of London unaffordable, in-borough private rented sector placements will often be extremely difficult. The fear is that many statutorily homeless households will be forced into small geographical pockets. Despite people being acknowledged to be 'vulnerable' under the relevant legislation this may mean that they are separated from vital support networks and this is likely to lead to them losing their accommodation. We welcome the guidance in the Revised Strategy: *The presumption is that boroughs will seek to discharge their homelessness duty within their local area, always considering the specific needs of households to remain in the locality. Boroughs should ensure that an appropriate balance is maintained between offers of accommodation for homeless households in the private rented and social rented sectors.*
- 5.8 In the Revised Strategy the Mayor has committed to *work with the boroughs and the Department for Work and Pensions to monitor the government's Housing Benefit reforms.* We encourage him to do this on a regular and systematic basis. The government have claimed that pressure groups have overestimated the impact of the policy and so objective analysis from the Mayor will have significant influence in getting them to reconsider the overall viability of the policy.
- 5.9 We are very concerned about the impact of the extension of the Shared Accommodation rate to 25-34 year olds. We have already received reports of people suddenly facing a drop in Housing Benefit of more than £100 a week, which will inevitably lead to them losing their accommodation. There is not evidence to suggest there is sufficient shared private rented accommodation

available for 25-34 year olds already established in independent accommodation to move into. While we welcome the exemptions announced in autumn 2011 for people who have lived in homeless hostel accommodation for three months we are aware that this leaves many other equally needy people stranded. For example it does not help those homeless people who have moved directly into housing through the church winter shelters (around 685 people in 2010/11). In fact the exemption creates a perverse incentive for individuals who do not need hostel places to try to use hostels. We are also very concerned about the situation of parents without care who will find it much more difficult to remain in relationship with their children if they do not have safe accommodation where children can visit and stay overnight.

5.10 The DWP has said that it is likely that the combination of Local Housing Allowance changes and the household benefit cap will result in families losing accommodation and needing “to move into more expensive accommodation, at a cost to the local authority”. (DWP Impact Assessment, 16.02.2011) The Government’s own figures suggest that nearly half of those affected by the caps will be in London. Seventeen boroughs (Barnet, Brent, Camden, City of Westminster, Croydon, Ealing, Enfield, Hackney, Hammersmith & Fulham, Haringey, Harrow, Islington, Kensington & Chelsea, Newham, Redbridge, Tower Hamlets, and Wandsworth) will see more than 1,000 households affected by the caps. In addition to household movement we anticipate a rise in domestic abuse and in youth homelessness as young people leave or are forced out of increasingly difficult family situations. London has a rental market which is nearly 44% above the national average. It is nearly a third more expensive than any other part of England and has inflated in price by 5.6% in the last year alone. Introducing the same charges in London as elsewhere will have a devastating impact. Housing has a unique regional inflationary element in a way that other items covered by benefits such as food and utilities do not.

5.11 **We recommend that the Mayor**

- **make an explicit commitment to ensure that from 2013 onwards “no one will live on the streets of London and no individual arriving on the streets will sleep out for a second night”;**
- **continue his dialogue with the other twenty three boroughs to ensure that they understand the key reasons why NSNO works and are committed to replicating the approach of the pilot ten. It is important that this dialogue includes consultation and agreement upon an updated Reconnections Protocol that can be agreed and implemented across all boroughs.**
- **use his influence to advocate to central government for a return of a ‘ring-fence’ around housing related support. We also suggest that he makes it clear to local authorities that cuts in essential homelessness services will have a detrimental effect on his plans to end rough sleeping;**
- **use his networks to raise awareness and disseminate accurate information about the benefit entitlement of the different groups of migrants to be found on London’s streets and in our communities.**
- **endorse the guidance produced by Homeless Link and to work with partners from boroughs and from the voluntary sector to produce an applicants’ charter which could be adopted by all London boroughs**
- **use the resources available to him to ensure that local policies complement his strategic approach regarding his presumption that the boroughs will seek to discharge their homelessness duty within their local area;**

- **promote pan-London protocols around the recording of placements of homeless households in other boroughs or outside London**
- **monitor and publish reports on the placement of homeless families in private-rented housing; identifying where families are being placed outside their boroughs; where they are being relocated to and the reasons for the relocation**
- **carry out his work with the boroughs and the Department for Work and Pensions to monitor the government's Housing Benefit reforms on a regular and systematic basis.**
- **press for further exemptions to the Shared Accommodation rate in London to reflect the gaps in the current arrangements and the shortage of affordable private rented accommodation in the Capital, as part of the Mayor's dialogue with the government around benefit reforms**
- **urge the Mayor to continue to argue for separate arrangements for London to reflect the additional challenges faced here**

6. Inclusion

- 6.1 The exercise of the increased housing powers of the Mayor, including investment plans and funding allocations, requires an up to date assessment of the housing need of equality groups. Further, the Mayor must demonstrate that the policy proposals in the London Housing Strategy address the deprivation and inequality experienced by specific groups. The non-availability of the Equalities Impact Assessment during the public consultation period has been a significant barrier to this process.
- 6.2 Older people should have the choice to move to a range of supported housing provision in their locality where they have friends and family networks (extra care housing, sheltered housing, home care and intermediate care housing). This is an important dimension of sustainable communities and lifetime neighbourhoods.
- 6.3 The need for more authorised sites for Gypsies and Travellers is clear and immediate. The mainstreaming of Gypsy and Traveller site allocation and funding within housing investment programmes requires the joining up of the Mayor's strategic role in this regard with the devolving of decisions on Gypsy and Traveller sites to borough level.
- 6.4 In exercising these new housing powers, the Mayor has a duty under equality legislation to ensure Borough policies with regard to the accommodation needs of Gypsies and Travellers, and indeed all equality groups, are non-discriminatory.

6.5 We recommend that the Mayor

- **encourage Boroughs to work with the voluntary and community sector to map the availability of sheltered housing, care homes and extra care housing per 1,000 older people**
- **take a strategic lead, working with local authorities and health authorities, to develop investment plans and allocate housing resources to those parts of London where mapping shows that the current supply of supported housing is insufficient to meet the needs and preferences of older Londoners**
- **should undertake his assessment of the housing needs of older people, the development of policy proposals and the allocation of resources in discussion with the voluntary and community sector**

- **take a strategic lead in addressing the evidenced accommodation needs of Gypsies and Travellers**
- **discuss with the Boroughs their targets for additional Gypsy and Traveller sites and the development of site specific proposals which can receive funding allocations**

7. Housing and Environment / Climate Change

- 7.1 We are concerned that the Draft strategy lacks a specific section on housing and environmental / climate change issues. Homes and workplaces are responsible for nearly 80% of London's emissions, once aviation emissions are excluded. In 2008 3.1 million homes accounted for 16.7 million tonnes of carbon emissions each year. With continued growth this could rise to 19.7 million tonnes by 2025. London's domestic sector produces 36% of the capitals CO2 emissions⁹.
- 7.2 GLA Economics suggest that 'fuel poverty in London affects 18.6% of households. When severe fuel poverty is examined, more than 126,400 London households fall within the definition. Significant number of households in both fuel and severe fuel poverty are just beneath the threshold level.'¹⁰ Although there is increasing awareness of 'fuel' poverty there is a growing problem of 'cool' poverty' or heat island effect (created by high density living) wherein the building fabric stores heat from the sun during the day, which is then released at night. 'Cool poverty' is increasingly a problem in the summer months in London, alongside 'fuel poverty' in winter months. Higher temperatures increase serious health problems and death levels particularly amongst the elderly and those with medical problems. Mechanical cooling of buildings uses extra energy and can be too expensive for those living on low incomes.
- 7.3 One of the key areas of work to combat both emissions and fuel poverty is through the GLA's retrofitting programme RE:NEW.¹¹ There are increasingly high standards for new buildings but London has a huge existing housing stock so the Mayor has made commitment to retrofit 200,000 homes by 2012 and 1.2 million homes by 2015. However the housing strategy states that by November only 19,000 homes had been retrofitted though the GLA's RE:NEW home retrofit programme, with 40,000 reached by February and obviously still at a relatively early stage of roll-out with the target for reaching 55,000 homes put back from March to May and longer term targets appear now just to be aspirations
- 7.4 According to the London Assembly Environment Committee report February 2012, 'The GLA has only allocated funding for 20,000 more homes to be retrofitted in 2012/13. The Mayor expects the rest to be delivered via the national Green Deal scheme (in which households will pay for their own works via a charge on the energy bill). London is still lobbying for the Green Deal to deliver fair funding to Londoners and the fuel poor, and the necessary take-up to achieve the required carbon savings. The Green Deal is due to start in 2012, but dates seem to be slipping.'¹²
- 7.5 The mayor currently does not have the finances to finance the target of 1.2 million homes retrofitted by 2015.
- 7.6 There are greater financial incentives to build new homes, than to refurbish existing ones - VAT is charged on housing refurbishment, while it is not on new build. Refurbishment is though more environmental sound. The embodied carbon (that associated with the consumption of goods and services; production of waste and transport) is higher in new build than in refurbishment, but is

⁹ Chapter 5 London Plan 2011 <http://www.london.gov.uk/sites/default/files/LP2011%20Chapter%205.pdf>

¹⁰ <http://www.london.gov.uk/sites/default/files/cin34.pdf>

¹¹ http://www.london.gov.uk/media/press_releases_mayoral/mayor-helps-londoners-save-least-%C2%A34m-fuel-bills-40000-homes-get-energy-makeover

¹² <http://www.london.gov.uk/sites/default/files/Background%20paper%201%20March.pdf>

not included in environmental impact assessments (GLA's Climate Change and Mitigation Energy Strategy 2011). The 2009 Bioregional and London Sustainability Development Commission report, 'Capital Consumption', estimated that London's combined emissions including embodied carbon to be 90 million tonnes of CO2 a year based on 2004 data, but is 47m tonnes if embodied carbon is not taken into account.

7.7 We propose that

- **given the Mayor's commitment to reducing emissions by 60% by 2025 and the fact that a large proportion of emissions are from domestic homes, environmental / climate change issues should form a key part of the Revised London Housing Strategy;**
- **the Mayor better promote the RE-NEW scheme – including through the use of advertising at bus shelters and tube stations**
- **the Mayor should encourage the use of cool roofs, pavements and parking areas in new housing developments and refurbishment schemes**
- **the Mayor should look to the rebalancing of retrofitting and the refurbishment of existing homes through lobbying for the removal of the financial incentives in building new homes;**
- **embodied carbon emissions should be included in environmental impact assessments carried out in any scheme that involves demolition of existing homes;**
- **the Revised London Housing Strategy should provide clear information on how the Mayor will fund the retrofitting of homes in order to meet his 1.2 million retrofitted homes by 2015**

FROM: *London Civic Forum; Homeless Link; Just Space; London Forum of Civic and Amenity Societies; Housing Justice; London Voluntary Service Council; London Federation of Co-operative Housing; Camden Federation of Private Tenants; Kings Cross Railway Lands Group; Zaccheaus 2000 Trust; Hayes Community Development Forum; London Tenants Federation, Stonewall Housing; London Gypsy and Traveller Unit*