

DRAFT LONDON HOUSING STRATEGY 2005-16

CONSULTATION RESPONSE from THE LONDON HOUSING FOUNDATION

The London Housing Foundation

The London Housing Foundation is a charitable foundation that provides support to voluntary organisations tackling single homelessness in the capital. It has been operating for over ten years and provides grants, training, personal and organisational development support. Whilst it does not itself have direct experience of service delivery it has a broad understanding of the issues affecting single homeless people in London as a result of its close involvement with service delivery agencies. This response seeks to address issues specific to single homelessness within the proposed strategy.

We welcome the production of the draft strategy and the time allowed for consultation. We believe that this – and the willingness of those involved in the production of the draft to engage in the consultation process – will succeed in delivering a more effective final strategy.

The London Housing Strategy in context

The draft strategy identifies in paragraph 2.7 that it needs to be consistent with other high level regional strategies and we support this. However, whilst reference is made in this section to the London Economic Development Strategy and the Mayor's Transport Strategy, there is little in the following text that takes these into account. **We are concerned in particular that the Housing Strategy should refer to the education, training and employment (ETE) needs of homeless people as part of their route back to inclusion within sustainable communities.**¹ Further, the final version of the strategy will be able to take into account issues raised in the recently published draft London Supporting People Strategy (ALG) and we would encourage this.

We note that this draft is predominantly an investment strategy, focussing mainly on the physical housing infrastructure. Our work in addressing single homelessness demonstrates the need for a wider perspective, taking into account personal and social factors, as well as the physical. This is also

¹ Off the Streets and into Work (OSW) is a leading agency that brings together a wide range of delivery agencies that provide ETE opportunities to homeless people. Using a combination of SRB, EU, LSC, other statutory and charitable funding OSW has pioneered collaborative working in this field. See www.osw.org.uk.

recognised by the Government (for instance, 'More than a roof – a report into tackling homelessness' ODPM 2002). Accordingly **we believe that the final strategy would be improved by adopting a more holistic, people-centred perspective.** Such an approach would, for instance, inform the issue raised above about the need to make connections with ETE provision.

Chapter 2 of the draft strategy explains that sub-regional and local housing strategies have helped inform the development of this strategy. Presumably also the local homelessness strategies have been taken into account? **Given the potential importance of the London Housing Strategy in influencing future levels of homelessness this aspect would benefit from more explicit attention.**

Further, **there is a strong case to be made for a regional London Homelessness Strategy** as the 33 separate borough based homelessness strategies inevitably miss cross-borough, sub-regional and regional issues. These are, by contrast, addressed in the London Supporting People Strategy, but in relation to SP alone and there are many aspects of homelessness, its prevention and required responses, that are not covered by either the draft London Housing Strategy or the London SP Strategy. Whilst it will not be within the remit of the LHB to address this within the timescale of production of this strategy **we would recommend this be highlighted as an action point to be addressed by the Mayor** when responsibility for the regional housing strategy is subsequently transferred to him.

Increasing the supply of accommodation

Paragraph 3.4 explains that the total net supply is currently running at about 24,000 units per annum. Paragraph 4.1 reports the target in the London Plan of 'at least 23,000 a year and aiming towards 30,000'. No mention is made in the strategy of the housing needs figure in the draft evidence base produced by the Mayor. This clearly illustrates an annual requirement of 35,000 new homes per annum over a ten year horizon. Thus, the target in the draft strategy would fail to meet the year on year need and as a result there will potentially be a greater problem of homelessness at the end of the plan period than there is now.

One deduces that the draft strategy is written within the constraints of the known and anticipated housing capital allocations. While this may acknowledge the 'realpolitik' of the situation it both fails to establish any aspirations in tackling the deficit in supply, nor indicates the consequences of the proposed lower target. As a result the aims identified in the strategy are weak: '*... to ensure that more people can be housed increasing the supply of new homes of appropriate sizes in each sector*' (page 8) provides little in the way of a vision or an aim. In comparison, the report of the ODPM Select Committee investigation into Homelessness pulls no punches:

"111. Virtually all our witnesses suggested that a major programme providing low-cost homes to rent was a key component in tackling homelessness. Our report on Affordable Housing, published in 2003, underlined the importance of subsidised affordable housing to tackle the increasing needs, particularly with the rising cost of market housing. Since our report, the Government has increased funding to the Housing Corporation. However, its enlarged programme is not adequate to tackle the backlog of housing need, is not sufficiently targeted at the needs of homeless people and is not in the right location."²

We would recommend that the strategy clearly identifies the scale of need for new dwellings and sets a target within its timeframe that will make genuine inroads in the levels of need. At the very least it is incumbent on those producing the strategy to identify the consequences of failing to provide the numbers of new dwellings identified as required. In this regard we would draw attention to the estimates of hidden homelessness produced by Crisis and others – a direct consequence of insufficient supply of accommodation.³

Paragraph 3.15 explains the difficulties experienced in increasing the supply of supported housing, due largely to the break in connection between capital and revenue funding. We would agree with the need identified in paragraph 3.16 for a greater exemplification of the need and demand for supported housing, but would **stress that it is of great importance that the break in connection of capital and revenue funding needs to be addressed as a matter of urgency** and that this should not wait until more comprehensive data on need and demand is available. Whilst this would appear to be a matter outwith the remit of the strategy, it does fall within the remit of the organisations that comprise the LHB and deserves to be highlighted within the strategy as an issue of importance. There is merit in the suggestion of top-slicing to create the facility for cross-authority, sub-regional or regional supporting people initiatives, but **against the background of reducing SP budgets at the borough level, the implications of this need to be carefully evaluated.**

Paragraph 4.4 addresses the location for new housing supply. Given the extent to which development within certain growth areas is a central plank of the Government's Sustainable Communities Plan, this receives surprisingly little attention in the draft strategy. **We believe that there is a conflict between the focus on providing new housing in growth areas and meeting the needs of single homeless people**, for whom local connections are often an

² House of Commons - ODPM: Housing, Planning, Local Government and the Regions Committee. Homelessness – Third Report of Session 2004-05 Volume 1.

³ Crisis estimates there are 380,000 'hidden homeless' in Britain – see "Hidden Homeless – Britain's invisible city. Background briefing" July 2004

important factor in sustaining accommodation. This concern is also reflected in paragraphs 116, 117 and 123 of the ODPM Select Committee report.

However, the London Housing Board is to be congratulated for its invitation to Broadway to facilitate consultation events to receive the views of homeless and formerly homeless people on the draft strategy. In these events homeless people demonstrated a surprising (to us) willingness to consider moving to other parts of London in order to access good quality accommodation. Our experience of supporting agencies deliver services to formerly homeless people suggests, however, that **such moves are only likely to be successful if there is the provision of suitable personal support, the availability of social networks (through day provision or other support), the availability of appropriate ETE opportunities and good transport networks.** Social isolation is a key problem for homeless and formerly homeless people⁴ and to avoid repeat homelessness there needs to be a holistic and multi-faceted response. Once again, this is something that could be developed further within a London Homelessness Strategy.

Paragraphs 4.6 and 4.7 refer to the need to encourage the development of the private rented sector. We believe that the private rented sector could potentially play a much more important role in providing opportunities for single homeless people and could help facilitate additional move-on accommodation from hostels. Indeed, the Foundation is investigating the possibility of stimulating further initiatives in this area. However, the biggest block to the availability of private rented accommodation is the continuing parlous state of housing benefit administration. The failures of HB actually create homelessness and act as a major disincentive to landlords, who know that they may have problems receiving their rent on time or at all. **An effective housing strategy needs to underline the importance of getting on top of housing benefit.** Of course, this is an area of considerable planned change and it may be considered that the housing strategy is not the place to rehearse the arguments and implications surrounding HB. Once again, this may be more appropriately dealt with in the framework of a London Homelessness Strategy, but the constraints of HB need to be referred to within the housing strategy.

Building sustainable communities

Paragraph 3.31 highlights the dual problems of homeless asylum seekers and the silting up of hostels. We confirm that both of these are substantial issues and need addressing.

⁴ See "Dreams Deferred: the families and friends of homeless and vulnerable people" Gerard & Durkacz 2002.

Reliable data is hard to come by on the 'solutions' found by homeless asylum seekers but anecdotal evidence suggests that the great majority find support from others within their refugee communities. Whilst this provides some degree of social support it is of concern that the responsibility and impact for coping with this falls on those in our society who are themselves amongst the most disadvantaged.

In summer 2004 we commissioned Broadway to undertake a study to identify the extent to which refugees and asylum seekers were accessing services aimed at single homeless people.⁵ This survey involved three aspects: those using hostel accommodation, those presenting at day centres and those in contact with street outreach workers. Some of the findings were:

- Of 2,431 bed-spaces surveyed in 58 hostels on a one night count 19% were people who had been granted refugee status, most often some time before. This figure is disproportionately high, raising questions about the causes, and in particular about the ability of refugees to successfully become part of the wider community. We are considering some further investigations to see if it is possible to shed further light on this. A significant proportion of these people (15%) have experienced destitution at the end of the asylum process, having been granted refugee status, without anywhere to live after their NASS supported accommodation. **The problems of newly accepted refugees being allowed only two weeks before their NASS supported accommodation is withdrawn are well documented and we believe that this needs to be addressed more sensitively.**
- The numbers of refugees and asylum seekers using homelessness day centre services varied widely. Some centres saw no-one they recorded in this category (although the standards of recording were highly variable, too) but two centres reported that over 15% of their clients were in this group, with a further one over 30%.
- The numbers of refugees/asylum seekers contacted by homelessness outreach teams varied widely. Three of the nine teams surveyed reported contacting them once a week or more often, but the numbers were not high. However, it was felt that there is significant under-recording here, as refugees and asylum seekers are known to go to great lengths to avoid being seen sleeping rough.
- Disproportionately high numbers of Africans were present in the refugees/asylum seekers identified, especially in hostels. It is not clear why this should be so.
- Emerging problems were identified in relation to people attempting to access homelessness services from recent EU accession states. All the signs are that this is likely to become a much larger problem and has already become a pressing demand for some services (e.g. The Passage

⁵ "Survey of homeless sector services provided to asylum seeker and refugee clients" Broadway and London Housing Foundation 2004 (for full report see www.lhf.org.uk).

day centre in Victoria and Broadway's Market Lane Centre in Shepherd's Bush).

Whilst it is arguably outside the remit of the London Housing Strategy to delve far into such issues, this is again an area where a London Homelessness Strategy would add considerable value, providing the opportunity to examine the issue in more depth.

Paragraph 3.31 suggests that 'about 30%' of single homeless people living in voluntary sector hostels are ready to move on, but are unable to do so for lack of alternative accommodation. A recent survey by Homeless Link, however, has demonstrated that as high as 46% of a sample of 3,639 bedspaces in 76 hostels are blocked for lack of move-on.⁶ Further, they found that:

- the average length of time waiting for move-on accommodation across all surveyed hostels was between one year and 18 months;
- 13 hostels reported service users waiting on average over two years for move-on to housing with medium support;
- the direct financial cost of failing to provide move on to more independent/lower support accommodation is more than £8 million per year.

This lack of move-on accommodation and the resulting silting up of hostels is a major barrier to reducing homeless and occurs at considerable cost – to the taxpayer and to the individuals that are forced to stay in inappropriate temporary accommodation for long periods. As paragraph 3.32 of the draft strategy records: "it is the decline in the supply of affordable housing that is by far the most significant factor in [contributing to homelessness] in London".⁷ **This needs to be addressed urgently and should feature as a more important element in the final strategy.**

Meeting diverse housing needs

Paragraph 3.35 refers to the high proportion of homeless households from BME backgrounds. This situation is reflected in single homeless people in hostels, but not for those sleeping rough, where lower than anticipated numbers are recorded. Once again, this lower number is believed to reflect the great lengths that people from BME communities go to avoid sleeping on the streets. **There is a need for further understanding of the routes into, through and out of homelessness for people from BME backgrounds** as the interventions to prevent and respond to their different problems will need to be tailored

⁶ "No room to move?" Homeless Link 2005 (www.homelesslink.org.uk)

⁷ The recently published (see footnote 2) ODPM Select Committee investigation into Homelessness, agrees that: "106. The shortage of suitable permanent low-cost housing is a fundamental cause of homelessness."

appropriately. See also the information above relating to refugees using hostel accommodation. Once again, this is an issue that would be best addressed within a London regional homelessness strategy, but one that deserves to be flagged up for attention within the housing strategy. Current and planned research within the ODPM will inform this topic and the proposed equalities impact assessment (paragraph 4.57).

Preventing more people becoming homeless

Paragraph 4.53 addresses the issue of prevention of homelessness – an area we agree is highly important. Through our support of voluntary agencies tackling homelessness we have a strong element of disseminating their best practice⁸ and the draft strategy (which concentrates on spreading the best practice of local authorities) illustrates that **we need to combine to share best practice from the statutory and voluntary sectors. It would be productive for this to be highlighted within the final strategy.**

The same paragraph refers to the pan-London Housing Advice Strategy. We welcome the publication of this strategy and acknowledge its important role in the prevention of homelessness. **We would draw attention in particular to the need for enhanced and effective advice services for people from BME communities.** Page 24 of the advice strategy provides a cogent summary of the reasons why specialist BME services are required. However, in 2004 London's only pan-London BME specialist housing advice agency closed and as yet no new organisation or services have been established to fill the gap left behind. We understand that Shelter is planning to address this and look forward to this.

Paragraph 4.53 also highlights the need to ensure that homeless people have access to high quality support, "including statutory services such as health, education and social services as well as support to gain employment, training and life skills". This is indeed an important area and **we would underline the important role played by services provided within homelessness day centres** in this respect. At the time of writing the London Housing Foundation is co-operating with Homeless Link at the request of the Homeless and Housing Support Division of the ODPM to bring together examples of good practice in day services to prevent homelessness. Whilst our submission to the HHSD will not be available within the timeframe for consultation responses to the London Housing Strategy it will be available shortly after and we will forward it to the LHB in the hope that it can be considered as part of this submission.

Meanwhile, we would note the particular difficulties for homelessness day centres in obtaining funding for their activities. This has arisen largely since the introduction of SP, with local authorities focussing on supported accommodation

⁸ See: <http://www.lhf.org.uk/IMPACTProgramme>

to the detriment of non-accommodation day services. This also coincided with a change in policy at the ALG, which led to reduced funding and also the perception for many trusts and foundations that achievement of Government targets for rough sleeping meant that 'homelessness has been solved', with a consequent reduction in funding. **It would provide a valuable contribution to the debate if the housing strategy underlined the need for continuing, publicly funded day services as part of the prevention of homelessness agenda.**

Creating mixed and sustainable communities

Section 4.3.3 addresses the creation of mixed and sustainable communities from a number of angles. We would draw attention to two aspects:

- homeless people and key workers are not mutually exclusive and
- the need for caution and proper evaluation in the development of choice based lettings.

We support the objectives identified within the strategy of creating sustainable communities and believe that single people who have been homeless have a constructive role to play in such communities. For many single people who are homeless their lack of accommodation and lack of employment are intertwined. Most are keen to work, although may require retraining and support to find and sustain employment. As the excellent short report of case studies from the London Housing Federation makes clear: today's homeless person can be tomorrow's key worker.⁹ **A creative approach to both the housing and employment strategies for London, therefore, could help in addressing the problem of lack of key workers, whilst providing accommodation to people in need.** Once again, this may benefit from a more detailed consideration as part of a London homelessness strategy.

Choice based lettings provide a potentially valuable opportunity to increase mobility in the social rented sector. It is not clear, however, whether CBL act to the detriment of those who are more vulnerable – which would, of course, include many single homeless people. Thus, **we believe that an evaluation of the impacts of CBL would be important before instituting it as the primary or sole source of (re)letting accommodation.**

⁹ "Today's homeless: tomorrow's key worker" London Housing Federation September 2004. (<http://www.housing.org.uk/library/viewfile.asp?fid=3023>)

Summary and Conclusion

We welcome the draft London Housing Strategy and appreciate the constructive approach to consultation. Whilst the strategy provides a good basis on which to build we feel that it needs to adopt a more robust approach to the continued deficits in proposals for housing supply – both in overall terms and in relation specifically to affordable homes for rent. The strategy would benefit greatly from a more holistic and people-oriented perspective. It needs to link more effectively with other regional, sub-regional and local strategies, especially employment and education regional strategies and local homelessness strategies. There is also an important need for a London-wide homelessness strategy and this presentation has identified several areas in which such a strategy could add considerable value to tackling and preventing homelessness in the capital.

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