

## **LONDON HOUSING STRATEGY 2005**

### **Comments on the London Housing Strategy 2005.** **London Assembly Liberal Democrat Group**

The London Assembly Liberal Democrat Group generally endorses the draft Housing Strategy's aim of trying to improve the match between housing supply and demand in London, including boosting the provision of affordable housing. The focused sections on overcrowding, tackling homelessness, reducing the number of non-decent homes, supporting vulnerable people and providing a combination of housing that responds to diverse housing needs are particularly welcome. Moving towards adopting more strategic, Londonwide systems is also a refreshing departure.

However, the Liberal Democrat Group is very concerned about the lack of tangible delivery mechanisms in this draft and the difficulty that this presents in assessing the effectiveness of the aims included within it. A strategy, by definition, requires the details of how aims are will be progressed and implemented but the LHS currently lacks this integration.

Below follow a number of specific comments about and revisions to the draft London Housing Strategy document that Liberal Democrat Group would like to propose.

#### **INCREASING THE NUMBER OF HOMES**

##### Para. 3.4

This paragraph states that total net supply of housing is running at about 24,000 per year. This is, however, slightly misleading as it suggests that provision of 24,000 units is the norm. However it is only over the last year (2003/04) that this number of houses have been added to London's housing stock. Prior to that provision level was far lower – not exceeding 20,000. It would be more accurate to mention the net supply for last year exceeded 24,000, but state that previously annual supply had been lower than this.

Interestingly, although the LHS 2005 talks about housing supply, it does not cross-reference this with the level of *need*. The draft concedes that demand is outstripping supply, but it would be extremely helpful to note by how much, so that the size of the task London faces is properly identified. The LHS needs to acknowledge that although supply last year was over 24,000 there is actually need for more than 33,000 houses per year in London, over 25,000 of which need to be affordable.

##### Para. 3.5

This paragraph lists the barriers that limit the delivery of additional homes. However, probably one of the largest overall factors - the lack of central funding for social housing – receives no mention at all. Surely this should be highlighted. In addition, the loss of public sector housing and the current threat to registered social landlord stock through right-to-buy, although alluded to in para. 3.9, should also be mentioned in para 3.5.

#### **DELIVERING MORE AFFORDABLE HOUSING**

##### Paras. 3.11 & 3.12

Para 3.11 is very useful in showing the need for different sizes of housing. It is a helpful acknowledgement that the requirement for social housing isn't just for one bedroom houses and suggests that affordable housing provision, and the monitoring of it, should be size as well as number sensitive.

Despite this however, para. 3.12 goes onto report the number of homes and affordable homes provided without any reference to the actual need levels for different sizes of houses that has just been mentioned in the previous paragraphs. Immediately following the acknowledgement that providing the right size of social housing is paramount to avoid overcrowding and the reliance on temporary accommodation, the LHS goes on simply to report the numbers of housing provided last year. It would be more than helpful to split this down into size of housing provided so that it follows on more logically and relevantly from the previous paragraph. This would also give some indication on which needs are currently being met in the capital.

## **INCREASING THE SUPPLY OF SUPPORTED HOUSING**

Para. 3.15

It is welcome that 'supported housing' is recognised as a key area in the LHS. However, although the document states that £33m will be used to provide 380 supported units between 2004-2006 we, again, have no indication of *need* levels. Therefore it is not possible to assess whether or not this figure comes anywhere close to meeting need for supported housing in London.

## **REDUCING THE NUMBER OF EMPTY HOMES**

Para. 3.22

The draft LHS acknowledges that empty homes are not only a considerable waste of valuable accommodation resource, but they are also a potential magnet for crime and anti-social behaviour. Addressing the empty homes problem will, therefore, have other beneficial knock-on consequences. However, although later on in the Strategy empty homes solutions are proffered (paras. 4.32 – 4.39) the link to crime and anti-social behaviour receives no further mention. Encouragement for local authorities and/or the GLA/ALG to conduct work with the MPS in co-ordinating strategies would be a sensible inclusion in this strategy to ensure the problems can be tackled in a joined-up way.

## **BUILDING SUSTAINABLE COMMUNITIES**

### **Homelessness**

Paras. 3.28 – 3.33

The extent of the capital's homelessness problem is well made in this paragraph, However, what the draft LHS lacks (which is not included later in paras. 4.50 – 4.55) is a tangible policy setting out how those in temporary accommodation are going to benefit from the provision of social housing. Surely the homeless in London, whose numbers have been growing steadily by 5,000 per year, should be the priority rather than giving housing assistance to those who could actually afford market price rents. How new social homes will be directly linked to curbing the increase of homelessness is not explicit and we would suggest that further thought is given to this.

Para. 3.35

This paragraph contains a useful breakdown of the different ethnic backgrounds of those who suffer from homelessness. The Liberal Democrat Group suggests the LHS should set out more clearly that redressing inequality as one of its primary aims and indicate a timescale for the achievement of equality improvement targets.

## **INCREASING NEW SUPPLY**

Para. 4.3 – pg 23

Instead of the Government Office for London (GOL) working with Boroughs to deliver substantial increases in new homes and to ensure they overcome any barriers in meeting London Plan targets, the Liberal Democrat Group feels that this should be a role for the GLA. As the GLA is responsible for writing the London Plan and is soon likely to have responsibility for production of the London Housing Strategy, it is more important and relevant that the GLA liaises with the Boroughs rather than GOL.

Pg 24

It is a welcome idea to suggest that the Boroughs work together and more consistently regarding the release of land to increase the delivery of housing. However, the Liberal Democrat Group feels strongly that this should be amended to include the phrase 'with particular reference to ***brownfield*** land'.

Pg. 25

The first bullet point on this page suggests that GOL works with the Housing Board to identify barriers to vertically extending low-rise buildings. We feel that this task would be better and more appropriately conducted by the GLA itself, especially with its responsibility for drawing up the London Plan.

## **ENCOURAGING DEVELOPMENT OF THE PRIVATE RENTED SECTOR**

Para 4.7 – pg. 47-48

These recommendations contain some worthy ideas, but who is responsible for actually fulfilling them? No one body is given authority or responsibility to take these recommendations forward. Will it be the role of the Housing Board, the Boroughs, the GLA, the ALG? Responsibility needs to be clearly afforded to one body of a partnership of bodies.

## **DELIVERING MORE AFFORDABLE HOUSING**

Para. 4.11

This paragraph usefully highlights how the current housing investment is going to be directed at some of the most disadvantaged groups in London. However, this only talks about the current investment programme – there are no suggested future proposals or strategies for tackling housing inequality long term, which we suggest should be included.

Para. 4.12

This paragraph calls for the establishment of clear systems to monitor all elements of the ***intermediate*** housing programme. This is welcome. However, surely it is important for clear systems to be in place to monitor the ***social*** housing programme as well. This should be included in the LHS. ***Who*** will be responsible for establishing these monitoring systems also needs to be identified. This is a role that could be performed by the GLA as a pan-London authority.

Para. 4.13

Approaching development across a portfolio of sites rather than on a site-by-site basis so that it is possible to reap economies of scale and get more value for money is a welcome departure. However, the draft LHS lacks detail and clarity as to how this is going to be achieved. Will Boroughs be expected to work together, will the GLA or ALG be expected to play a co-ordinating role, will it be up to the Housing Corporation to take the initiative? More information is needed here.

## **ENSURING NEW HOUSING IS OF HIGH QUALITY**

Para. 4.23 – 4.31

The Liberal Democrat Group would like to see greater emphasis placed in the LHS to ensuring that design of whole housing developments, rather than just individual units, are consistent and sensitive to the surrounding environment.

The Group would also like to see an additional clause in the LHS to specifically refer to the need to plan housing developments with open spaces and green chains so as to minimise flooding risk. This is particularly important due to progressive climate changes.

## **INCREASING THE SUPPLY OF SUPPORTED HOUSING**

Para. 4.19

It is indeed crucial that support services are developed and improved, but by whom and how? Far more detail on this proposal is required.

## **REDUCING THE NUMBER OF EMPTY HOMES**

Para. 4.34

This paragraph highlights the scope for local authorities to use Empty Dwelling Management Orders to take over control of long-term empty properties. The Liberal Democrat Group encourage the LHS to be more positive and promote these, encouraging the Boroughs to make the most of the power and put it into practice.

Paras. 4.35 – 4.37

In these paragraphs no authority or agency is nominated to carry out these responsibilities/actions. Whose role it is to perform these functions? This needs to be made clearer so that there are obvious lines of accountability in the endeavour to return empty properties into use.

Para. 4.39

Here again, rather than just stating that local authorities can now remove or reduce council tax discounts, we suggest that the LHS endorses this approach and encourages Boroughs to take advantage of this power so that the incentive to leave a property empty is completely removed.

The Liberal Democrat Group would also like to see the insertion of a new clause in the 'Reducing the Number of Empty Homes' section to emphasise the need to encourage local authorities and/or the GLA/ALG to work jointly with the MPS to tackle the link between empty properties, crime and anti-social behaviour.

## **IMPROVING THE QUALITY OF EXISTING HOMES**

Para. 4.43

With 72% of non-decent homes in the private sector, this is really where the problem lies. However, although bullet points 1, 2, 3, 5 and 6 in this paragraph contain recommendations, there is not enough detail on how these recommendations will be progressed. Once again it is not clear who should carry these initiatives forward and without anyone named as responsible the Liberal Democrat feels that there is a risk that these actions will not be fulfilled.

Para. 4.46

Whose responsibility will it be to monitor the provision of decent accommodation? Will it be conducted on a Borough-by-Borough basis or does this need to be carried out on a Londonwide basis? The Group feels that more thought needs to be given to this proposal.

## **PREVENTING HOMELESSNESS**

Para. 4.53

Pg. 38

The first bullet point mentions a report by the ALG into different practices among local authorities that will be published in November – this has presumably been completed and the results/conclusions should be reflected in the revised LHS.

Under the second bullet point the London Housing Advice Strategy is mentioned, with publication date noted as December 2004. Again this should have been completed so we would expect this paragraph to be amended in the final LHS.

Pg. 39

The third bullet point on this page refers to the need to ensure homeless people have access to high quality support. What is lacking again is the detail as to whose role it is to ensure that support is available. Is this a Borough responsibility or is a pan-London support system required? More information would be useful.

## **MEETING DIVERSE HOUSING NEEDS**

Para. 4.57

This paragraph mentions that the London Housing Board's Equality Impact Assessment (EIA) will look into the potentially adverse impacts of the 2003 Housing Strategy and reports that this will feed into the 2005 LHS. However, it doesn't mention the timescale of the EIA, which would be helpful.

Again, the Liberal Democrat notice that the series of bullet points with recommendations provide some good ideas but contain no guidance about who will be carrying forward these suggestions.

Para. 4.63

The draft LHS talks about a current study into the housing needs of various black and ethnic minority communities being undertaken by the GLA, ALG and sub-regions although it doesn't say when this will be completed and whether or not the results will be available in time to properly feed into and inform the policies of the 2005 LHS. Greater clarity is required on this issue.

## **CREATING MIXED AND SUSTAINABLE COMMUNITIES**

Para. 4.71

A pan-London choice based letting scheme and common local authority and housing registers are worthy suggestions but there is too little detail about how these initiatives should be established, who should lead on them and have responsibility for day-to-day operations. The Liberal Democrats regard an indication about the allocation of roles as essential.

Para. 4.76

Bullet Point 1

This paragraph proposes that the targets of affordable housing should be set on the basis of how many people can be housed rather than just whole numbers of housing. The idea behind this is to reflect the fact that many affordable properties (81% - para 3.11) need to have over 2 bedrooms. It is no good if developers provide only small one/two bed properties to make up their affordable housing quota when only 19% of demand falls into this category. This will add to problems of overcrowding and an oversupply of the wrong sized property will result in them going to those who do not necessarily have the most acute needs.

The Liberal Democrat regards it as a sensible proposition to align funding assistance to the number of bed spaces provided rather than just per property, as this will encourage the provision of larger affordable houses which London is in desperate need for. However, should this be the case, affordable housing targets in the London Plan would need to be revised to make them more relevant. Liberal Democrats would certainly like to see the overall target for affordable homes to be broken down into the amount of each different size of property required so that we could be surer that supply meets actual demand patterns,

Bullet Point 2

This paragraph again, marks a fairly new departure. It is certainly a welcome idea that we are striving towards making the most out of our social housing resource and moving away from under-occupation of properties. Clearly with 750,000 under occupied homes in London making it as bad a problem as overcrowding. More detail in this paragraph is vital, however, about how exactly this scheme is envisaged to operate on a Londonwide scale.

## **GENERAL POINTS**

- **Delivery and Implementation**

The draft LHS does provide some innovative and refreshing solutions to the housing problems currently facing London. However, the Liberal Democrats principal criticism of the draft strategy is that it lacks detail about how exactly proposed recommendations will be carried forward and who will be responsible. Aspirational statements about 'improving' services and 'encouraging' or 'seeking' certain approaches need to be reinforced by more robust action plans with allocated responsibilities and clear monitoring procedures. To be effective the LHS needs to be far stronger on delivery mechanisms to match up to its rhetoric.

- **Prioritising and Monitoring Affordable Housing Provision**

It would be preferable to see a clear definition of what affordable housing is and whom it should go to in the LHS. Although the London Plan and the Mayor's Affordable Housing SPG contain definitions, we hold concerns that housing assistance is not necessarily going to those who are in the most acute need. The prevailing priorities of the LHS should be:

- On the demand side - to tackle the capital's mounting homelessness crisis, target overcrowding and reduce accommodation inequalities.
- On the supply side - to return to use empty homes, prevent under-occupation and match demand patterns.

The Liberal Democrat Group regards it as essential that these principles guide and underlay the attainment of total provision figures and affordable housing provision targets if London's housing crisis is to be addressed in the long term. It's not just about attainment of figures, it's about the principles guiding attainment of those figures and this should be spelt out clearly as the *raison d'être* of the LHS.

To ensure this, the LHS should propose a clear monitoring mechanism to assess who is benefiting from affordable housing provision.