

Draft London Housing Strategy Homeless Link response – December 2017



Introduction

Homeless Link is the national membership charity for frontline homelessness agencies and the wider housing with health, care and support sector. We represent over 700 organisations providing supported housing and homelessness services across England. We work to improve services through research, information, training and guidance, and to promote policy change that will ensure everyone has a place to call home and the support to keep it.

Homeless Link is one of the delivery partners of StreetLink (the website, mobile app and phone line) which enables the public to alert local authorities about people sleeping rough in England and Wales. We sit on the Mayor's No Nights Sleeping Rough taskforce, convened to tackle rough sleeping in London. We also run the PLUS Project in partnership with Shelter. Funded by London Councils, this project supports organisations, boroughs and landlords in London working with people who are sleeping rough, homeless, or in housing need.

We worked with the GLA to run a consultation event on the draft London Housing Strategy with our members working in London. This response is partly based on the discussions at that event and also our wider expertise around homelessness and supported housing. Our response will focus on those areas of the consultation where we feel we have the expertise and input from members to comment, and highlights areas where we feel the sector could support the Mayor in moving this strategy forward.

Recommendations

- Further consultation with the sector around a definition of affordable housing.
- Continue making representation to national Government about the impact of welfare reform on the affordability of housing in London.
- Explore the feasibility of new housing and rent models, such as Y Cube and peer landlord schemes, to increase access to affordable housing.
- Develop a supported housing plan for London.
- Strengthen links between health, social care and housing within this strategy and all relevant strategies being developed and implemented by the Mayor and the GLA
- Include homelessness and supported housing services as key partners in developing the proposed London Model for the private rented sector.
- In addition to the specific groups identified in the strategy, further targeted responses for other groups experiencing homelessness should be co-produced with the sector, such as people with no recourse to public funds, young people, women, people in contact with the criminal justice system and older people.
- Ensure there are clear plans to provide revenue funding for schemes and not just capital investment.
- Co-produce indicators of success for London in preventing and addressing homelessness and tackling rough sleeping.

Response

Chapter 4: Delivering genuinely affordable homes

The current lack of genuinely affordable accommodation both contributes to homelessness and prevents people moving on from homelessness services once that are ready to do so. This is driven both by the lack of available social housing and barriers to accessing the private rented sector, including the high cost of rent compared to benefit income, shared accommodation rates, a shortage of one bedroom properties and few incentives for private landlords to let to people claiming benefits.¹ There are a number of different rent models, such as the London Living Rent and Affordable Rent, and members consistently raised the importance of social rents not linked to market rates. Some felt this was particularly important at the point of transition into work, as many people may be on entry level wages and have part-time or zero hour contracts which would make managing high levels of rent difficult. An agreed definition of affordable rent in a London context would offer clarity to tenants and developers of the expectations around affordability. This is something the sector could support in developing.

One of the key barriers to affordability in London is the impact welfare reform has had on people's incomes. In terms of support with housing costs from the welfare system, the Local Housing Allowance (LHA) has been frozen since 2016, and this freeze is set to continue. This has contributed to an ever-increasing gap between people's incomes and the rents in their areas. This is a particular challenge in areas with high LHA rates and a very competitive rental market, such as London. It has a significant impact on affordability of housing, which can both lead to homelessness and restrict people's options when moving on from homelessness services. In our Annual Review, 30% of clients were ready to move but were not currently able to do so and 34% of services reported a lack of affordable accommodation as the main barrier.² Added to this are concerns around the shared accommodation rate (SAR) for people under 35 and the removal of automatic entitlement to housing costs from 18-21 year olds. For those under 35 and eligible for SAR, there is a significant lack of availability of shared accommodation. While we acknowledge that welfare reform sits outside the powers of the Mayor, we would urge City Hall to continue to raise issues of welfare reform and its impact on affordability at a national level.

In discussions with members, it has been recognised that it will take some time to build new affordable housing and some wanted the Mayor to explore interim measures, for example, modular housing and schemes like Y Cube.³ There might also be an opportunity to better utilise land on a 'meanwhile use' basis to respond to the interim shortage of affordable housing. There was a strong feeling that any new housing development should be needs led rather than developer led and there was a call for the Mayor to also push national government on this point.

The impact of affordability on different groups was also raised. There was an ask for greater availability of affordable housing for people who are homeless via the Clearing House model. Women fleeing domestic abuse should have easier access to affordable housing for them and their children, and there was support for the pan-

¹ Homeless Link (forthcoming) Move On report

² Homeless Link (2017) [Single Homelessness Support in England: Annual Review 2016](#)

³ For more information, please see: <https://www.rsh-p.com/projects/ycube/>

London protocol. There is also currently a lack of appropriate housing responses for young people.

Many of our members have raised the issue of the impact of high rents on the workforce in London and that high housing costs are impacting on recruitment and the ability to retain a stable staff team. Others asked what consideration was being given to the housing needs of key workers and whether frontline homelessness workers should be considered in this way given the key role they play.

The issue of the large number of empty homes in London was also raised and the proposals in the strategy around empty homes were broadly welcomed. It is felt that anything that can be done to make better use of empty homes and bring them back into use quickly is positive.

Recommendations:

- Further consultation with the sector around a definition of affordable housing.
- Continue making representation to national Government about the impact of welfare reform on the affordability of housing in London.
- Explore the feasibility of new housing and rent models, such as Y Cube and peer landlord schemes, to increase access to affordable housing.

Chapter 5: High quality homes and inclusive neighbourhoods

The current consultation on the future funding of supported housing was consistently raised in relation to the provision of specialist and supported housing in the provision of the strategy. There is still a lot of uncertainty which is having a significant impact on business planning and development of supported housing schemes, particularly short-term working age provision. Homeless Link is currently in consultation with members about the proposals and would be happy to stay in contact with the Mayor and the GLA as our position develops.

The strategy should make stronger links between health, social care and housing and be more explicit about how partnerships between these sectors can help achieve ambitions around high quality homes and inclusive neighbourhoods. Homeless Link is a signatory to a Memorandum of Understanding (MoU), coordinated by Public Health England, which sets out shared commitments across government, health, housing and care to improve health through the home. The MoU is currently being refreshed and we would encourage the GLA to consider how the principles in the updated document might support the implementation of the strategy once published.

Several members raised the need for stronger action around youth homelessness and that, as with all homelessness, this was more than just a housing issue. In particular, points were raised around access to employment, skills training and social spaces as key elements of developing inclusive neighbourhoods for young people.

Recommendations:

- Develop a supported housing plan for London.
- Strengthen links between health, social care and housing within this strategy and all relevant strategies being developed and implemented by the Mayor and the GLA

Chapter 6: A fairer deal for private renters and leaseholders

There are major difficulties with accessing good quality accommodation in the private rented sector and there are calls for the Mayor to look at ways of increasing access, as well as improving the quality and security of PRS accommodation.

People were in favour of the principles of the Mayor's proposed London Model for the private rented sector and would welcome more detail and the opportunity to help develop this further. Our members feel that encouraging longer-term tenancies and increasing access to rent deposit schemes are key components of increasing access and greater security in the private rented sector. Alongside greater regulation of landlords, members also recommended greater landlord education around the benefits of longer-term tenancies. There was a feeling this was an opportunity to challenge landlord misconceptions as well as increasing oversight within the sector. Members also recommended exploring schemes like KeyRing, where people offer peer support and peer landlord schemes,⁴ and the possibility of a London social lettings agency, a type of private rented sector access scheme that runs on a commercial basis to generate income to cover costs.⁵

As raised in an earlier section, the impact of welfare reform means it is no longer able to cover rents in the private rented sector. There is also an increasing reluctance among private landlords to rent to people on Universal Credit due to the loss of direct payments and administrative delays.

Recommendations:

- Include homelessness and supported housing services as key partners in developing the proposed London Model for the private rented sector.

Chapter 7: Tackling homelessness and helping rough sleepers

The current commissioning and funding landscape for homelessness and supported housing services is complex and uncertain. While recent national and regional announcements of funding to tackle homelessness are welcome, this money is often only available on a short-term, cyclical basis which does not allow commissioners or providers to plan for the future. Members are also reporting disinvestment in key services, such as outreach services.

A holistic, long-term and pan-London strategic approach to funding would allow substantial pieces of work to take place locally and ensure sustainability of vital homelessness and supported housing services. Funding streams for services should be reliable and long term for services to confidently build on their practice, offer longer term support where that is required and continue to meet identified local needs.⁶ The spending commitments in the strategy are welcome, but many raised concerns that this was capital investment and not revenue funding, which is vital to the sustainability of services.

⁴ For more information, please see: <http://www.keyring.org/>

⁵ For more information, please see: <https://www.crisis.org.uk/ending-homelessness/housing-resource-centre/housing-centre-guides/social-lettings-agency-guide/>

⁶ Homeless Link (forthcoming) Move On report

Given the current upward trend in homelessness, and future projections,⁷ the ability to take a long-term, cross-agency approach has never been more urgent. This must be facilitated by local budgeting processes which support a more strategic approach to funding. It also means ensuring that broader related strategies, such as health, social care, criminal justice are properly joined and make reference to housing and homelessness where appropriate. Opportunities to better embed trauma-informed and psychologically-informed approaches into service delivery could also be explored through a more holistic approach.

The impact of a lack of move on accommodation for people experiencing homelessness cannot be overstated. As well as having a detrimental impact on the individual ready to move on, it also reduces the ability of people who need them to access homelessness schemes.

The difficulty of accessing accommodation for people in contact with the criminal justice system was raised by a number of members and is something that could be usefully considered as part of a broader strategy. Alternatives to custodial sentences that result in people losing their homes, people being released from prison without accommodation and proactive outreach with prisons and probation were all suggested as possible solutions. Another group that was particularly at risk of slipping through the net were people without recourse to public funds (NRPF).

The problem of understanding the scale and scope of need was also raised. It was felt that more accurate data around rough sleeping would help and that more needs to be done to understand the needs of people described as experiencing 'hidden' homelessness, for example staying with friends short-term. It was felt certain groups, such as women and young people, were particularly likely to be represented in this category and that a better understanding of this cohort of people could lead to more targeted approaches for the prevention and relief of homelessness. Very little is also known about what happens to people once they are refused the main homelessness duty and more could be done to understand people's route to support, or lack of it, at that stage.

Members welcome a pan-London approach to tackling many of the issues raised in the strategy but would welcome more information about how this will work in practice. In particular there were questions about the reciprocal nature of these arrangements, what the expectations will be and how existing bureaucracy and barriers to accessing services, for example around local connection, will be addressed.

Homeless Link runs Housing First England, a national project created to develop and support a national movement of Housing First services across England. Housing First is an internationally evidence-based approach shown to be successful at supporting people experiencing multiple disadvantage due to the most complex needs (homelessness, mental ill health, substance misuse, contact with the criminal justice system and experiences of violence and abuse). We welcome the inclusion of Housing First in the draft London strategy, and its increasing national profile. While other areas of the country are piloting the approach, we feel the evidence base for

⁷ Bramley, Professor G. (2017) [Homelessness projections: Core homelessness in Great Britain](#)

Housing First as a response to people with multiple and complex needs is well-established and, therefore, would recommend that any investment in London focuses on scaling up Housing First rather than piloting it. This should include secure revenue funding for the provision of support within Housing First alongside capital investment and transitional funding for services where appropriate. This investment should sit alongside a wider investment in range of services for people who are homeless or vulnerably housed.

The final observation from members regarding the strategy was that it is unclear what the ultimate objective is around rough sleeping. Is the plan to reduce it or to eliminate it completely, and what timescales is the Mayor considering. While we recognise that an arbitrary target or timeframe might not be appropriate, the sector would welcome the opportunity to work with the Mayor and the GLA to set out some ambitions around the homelessness elements of the strategy.

Recommendations:

- In addition to the specific groups identified in the strategy, further targeted responses for other groups experiencing homelessness should be co-produced with the sector, such as people with no recourse to public funds, young people, women, people in contact with the criminal justice system and older people.
- Ensure there are clear plans to provide revenue funding for schemes and not just capital investment.
- Co-produce indicators of success for London in preventing and addressing homelessness and tackling rough sleeping.