

4in10 Submission to the London Housing Strategy: Draft for Public Consultation (May 2009)

28 August 2009



4in10: The End Child Poverty London Project

4in10 is a two-year London-based project coordinated by End Child Poverty, a coalition of over 150 organisations who believe child poverty in the UK is unacceptable. Comprised of more than 50 member organisations at community, regional and national levels, the 4in10 project aims to tackle the specific challenges London faces through two ways: firstly, to increase awareness of the issues and strengthen campaigning; and secondly, to identify projects that have been shown to have a positive impact on the levels of child poverty in the capital, and to develop strong networks through which knowledge of this good practice can be shared.

Background to the London Housing Strategy

In May 2009, London Mayor Boris Johnson released the Greater London Authority's (GLA) London Housing Strategy for public consultation, giving stakeholders the opportunity to submit any comments or responses. The Strategy centres on three priority areas:

1. *Raising aspirations, promoting opportunity*

- Target to build 50,000 affordable homes by 2011
- Market mix: 60% homes built will be social rented, 40% intermediate
- Abolition of 50% affordable housing target, replaced by individual borough targets
- 42% social rented homes and 16% intermediate homes to be family-sized homes (i.e. contain three or more bedrooms)
- 10% new homes built to be wheelchair accessible or easily adaptable
- Promotion of mixed tenure housing developments

2. *Improving homes, transforming neighbourhoods*

- All new public housing to be in accordance with London Housing Design Guide

3. *Maximising delivery, optimising value for money*

- Homes and Communities Agency (HCA) to drive delivery and forge new partnerships and approaches

The London Housing Strategy represents a valuable opportunity to confront many of the problems faced by children and families living in poverty in London head on. Children who live in poverty are almost twice as likely to live in bad housing which has a profound impact on a child's health, educational outcomes and future life opportunities¹. Action to end bad housing must therefore be the cornerstone of any serious attempt to tackle poverty.

¹ London Child Poverty Commission (2008) *Capital Gains: London Child Poverty Commission Final Report*, London Councils (on behalf of the Commission)

4in10 welcomes a number of the Strategy's proposals, particularly the GLA's pledge to halve both the number of households in temporary accommodation by 2010 and the level of severe overcrowding by 2016. However, 4in10 have identified a number of areas of concern within the Strategy, which we believe pose potential problems not only to our goal of ending child poverty in the capital, but also to the improvement in standards of living for the London population as a whole.

Housing Provision

50,000 Target (see Page 17, Section 1.1.1b of Housing Strategy)

The number of social rented housing units available in London decreased by 79,000 units between 1997 and 2007, during which time the number of private renting housing units in London increased by 187,000². The Mayor's commitment to delivering 50,000 more affordable homes, of which 30,000 will be social housing, by 2011 is therefore a welcome one. However, figures detailing the number of priority need households waiting for social housing demonstrate that this figure considerably underestimates demand.

The number of homeless households in priority need currently living in temporary accommodation in London is 47,780³. In addition, the number of households accepted as homeless and in priority need this year has been 12,780⁴. If we use this latter figure as an approximation for the number of families becoming homeless over the course of a typical year, we can estimate the number of social housing units needed in order to clear the backlog of homeless households and to meet the continuing demand.

Existing households in priority need:		47,780
Households	Y1:	12,780
accepted as	Y2:	12,780
homeless:	Y3:	12,780

Total number of social homes needed over three years: 86,120

The figures above demonstrate that the proposed 30,000 units due to be built will wholly fail to meet the burgeoning demand. 4in10 would therefore like to see a target for social housing that will truly address the acute need for social housing. **Based on these calculations, 4in10 believes 90,000 social housing units would be a much more appropriate figure for addressing the housing need in London 2008-2011, three times the figure currently proposed.**

Tenure Ratios (p.29+42, 1.2.1a+1.3.1a)

The tenure ratios outlined in the Strategy have been revised from 70:30 social rented/intermediate to 60:40. 4in10 is concerned that the new 60:40 proposition fails to acknowledge demand for social rented housing in the capital.

The revision of this ratio, on the current target, will mean 5,000 fewer homes will be available for families in need. Moreover, 4in10 would question the need for additional intermediate housing when it

² Table 109 Dwelling stock by tenure and region. DCLG live housing tables.

(<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/livatables/>)

³ Table 624 Statutory Homelessness: households in temporary accommodation in London and England. DCLG live homelessness tables

(<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/livatables/>)

⁴ Table 621 Homeless households in priority need, by region. DCLG live homelessness tables
(<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/livatables/>)

is already apparent that demand for these properties has not been as high as expected, and there are thousands of units of shared ownership housing lying empty across London⁵.

In light of the critical need for social housing, as outlined above, and the apparent lack of demand for intermediate housing, 4in10 would like for the tenure ratio outlined in the current Strategy to be reviewed to ensure it will best meet the needs of Londoners.

Removal of 50% Affordable Housing Standard (p.17, 1.1.1a)

4in10 recognises local authorities are best placed to address local issues and agrees with the principles of devolving power and supporting greater local autonomy. However, we remain concerned that through removing the 50% target as standard a number of problems will emerge.

We also understand that the current economic climate is difficult for housing development schemes, with many developers finding insufficient profit in mixed housing schemes in order to deliver the percentage of affordable housing agreed in more optimistic times⁶.

In the Housing Strategy the Mayor cites the security of the housing market as a key motivation for removing the 50% affordable housing target. However, research has shown that increasing the quantity of affordable housing in a local area does not have a negative impact on surrounding house prices nor the ability to sell or let property⁷. Equally, many developers are turning to the development of social housing as a source of guaranteed income⁸ and we believe this is an opportunity that the Mayor should look to exploit.

The decision to remove the 50% affordable housing standard seems to run counter to the Mayor's repeated endorsement of 'mixed communities'. Child poverty exists in every London borough⁹. 4in10 is concerned that removing the 50% standard will serve only to perpetuate existing economic and social divisions across London, whereby the poorest families are pushed into the poorest boroughs (where jobs and services are scarcer) and where those families struggling in wealthier boroughs miss out.

4in10 would therefore like to see the 50% target re-instated across all London boroughs, allowing those boroughs who have higher need to exceed this target whilst ensuring access to affordable housing is open to all.

Quality of Housing

London Housing Design Guide (p.67, 2.1.1)

4in10 welcomes the proposal that all new publicly funded builds will be designed and constructed in accordance with the new *London Housing Design Guide (LHDG)*. Not only will this help ensure the construction of more environmentally-friendly, and therefore more cost-effective (in the long term) homes, but it will also markedly improve both the circumstances of families living in social housing, as well as child development.

⁵ Housing Corporation Survey (2008) (www.housingcorp.gov.uk)

⁶ Parkinson M et al (2009) *The Credit Crunch and Regeneration: Impact and Implications*.

⁷ Bailey, N and Manzi, T. (2008) *Developing and Sustaining Mixed Tenure Housing Developments*. Joseph Rowntree Foundation

⁸ Parkinson M et al (2009) *The Credit Crunch and Regeneration: Impact and Implications*.

⁹ Centre for Social and Economic Research (2008) *Children in Struggling Families*

Family Sized Homes (p.17, 1.1.2a)

On a similar note, we also welcome the Strategy's focus on delivering more family-sized homes, with the proposal that 42% of social rented homes provided will have three or more bedrooms.

Whilst the 42% target is a significant improvement on recent years, it falls short of the 50% target suggested by London Councils¹⁰ in 2006. **4in10 would like to see this figure increased to 50% and for the Mayor to strengthen his commitment to halving severe overcrowding in the social rented sector by 2016 by targeting boroughs to ensure that these houses are built where demand is highest.**

In addition, 4in10 is concerned that the Strategy contains no targets relating to social housing containing four or more bedrooms. This raises the concern that there may be a sudden influx of three bedroom properties, ignoring the needs of larger families where children are at particularly high risk of living in poverty¹¹. **4in10 would therefore like to see the introduction of targets for four and five bedroom houses. In 2006, London Councils identified, within the 50% of three or more bedroom houses, that half of these (i.e. 25% in total) should be houses with four or more bedrooms¹²; 4in10 supports this target.**

Closer Integration of Housing and Employment Services (p.119, 3.2.2+3.2.3)

Parental employment in London is particularly low with one in four children in London living in a workless household¹³. Parental unemployment significantly raises the risk of a family living in poverty. In addition, there is an extensive body of research suggesting that young people growing up in social housing are more than twice as likely as their counterparts to find themselves unemployed in later life; 7% of the general population aged 11-15 in 1994 were unemployed 10 years later, compared with 19% of young people who had been brought up in social housing.¹⁴

It is therefore vital that investment in social housing is accompanied by investment in social infrastructure, in particular looking to registered social landlords to recognise their role in reducing levels of child poverty in the capital. Enhancing employment opportunities for those in social rented housing will be central to the Mayor's vision of creating a fairer and more equitable London.

We strongly support the London Child Poverty Commission's recommendation for the Mayor to use the London Housing Strategy as opportunity to require social landlords and their partners to provide closer integration of their housing and employment services. 4in10 would like to see specific strategies outlined in the Housing Strategy that detail how this can be achieved. In particular, 4in10 would like to see stronger strategies outlining social landlords' roles in assisting residents to access employment and training opportunities as well as signposting to benefits in order to tackle in-work and out-of-work poverty. However, we would like to stress that this support should remain optional and housing provision should in no way become dependent on residents accessing these support services.

¹⁰ London Councils and London Housing Federation (2006) *Think Big*

¹¹ London Child Poverty Commission (2008) *Capital Gains: London Child Poverty Commission Final Report*, London Councils (on behalf of the Commission)

¹² London Councils and London Housing Federation (2006) *Think Big*

¹³ London Child Poverty Commission (2008) *Capital Gains: London Child Poverty Commission Final Report*, London Councils (on behalf of the Commission)

¹⁴ Sefton (2007) *Using the British Household Panel Survey to explore changes in housing tenure in England*

Provision for Disabled Children (p.17+73, 2.1.2)

Families with disabled children remain disproportionately likely to be in poverty as a result of both lower incomes and higher costs. Social disadvantage further exacerbates the poor housing situation of families with disabled children¹⁵. 4in10 therefore welcomes the commitment by the Mayor for 10% new housing to be wheelchair accessible or easily adaptable. However, considering the figures outlined in the Strategy regarding the demand for wheelchair accessible housing (which state that over 20,000 households have an unmet need), we are concerned the 5,000 additional homes earmarked will be insufficient.

In addition, 4in10 would like to see recognition for the needs of other disabilities in the 10% target including other physical impairments, learning difficulties, behavioural problems and complex health needs. Housing need is not simply about access issues; equipment storage, family space, a room for a carer who does not count as part of the household, and bathroom and functional room facilities are also cited as important factors to take into consideration¹⁶.

We therefore believe the Housing Strategy should include a stipulation for local authorities to hold meaningful consultations with groups of families with disabled children in order to inform authority-wide housing strategies.

Play Access for London Children (p.68+94, 2.1 + 2.3.1)

Children everywhere need opportunities and a good environment for play – it is critical to their overall physical, emotional, mental, social and healthy development. Outdoor playable space is of paramount importance for children and young people living in London, which also has the highest overcrowding rate in the country. Mounting research evidence shows that access to and playing in natural and green environments helps counter behavioral problems and has a positive overall effect on children's lives. Playing outdoors near their homes, with only minimal adult supervision, helps children develop a sense of identity, locality, competence, and growing independence. Planning for space for play is therefore critically important, and adequate children's play provision needs to be built in to any new housing developments. Not to do so will sow the seeds of more anti-social activities.

The current Housing Strategy falls short when it comes to play: it mentions play only in passing on pages 68 and 94, but with no detail and no quantifiable amount. 4in10 believes that the Supplementary Guidance on play provision in new housing developments developed by the previous mayor as part of the London Plan is now under grave threat. It specified a minimum of 10 square metres of play space for every child expected to be in a development of over 10 housing units, by use of a formula linked to the number of bedrooms¹⁷. The Supplementary Guidance has the effect of enforcing play standards through the planning permission route; as developers should be refused planning permission for developments with inadequate play space. There must be an enforceable minimum for playspace in new developments because, if left to the discretion of local boroughs, this would leave developers able to put up housing with no play or recreation space at all. **4in10 has not seen any evidence why these benchmark standards are no longer required. We recommend that the standards for play which have been developed to provide a minimum of play spaces be retained in the new London Strategy.**

¹⁵ Kemp P. et al. (2004) *Routes Out of Poverty* Joseph Rowntree Foundation

¹⁶ Every Disabled Child Matters (2008) *Disabled Children and Housing*

¹⁷ For details please see <http://www.london.gov.uk/mayor/strategies/sds/spg-children-recreation.jsp>

Mixed Tenure (p.17, 1.1.3)

4in10 is particularly supportive of the Mayor's commitment towards developing mixed tenure housing estates. Adopting a mixed tenure approach has been shown to promote social cohesion, reduce social exclusion and create stronger communities¹⁸. Indeed, it is on the basis of this evidence that we remain concerned at the Mayor's decision to abolish the 50% affordable housing target.

However, we are keen to stress the importance of careful management to ensure positive outcomes are achieved. Evidence is mixed regarding the success of mixed tenure developments, but research has shown that adopting the following principles can offer a greater chance of success:

- A carefully planned layout and high quality neighbourhood facilities¹⁹
- Landscaping to provide local services linked by footpaths and cycle-ways, facilitating greater social interaction²⁰
- Ensuring a high proportion of residents are families facilitates greater interaction across tenures and wider benefits to schools²¹
- 'Pepper potting' whereby different tenures are integrated throughout developments to encourage greater social interaction across tenures²²
- Ensuring that tenure mixing does not only apply in areas of local authority housing and new developments, but also in areas of predominantly owner-occupied housing²³

We would like to see inclusion of these principles in the London Housing Strategy and a duty placed on Local Authorities and private housing developers to take these into consideration when designing mixed tenure housing estates.

Fulfilling the Promise

Individual Borough Targets (p.23+155, 1.1.1 + Appendix 2)

Only 23,154 affordable homes have been agreed with 21 boroughs so far, with the GLA having 'identified scope to deliver a further 17,105 in the remaining boroughs'. Even on this assumption, the overall number of planned affordable homes currently falls short of the 50,000 target by just under 10,000 homes. **Whilst 4in10 agrees the borough arrangements so far constitute a significant achievement, we are concerned about this apparent shortfall and would like the GLA to work quickly to identify and outline an appropriate solution.**

Incentives for under-occupiers (p.42+49, 1.3.2)

4in10 supports the Mayor's attitude towards under-occupation and strongly agrees if suitable incentives are identified this represents a real opportunity to increase the provision of larger homes to those families most in need.

However, incentive schemes to date have proven, on the whole, to be unsuccessful. 4in10 believes for this strategy to have a noticeable impact more research is needed into why residents who are under-occupying homes are reluctant to move out and how they can be better persuaded. For example

¹⁸ Bailey, N and Manzi, T (2008) *Developing and Sustaining Mixed Tenure Housing* Developments Joseph Rowntree Foundation

¹⁹ Allen, et al., (2006) *Mixed Tenure Twenty Years On: Nothing Out of the Ordinary*. York: Joseph Rowntree Foundation

²⁰ Allen, et al., (2006) *Mixed Tenure Twenty Years On: Nothing Out of the Ordinary*. York: Joseph Rowntree Foundation

²¹ Silverman, et al., (2005) *Mixed and Balanced Communities? Attracting and Retaining Families in Inner City Mixed Income Housing* Coventry: Chartered Institute of Housing and Joseph Rowntree Foundation

²² Andrews, L. and Reardon Smith, W (2005) *Challenging Perceptions: Case Studies of Dispersed and Mixed Tenure New Build Housing Developments*. Newbury: Sovereign Housing

²³ Bailey, N and Manzi, T (2008) *Developing and Sustaining Mixed Tenure Housing Developments*. Joseph Rowntree Foundation.

through taking into account their perceptions of what constitutes under-occupation and what would motivate residents to vacate their homes when they do become under-occupied. However, we are also keen to stress that we are strongly against any strategy that would involve forcibly removing people and families from their homes.

We would like to see the Strategy outline further research to ensure that under-occupation strategies implemented by local authorities are successful in freeing up larger properties across London.

The Effects of the Recession (p.101, 3.1)

4in10 recognises the need for the Mayor to take into consideration the current economic climate and welcomes the proactive approach the Mayor has taken in partnership with the HCA.

However, families, particularly those on low incomes, are struggling now more than ever and the need for affordable housing is acute. In particular, the recession has led to a rise in the number of unintentionally homeless households as buy-to-let landlords default on their mortgage and their tenants lose their homes²⁴.

We therefore believe it is crucial for the Mayor to restate the commitment to reach the target despite the economic downturn to ensure that the recession cannot be used as a 'get-out' clause for not achieving these ambitious targets at a later date.

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The 31 members of the 4in10 network that have signed up to these common principles are:

Action For Children	Discover	Parents and Kids Zone
ATD Fourth World	Faith Regen Foundation	Pupil Parent Partnership
Attlee Foundation	Family Action	Roma Support Group
Barnardo's	Gingerbread	Save The Children
Befriend a Family	Green and Chambers	Spitalfields City Farm
Bromley by Bow Centre	Islamic Circle Supplementary School	Streatham Drop-In Centre
Cardinal Hume Centre	London Play	The Abbey Centre
Climate Change Youth Development Trust	Newham Asian Women's Project	The Baytree Centre
Community Action Southwark	Notting Hill Housing Trust	The Children's Society
Community Links	One World Foundation Africa	TreeHouse
		Westminster Children's Society

²⁴ Council of Mortgage Lenders (2008) <http://www.cml.org.uk/>

4in10 Members who have signed up to this statement of common principles:

