

M30: Would policy H14 provide a justified and effective approach to the delivery, retention and refurbishment of supported and specialised housing? In particular, would it meet the objective of GG4 to delivering homes for Londoners in need?

Policy H14 on “supported and specialised accommodation” is a good starting point but **utilises a narrow view and definition of what is “specialised accommodation” and who needs to be “supported”**.

Every public body, including the GLA, has a duty to ensure that its policies do not discriminate - either by direct or indirect discrimination - against specific “protected groups” (such as black and ethnic minority residents, the disabled, the elderly and so on), and have a public duty to eliminate discrimination against these groups who are already disadvantaged disproportionately by existing housing policies and provision. Furthermore, the right to housing is recognised in international law as a human right.

Policy H14 is an opportunity to strategically meet the housing needs of all communities and in this it is not effective. We will particularly refer to the housing needs of BME communities, but at the outset we should mention that canal and river boat dwellers have not found their way into the London Plan, nor the housing care and support needs of LGBT people who need more emergency housing, short and long term supported housing and move-on accommodation.

In relation to BME communities, they often suffer multiple discrimination and deprivation since BME people tend to be on lower incomes / poorer and suffer disproportionately from high unemployment, discrimination in employment, poor health including mental health, are affected disproportionately by crime and often lack access to decision – making processes such as through consultation.

The Government’s recent race audit and the EHRC’s recent report, “Is Britain Fairer?”, along with a number of other reports, show that the gap between BME groups and white people is growing rather than reducing. Given that BME residents are also more likely than the white population to be poorer, it is essential that the housing policies adopted by the Mayor and GLA not only do not discriminate against this group (and other protected groups) but also (more importantly) adopt policies **that actively take steps to eliminate discrimination by adopting specific policies**.

National housing policies currently transfer public funds to the better off in society so that it is vital that the Mayor’s policies do not replicate such discriminatory practices. For example, the Mayor’s proposed policy and criteria for shared ownership housing is indirectly discriminatory as it benefits those who are better off, (and who can often afford to pay for private rented accommodation) and disproportionately disadvantages BME and refugee residents.

As noted in the Mayor's **Integrated Impact Assessment** there are options that can be taken that will reduce discrimination and inequality or add to discrimination and inequality and it is crucial to adopt the options that reduce discrimination, in line with the Equality Act 2010.

For example, this could be done by selecting option 4 of the "strategic policy options", at **page 8 of the Integrated Impact Assessment**. Option 4 reads "Focus on delivery of affordable homes (concentrating on social / target rents at the expense of total quantum of housing) – see table 6 – "Strategic policy options."

Some other solutions would be for funding to be given to groups that specifically target disadvantaged / discriminated against groups, such as black and ethnic minority housing associations, and to give funds to not-for-profit groups to develop housing aimed at disadvantaged groups or groups with specific needs such as the disabled and the elderly.

This could include providing incentives for housing associations or not for profits who will build homes with more bedrooms since Asian and other groups with "protected characteristics" often have more children or have elderly parents for whom they care living with them.

The Mayor's policies do not address the fact that some sectors of our society will never be able to afford to buy a home and they will always need to rent and will need to have a social rent because of their low incomes.

Current housing policies in London, and especially the demolition of council estates in so-called regeneration policies, have indirectly and directly discriminated against BME residents and increasingly push these disadvantaged / discriminated against groups out of London or into poor quality or over-crowded housing. This is discriminatory and unfair and in the long term unsustainable because London needs workers who are local to do the less well paid jobs in London.

The Mayor must priorities social housing at social rent so that the housing needs of the poorer sections of London are met. This is not just fair but it is also cost effective. We know that BME residents in poor or no housing suffer from increased physical and mental ill health which creates additional costs in time, resources and money on social work, welfare benefits and NHS services and the criminal justice system. Further, the provision of social housing at social rent builds "resilience" against poor health, poverty, crime and civil unrest. **In addition to the Equality Act point, it is therefore "cost effective" to prioritise social housing at social rent for discriminated against / disadvantaged groups as it represents good value for money and is a good investment because of the positive "knock-on" savings.**

Case Study: Haringey (we also use this case study in our statement on M24)

Currently in Haringey, the Mayor has bought the land at the former St Anne's Hospital NHS site, which the community group StART (St Anne's Redevelopment Trust) campaigned hard to keep in public hands. The Mayor's plan for this site is due to go out to tender shortly. However, at the moment the Mayor's plans for this large site include

plans for shared ownership and rents that are not locally affordable, so that the homes (as currently proposed) will be out of the reach of local Haringey residents, many of whom are disproportionately BME and migrants. This is unacceptable and discriminatory.

StART have campaigned for more homes at social rent and have even suggested that this land be given or leased to Haringey Council who are looking to build more truly affordable homes in one of London's most deprived boroughs.

This is a good example of where the Mayor has **not** engaged with the local group arguing to keep the land in public ownership and to build homes that will benefit those in most need locally.

Further, on the current proposals for this site, the Mayor has **not** had regard to the statutory duty to eliminate race discrimination in housing provision in a borough with a large number of BME and migrant residents who are currently not living in decent homes. It is well known that Tottenham suffered from riots in 2011 which, although sparked by a police shooting of a black man, was symptomatic of anger at great inequality, discrimination, marginalisation and poverty in the area.

To put it another way, building more good quality housing for rent at social rents makes good financial sense because this aids the prosperity and well-being of disadvantaged / discriminated against groups and helps to build the kind of "resilience" that prevents civil unrest.