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Consultation Response – London Housing Strategy

The Simon Community¹

About the Simon Community

The Simon Community has been in operation since 1963 living and working with homeless people in London. It currently runs services in the streets of London 365 days a year making contact with over 180 people on an almost daily basis. We are intimately connected to the lives of people sleeping rough and homeless in the capital through regular outreach work, our house of hospitality and our residential house. The Simon Community model has inspired innovation in others since its inception and we continue to pride ourselves on our independent and pioneering way of working.

As we approach our 46th anniversary we continue to see a need for our services and voice which meets a need where no other provision exists.

Summary Comment

The Simon Community welcomes the commitment to building new housing and with a specific commitment to social housing. It also supports the renewal of unused buildings for residential purposes with some caveats mentioned below. However, we are extremely concerned by the implications of the commitment to 'end rough sleeping by 2012' in London. We give our response against statements and headings given in the draft strategy below.

Priority Area 1 - Raising aspirations, promoting opportunity by

□ Providing more homes 50,000 affordable homes by 2011, abolition of the 50% target

We are delighted that there is a clear commitment to build more affordable homes. There is a massive and increasing shortfall of affordable housing for people who are homeless and on housing waiting lists and all London Boroughs should be required to sign up to investment in new and existing housing to meet this need. If the 50% target is dropped boroughs must be given another target otherwise they will have no incentive to provide the housing so desperately needed.

□ Improving the private rented sector

We disagree with the notion that a boosted private rented sector can somehow lift the burden of responsibility on statutory bodies to provide housing for those who have a right to it. We would be concerned that this move would leave an 'accountability gap' into which vulnerable people could fall and would further burden the voluntary and community organisations who advocate on their behalves.

¹ Simon Community is a registered charity and company limited by guarantee. Registered charity number 283938.

Priority Area 2 - Improving homes, transforming neighbourhoods

□ Regenerating Areas & Estates

Whilst we support the regeneration of communities we are concerned that a mandate to 'design out criminal activities' will be used against rough sleepers. As our city is renovated to welcome the world's media in 2012 we are concerned that the design of public spaces does not aim to make it harder for people who need or choose to sleep rough. Sleeping on the street is not a criminal activity.

□ Bringing Empty Homes Back Into Use

This is a welcome development and we support the restoration of empty buildings to residential use. We would point out that, although we do not condone any illegal act, we are acutely aware that there is currently a huge shortage of housing. As such we recognise that those who have taken matters into their own hands to secure accommodation have often done so *in extremis* and when other routes have failed. This is particularly true for those who have no recourse to public funds. We would expect there to be targets set around proportions of social housing in the stock brought back into operation.

Priority Area 3 - Maximising Delivery, Optimising Value For Money by

□ Rough sleeping should be ended by 2012 and the number of rough sleepers experiencing the 'revolving door' of homelessness should be reduced.

We are concerned by the target to end rough sleeping by 2012 for a number of reasons:

- That it is a target motivated more by how London will be viewed in 2012 during the Olympics than by concern for rough sleepers
- That to reach this target, statutory bodies and other agencies will be forced to 'oblige' people to 'accept help' and/or make the alternative of sleeping rough even less palatable for that individual. We are not naïve enough to suggest that people choose to sleep rough as a 'lifestyle choice' but we do know that there is often an element of choice involved. For example between a violent and noisy hostel place which combines with mental health issues and escaping to the street. We are concerned that the current strategy may lead to an extension of 'enforcement' style tactics seen recently in the City of London under the title of 'operation Poncho'. These practices are immoral, counterproductive and, we suspect, illegal.
- Rather than looking for innovative and sustainable solutions, increasingly 'technical' responses will be sought by the collection of large agencies currently active on the London Delivery Board. Smaller, innovative and community based organisations will be seen to have a smaller and smaller role to play outside of this and innovation will be reduced. Community responses are essential in providing a basic social safety net for those sleeping rough and we would welcome a supportive approach from the strategy and board.
- Whilst we welcome the focus on collaboration implied by the board, we would expect it to allow a high degree of flexibility, diversity of approach and critical appraisal of progress made. We would request that representation is invited on the board from small community organisations. We would also expect to see it being held publicly accountable for its progress against a wide range of indicators including safeguarding the rights of those sleeping rough in London.
- Finally, we are concerned that the strategy will serve to 'penalise' those who do not or cannot accept the support offered, however well meaning. We would seek guarantees that no individual will be harassed or suffer any coercive action to 'disrupt' their rough sleeping.

Toward the 2012 zero target the strategy identifies some of the challenges of addressing rough sleeping such as:

□ The need for some long-term rough sleepers to have intensive support and appropriate services

We welcome the commitment to providing more appropriate services for rough sleepers in London but are concerned that rough sleepers may be 'targeted' in an inappropriate way. See previous comments.

In terms of services for rough sleepers we would make the following observations about hostels. The emphasis on creating 'places of change' has meant investment in some hostels. However, this investment has left many behind. The numbers of people leaving hostels to return to the street, or even visit soup runs, is testament to the fact that they are not attractive options. We assert that this is due to the failure to provide genuine human contact for the residents free from a 'change plan'. Ratios of volunteers to residents must be raised to ensure this human exchange. We fear that the 'professionalisation' of the sector has created a bureaucracy that attempts to manage homelessness rather than engage with the person.

□ The challenges of migration to London

Migration brings benefit to the city of London. In fact, the housing needed for the city is largely being built by migrant tradesmen and women whether in the formal economy or outside of this. The strategy should recognise the needs of EU citizens in the city, particularly when they are unable to find work, have mental health needs and alcohol or drug dependency. At Simon Community we are now seeing large numbers of EU citizens from the accession states who cannot access any support from homelessness agencies or the state. Small and voluntary organisations like ours are picking up this bill and our services are stretched to breaking point. The strategy should either relieve this burden by providing for some level of statutory support or accept the major role of small organisations and support them to deliver. Any middle ground is both unfair and counterproductive. While we wait for a solution at national and EU level we and our community members are paying a dear price.

Some early priorities for the new London Delivery Board are also identified including

□ Establishing a targeted response for the most entrenched rough sleepers

The 'debate' around the provision of food, clothes and other essentials in an approachable environment on the street needs to move on. Evidence from the London School of Economics² has underlined the important role of these services. We would welcome support in better coordinating support to rough sleepers and seek recognition in the strategy for the role that we play in providing these basic services. This would protect us from the worrying attempts at the London Councils to ban the free distribution of food in London which we were forced to resist in 2007 and 2008. As for the targeting of the most entrenched rough sleepers we know that the most progress comes through trust and that this takes time. We would expect that a person's needs and wishes come at the centre of a package of support from them and that a 'targeted response' works with not for that person. Where a person rejects help, this should be accepted at that time. This is not to say that people will never leave the streets just that they are much more likely to stay off the streets if they took the choice themselves. We will be working with people to record testimony of any coercive acts.

² [Soup Runs in Central London: 'the right help in the right place at the right time?'](#) London School of Economics, 2009.