

London Tenants Federation

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LTF response to ‘A New Deal for Social Housing’ consultation

London Tenants Federation brings together borough- and London-wide federations and organisations of tenants (including leaseholders)¹ of social housing providers. Its membership also includes the London Federation of Housing Co-operatives and the National Federation of Tenant Management Organisations. A number of its member organisations involve both council and housing association tenants and a few (a minority) also involve some private tenants. LTF’s main focus is on engaging its member organisations in London-wide and national strategic policy – particularly relating to housing and planning.

LTF published a statement in early July 2018 on four things our members were hoping for from the Green Paper -

[http://www.londontenants.org/publications/other/Apositivefutureforsocialhousing\(f\).pdf](http://www.londontenants.org/publications/other/Apositivefutureforsocialhousing(f).pdf)

We organised a conference on ‘A Tenant-led Deal for Social Housing in London’, in partnership with the London Federation of Housing Co-ops and the National Federation of Tenant Management organisations on 20th October 2018. The conference included workshops and discussion in part focused on the Social Housing Green Paper and the consultation on the government’s consultation on Rents for Social Housing 2020-21. It was attended by 110, mostly social housing tenant representative attendees,

Our response to this consultation comprises

- agreed key points from our 20th October conference (mentioned above),
- sections from our statement on four key things our members were looking for from the social housing green paper,
- comments made in our response to the London Assembly Housing Committee’s consultation on tenant involvement in decision-making post Grenfell and
- parts of LTF’s ‘policy positions’ which have been built on over many years and are formally updated bi-annually.

SAFE AND DECENT HOMES – SECTION 1

1. How can residents best be supported in this important role of working with landlords to ensure homes are safe?

- (i) There should be an independent national organisation (funded by government) that gathers together expertise on issues relating to fire and smoke safety and load-bearing large panel buildings. Importantly this should be a resource for tenants to gain access to independent advice on issues relating to their estates.
- (ii) There must be greater transparency by all social landlords about risk assessments and annual monitoring / following up on areas of risk identified. This might include distribution of information to each household and be availability online.
- (iii) The national safety regime needs to be tightened through regulation / legislation, including a legal requirement for tenants’ voices to be heard, at the estate-based, borough or landlord based, regional and national level.

¹ When referring to ‘tenants’ we mean both tenants and leaseholders (as set out in our Articles of Association)

- (iv) There should also be legal requirements for tenants to be involved in major works specifications and greater accountability to tenants around delivery and supervision of major works. Buildings may be safe when built but subsequent changes can create significant health and safety / fire risk problems.
- (v) Social landlords should be required to directly employ independent Clerks of Works to oversee major works contracts as there are endemic problems in the construction industry. There is a need for greater safety consciousness and the monitoring of the quality of works, particularly when large numbers of subcontractors are involved.
- (vi) Government funding must be made available to: (i) ensure that works relating to required safety in social-rented homes is carried out and (ii) ensure social landlords implement delivery, supervision and monitoring of works in an open and transparent way.

2. Should new safety measures in the private rented sector also apply to social housing?

3. Are there any changes to what constitutes a Decent Home that we should? 6

Any changes to the standard must be properly resourced (via funding from the government / London Major's office). There were / are concerns that the introduction of the decent homes' standard was used as a Trojan Horse to force through privatisation of council homes, via restrictions around resourcing of these works. This must not happen again.

Social landlords should be required to directly employ independent Clerks of Works to oversee major works contracts as there are endemic problems in the construction industry. There is a need for greater safety consciousness and the monitoring of the quality of works, particularly when large numbers of subcontractors are involved.

4. Do we need additional measures to make sure social homes are safe and decent?

- (i) Installation of sprinklers. NB this is also recommended by the London Assembly Planning Committee **Never Again: Sprinklers as the next step in fire safety**²
- (ii) The definition of a high-rise home should immediately be 18m (6 storeys high) and move towards 11m (4 storeys) high and include other buildings based on vulnerability of residents (such as sheltered housing and care homes). The National Fire Chief Council says that between 2010/11 there were 51,683 fires in blocks of 1-9 storeys and only 5,950 in blocks of 10 storeys and above. 11m is the height to which firefighters ladders are able to access in order to access externally. 18m used in current building regs B5 such as where there is a requirement for specific firefighting facilities (e.g. dry risers) was based on the height reached with 'wheeled escape ladders. These were once in widespread use across the UK, but practical issues concerning the weight, maintenance and limited ability to access buildings beyond obstacles such as alleys and fences means that they have not been in widespread uses since the late 1980's.
- (iii) Homes must be safe for all sections of our communities with full consideration of the needs of households with small children, older, disabled and deaf people.

² <https://www.london.gov.uk/assembly-publications/never-again-sprinklers-next-step-fire-safety>

EFFECTIVE RESOLUTION OF COMPLAINTS – SECTION 2

5. Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?

There are more serious issues to be addressed in order to prevent so many complaints occurring in the first place, rather than tinkering with the existing system. The following are issues that were raised in LTF discussions with council and housing association tenants' groups from across London that were submitted to the London Assembly Housing Committee investigation into tenant involvement in decision-making about their homes post-Grenfell.

- (i) We are of the view that the co-regulatory system just doesn't work. It assumes an equal balance of power and interest between tenants and social landlords, when this is just not the case. This means that when things go wrong tenants find it very difficult to get issues resolved.
- (ii) While in the past Local Authorities and their staff viewed themselves as working for public good, changes in councils' being deemed as facilitating rather than providing housing has resulted in huge changes, in terms of their own democratic and accountable decision making, large levels of outsourcing and turn-over of staff occurring. These have significantly reduced the amount of the collective knowledge held by local authority staff (within departments). Thus, with no solid and sustainable way for new staff to learn from others more experienced. This has had a significant negative impact on the quality of services delivered.
- (iii) Large housing associations are increasingly focused on developing all types of market and so-called affordable housing, at the expense of existing social housing tenants and the management and maintenance of their homes, as well as those desperately needing social housing. We are advised that councillors' mail-boxes are often full of complaints by housing association tenants. Failures to properly maintain homes and delivery of shoddy workmanship are significant issues.
- (iv) Strategically with such high levels of housing need, in London, it is essential that existing homes are protected through good management and maintenance so that they last as long as possible. There are huge concerns that many of the large housing associations are moving far from their original social objectives.
- (v) Tenants and residents' associations are often left to deal with poor contractors, rather than landlords doing this themselves.
- (vi) Tenants feel that landlords too often accept lowest bids from contractors and that this results in poor quality work. We note that on 4 June 2018 Rebecca Rees a partner at Trowers & Hamlin wrote a comment piece in Inside Housing entitled "We need a radical rethink of procurement in the wake of the Hackett Review" in which she says "relying on lowest prices can result in flawed contracts, adversarial relationships and poor-quality outcomes."
- (vii) Transparency and accountability are incredibly weak. This is the case in respect of: general conditions of social rented homes, the apparent need for demolition rather than refurbishment, business plans for mergers of housing associations and/or their hiving off of social housing stock. Tenants often struggle to gain access to information they want about their homes and the decisions that are being made on their behalf and find that comments they have made in consultations have not been heard.

- (viii) Opportunities for tenants to shape delivery of services is increasingly weak - too often being little more than tick box exercises, excluding proper debate.
- (ix) Complaints systems are long and arduous – with many tenants being ground down and or giving up before even attempting to get through to the Ombudsman. Even where complaints are acknowledged there are often failures to changes methods of operation to prevent similar complaints having to be made again.
- (x) The abolition of local government committees and replacement with cabinets or elected Mayors by the Labour Party in 2000 was a significant loss in terms of local democratic accountability. While the theory was that local councillors would have more time to engage with their electorate, in practice it has created a huge democratic deficit, resulting in little public debate on important housing issues locally.

6. Should we reduce the eight-week waiting period to four weeks, or should we remove the requirement for the “democratic filter” stage altogether?

7. What can we do to ensure that the “designated persons” are better able to promote local resolutions?

8. How can we ensure that residents understand how best to escalate a complaint and seek redress?

- (i) The complaints system is to an extent only beneficial to more articulate tenants that know their way around what landlords are supposed to do and how long they should take to resolve complaints.
- (ii) We do not feel that Government’s focus on how the complaints systems work or how tenants might escalate a complaint is the right one. Many tenants anyway don’t feel that it is worth making a complaint or are frightened to do so.
- (iii) In this respect we don’t feel that it is particularly helpful to many older and disabled households.
- (iv) We are not convinced that the system is effective in addressing systemic problems / poor service delivery.
- (v) Government should focus more on processes that need to be put in place to resolve issues before they become formal complaints.
- (vi) There is a need for a more effective way in which tenants can collectively, through formal tenants and residents’ associations (including for sheltered housing tenants), raise issues that are affecting many residents (and thus indicating a bigger problem), at times taking up issues on behalf of individuals, or to raise issues that might be landlord-wide via landlord-wide tenants organisations – which would result in a stronger and more effective tenants’ voice.
- (vii) We support the re-instatement of local authority committees (particularly housing committees) to achieve more effective and accountable decision-making and to ensure stronger links with community organisations.

9. How can we ensure that residents can access the right advice and support when making a complaint?

There is a need for a more effective way in which tenants can collectively, through formal tenants and residents’ associations (including of sheltered housing tenants), raise issues that are affecting many residents (and thus indicating a bigger problem), at times taking up

issues on behalf of individuals, or to raise issues that might be landlord-wide in landlord-wide tenants organisations that would result in a stronger and more effective tenants' voice.

10. How can we best ensure that landlords' processes for dealing with complaints are fast and effective?

We propose that to support the reduction on complaints:

- (i) Legislation should provide all social housing tenants with rights to be consulted on issues of management and maintenance, improvements or demolition of their homes.
- (ii) Legislation should provide tenants with collective rights (as tenants and residents associations and landlord-wide networks of tenants and residents associations) around consultation or engagement in decision-making about their homes.
- (iii) The Local Audit and Accountability Act, Freedom of Information, the Public Sector Equalities Duty and Gunning or Sedley rules around consultation should be accessible to all social housing tenants.

See also responses to questions 5 and 8.

11. How can we best ensure safety concerns are handled swiftly and effectively within the existing redress framework?

If the existing redress framework was working we wouldn't have had the Grenfell tragedy.

EMPOWERING RESIDENTS AND STRENGTHENING THE REGULATOR – SECTION 3

12. Do the proposed key performance indicators cover the right areas? Are there any other areas that should be covered?

Suggested areas to be covered:

- (i) Delivery of each separately - new and additional social-rented homes, affordable rent and intermediate homes which might be assessed against levels of need.
- (ii) Maintenance of existing social-rented homes. We don't feel that landlords should have access to grant funding to deliver new homes unless they are properly maintaining existing homes and unless they have an effective participatory, democratic and accountable tenants' engagement strategy in place.
- (iv) Effective engagement of tenants and residents in decision-making about their homes.

13. Should landlords report performance against these key performance indicators every year?

- (i) Generally, we feel KPI data can be too easily manipulated to be a main determinant of performance. Sometimes the wrong things are measured. Residents' own experience need to heard in an effective way.
- (ii) High turnover of staff and use of temporary staff mean that they don't have enough local knowledge and have little knowledge of the KPI which will be reported after they have left. Individually enforceable rights can be used more easily by tenants – e.g. the right to repair.

14. Should landlords report performance against these key performance indicators to the Regulator?

15. What more can be done to encourage landlords to be more transparent with their residents?

- (i) Government should require landlords to provide democratic, accountable and participatory tenant engagement in decision-making about their homes.
- (ii) Over a number of years, ways of engaging tenants have changed from the use of formal, democratic and accountable models (which also facilitated greater transparency of landlord practices and services) to instead - 'consumerist' models.

With this, tenants increasingly feel that what they have to say, is dismissed. While the tragic example of Grenfell has highlighted this at its very worst, it is a very common cry from social housing tenants.

Landlord preferred consumerist models (including selection of tenants to sit on boards, panels or forums) not only fail to address collective need around the services that we receive (and pay for in our rents) but are necessarily less strategic and less effective in delivering services that meet our collective needs.

Combined with the notion that tenants have to be trained by their landlords to understand the issues that impact on them and their neighbours, in order to engage in landlord consultation structures, these are both patronising, controlling and disrespectful of the grass-root insights and expertise that tenants have about their homes and neighbourhoods.

Such models sit perfectly with the negative stereotyping of social housing tenants. They go hand in hand with lack of landlord transparency, particularly around finances which impact on the management and maintenance of social-rented homes.

Consumerist involvement models have resulted in: fewer engaged tenants, trusted elected tenant representatives feeling disempowered, tenants being collectively less well-informed about housing policy (from the local to national level) and fewer democratic and accountable voices able to influence and inform policy.

We find this incredible when time and again the evidence shows that good participatory engagement delivers better services.

- (iii) We are aware that some landlords
 - refuse to recognise tenants' associations unless they adopt their landlord's model which sometimes stipulate that associations will not be recognised if they are critical of their landlords;
 - advise potential tenant board members that they are not there to represent other tenants and should not speak publicly about issues discussed at board meetings.
- (iv) Legislation should provide all social housing tenants (council and housing association) with rights to be consulted on issues of management and maintenance of their homes and improvements or demolition.
- (v) Legislation should provide tenants with collective rights (as tenants and residents associations and landlord-wide networks of tenants and residents associations) around consultation or engagement in decision-making about their homes.
- (vi) The Local Audit and Accountability Act, Freedom of Information, the Public Sector Equalities Duty and Gunning or Sedley rules around consultation should be accessible to all social housing tenants.
- (vii) Reinstatement of local authority housing committees.

16. Do you think that there should be a better way of reporting the outcomes of landlords' complaint handling? How can this be made as clear and accessible as possible for residents?

17. Is the Regulator best placed to prepare key performance indicators in consultation with residents and landlords?

- (i) There is scepticism about the capacity of the regulator to complete this work.
- (ii) There should be funded tenant involvement.
- (iii) There should be some random inspections using a checklist.
- (iv) The notion of tenants and residents as 'consumers' is not helpful.
- (v) There should be more access to courts to enforce rights, including an ability to compel the regulator to fulfil its role.
- (vi) A KPI perhaps for the regulator?
- (vii) The regulator should take more seriously its duty to publicise itself.

18. What would be the best approach to publishing key performance indicators that would allow residents to make the most effective comparison of performance?

19. Should we introduce a new criterion to the Affordable Homes Programme that reflects residents' experience of their landlord? What other ways could we incentivise best practice and deter the worst, including for those providers that do not use Government funding to build?

We don't feel that landlords should have access to grant funding to deliver new homes unless they are properly maintaining existing homes and unless they have an effective participatory, democratic and accountable tenants' engagement strategy in place.

Requirements for landlords to all keep homes in a good condition and safe should be set out in strong health and safety legislation. Where new safety measures are put in place these must be accompanied by adequate grant funding to carry out this work.

There are concerns that the previous 'Decent Homes Standard' was used as a trojan horse to encourage transfer of council homes to housing associations.

20. Are current resident engagement and scrutiny measures effective? What more can be done to make residents aware of existing ways to engage with landlords and influence how services are delivered?

Please see comments to question 15

While there has never been a halcyon past in which social housing tenants have felt listened to and respected by their landlords, at times there have been attempts to address this. There have been waves of legislation to promote tenants' rights, including the limited elements introduced by the 'Tenants Charter' (Housing Act 1980), 2000 participation compacts and the establishment of the short-lived Tenant Services Authority in 2008

Sadly, experience and evidence show that social landlords will often not have meaningful dialogue with residents unless compelled to by strong legislation or threats or enticed with promises around funding.

Again, we feel there is no good replacement for democratic and accountable grassroots tenants' groups. They play a huge role in supporting and developing strong, supportive local communities. When joined together to form borough- or landlord-wide organisations we gain strength in shared knowledge and numbers to amplify our voice ensure we are heard. In the past, for example, we've seen landlord-wide tenants' federations funded through a weekly levy on rents to enable tenants to self-organise structures.

Democratic structures were quite widespread from TRAs to borough or organisational London-wide structures (like the LTF) which worked at a senior, strategic level. These best suited tenants' needs and gave tenants an ability to hold landlords to account and to input at strategic regional and national levels.

The Hackitt Report is the most recent of many government reports that have now advocated tenant involvement. We cannot allow what happened at Grenfell to occur again. We can't let this be another moment where a landlord's responsibility to listen to their tenants is brief and then subsequently forgotten about.

21. Is there a need for a stronger representation for residents at a national level? If so, how should this best be achieved?

Yes, there is a need for good representation of social housing tenants at every level that decisions are made about our homes.

- (i) A body representing tenants at the national and London-wide level needs to be bottom up – not top down. We can't have something like the tenants' panels that we have seen at the local level where landlords or consultants select tenants to engage.
- (ii) At the regional and national level, we (and landlords) should encourage the re-establishment of borough- and or landlord-wide tenants and residents' federations / organisations. We need to be part of rejuvenating the tenant movement. We need effective grass-roots tenants and residents' associations in each borough that include the diversity of tenants and residents living in social housing and their household members (including young 'hidden homeless' households who struggle to get their voices heard). We need this because the boroughs and the London Mayor have strategic housing responsibilities. We know that some tenants are afraid that there will be consequences of speaking out against their landlord.
- (iii) Tenants' groups at the local, regional and national level should be democratic, accountable and non-party political.
- (iv) At the national level we need to have 'voices' not just one voice – to accommodate the variety and variation in issues for tenants and their concerns across the country. The re-establishment of regional tenants and residents' organisations could be an effective way of achieving this.
- (v) At the regional or national level, a tenants' body would need to unite and be representative of all tenants and leaseholders (but not absentee landlords) - housing association, council, TMOs and co-operatives. It is important for us to bring people together in London, or we fear Government will set up a voice on our behalf. We need to ensure we are not divided.

London Tenants Fed is a perfect model that gives us strength; it facilitates sharing and exchanging amongst member groups and with members of member groups. It operates by consensus.

- (vi) If established, a national tenants' body should have genuine power; be engaged in

policy and strategic decision-making. It can't be just about consultation.

- (vii) A national tenants and residents' body should map existing representation and gaps (which needs to be highlighted and addressed).
- (viii) Issues that it should focus on include: stigma (which has grown) and social inclusion (e.g. the green paper suggests that you are not a valid person unless you are a home owner); overcrowding; temporary housing and homelessness; gentrification; positive investment in existing and new social housing; rebalancing of funding for social housing (rather than home ownership).

22. Would there be interest in a programme to promote the transfer of local authority housing, particularly to community-based housing associations? What would it need to make it work?

- (i) We do not support a new programme of Large Scale Voluntary Transfer from council housing to housing associations.
- (ii) We propose that Government provide housing association tenants with the Right to Manage and the Right to Transfer.
- (iii) Where community-based housing associations are working (i.e. not ended by the board) this is felt to be valuable and effective.
- (iv) Resident membership needs to be enshrined in the articles, so it cannot be changed without a vote by residents.
- (v) There is support for nationalising/mutualising housing associations.

23. Could a programme of trailblazers help to develop and promote options for greater resident-leadership within the sector?

24. Are Tenant Management Organisations delivering positive outcomes for residents and landlords? Are current processes for setting up and disbanding Tenant Management Organisations suitable? Do they achieve the right balance between residents' control and local accountability?

- (i) Numerous studies show that tenants that live on TMO estates generally have high satisfaction levels of their TMOs.
- (ii) Leasehold properties which are sub-let can dilute involvement in TMOs or Tenants and Residents Associations.
- (iii) A large percentage of TMOs are situated in London – some carrying out not only very good service delivery but also active community engagement (as often also occurs with formal tenants' and residents' associations) and delivery of new homes.
- (iv) We are concerned that funding to support development of new TMOs is no longer provided by central government.
- (v) We are worried that the Grenfell disaster (actually managed by an ALMO – which is very different for what most of us know of as a TMO) has had negative impact on the way in which TMOs are perceived.

25. Are there any other innovative ways of giving social housing residents greater choice and control over the services they receive from landlords?

Please see our responses to questions 15 and 20.

26. Do you think there are benefits to models that support residents to take on some of their own services? If so, what is needed to make this work?

27. How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?

- (i) There should also be legal requirements for tenants to be involved in major works specifications and greater accountability to tenants around delivery and supervision of major works. Buildings may be safe when built but subsequent changes can create significant health and safety / fire risk problems.
- (ii) Social landlords should be required to directly employ independent Clerks of Works to oversee major works contracts as there are endemic problems in the construction industry. There is a need for greater safety consciousness and the monitoring of the quality of works, particularly when large numbers of subcontractors are involved.

28. What more could we do to help leaseholders of a social housing landlord?

29. Does the Regulator have the right objective on consumer regulation? Should any of the consumer standards change to ensure that landlords provide a better service for residents in line with the new key performance indicators proposed, and if so how?

30. Should the Regulator be given powers to produce other documents, such as a Code of Practice, to provide further clarity about what is expected from the consumer standards?

We are tenants with rights – not consumers. Government should strengthen our rights in legislation.

31. Is “serious detriment” the appropriate threshold for intervention by the Regulator for a breach of consumer standards? If not, what would be an appropriate threshold for intervention?

- (i) There is scepticism about the capacity of the regulator to complete this work.
- (ii) There should be funded tenant involvement.
- (iii) There should be some random inspections using a checklist.
- (iv) The notion of tenants and residents as ‘consumers’ is not helpful.
- (v) There should be more access to courts to enforce rights, including an ability to compel the regulator to fulfil its role.
- (vi) A KPI perhaps for the regulator?
- (vii) The regulator should take more seriously its duty to publicise itself.

32. Should the Regulator adopt a more proactive approach to regulation of consumer standards? Should the Regulator use key performance indicators and phased interventions as a means to identify and tackle poor performance against these consumer standards? How should this be targeted?

See response above.

33. Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords? If so, what measures would be appropriate?

Bring back the Audit Commission

34. Are the existing enforcement measures set out in Box 3 adequate? If not, what additional enforcement powers should be considered?

35. Is the current framework for local authorities to hold management organisations such as Tenant Management Organisations and Arm’s Length Management Organisations to account sufficiently robust? If not, what more is needed to provide effective oversight of these organisations?

36. What further steps, if any, should Government take to make the Regulator more accountable to Parliament?

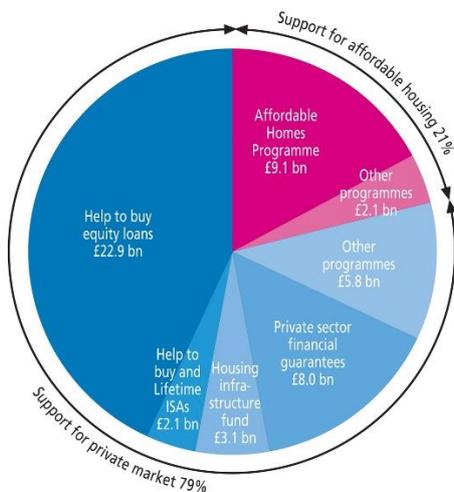
TACKLING STIGMA AND CELEBRATING THRIVING COMMUNITIES – SECTION 4

37. How could we support or deliver a best neighbourhood competition?

38. In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?

The stigma of social housing tenants has been created over many years of governments’ promotion of home-ownership as the normal form of tenure. The result of this has been:

- significant shifts in public funding away from delivering council homes to subsidising homes ownership;



From UK Housing Review 2018

See article – from Inside Housing 21.03.18

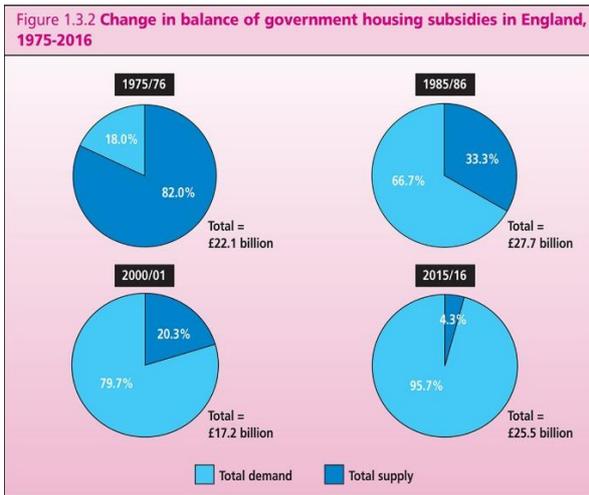
<https://www.insidehousing.co.uk/comment/comment/government-policy-needs-to-return-to-building-homes-let-at-modest-rents-55397>

- this continues despite significant failures of the help to buy schemes – as highlighted by Burt Proven, LSE in his - ‘How ‘Help to Buy’ helps mainly the privileged’³
- decreased levels of social-rented homes - only 6,713 (just 5.6% of homes delivered in delivered in London 2014-17) when the backlog of need for social rented homes (alone) in London comprises 78% (173,000) of the total backlog (according to the London 2017 Strategic Housing Market Assessment⁴;
- ever increasing levels of homelessness, overcrowding and (in London) households who can only afford social-rented homes being displaced from their family, friends and neighbourhoods;

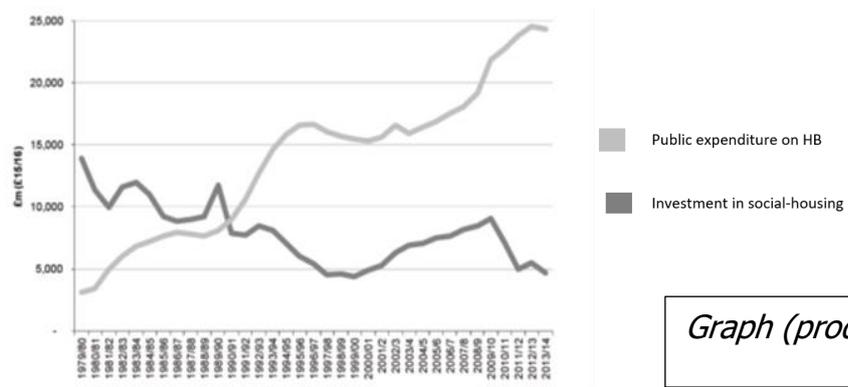
³ <http://blogs.lse.ac.uk/politicsandpolicy/how-help-to-buy-helps-the-privileged/>

⁴https://www.london.gov.uk/sites/default/files/london_shma_2017.pdf

- need for social rented housing London requiring almost 41,000 a year - if the backlog of need were to be addressed along with needs of new forming households in a 10-year period;
- increasingly high levels of housing costs for social and private renters and as a result also of housing benefit. NB in London council rents increased by 72% from 2002 when the Labour Government introduced rent restructuring to 2017 and 90% for housing association tenants;



From UK Housing Review 2018
 See article – from Inside Housing
 21.03.18
<https://www.insidehousing.co.uk/comment/comment/government-policy-needs-to-return-to-building-homes-let-at-modest-rents-55397>



Graph (produced by John Perry)

- residualisation of the social housing sector with only those in greatest need being able to access an increasingly scarce resource and
- combined, bit by bit, social housing tenants being labelled as getting something for nothing, being heavily subsidised by the state, lacking in aspiration and ultimately at times it being suggested that tenants themselves the cause of poorly maintained social housing, where that exists.

While the social housing green paper apparently acknowledges stigma, the Secretary of State, in his foreword, continues to refer to social housing being a safety net and a springboard to home ownership. In other words, not an acceptable form of tenure that might provide a secure home long-term home in which many households might safely raise their families and from which they might engage (as very many social housing tenants anyway do) in supporting and sustaining their communities.

Grenfell challenged the negative stereotypes – particularly the interviews with many of its surviving articulate, working-class social housing residents (that continue to be heard

nationally via the Grenfell inquiry) – all a very long way from the negative stereotypes that the media and politicians often promote.

If the government is serious about challenging the negative stereotypes of social housing tenants it must:

- recognise that social housing is the best form of housing for many households (acknowledging particularly that in London, social and private renters form a larger percentage of households than those owning or buying a home) and that the ongoing push to build more market homes that don't actually meet need⁵, is socially and economically unsound;
- recognise social-rented housing an infrastructure resource; providing public social benefit including to health and well-being;
- recognised social-rented homes as somewhere that households to set down roots to safely raise their families and actively engage in supporting the life of their local communities;
- provide the funding required to address the shocking general evidenced levels of need for social housing and to include fully accessible and safe housing that meets the needs of disabled and deaf households that are fully integrated within general needs housing. We also note the particular need for housing with wardens for older people;
- end the fudging of the cost differences between social and affordable rent homes - particularly where the affordability crisis is highest. NB in London, even London Affordable Rents are between 30 and 50 percent higher in cost than social rents.
- end the use of the term 'affordable' in housing and planning terms;
- support, through legislation, social housing tenants to being fully engaged – in a fair, democratic and accountable way – at every level that decisions are made about their homes.

39. What is needed to further encourage the professionalisation of housing management to ensure all staff deliver a good quality of service?

40. What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?

41. What evidence is there of the impact of the important role that many landlords are playing beyond their key responsibilities? Should landlords report on the social value they deliver?

42. How are landlords working with local partners to tackle anti-social behaviour? What key performance indicator could be used to measure this work?

43. What other ways can planning guidance support good design in the social sector?

⁵ 12,905 conventional self-contained and non-self-contained market homes; 82% of the homes delivered in London between 2014 and 2017.

EXPANDING SUPPLY AND SUPPORTING HOME OWNERSHIP – SECTION 5

44. How can we encourage social housing residents to be involved in the planning and design of new developments?

London Tenants Federation is unusual as a tenants' organisation in its focus on both housing and planning policy. We have established and supported networks of tenant and other community groups in influencing planning policy in areas of large-scale developments such as the two Mayoral Development Corporation Areas – the OPDC and the LLDC and in supporting groups in developing Neighbourhood Plans (particularly the Greater Carpenters Neighbourhood Forum). This can only occur with funding and support for formal tenants organisations.

45. Recognising the need for fiscal responsibility, this Green Paper seeks views on whether the Government's current arrangements strike the right balance between providing grant funding for housing associations and Housing Revenue Account borrowing for local authorities.

Given the chronic level of need for social rented homes, it is disappointing the Government has not seen the social housing green paper as an opportunity to more seriously begin to address the high levels of evidenced need for this type of housing, to improve conditions immediately for lower income residents, relieve the demand-side pressure on the housing market and reduce the overall housing benefit bill.

We would like to see:

- (i) grant-funding ringfenced solely for delivery of additional social-rented homes at existing social rents (not affordable rent homes at 30% - 50% higher in rents but dressed up as 'social rented homes');
- (ii) public land that is suitable for housing development to be ring-fenced exclusively for new social-rented homes;
- (iii) local authorities and smaller or community-led organisations prioritised for receipt of social housing grant funding (as more could be delivered at lower cost);
- (iv) a suspension of the Right to Buy until unmet need has been addressed;
- (v) the return of historic Right to Buy capital receipts totalling £42bn to local authorities to support the provision of new social rented homes;
- (vi) protecting existing social rented homes should be paramount (set in legislation) to ensure that grant funding can be focused on delivering additional homes. Refurbishment is socially environmentally and economically sound. Demolition and rebuild is often not.
- (vii) capital costs (including interests on loans taken out to build homes) covered by the public purse not, as with the latter, covered exclusively by social housing tenants, through rents. Social rented homes should be considered an infrastructure resource; providing public social benefit including to health and well-being;
- (viii) Local housing companies should be required to be more transparent about the benefits and risks of their developments, about what will happen to land ownership where they build on public land, and especially about the quantity of houses they will deliver, at what tenancies, and at what rents.

(ix) There is a need for a thorough cost-benefit analysis comparing LHCs with building housing within the HRA now that borrowing caps are set to be removed.

46. How we can boost community-led housing and overcome the barriers communities experience to developing new community owned homes?

See response to 45.

47. What level of additional affordable housing, over existing investment plans, could be delivered by social housing providers if they were given longer term certainty over funding?

See response to 45 and scrap the term ‘affordable housing’.

48. How can we best support providers to develop new shared ownership products that enable people to build up more equity in their homes?

Help to buy benefits mainly the privileged – as highlighted by Bert Proven, LSE⁶

Grant-funding should be ringfenced solely for delivery of additional social-rented homes at existing social rents.

Yours sincerely

Ron Hollis and Pat Turnbull
Regional delegates
London Tenants Federation

⁶ <http://blogs.lse.ac.uk/politicsandpolicy/how-help-to-buy-helps-the-privileged/>