Housing & Land Directorate  
Greater London Authority   
169 Union Street   
London SE1 0LL

By mail to: housingstrategy@london.gov.uk 11th October 2020

Dear Sir or Madam,

**RE: CONSULTATION ON INTERMEDIATE HOUSING**

I am writing on behalf of TSSA, a trade union that principally organises in the railways of the United Kingdom and the Irish Republic. In Britain, the Union is recognised for collective bargaining purposes by all the Train Operating Companies as well as Network Rail and many of its infrastructure contractors. Additionally, TSSA bargains with organisations like the RSSB, London Underground and Transport for London.

The point we want to make from the start is that many TSSA members work in London. Some are able to live in the Capital, often some distance from their workplaces as the cost of rents or the expense of a mortgage for a home mean that they have to find cheaper areas in which to live. For other members, the cost of housing in London is just too expensive, meaning that their only option is to travel in from outlying towns. Travelling into London for some and across the city for all those with work to get to becomes a factor that eats into family budgets and can cause extra daily stress.

The Covid-19 pandemic has relieved many members temporarily from the daily travel grind because they have been able to work from home but, short of this flexibility becoming permanent, the need for housing for London’s workers remains acute. It is for this reason that we welcome the Mayor’s timely consultation.

In our response the one main issue we want to focus on is in relation to Chapter 5, Supporting London’s key workers:

**Q16. a) Should the GLA should define a ‘core’ list of key worker occupations for use in intermediate housing allocation policies, and should local authorities be able to identify additional key worker groups, where there is evidence of local need?**

We support a core list of key worker occupations that should be adopted consistently across London.

Our concern with local authorities being able add additional key worker groups is whether that could introduce a borough based priority system that effectively undermines the Londonwide core list.

There is also a question about who decides whether the evidence of a local need outweighs that of the core London list – and in the event that someone on the core list works in the same borough that has the local need, how will that person be dealt with fairly (eg, a public transport worker)?

**Q16 b) If yes, which occupations should be included in a ‘core’ list of key workers for use in intermediate housing allocation policies?**

Public transport workers should be included. They have been identified by the UK Government as key workers under the Covid-19 measures and have proved vital for the continuation of rail, bus and other services.

**Q16 c) What evidence should be required to define an occupation as a key worker for the purpose of intermediate housing allocations?**

Principally, employment by a rail, bus, etc, company.

Many railway based public transport workers have ‘safety critical’ responsibilities but not all of them are classed as ‘frontline’ even though they are nevertheless vital for the operation of the Underground, TfL or mainline railway. Other staff are frontline but not regarded as safety critical.

Those staff that are safety critical have that legal definition because of their specific role or carry out a duty deemed to be in that category (eg, because they drive a train; or because they are deemed to “receive and relay communications or other activity capable of controlling the movement of vehicles” (such as a controller based in an office). There are number of other definitions in the legislation.[[1]](#footnote-1)

Those staff that are frontline may not be safety critical (eg, like some people working on platforms or in offices) but their role is critical in dealing with passengers or ensuring other staff can do their job in running services and maintaining track, signals and rolling stock.   
  
Many railway workers have to work at times when public transport is not available so the ability to be able to find a home near to where they work would assist them in being able carry out those early morning or late night shifts.

In making this submission, we trust that its contents will be considered and look forward to the Mayor’s response.

Yours sincerely



Manuel Cortes

TSSA General Secretary

1. Railways and Other Guided Transport Systems (Safety) Regulations 2006 (as amended) (ROGS). The Office of Rail and Road has issued guidance about the legislation and especially Regulation 23 which describes the various roles and duties classed as safety critical. [↑](#footnote-ref-1)