

Public consultation on Key Worker Living Rent as a form of rent control homes for Londoners

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Foreword

The Mayor and I are determined to do everything we can to make housing more affordable for Londoners. At the heart of this are our plans to build more homes for social rent, many of which will be built by councils, as this is the type of housing that is most affordable to Londoners on low incomes.

But the housing crisis in London doesn't just affect those on the lowest incomes. It also affects those on ordinary incomes: in work and earning a wage but still struggling to meet high housing costs in the capital. These include the everyday heroes that are the backbone of our city – our nurses, teachers, bus drivers, shop workers, and cleaners.

For the thousands of these workers and their families, the Mayor is determined to act, and fulfil his manifesto commitment to introduce a new type of new build, rent controlled home for London, which we will call Key Worker Living Rent homes.

This new type of housing builds on the Mayor's pioneering work developing London Living Rent, but we are proposing to make this next generation of homes better still. For Londoners: a clearer link to keyworker incomes and a simpler rent-setting process. For builders: more certainty over future rental income, so they can plan to deliver these homes at scale, alongside full backing in our grant funding and planning frameworks.

We welcome your views on how we can make this new type of housing a success, for the thousands of Londoners who need and deserve a more affordable home.



Tom Copley
Deputy Mayor for Housing and
Residential Development



1. Introduction

- 1.1 In his 2024 election manifesto, the Mayor of London committed to introduce a new form of rent control homes, which will see rents capped and linked to the incomes of key workers. The manifesto set out a bold ambition for an initial phase of 6,000 of this new type of intermediate home to be built across the city.
- 1.2 The Mayor is now consulting on his plans to deliver this commitment, via a new vision for Key Worker Living Rent (KWLR) homes. This document sets out his initial proposals, including ways in which he might use both his planning policy and his capital funding programmes for developing affordable homes in London to support KWLR homes. It includes a series of questions about areas on which the Mayor is especially keen to hear views and insights. The document also invites any other comments relevant to his proposals. Responses will inform the Mayor's final plans for KWLR homes.
- 1.3 The Mayor welcomes and will consider all responses, but he is particularly keen to hear from:
- key workers who need homes that are genuinely affordable for them, institutions that employ these key workers, and organisations that represent them
 - housing providers and developers, with whom the Mayor will work to deliver KWLR homes, and the organisations that represent them. This group includes Registered Providers of affordable housing (RPs), both local authorities and housing associations; housebuilders and other organisations that may want or need to invest in or develop KWLR homes; and other housing providers that may need to manage them
 - Local Planning Authorities (LPAs) and planning consultants, who will receive, consider and advise on applications to develop these homes.

2. How and when to respond to this consultation

- 2.1 The Mayor encourages those responding to this consultation to do so by answering some or all of the questions set out in this document. (They are posed under the sub-heading 'Questions' at the end of each section of this document, but also summarised at the end of it.) This will help his team to analyse and take account of respondents' views on his plans for KWLR homes.

- 2.2 The Mayor welcomes detailed or technical responses to questions where respondents can provide these. But he does not expect that respondents will necessarily answer in this way and understands that some may choose to respond only to some questions.
- 2.3 The Mayor suggests those responding to this consultation read through the whole document before responding to the questions, even if they do not intend to answer all questions. This is because there are links between the different areas the different sections of the document cover.
- 2.4 This consultation will run for 14 weeks from 25 November 2024 to 3 March 2025. Those responding need to submit their responses by 23:59 on 3 March 2025. They should email responses to housingstrategy@london.gov.uk.

3. Key Worker Living Rent homes: what and why?

- 3.1 The Mayor intends that KWLR homes will be a type of ‘intermediate housing’ and, specifically, intermediate rented housing. Intermediate homes have been developed in London and elsewhere in recent decades, for households who are working and earning more than those with the lowest salaries or no earnings, but who are struggling to afford accommodation that meets their needs on the open market. The Mayor supports intermediate homes that are genuinely affordable for those for whom they’re intended through his planning policy. He also funds councils and housing associations to develop them, alongside social rented homes. (In London, the Mayor is responsible for administering government funding to help councils and housing associations build affordable housing. Currently, his main programme for doing so is the 2021-26 Affordable Homes Programme.)
- 3.2 Neither intermediate housing in general, nor KWLR homes in particular, are or will be an alternative to social rented homes. The Mayor recognises Londoners’ huge need for social rented homes. In view of that need, both his planning policy and his funding programmes give priority to social rented homes and will continue to do so. But the Londoners the Mayor anticipates will benefit from KWLR homes are unlikely to be allocated a social rented home, because other Londoners need those homes more.¹ Also, those to whom KWLR homes will be let can afford to spend more on

¹ Most social rented homes must be allocated in line with local authorities’ policies on the allocation of social rented housing. Their policies must, in turns, reflect a legal framework that requires they prioritise households in particular forms of need for housing. These include homelessness, overcrowding, and needing to move for medical or welfare-related reasons.

housing than social sector rents. Yet, these Londoners' need is real and they are currently ill-served by the alternatives the market offers.

- 3.3 Paying private rents places these Londoners under significant strain. Twenty-four per cent of private renting households in London spend over half of their gross household income on housing costs, after housing benefit is taken into account.² The strain has been compounded by recent steep increases in London's private sector rents, at the same time as the cost of other essentials, such as food and utilities, has been rising. In September 2024, 21 per cent of London's private renters said they were struggling to make ends meet, going without meeting their basic needs and/or relying on debt to do so. Another 40 per cent reported that they were just about managing.³ Even back in 2017, an assessment of need for housing in London found that the city needed to provide 12,000 additional intermediate homes every year.⁴
- 3.4 The Mayor wants KWLR homes to provide intermediate housing for London's key workers in particular. The Mayor defines this group broadly as those who have a direct role in providing the services Londoners rely on. They are identified in the [list of key worker occupations that the Mayor issued in 2021](#), and which he encourages boroughs and housing providers to use when allocating intermediate homes. Around a third of working Londoners are employed in jobs covered by this list. Occupations listed include (but aren't limited to) nurses, postal workers, care workers, public transport drivers, teachers, those who produce and sell food, childminders, and refuse collectors. It was shaped by London's experience of the Covid-19 pandemic, which underlined how important these roles were in keeping the city running smoothly. And it was developed following a consultation on intermediate housing in 2020, and subsequent engagement with trade unions, local authorities and other employers. The Mayor does not intend to review his established list of key worker occupations in response to this consultation.
- 3.5 Although many of the particular challenges to delivering essential services that the pandemic presented have now eased, other challenges remain. The cost of housing is prominent among them and recent research by the GLA highlighted how difficult it makes recruiting and retaining staff in London's public sector.⁵ It also limits

² GLA analysis of 2019/20 to 2021/22 English Housing Survey data.

³ YouGov Plc polling for the GLA, available at [GLA cost of living polling – Page 2 – London Datastore](#). Total sample size was 1057 adults. Fieldwork was undertaken between 20 and 25 September 2024. The survey was carried out online. The figures have been weighted and are representative of all London adults (aged 18+).

⁴ GLA. London Strategic Housing Market Assessment, 2017.

⁵ See, for example, GLA Economics' 'Housing Affordability and Public-Sector Recruitment in London' at <https://www.london.gov.uk/business-and-economy-publications/housing-affordability-and-public-sector-recruitment-london>

economic productivity more broadly.⁶ This is bad, both for the individuals and households affected and for London's services. The Mayor wants KWLR homes to play a part in helping key workers both come to and stay in London. So, ensuring developers and providers can build these homes at scale will be a priority for the Mayor in his plans for KWLR homes.

3.6 As noted at paragraph 3.4, the Mayor already encourages boroughs and other housing providers to prioritise key workers when allocating intermediate homes. Many of the intermediate homes being developed are shared ownership or London Living Rent (LLR) homes and these are the tenures encouraged in planning policy and prioritised through affordable homes funding.

- Shared ownership enables a household to buy part of a home and pay rent at below market levels on the remaining share. It also offers the option of buying more of the home in future, with scope to own 100 per cent.
- LLR homes are let at rents below market levels, on the understanding that tenants will use the opportunity of housing costs lower than private rents to save towards a deposit, so that they can buy the home they rent (or another home) on a shared ownership basis.⁷

3.7 Although shared ownership and LLR have been and remain hugely helpful for many Londoners, demand exceeds supply and both preferred tenures may not always meet the needs of some key workers. Because they involve home ownership (in the case of LLR, providing a pathway to it), these tenures suit households who are able and inclined to pursue home ownership. This isn't the case for all key workers. Some may not have money for a deposit or, even with rents at less than market level, be able to afford to save towards one. Increasing numbers of key workers are likely to be in this position, as private rents and house prices have continued to rise, and mortgage interest rates have fluctuated. Some key workers may not want to own a home – for example, because they do not anticipate staying in London long-term. And for others, home ownership might be complicated, because their household is made up of friends or others with whom they wouldn't necessarily envisage the long-term commitment of buying a home. The Mayor wants KWLR

⁶ Under the umbrella of the London Partnership Board, the GLA, London Councils, Trust for London, and the G15 network of major housing associations jointly commissioned research to model the relationship between housing supply and affordability and economic productivity. The resulting report, 'Housing Affordability and Economic Productivity Estimating the Effect of Housing Affordability on Economic Productivity in the Greater London Area', found that a one per cent decrease in house prices in London would increase economic productivity – by 0.14 per cent, or about £7.3 billion over a 10-year period. The report is available at <https://www.london.gov.uk/programmes-strategies/business-and-economy/business-and-economy-publications/housing-affordability-and-economic-productivity>.

⁷ As explained at paragraph 9.2 below, the provision for tenants to buy a share of the LLR home that they are renting may not exist if the home has not received Mayoral funding.

homes to provide a form of intermediate housing that meets those key workers' needs.

- 3.8 The Mayor also recognises that not all key workers are able to afford intermediate housing. Many need social rented homes. He is committed to working with boroughs and housing associations to deliver the social rented homes that they and other Londoners need.

Questions

- Q1. What do you identify as the main considerations for the Mayor to ensure that KWLR homes will be attractive to
- a) Londoners in need of intermediate housing, especially key workers
 - b) developers seeking to build intermediate housing
 - c) providers seeking to manage and let intermediate housing?

4. Planning framework

- 4.1 In order for KWLR homes to be delivered, they will need to secure planning permission. As explained in paragraphs 4.2 to 4.4 below, the Mayor's view is that KWLR homes are consistent with the National Planning Policy Framework (NPPF) and the London Plan, meeting the criteria for intermediate affordable housing that each sets out. Accordingly, he anticipates that LPAs will support applications to develop these homes.

The NPPF

- 4.2 The NPPF states "Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required...". Its glossary, at Annex 2, defines various types of affordable housing, including social rented and intermediate homes. The existing definition of intermediate homes accommodates KWLR homes.

The London Plan

- 4.3 [The London Plan](#) provides further detail on the affordable homes the Mayor expects to receive planning permission in London. It gives a clear basis for providing intermediate housing. Policy H6 'Affordable housing tenure' states that plans for affordable housing should include "a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing". (This is alongside a minimum of 30 per cent social rented homes, with the borough determining the

appropriate affordable housing tenure or tenures for the remaining 40 per cent, on the basis of identified need.)

- 4.4 Policy H6 also outlines the following criteria, to ensure that intermediate homes given planning permission are genuinely affordable:
1. meet the broad definition of affordable housing⁸
 2. meet the London Housing Strategy definition of genuinely affordable housing – for intermediate rent, that is, that “...they are genuinely affordable to Londoners, generally meaning that they should be accessible by those whose household incomes fall under [the income threshold for intermediate rented housing].”
 3. are affordable to households with a range of incomes below that maximum income threshold
 4. are affordable to households with incomes up to the household income threshold for intermediate rented housing, without them spending more than 40 per cent of their net income on housing costs
 5. are considered by the borough to be genuinely affordable.

As explained above, the Mayor considers that the initial proposals for KWLR homes set out in this document meet these criteria.

Defining KWLR homes in London planning policies

- 4.5 The Mayor is aware that there would be value in having a clear definition of KWLR as a tenure type in the documents he produces that guide planning decisions in London. This would help provide clarity and consistency in what type of homes are delivered as KWLR homes. He thinks this is important for those who will rent the homes, for potential developers and providers seeking planning permission to deliver them, and for LPAs and the GLA in assessing those applications.
- 4.6 To this end, the Mayor intends to refer to KWLR homes in planning guidance. The Mayor hopes this will signal to developers, providers and planners that he supports KWLR homes as a form of intermediate housing, so that they are confident to, respectively, seek and to grant planning permission for them.
- 4.7 Looking ahead, the Mayor will consider the case for identifying and defining KWLR as a preferred tenure in the new London Plan. This is something he would cover in future consultation on any new London Plan and test alongside other policies, if he decided to proceed.

⁸ This includes the definition in the NPPF referred to at paragraph 4.2 above.

Questions

Q2. To what extent do you think that the steps set out at paragraphs 4.5 to 4.7 will provide clarity to

- developers and other housing providers seeking planning permission to develop KWLR homes, and/or
- local authority planning departments assessing such proposals?

If you do not think they will be sufficient to do so, do you think there are additional or alternative steps the GLA could take to ensure that the Mayor's planning framework is enabling to the delivery of KWLR homes?

5. Eligibility and allocation

5.1 As explained at paragraph 3.4, the Mayor wants KWLR homes to go to London's key workers.

5.2 The Mayor plays a limited role in the allocation of intermediate housing. He does set some eligibility criteria and expectations of boroughs and housing providers – both through planning policy and, where he funds homes, funding guidance. These include:

- maximum household income thresholds for accessing intermediate housing, as explained at paragraph 4.4.
- Where intermediate homes are funded by the Mayor, he also makes clear that they should only go to households who live and/or work in London and who do not already own a home, or have the means to buy one on the open market.

The Mayor envisages the first criterion would apply to all KWLR homes, as a form of intermediate rented housing, and the second to any KWLR homes that he funds. (See section 8 for further consideration of Mayoral funding for KWLR homes.)

5.3 Beyond these criteria and expectations, boroughs and providers have flexibility in allocating intermediate homes. The Mayor's London Plan and his funding guidance allow them to set eligibility criteria that reflect local housing need.⁹ They make clear that additional criteria should only apply for the first three months of marketing an

⁹ The relevant provision in the London Plan, at paragraph 4.6.10, makes clear that these additional criteria should not apply to re-sales or re-lets. The Mayor appreciates that this provision may make it difficult to ensure that intermediate rent homes, including KWLR homes, go to key workers after first let. He will consider revising the provision in a new London Plan.

intermediate home, something intended to ensure that other households in need can benefit from homes not allocated to those who meet local eligibility criteria.

- 5.4 As set out in paragraph 3.4, in recent years the Mayor has provided some direction to boroughs and providers about who they prioritise for intermediate housing. Specifically, he has made clear that he encourages them to prioritise key workers. The steps he has taken to do this, which are outlined below, will be important in ensuring that London's key workers benefit from KWLR homes.
- 5.5 The Mayor published a [Housing Policy Practice Note \(December 2021\)](#) and a [Planning Practice Note \(March 2024\)](#)¹⁰ that encourage boroughs to prioritise key workers for intermediate housing, using a list of key worker occupations issued by the GLA (as part of the 2021 Housing Policy Practice Note), with variations to reflect local need. The provision for local variation enables boroughs to prioritise occupations that play a particular part in the local economy, or for which there's an especially pressing need.
- 5.6 The Planning Practice Note published in March 2024 sets out the related expectation that local authorities are "strongly encouraged" to work with housing associations to develop allocations policies and intermediate housing registers.
- 5.7 The Mayor's expectation that boroughs and providers prioritise key workers for intermediate homes and develop systems that help them to do so are reinforced by his LPG on affordable housing, on which the Mayor consulted between May and July 2023. It states the Mayor's expectations that planning authorities and housing providers:
- adopt an equitable and targeted allocation process for intermediate housing, having regard to London-wide and local eligibility criteria, and established definitions of housing need
 - prioritise key workers; and to adopt the definition of key workers, and the GLA's core list of key worker occupations
 - draw up and publish targeted allocations policies and intermediate housing registers alongside other measures they consider necessary
 - set out in s106 agreements a process for prioritising households from any intermediate housing register.
- 5.8 The Mayor is considering setting a specific requirement that KWLR homes are allocated to key workers in cases where he funds councils or housing associations to develop these homes. Any such requirement would go beyond the expectation

¹⁰ See the document 'Prioritising Key Workers for Intermediate Affordable Housing Planning Practice Note' under the heading 'Practice Notes'.

contained in the policy framework outlined above. It would be specific to KWLR homes he funded and would not apply to homes of other intermediate tenures he funded. He would welcome views on this option – see question 5.

- 5.9 The Mayor doesn't anticipate that either the approach outlined in his LPG on affordable housing or any specific funding requirement would stop Londoners who aren't key workers accessing KWLR homes. He appreciates that some KWLR homes may need to be allocated to those who aren't key workers, if boroughs and other housing providers have been unable to let them to key workers within the first three months of marketing. This is in line with the approach to prioritisation outlined in the London Plan.
- 5.10 Finally, the Mayor hopes that KWLR homes will be of interest to organisations and institutions that employ key workers and are seeking to develop or secure accommodation for them – whether by developing homes directly or by working with other developers and/or providers on their own land. This might, for example, include NHS Trusts or other public sector organisations with land holdings that could be used for housing. He is interested in hearing insights on the scope for this collaboration – see question 6.

Questions

- Q3. Please share any insights you have on demand for intermediate housing and, in particular, intermediate rented homes, from key workers, as defined by the GLA's list of key worker occupations or local additions to it? This might include insights on the role of intermediate housing in supporting recruitment and retention, or on the profile of key workers seeking and securing intermediate housing. (Please also see question 19 below.)
- Q4. Beyond the two Practice Notes and LPG on affordable housing described above, what more, if anything, could the Mayor do to support boroughs and housing providers to prioritise key workers for KWLR homes?
- Q5. What do you think of the possibility that the Mayor makes allocating any KWLR homes he funds to key workers a condition of that funding (paragraph 5.8)?
- Q6. Do you have any insights or suggestions on how the Mayor could work with organisations and institutions interested in providing or securing accommodation for employees to support them to develop KWLR homes for staff (paragraph 5.10)?

6. Rent setting and increases

Affordability and deliverability

- 6.1 The Mayor wants KWLR homes to be genuinely affordable to key workers who are eligible for intermediate rented homes. He wants to make sure that KWLR homes remain affordable to them over time, not just when they are first let.
- 6.2 The Mayor appreciates that the imperative of affordability over time sits alongside ensuring that KWLR homes are viable and deliverable to those investing in, building and managing the homes. The Mayor recognises that potential developers and providers of KWLR homes need to be clear and confident about the income they will secure over the lifetime of those homes. He understands this is important, so they know they can cover the cost of both building the homes and maintaining them long term. The Mayor considers that a clear, straightforward approach to setting and increasing rents and any service charges will also be helpful to prospective and actual tenants, as it will help give them have a clear idea of their housing costs over time.
- 6.3 As noted at Paragraph 4.4 above, London Plan Policy H6 sets a number of requirements to ensure that intermediate homes are genuinely affordable. Currently, the maximum household income threshold for intermediate rented housing is £67,000, with maximum housing costs of 40 per cent of the net amount of that income.¹¹
- 6.4 This consultation assumes that rent and service charge benchmarks for KWLR homes are capped at that maximum, as is the case for LLR. However, the Mayor appreciates that applying this cap on rents and service charges can make it difficult for potential investors, developers and providers of intermediate homes to calculate what rental income they'll secure from the homes over time. The Mayor doesn't want this to deter delivery of KWLR homes. So, he highlights two considerations intended to provide reassurance to potential investors, developers and providers of KWLR homes:
- First, the GLA reviews this cap regularly, as part of preparing its Annual Monitoring Report (AMR) on the London Plan. In doing so, it takes into account changes in incomes and affordability.
 - Second, where rents and service charges are set at benchmarks published by the Mayor, City Hall is interested in views on allowing rent and service charges, over time, to exceed the London Plan's household income

¹¹ The GLA increased the household income threshold for intermediate rented housing from £60,000 to £67,000 per annum in the Annual Monitoring Report in the London Plan, published in May 2024. See <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/monitoring-london-plan>

threshold. It would only consider this if ongoing affordability can be assured via a direct link between rent indexation and changes in Londoners' average incomes. This would ensure future rents remain affordable for tenants, without providers having to second guess future London Plan income thresholds. City Hall will separately consider whether more certain approaches to increasing rents could be permissible within a planning framework that prioritises genuine affordability at completion. This approach could help provide more certainty to prospective investors and developers, potentially making KWLR homes more viable, without compromising affordability.

The impact of existing policies on rent setting

- 6.5 The Mayor is aware his approach to setting and increasing rents for KWLR homes needs to take account of existing policies on rents for affordable homes. For clarity, the following paragraphs outline his assessment of their implications for KWLR homes. He would welcome views on any further factors that consultation respondents think the Mayor needs to consider in setting rents and/or ways in which they anticipate the following implications could prove problematic – see question 7.
- 6.6 First, both the NPPF and the London Plan mean that rents for intermediate housing must be at least 20 per cent below market levels. The Mayor favours rent levels lower than this.
- 6.7 Second, as outlined at paragraphs 4.4, London Plan Policy H6 means that, for homes to be considered affordable, housing costs shouldn't exceed 40 per cent of the net amount of the income set as the threshold for accessing intermediate rented housing. As explained at paragraph 6.3, the current threshold is £67,000 per annum. However, the Mayor notes that this monthly maximum could increase, either as the result of his regular reviews of the threshold, or through him allowing rents and services charges to increase above this level through increases over time, once a home is let at benchmarks published by the GLA.
- 6.8 Third, RPs may only set rents at levels other than those prescribed for social rent or Affordable Rent for categories of home to which the [Regulator of Social Housing's \(RSH's\) Rent Standard](#) doesn't apply. These include intermediate rented homes, as defined in paragraph 5.4 of the [Government's policy statement on rents for social housing](#). This will be relevant for any KWLR homes grant funded by the Mayor, because the Mayor requires that homes that receive such funding are let by an RP.
- 6.9 The Mayor appreciates that the government may update this statement and will keep abreast of potential and actual changes as he develops plans for KWLR homes. He notes that criterion (a) in paragraph 5.4 of the policy statement will need to be changed when the government abolishes Assured Shorthold Tenancies

through the Renters Rights Bill. The Mayor will bring to the government's attention to changes to the policy statement on rents for social housing that would help or hinder scope for delivering KWLR homes. He is keen to hear consultation respondents' insights and suggestions on such changes.

- 6.10 Meanwhile, the Mayor considers that existing criteria would, broadly, give developers and providers flexibility to develop KWLR homes. In particular, he notes that there is scope for the GLA to ask the RSH to identify particular programmes as enabling development of intermediate rent homes. With this permission, KWLR homes funded by the Mayor would meet criterion (b). He also assesses that his intention that KWLR homes go to key workers, discussed in section 5 above, means that KWLR homes are likely to meet criterion (c) in the definition of intermediate rented accommodation. He would welcome views on these assessments – see question 7.
- 6.11 Working in the context of the policies outlined at paragraphs 6.5 to 6.10 above, the Mayor has considered potential approaches to setting rents for KWLR homes and to permitting increases. The following paragraphs explain these.

Rent setting

- 6.12 The Mayor envisages that the starting point for KWLR rent setting will be a set of benchmarks, linked to key workers' incomes. Broadly, developers and providers would need to ensure that the rents and service charges they set for KWLR homes at the start of tenancies did not exceed these benchmarks, at least when first letting the home and potentially when they are re-letting them.
- 6.13 This section considers the option of setting a single London-wide set of benchmarks (Option A, paragraph 6.17) and an option whereby rents and service charges vary by borough (Option B, paragraphs 6.18 to 6.20). It also flags the question of whether benchmarks should apply when providers re-let a KWLR home, as well as when they first let it (paragraphs 6.21).
- 6.14 As a starting point for rent-setting, the Mayor is proposing benchmarks for three- and four-bedroom homes that are set at 40 per cent of key workers' average household income. The Mayor intends that rent and service charge benchmarks for KWLR homes would be adjusted for homes with one or two bedrooms. This adjustment, like the one currently used to set LLR rent benchmarks, would use the formula applied in setting social rents. Table 1 below shows potential rent and service charge benchmarks.

Table 1: Potential monthly rent and service charge benchmark for KWLR homes, by number of bedrooms

1 bed	2 bed	3 bed (benchmark)	4 bed (benchmark)
£1,099	£1,236	£1,373	£1,373

- 6.15 Benchmarks would then be checked to ensure they do not exceed 70 per cent of market rents - and capped if they did. Capping benchmarks at 70 per cent of market rents goes beyond the NPPF's requirement that rents for intermediate rent homes mustn't exceed 80 per cent of market levels. Finally, benchmarks would be checked against the maximum housing costs for intermediate rent permitted in London Plan policy, as explained at paragraph 6.3. These steps reflect the Mayor's commitment to ensuring that KWLR homes are genuinely affordable.
- 6.16 The following paragraphs set out two different ways in which the Mayor could apply the initial benchmark set out in Table 1. He is keen to hear views on the advantages and disadvantages of these.
- 6.17 **Option–A - London-wide benchmarks, set annually by the Mayor:** The Mayor could adopt the figures in paragraph 6.14 and Table 1 as London-wide rent and service charge benchmarks for KWLR homes, and then update and publish new benchmarks, set on the same basis, annually. (This is how he sets LLR rent benchmarks.) If he did this, providers would set rents and service charges for KWLR homes being let during that year at or below the benchmarks the Mayor published.
- 6.18 **Option B – Borough benchmarks, set annually by the Mayor:** Rather than setting and annually updating a single set of London-wide rent and service-charge benchmarks, the Mayor could issue benchmarks for each London local authority. London-wide benchmarks would be used as the starting point, with borough-level benchmarks extrapolated from them. London-wide benchmarks would be varied in line with market rents in each borough. The most recent data on rents for local authority areas from the Office for National Statistics' (ONS's) Price Index for Private Rents would be used to do this.¹² As well as being adjusted in line with market rents in each borough, borough-level benchmarks would be checked against

¹² Specifically, the Mayor's team would calculate the difference between London-wide market rents and borough-level market rents for one-, two-, and three-bedroom homes. They'd then adjust the London-wide benchmark by half of that difference to arrive at a borough-level benchmark, using the following calculation:

Step 1: adjustment, or increment =

$$\frac{(\text{borough level average private rent for homes with } x \text{ number of bedrooms} - \text{London average private rent for homes with } x \text{ number of bedrooms})}{\text{London average private rent for homes with } x \text{ number of bedrooms}} \div 2$$

Step 2:

$$\text{London wide bedroom specific benchmark for homes with } x \text{ number of bedrooms} \times (1 + \text{increment})$$

70 per cent of borough-level market rents and the maximum housing costs for intermediate rent.

- 6.19 The Mayor would establish and publish these benchmarks annually, for providers to use when letting KWLR homes. As with Option A, the Mayor would revise the initial, London-wide benchmark using the most recent data on key workers' incomes. He'd then use those, together with the latest ONS data on rents, to calculate borough-level benchmarks for the year.
- 6.20 Both Options A and B base rent and service charge benchmarks on key workers' incomes. Option B differs from Option A in varying rent and service charge benchmarks for KWLR homes, depending on rent levels in the borough where homes are located. This would make some allowance for differences in rent and service charges for KWLR homes, in line with local housing markets. That might, in turn, encourage developers and providers to build and let KWLR in areas of London with the highest housing costs, rather than just in areas with lower costs, where it typically costs less to develop new homes. It would also ensure that, in boroughs where rents are below the London average, rent benchmarks are well below market rents – specifically, no more than 70 per cent of that level.
- 6.21 **Applying benchmarks when re-letting KWLR homes:** A further consideration is whether the Mayor should expect providers to let KWLR homes at or below published benchmarks when they re-let homes. The Mayor is minded to require providers to let KWLR homes at these levels only when they are first let. For subsequent lets, he would expect providers to charge existing rent levels, which will be determined by the options set out at paragraphs 6.22 to 6.25. This would ensure that rent levels do not fall between tenancies, which will improve the viability of the tenure, while ensuring homes remain genuinely affordable to tenants.

Rent increases

- 6.22 In relation to increases in rents and service charges for KWLR homes, the Mayor recognises that providers need to make some increases over time, as they do for homes of other affordable tenures. But the Mayor wants to make sure these are limited, predictable and, crucially, to ensure that rents remain affordable for tenants.
- 6.23 The Mayor has identified the following potential bases for increasing rents.

Wage pegged: in line with the higher of

- i) increases in key workers' income, or
- ii) two per cent.

This would involve the GLA confirming the permitted increase annually, having reviewed the most recent data on the average incomes of key workers.

CPI+1%: in line with the rate of CPI published by the Office for Budget Responsibility (OBR), plus one per cent.

6.24 Table 2 below shows the amounts by which rents might increase over a six-year period, using each of these approaches.

Table 2: Likely increases in rents for KWLR homes, using the potential methods identified in paragraph 6.23

	2024/25	2025/26	2026/27	2027/28	2028/29	Average
Wage-pegged¹³	3.6%	2.1%	2%	2.3%	2.6%	2.8%
CPI¹⁴+1%	2.6%	2.6%	2.7%	3%	3%	3.49%

6.25 As well as yielding the increases shown in Table 2 above, some of the implications of these different options are as follows:

- **Wage-pegged** would continue the close link between rents and service charges for KWLR homes and key workers' incomes, which will help ensure that the homes remain affordable to tenants. Allowing providers to increase rents and service charges by two per cent if the increase in key workers' incomes is below this rate is intended to balance affordability with deliverability, by assuring potential developers and providers that their rental yield will increase every year.
- **CPI+1%** is a familiar approach to increasing rents for affordable homes. If increases in key workers' incomes falls significantly behind CPI, this approach could mean tenants find it difficult to afford their rents and service charges. After 2024/25, it would result in rents increasing by more than the wage-pegged approach.

Questions

- Q7. Please outline any comments or concerns you have about the framework of policies that the Mayor has identified as considerations when setting rent and service charge benchmarks for KWLR homes (at paragraphs 6.5 to 6.10 above)?
- Q8. What do you think about the potential starting point for setting rent and service charges presented at paragraphs 6.14 and 6.15 and Table 1, and why?
- Q9. What do you think about as Options A and B, outlined at paragraphs 6.17 to 6.20 above, as approaches to rent setting, and why? In particular, what do you think of

¹³ As explained at paragraph 6 of the appendix, earnings for 2024/25 onward are projected using UK Earning projections from the Office of Budget Responsibility.

¹⁴ The measure of CPI is based on is based on forecast produced by the Office for Budget Responsibility as part of their Economic and fiscal outlook, March 2024.

the link between rent and service charges for KWLR homes and local market rents that Options B allows, and why?

- Q10. Do you think the Mayor should expect providers to set rents and service charges for KWLR homes at benchmarks when they re-let homes, or just when they first let them (see paragraph 6.21 above)?
- Q11. What do you think about the potential approaches to permitted increases in rent and service charge benchmarks for KWLR homes outlined at paragraphs 6.22 to 6.25 and illustrated in Table 2 and why?

7. Tenancies and management

- 7.1 The Mayor is aware that, until the government's Renters' Rights Bill is passed, there is a degree of uncertainty about the legal framework within which providers would issue tenancies for KWLR homes. Under the current legal framework, the Mayor understands that housing associations and providers that are not RPs could let KWLR homes using assured tenancies, while local authorities could use periodic secure tenancies. He will keep abreast of the government's reform plans and is willing to make representations to the government in support of provisions that would assist developers and providers with delivering KWLR homes.
- 7.2 Irrespective of changes in the legal framework for tenancies, the Mayor wants tenants of KWLR homes to be secure in their homes. He will expect providers to let KWLR homes on the basis that they may remain in their homes provided that they abide by the terms of their tenancies. He intends that tenants will be able to remain in their homes if they cease to work in a key worker occupation, and/or if they see increases in their household income that bring it above the London Plan threshold for intermediate rented housing (currently £67,000 per annum). This approach is akin to social renters and shared owners being able to remain in their homes irrespective of changes in their circumstances that would mean they would no longer be eligible to be allocated their current home.
- 7.3 As indicated at paragraph 3.7, the Mayor is keen for KWLR homes to provide a practical option for households who might not look to buy a home together – for example, friends sharing a home. He would like to see providers offering tenancies for KWLR homes to such households.¹⁵ The Mayor envisages that they would issue joint tenancies. If one tenant left, the Mayor expects a provider would assess whether it was reasonable and practical to issue a new tenancy to any other tenant or tenants who wanted to stay in the home, potentially adding a new household

¹⁵ Such households would need to have an annual income below the maximum for accessing intermediate rented housing.

member to the tenancy. This would involve assessing whether the new tenants were, together, eligible for a KWLR home. The Mayor does not anticipate that this would present providers with scenarios qualitatively different from those that might arise where, say, a couple who held a joint tenancy separated and one of the former partners sought to leave the home.

- 7.4 The Mayor is aware that the Right to Buy could, as it currently stands, apply to KWLR homes that are managed by a local authority within its Housing Revenue Account. He understands that the potential application of the Right to Buy has been a barrier to some local authorities developing LLR homes. He does not want this to be the case for KWLR homes.

Questions

- Q12. Do you have any insights on or concerns about the types of tenancy that providers would be likely to use for letting KWLR homes (paragraph 7.1)?
- Q13. To what extent do you agree that tenants of KWLR homes should not be obliged to leave their home if they cease to work in a key worker occupation and/or their household income increases above the threshold at which the household would be eligible for intermediate rented housing (paragraph 7.2) and why?
- Q14. Are there particular challenges you anticipate providers might face as a result of letting KWLR homes, with joint tenancies, to households with two or more members who are not partners? If so, are there approaches that you recommend providers adopt to help them manage these challenges.

8. Funding and viability

- 8.1 The Mayor's current London Affordable Homes Programme runs until March 2026. The Mayor is keen to fund the GLA's Investment Partners (IPs) to deliver KWLR homes through his capital programmes, such as the London Affordable Homes Programme. This would be subject to agreement from the government, with which the GLA agrees the terms of the funding for developing affordable housing.
- 8.2 The Mayor appreciates that it may cost IPs more to deliver KWLR homes than it does to deliver shared ownership or LLR homes, because providers will not receive the lump sum that they receive when they sell as share of a shared ownership or LLR home. He would welcome consultation respondents' initial assessments of the level of grant that they would need to make developing KWLR homes viable – see question 15.

- 8.3 The Mayor is also interested to hear early views on the costs of developing KWLR homes and their viability, from all potential investors, developers and providers.

Questions

- Q15. Do you have insights on how much funding IPs might require to deliver KWLR homes, relative to the funding needed to deliver social rented, LLR or shared ownership homes? Please set out the evidence that informs these insights.
- Q16. What are the key assumptions about cost and viability that potential investors, developers and providers of KWLR homes would need to take into account?

9. Relationship to and future of LLR

- 9.1 One important consideration in the Mayor's plans for KWLR homes is whether, when it comes to new homes, KWLR homes should replace LLR homes as they currently exist, or sit alongside them.
- 9.2 By way of context, the Mayor developed LLR as an intermediate tenure in 2016. There are two elements to LLR.
- The first is a set of rent benchmarks, linked to local (ward-level) incomes and adjusted for the number of bedrooms in a home.¹⁶ These may be used for any intermediate rented home and the London Plan encourages planning authorities to require homes with rents at these benchmarks, to ensure genuine affordability.
 - The second, which applies to homes funded by the Mayor, is a distinctive hybrid tenure, described at paragraph 3.6. The GLA expects IPs to let home to tenants who will save towards a deposit to buy a share of the home they're renting or another home on a shared ownership basis. It also expects IPs to sell LLR homes on a shared ownership basis after 10 years of letting them if, during that time, no tenant has bought a share of the home. (These homes are referred to below as LLR homes that offer a pathway to home ownership.)
- 9.3 Although developed in 2016, LLR remains a young tenure. In terms of the expectation that providers sell homes on a shared ownership basis after 10 years of letting them, it's less than a decade since any of the LLR homes funded by the GLA were completed. Since 2016, developers and providers have delivered and are delivering LLR homes. The Mayor will continue to publish ward-level rent

¹⁶ The benchmarks and an explanation of the methodology the GLA uses to set them are available at <https://www.london.gov.uk/programmes-strategies/housing-and-land/improving-private-rented-sector/london-living-rent>

benchmarks that providers can use for these homes and for homes that have already received planning permission, on the basis either that rents will be set at LLR benchmarks, or that they will provide a pathway to home ownership. However, the Mayor is considering whether or not he should continue to actively promote the development of either of these sorts of home – first, through his planning policy and, second, by funding LLR homes that offer a pathway to home ownership.

- 9.4 In future, the Mayor could encourage developers and providers to set rents and service charges for new intermediate rent homes using the approach to rent setting for KWLR homes he adopts following this consultation, rather than using the LLR benchmarks he'll continue to publish (as explained in paragraph 9.3). He could also encourage them to offer these homes for long-term rent, rather than with a pathway to home ownership. He welcomes views on whether he should do so.

Questions

- Q17. To what extent do you think KWLR homes should replace LLR homes as the Mayor's preferred intermediate rented tenure, with rents linked to incomes? Please explain the reasons for your answer.

10. Any other comments, including equalities impacts

- 10.1 The Mayor recognises that the emerging proposals for KWLR homes set out in this document may not take into account all relevant considerations, or identify all potential implications. He is keen for those responding to the consultation to highlight any such omissions.
- 10.2 The Mayor will complete a full assessment of the equalities impacts of his plans for KWLR homes prior to finalising them. He is aware that data on demand for intermediate rented housing, as well as on who secures these homes, is limited, because RPs were not required to capture data on lettings for these homes on the Continuous Recording of Social Housing (CORE) sales and lettings system until 2021/22. He has some Census data that helps provide a profile of London's key workers, but is aware this relies on some extrapolation from national data.¹⁷ Given

¹⁷ It wasn't possible to extract data from the 2021 Census the protected characteristics of Londoners on the GLA's list of key workers. That list identifies occupations by both sector and occupation, and data on individuals' sector and occupation is only available at national level. To provide a proxy for this data, the GLA undertook the following steps:

- Extracted 2021 Census data on the protected characteristics of those living in London in occupations on the GLA's list of key workers.

this, he would especially welcome intelligence or insights on the potential impact of his initial proposals for KWLR plans on Londoners – and, in particular, London key workers who are eligible for intermediate housing - with different protected characteristics and combinations of characteristics.¹⁸ See question 19.

Questions

- Q18. Is there anything else that you think the Mayor should consider in developing his plans for KWLR homes?
- Q19. Please share any intelligence or insights you have on the possible impacts of the Mayor's initial proposals on Rent Control Homes, including different options set out in this document, on Londoners – and, in particular, London key workers who are eligible for intermediate housing - with different protected characteristics and combinations of those characteristics. (Please also see question 3 above.)

Appendix: Methodology for setting rent and service charge benchmarks

1. In establishing potential rent and service charge benchmarks, the Mayor's team started by seeking data on the incomes of London's key workers, using the ONS's Annual Survey of Hours and Earnings (ASHE).¹⁹ Specifically, they sought data on

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- Analysed national data to establish the proportions of workers in both the occupations and sectors specified on the GLA's list. So, for example, the GLA's list includes biological scientists working in health and social care and national Census data indicates that 13 per cent of biological scientists work in health and social care.
 - Applied those proportions to the numbers of Londoners with particular protected characteristics in occupations on the GLA's list, to estimate the number of Londoners with particular characteristics in those occupations in the sectors on the GLA's list. So, for example, the 2021 Census data showed that there are 640 female biological scientists in London. The GLA calculated 13 per cent of this number – i.e., 83.2. On this basis, it extrapolated that there are 83.2 female biological scientists working in health and social care in London, for the purpose of calculating the total number of those in occupations on the GLA's list who are female.

The accuracy of the profile of Londoners in occupations on the GLA's list that this methodology yields may be limited if either of the following is the case:

- The distribution of occupations on the GLA's list across sectors on the GLA's list is different in London from the distribution nationally.
- The protected characteristics of all those who work in an occupation in all sectors are different from the protected characteristics of those who work both in that occupation in the sector or sectors specified on the GLA's list.

¹⁸ This refers to the characteristics on which the Equality Act 2010 confers protection – that is, age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race (including colour, nationality, ethnic or national origin), religion or belief, sex, and sexual orientation.

¹⁹ ASHE uses HM Revenue and Customs' (HMRC) Pay As You Earn (PAYE) records to collect information about income. It provides data on gross income.

the median incomes of the key worker occupations listed in the Table 1 below.²⁰

They used median incomes, as this measure is not skewed by exceptionally high or low values in the dataset.

Table 1: Specified London key workers' median annual gross earnings²¹

Occupation group	Occupations included	Annual gross earnings (£) ²²		
		2021/22	2022/23	2023/24
Nursing professionals	Midwifery nurses; registered community, specialist; mental health, and children's nurses; registered nurse practitioners; other registered nursing professionals	39,806.00	39,462.80	40,648.40
Teaching professionals	Higher, further, secondary, primary, nursery, and special and additional needs education teaching professionals; teachers of English as a foreign language; teaching professionals not classified elsewhere	39,873.60	40,856.40	43,019.60
Welfare professionals	Social workers, probation officers, clergy, youth work professionals, and other welfare professionals	38,292.80	35,542.00	40,378.00
Protective service occupations	Non-commissioned officers and other ranks, Police officers (sergeant and below), fire service officers (watch manager and below), prison service officers (below principal officer), and protective service associate professionals not classified elsewhere	40,622.40	47,663.20	44,298.80

- The Mayor's team then used the earnings of individual London key workers shown in Table 1 above to calculate the average incomes of these key workers' households. They did this by multiplying the earnings by 1.45, the average number of earners in London households where one or more household members works, and where the person earning the largest amount is under 45. This information on the average size of working households came from Family Resources Survey data for 2020/21 to 2022/23. The team excluded data on the size of households where the main earner was aged 45 or over. They did so because they anticipated these

²⁰ They initially explored sourcing data for all the occupations in the GLA's list of key workers, as a starting point for setting rents and service charges. However, a number of factors made this approach problematic. These related to recent changes in ASHE data and in response rates to the survey, as well as to the GLA's list of key workers including some relatively high-earning occupations - e.g., chief executives and senior officials in utilities and communication, health and social care, national and local government, and public safety and national security.

²¹ Table 1 shows data for the three years up to 2023/34, the most recent year for which income data is currently available.

²² The data is sourced in April each year. The earnings it shows are assumed to reflect key workers' earnings for the financial year starting that April.

households were likely to have higher incomes, making them less likely to need intermediate housing, and to be larger – for example, where adult children live with parents. The results are shown in Table 2 below. All estimated household incomes are less than £67,000, so all these households would be eligible for intermediate rented housing.

3. Table 2 also includes, in the final row, the overall average annual household income across four groups of key workers. The Mayor's team used a weighted average approach to calculate these figures. The average annual household earnings for each of the four occupation groups were multiplied by the proportion of jobs that each group represents within the ASHE survey sample. The resulting weighted earnings for each occupation group were then summed to obtain the weighted average income. The final calculated figure for 2023/24 is £63,115.

Table 2: Specified London keyworkers' estimated annual gross household earnings

Occupation group	Annual gross household earnings (£)		
	2021/22	2022/23	2023/24
Nursing professionals	57,719	57,221	58,940
Teaching professionals	57,817	59,242	62,378
Welfare professionals	55,525	51,536	58,548
Protective service occupations	58,902	69,112	64,233
Weighted average	57,658	60,922	63,115

4. The Mayor's team then converted average incomes from gross to net, using a basic gross to net formula of 70 per cent.
5. The Mayor's team wanted to establish what potential rent and service charge benchmarks could look like for this financial year and beyond, up to 2028/29. To do this, they made projections using a three-year rolling average of average key worker household incomes calculated using the most recent three years of ASHE data available (2021/22 to 2023/24). This is to make rent benchmarks less sensitive to variations in income data that may result from factors such as sample sizes, rather than changes in income.
6. The Mayor's team based projections of key workers' incomes beyond 2023/24 on the OBR's projections for wage growth, the most reliable forecast available.
7. Having done this, the team identified 40 per cent of average key worker net household income (the measure of affordability used in the London Plan) for key workers' average income as the benchmark for three- and four-bedroom homes.

Summary of questions

- Q1. What do you identify as the main considerations for the Mayor to ensure that KWLR homes will be attractive to
- a) Londoners in need of intermediate housing, especially key workers
 - b) developers seeking to build intermediate housing
 - c) providers seeking to manage and let intermediate housing?
- Q2. To what extent do you think that the steps set out at paragraphs 4.5 to 4.7 will provide clarity to
- developers and other housing providers seeking planning permission to develop KWLR homes, and/or
 - local authority planning departments assessing such proposals?
- If you do not think they will be sufficient to do so, do you think there are additional or alternative steps the GLA could take to ensure that the Mayor's planning framework is enabling to the delivery of KWLR homes?
- Q3. Please share any insights you have on demand for intermediate housing and, in particular, intermediate rented homes, from key workers, as defined by the GLA's list of key worker occupations or local additions to it? This might include insights on the role of intermediate housing in supporting recruitment and retention, or on the profile of key workers seeking and securing intermediate housing. (Please also see question 19 below.)
- Q4. Beyond the two Practice Notes and LPG on affordable housing described above, what more, if anything, could the Mayor do to support boroughs and housing providers to prioritise key workers for KWLR homes?
- Q5. What do you think of the possibility that the Mayor makes allocating any KWLR homes he funds to key workers a condition of that funding (paragraph 5.8)?
- Q6. Do you have any insights or suggestions on how the Mayor could work with organisations and institutions interested in providing or securing accommodation for employees to support them to develop KWLR homes for staff (paragraph 5.10)?
- Q7. Please outline any comments or concerns you have about the framework of policies that the Mayor has identified as considerations when setting rent and service charge benchmarks for KWLR homes (at paragraphs 6.5 to 6.10 above)?

- Q8. What do you think about the potential starting point for setting rent and service charges presented at paragraphs 6.14 and 6.15 and Table 1, and why?
- Q9. What do you think about as Options A and B, outlined at paragraphs 6.17 to 6.20 above, as approaches to rent setting, and why? In particular, what do you think of the link between rent and service charges for KWLR homes and local market rents that Options B allows, and why?
- Q10. Do you think the Mayor should expect providers to set rents and service charges for KWLR homes at benchmarks when they re-let homes, or just when they first let them (see paragraph 6.21 above)?
- Q11. What do you think about the potential approaches to permitted increases in rent and service charge benchmarks for KWLR homes outlined at paragraphs 6.22 to 6.25 and illustrated in Table 2, and why?
- Q12. Do you have any insights on or concerns about the types of tenancy that providers would be likely to use for letting KWLR homes (paragraph 7.1)?
- Q13. To what extent do you agree that tenants of KWLR homes should not be obliged to leave their home if they cease to work in a key worker occupation and/or their household income increases above the threshold at which the household would be eligible for intermediate rented housing (paragraph 7.2) and why?
- Q14. Are there particular challenges you anticipate providers might face as a result of letting KWLR homes, with joint tenancies, to households with two or more members who are not partners? If so, are there approaches that you recommend providers adopt to help them manage these challenges.
- Q15. Do you have insights on how much funding IPs might require to deliver KWLR homes, relative to the funding needed to deliver social rented, LLR or shared ownership homes? Please set out the evidence that informs these insights.
- Q16. What are the key assumptions about cost and viability that potential investors, developers and providers of KWLR homes would need to take into account?
- Q17. To what extent do you think KWLR homes should replace LLR homes as the Mayor's preferred intermediate rented tenure, with rents linked to incomes? Please explain the reasons for your answers.
- Q18. Is there anything else that you think the Mayor should consider in developing his plans for KWLR homes?

- Q19. Please share any intelligence or insights you have on the possible impacts of the Mayor's initial proposals on Rent Control Homes, including different options set out in this document, on Londoners – and, in particular, London key workers who are eligible for intermediate housing - with different protected characteristics and combinations of those characteristics. (Please also see question 3 above.)

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